Bloomington Business Park Specific Plan

SCH No. 2020120545



September 2022

Final Environmental Impact Report

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FINAL
ENVIRONMENTAL IMPACT REPORT
BLOOMINGTON BUSINESS PARK SPECIFIC PLAN
SAN BERNARDINO COUNTY, CALIFORNIA
STATE CLEARINGHOUSE NO. 2020120545

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ACRONYMS AND ABBREVIATIONS

°C	degrees celsius
µg/m³	micrograms per cubic meter
AB 52	California Assembly Bill 52
ACM	asbestos-containing material
AF	acre-feet
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
amsl	above mean sea level
AQIA	Air Quality Impact Analyses
AQMP	Air Quality Management Plan
APN	Assessor's Parcel Number
ATCM	airborne toxic control measure
BAAQMD	Bay Area Air Quality Management District
BACM	best available control measure
BACT	best available control technology
Basin	South Coast Air Quality Basin
BAU	business as usual
BFE	base flood elevation
bgs	below ground surface
BMPs	Best Management Practices
CAA	Clean Air Act of 1970
CAAA	CAA Amendments of 1990
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CAP	Climate Action Plan of 2013
CARB	California Air Resources Board
CBC	California Building Code
CCAA	California Clean Air Act of 1988
CDA	Chino Desalter Authority
CDFW	California Department of Fish and Wildlife
CC&Rs	Covenants, Conditions, and Restrictions
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CGEU	California Gas and Electric Utilities 2016 California Gas Report
CGS	California Geological Survey
CH_4	methane
CHAPIS	Community Health Air Pollution Information System (CARB)
CHRIS	California Historical Resources Inventory System
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CRHR	California Register of Historical Resources
CTP	Clean Truck Program
CUP	Conditional Use Permit

dB	decibel
dBA	A-weighted decibels
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EMS	Emergency Medical Services
ESA	Environmental Site Assessment
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act of 1973
FMMP	Farmland Mapping and Monitoring Program
gal/day	gallons per day
GHG	greenhouse gas
GWP	global warming potential
Handbook	Air Quality and Land Use Handbook: A Community Health Perspective (CARB 2005)
HAPs	hazardous air pollutants
HCM	Highway Capacity Manual
HCP	Habitat Conservation Plan
HDT	Heavy Duty Trucks
HFCs	hydroflourocarbons
Hot Spots Act	Air Toxics Hot Spots Information and Assessment Act of 1987
HP	horsepower
HPLV	High Pressure Low Volume
HVAC	heating, ventilating, and air conditioning
ICU	intersection capacity utilization
I	Interstate
IEUA	Inland Empire Utilities Agency
LBP	lead-based paint
LCFS	Low Carbon Fuel Standard
LEED	Leadership in Energy and Environmental Design
LEV	Low Emission Vehicle
LID	low impact development
LOS	level of service
LSTs	localized significance thresholds
MACT	maximum available control technology
MBTA	Migratory Bird Treaty Act of 1918
MCC	Material Culture Consulting
mgd	million gallons per day
MMRP	Mitigation Monitoring and Reporting Program
MMT	million metric tons
MPO	metropolitan planning organization
MT	metric tons
MT CO_2e	metric tons of carbon dioxide equivalent
NAAQS	National Ambient Air Quality Standards
N_2O	nitrous oxide
NAHC	Native American Heritage Commission
NALs	numeric action levels
NCCP	Natural Community Conservation Plan
NESHAP	national emissions standards for HAPs
NH_3	ammonia
NHPA	National Historic Preservation Act of 1966
NHTSA	National Highway Traffic and Safety Administration

NOP	Notice of Preparation
NO_2	nitrogen oxide
NO_x	nitrogen oxide
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NRCS	U.A. Department of Agriculture Natural Resources Conservation Service
O_3	ozone
Pb	lead
PDF	project design feature
PFCs	perflourocarbons
$PM_{2.5}$	particulate matter less than 2.5 micrometers in aerodynamic diameter
PM_{10}	particulate matter less than 10 micrometers in aerodynamic diameter
ppb	parts per billion
PPP	Plans, Programs, and Policies
PRC	Public Resources Code
PRIMP	Paleontological Resources Impact Mitigation Plan
PWS	public water supplier
REC	recognized environmental conditions
ROG	reactive organic gas
RP-5	IEUA Regional Water Recycling Plant No. 5
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SB 18	California Senate Bill 18, Ch. 905 (2004)
SC	Standard Condition
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison Company
SCS	Sustainable Communities Strategy
SF	square feet
SF_6	sulfur hexaflouride
SIP	state implementation plan
SO_2	sulfur dioxide
SO_3	sulfur trioxide
SO_4	sulfates
SoCalGas	Southern California Gas Company
SO_x	sulfur oxides
SP	Specific Plan
SR	State Route
SRA	Source Receptor Area
SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
SWRCB	Storm Water Resources Control Board
TACs	toxic air contaminants
TIA	Traffic Impact Analysis
tpy	tons per year
TTCP	traditional tribal cultural places
TUA	traditional use area
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service

UTRs	utility tractors
UWMP	Urban Water Management Plan
VdB	velocity levels expressed in decibel notation
VMT	vehicle miles travelled
VOC	volatile organic compounds
WDR	Waste Discharge Requirements
WFA	Water Facilities Authority
Williamson Act	California Land Conservation Act of 1965
WQC	Water Quality Certification

1. Introduction

This Final Environmental Impact Report (FEIR; Final EIR) has been prepared in conformance with the environmental policy guidelines for the implementation of the California Environmental Quality Act (CEQA) to evaluate the environmental effects that may result from construction and operation of the proposed Bloomington Business Park Specific Plan Project (proposed Project).

According to CEQA Guidelines Section 15132, the FEIR shall consist of:

(a) The Draft Environmental Impact Report (DEIR; Draft EIR) or a revision of the Draft EIR;

(b) Comments and recommendations received on the Draft EIR, either verbatim or in summary;

(c) A list of persons, organizations, and public agencies commenting on the Draft EIR;

(d) The responses of the lead agency to significant environmental points raised in the review and consultation process;

(e) Any other information added by the lead agency.

This document contains responses to comments received on the Draft EIR during the public review period, which began September 29, 2021 and ended on December 15, 2021. This document has been prepared in accordance with CEQA, the State CEQA Guidelines, and represents the independent judgment of the lead agency, the County of San Bernardino. This document and the circulated Draft EIR comprise the Final EIR in accordance with CEQA Guidelines, Section 15132.

1.1 Format of the Final EIR

The following chapters are contained within this document:

Chapter 1, Introduction. This chapter describes CEQA requirements and the content of the Final EIR.

Chapter 2, Response to Comments. This chapter provides a list of agencies and organizations who commented on the Draft EIR, as well as copies of their comment letters received during and following the public review period, and individual responses to their comments.

Chapter 3, Revisions to the Draft EIR. This chapter contains revisions made to the Draft EIR as a result of the comments received by agencies and organizations as described in Chapter 3, and/or errors and omissions discovered subsequent to release of the Draft EIR for public review.

The County of San Bernardino has determined that none of this material constitutes significant new information that requires recirculation of the Draft EIR for further public comment under CEQA Guidelines Section 15088.5. The additional material clarifies existing information prepared in the Draft EIR and does not present any new substantive information. None of this new material indicates that the project would result in a significant new environmental impact not previously disclosed in the Draft EIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that would not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

Chapter 4, Mitigation, Monitoring, and Reporting Program. This chapter includes the Mitigation Monitoring and Reporting Program (MMRP). CEQA requires lead agencies to "adopt a reporting and mitigation monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment" (CEQA Section 21081.6, CEQA

Guidelines Section 15097). The MMRP was prepared based on the mitigation measures included in this Final EIR and has been included as Chapter 4.0.

1.2 CEQA Requirements Regarding Comments and Responses

CEQA Guidelines Section 15204(a) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review and comment of Draft EIRs should be "*on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible … CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.*"

CEQA Guidelines Section 15204(c) further advises, "*Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence." Section 15204 (d) also states, "Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility." Section 15204 (e) states, "This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.*"

In accordance with CEQA, Public Resources Code (PRC) Section 21092.5, copies of the written responses to public agencies are being forwarded to those agencies at least 10 days prior to certification of the Final EIR, with copies of this Final EIR document, which conforms to the legal standards established for response to comments on the Draft EIR pursuant to CEQA.

Chapter 2. Response to Comments

Section 15088 of the CEQA Guidelines requires the Lead Agency, the County of San Bernardino, to evaluate comments on environmental issues received from public agencies, organizations, companies, and individuals who reviewed the Draft EIR (DEIR) and prepare written responses. This section includes copies of all written comment letters received on the DEIR and the County of San Bernardino's responses to the comment letters. Comment letters and specific comments are numbered for reference purposes which correspond with the County's response. A summary of each numbered comment in the commenter's letter precedes the County's response.

MASTER RESPONSES

Master Response 1: Project Merits (Economic and Social Effects)

In response to comments received on the Draft EIR expressing concerns regarding the industrialization of the Bloomington community and the Project's potential economic and social effects, under CEQA, economic or social effects are not considered significant effects on the environment. Rather, these effects are considered in the context of their potential linkage or indirect connections between the proposed project and physical environmental effects. More specifically, the direction for treatment of economic and social effects is stated in Section 15131(a) of the CEQA Guidelines:

> "Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on physical changes."

Additionally, pursuant to CEQA Guidelines Section 15382, a social or economic change by itself shall not be considered a significant effect, but a social or economic change may be considered in determining whether the physical change is itself significant.

CEQA is an environmental protection statute that is concerned with physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project's potential economic and social effects are not considered effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Thus, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include substantial discussion of the Project's economic or social effects. Further, it is not the purpose of a CEQA document to advocate for or against any specific project. Instead, environmental impact reports are objective and technical documents, prepared for the purpose of identifying and disclosing environmental impacts, to inform both the public and the County's decision makers. It is then in the discretion of the County's decision makers to weigh the environmental impacts identified in the environmental impact report against the Project's merits (including its economic and social effects) to decide whether to approve or disapprove the Project.

CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, and provides the following direction related to EIR comments and responses:

> *In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant*

> *effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors.*

Thus, this Final EIR does not provide detailed responses to comments that do not raise a significant environmental question (Citizens for E. Shore Parks v. State Lands Commission (2011) 202 Cal.App.4th 549). Because comments regarding the Project's social and economic merits do not pertain to the potential for significant physical impacts, or the objective analysis of the same, such comments are not responded to in detail in this Final EIR.

Even though the EIR does not provide detailed analysis regarding the Project's economic and social effects, such effects are important and will be considered by the County's decision makers in determining what action to take on the proposed Project. The Planning Commission and Board of Supervisors will hold publicly-noticed hearings to consider the Project, which will include consideration of the Project's merits (including economic and social effects).

Master Response 2: Construction Health Risk Assessment

In response to comments received on the publicly circulated Draft EIR, a construction Health Risk Assessment (HRA) was prepared and is included as Appendix A of this Final EIR. The construction HRA was prepared in accordance with the South Coast Air Quality Management District (SCAQMD) Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis (2003). Consistent with Section 5.3, *Air Quality*, of the Draft EIR, SCAQMD has established an incidence rate of 10 persons per million as the maximum acceptable incremental cancer risk due to TAC exposure from a project. This threshold is used to determine whether or not a project has a potentially significant development-specific and cumulatively considerable impact. The SCAQMD has also established non-carcinogenic risk parameters for use in HRAs. Noncarcinogenic risks are quantified by calculating a "hazard index," expressed as the ratio between the ambient pollutant concentration and its toxicity or Reference Exposure Level (REL). A REL is a concentration at or below that which health effects are not likely to occur. A hazard index of less than 1.0 means that adverse health effects are not expected and are considered less-than-significant.

Based on the construction timing and equipment that is detailed in the Draft EIR, the on and off-site construction activities were modeled using the U.S. EPA's AERMOD model (Lakes AERMOD View Version 10.2.1 that incorporates the latest AERMOD Version 21112). Potential effects on resident/employee adults and school-age minors were modeled at the location with the greatest potential exposure to construction emissions to identify the greatest potential impact that could occur from implementation of the Project.

Individual Exposure Scenario:

The residential receptor with the greatest potential exposure to Project construction-source diesel particulate matter (DPM) emissions is the residence located at 18665 Jurupa Avenue, approximately 1,080 feet southeast of the Specific Plan area. At the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project-construction-source DPM emissions is estimated at 3.69 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled residential receptors are exposed to lesser concentrations and are located at a greater distance than the MEIR analyzed herein, and DPM generally dissipates with

distance from the source, all other residential receptors in the vicinity of the Project site would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, Project construction would not cause a significant human health or cancer risk to nearby residences, and impacts would be less than significant.

Worker Exposure Scenario:
The employment receptor with the greatest potential exposure to Project-construction-source DPM emissions is Little Truck Sales, located at 11311 Cedar Avenue, approximately 1,420 feet southeast of the Specific Plan area. At the maximally exposed individual worker (MEIW) receptor, the maximum incremental cancer risk impact is 0.20 in one million, which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled worker receptors are located at a greater distance than the MEIW analyzed herein, and DPM dissipates with distance from the source, all other worker receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIW identified herein. As such, the Project would not cause a significant human health or cancer risk to adjacent workers, and impacts would be less than significant.

Student Exposure Scenario:
The school-site receptor with the greatest potential exposure to Project-construction-source DPM emissions is Walter Zimmerman Elementary School, located north of Project site. The analysis for school impacts utilized appropriate conservative assumptions based on the Office of Environmental Health Hazard Assessment (OEHHA) guidance in order to reflect potential impacts to school-age minors. At this maximally exposed school child (MEISC), the maximum incremental cancer risk impact attributable to the Project is calculated to be an estimated 0.06 in one million, which is less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to the Project were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Any other schools near the Project site would be exposed to less emissions and consequently less impacts than what is disclosed for this MEISC. As such, the Project will not cause a significant human health or cancer risk to nearby students.

Construction and Operational Impacts:
The land use with the greatest potential exposure to the Project's construction and operational-source DPM emissions from the most conservative Specific Plan Buildout scenario is the existing residence located at 18665 Jurupa Avenue, approximately 1,080 feet southeast of the Project site. At this MEIR, the maximum incremental cancer risk attributable to Project construction and operational-source DPM emissions is estimated at 4.91 in one million, which is less than the threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. As such, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of the Project's construction and operational activities. All other receptors during construction and operational activities would experience less risk than what is identified for this location. Therefore, impacts would be less than significant.

Master Response 3: Localized Significance with AERMOD Modeling

As detailed in the Air Quality Impact Analysis (Draft EIR Appendix C1) pursuant to SCAQMD methodology CalEEMod and EMFAC2017, emission factors were utilized to prepare the air quality emissions modeling for the Draft EIR. However, in response to comments received on the publicly circulated Draft EIR, additional AERMOD dispersion modeling was completed (and is included as Appendix A to this Final EIR) to model worst-case conditions, which is the highest daily peak on-site emissions resulting from construction activity at the nearest land use to the Project site where an individual could remain.

Construction: As shown on Table 1, emissions during peak construction activity would not exceed the SCAQMD's localized significance thresholds with implementation of the EIR's mitigation measures, which

include requirements to use super-compliant low VOC paints, Tier 4 Final construction equipment, and implementation of idling regulations (Mitigation Measures MM AQ-1 through MM AQ-3). As such, the AERMOD dispersion modeling shows that the Project's localized impacts during construction activity would be less than significant.

Table 1: Localized Significance Summary Peak Construction (With Mitigation)

Peak Construction	CO		NO_2	PM_{10}	$PM_{2.5}$
	Averaging Time				
	1-Hour	8-Hour	1-Hour	24-Hours	24-Hours
Peak Day Localized Emissions	0.05	0.02	3.30E-03	3.01	1.14
Background Concentration [A]	2.7	1.3	0.08		
Total Concentration	**2.75**	**1.32**	**0.08**	**3.01**	**1.14**
SCAQMD Localized Significance Threshold	20	9	0.18	10.4	10.4
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**

[A] Highest concentration from the last three years of available data.

Note: PM_{10} and $PM_{2.5}$ concentrations are expressed in $\mu g/m^3$. All others are expressed in ppm

Operation: To provide for a conservative estimate of onsite travel distances, the modeling shown in Table 2 uses an estimate of 0.8 mile/4,382 feet for passenger cars and 2 miles/10,560 feet for trucks. It should be noted that the longest on-site distance is approximately 0.7 miles for both trucks and passenger cars. As Table 2 shows, emissions during the peak operational activity would not exceed the SCAQMD's localized significance thresholds. As such, the Project's localized impacts during operational activity would be less than significant.

Table 2: Localized Significance Summary Peak Operations (Without Mitigation)

Peak Operation	CO		NO_2	PM_{10}	$PM_{2.5}$
	Averaging Time				
	1-Hour	8-Hour	1-Hour	24-Hours	24-Hours
Peak Day Localized Emissions	1.06E-03	9.08E-04	7.22E-04	0.21	0.07
Background Concentration [A]	2.7	1.3	0.08		
Total Concentration	**2.70**	**1.30**	**0.08**	**0.21**	**0.07**
SCAQMD Localized Significance Threshold	20	9	0.18	2.5	2.5
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**

[A] Highest concentration from the last three years of available data.

Note: PM_{10} and $PM_{2.5}$ concentrations are expressed in $\mu g/m^3$. All others are expressed in ppm

Master Response 4: Environmental Justice

Comments were received expressing concerns that the Project is inconsistent with the Hazards Element (Environmental Justice) of the Countywide Plan; that the Project will disproportionately expose low-income and Latinx households to toxic air emissions and excessive noise levels, resulting in discriminatory effect based on race; that notices and documents were not provided in Spanish, that there were not enough community meetings held; and that translators were not available at community meetings to advice and engage the community with respect to the environmental consequences if the Project were approved.

Although the Draft EIR discusses physical changes to the environment as it effects the Project site, which is within and adjacent to an Environmental Justice Focus Area, the following text and exhibit are added to consolidate and clarify the information contained throughout various sections of the Draft EIR.

The Specific Plan area is partially located within an Environmental Justice Focus Area (EJFA) as shown in Figure 1, *Project Proximity to Environmental Justice Area.*

Table 3: Bloomington Pollution Burden Scores by Census Tract

Census Tract	Low Income	Percentile and Quartile Rank			Scores in the Upper Quartile	
		Composite Score	Pollution Score	Population Score	Pollution Factors	Population Factors
Bloomington-Colton						
6071002601 Bloomington	Yes	71	99	36	AQ | TR | TD | CS | HZ | SW	
6071003605 Bloomington	Yes	68	51	72	AQ | DW	UE
6071003606 Bloomington	Yes	83	91	74	AQ | DW | TD | HZ	ED | POV | UE | HB
6071004001 Bloomington	Yes	86	91	68	AQ | TD | HZ	ED | UE
6071004003 Bloomington	Yes	98	97	86	AQ | DW | GW | HZ | SW	LB | ED | POV | UE | LI
6071003403 Bloomington	Yes	72	57	74	AQ	LB | ED | POV | UE
6071004004 (COL)	Yes	98	100	78	AQ | DW | TD | CS | GW | HZ | SW	LB | ED | POV | UE
6071003302 Bloomington	Yes	85	88	70	AQ | DW | TR | TD	LB | ED | LI | POV | UE
6071006601 (COL)	Yes	95	80	97	AQ | DW | TD	AS | LB | CVD | ED | LI | POV | UE

Sources: OEHHA, CalEnviroScreen, version 3, 2016.

Rankings:

Quartile 1 = Good	Quartile 2 = Moderate	Quartile 3 = Poor	Quartile 4 = Challenged

Variables in the CES model:

Pollution Exposure	Environmental Effects	Sensitive Population	Socioeconomic Factors
AQ = Air Quality (incl. Ozone, PM2.5, diesel PM)	CS = Toxic Cleanup Sites	AS = Asthma	LI = Linguistic Isolation
DW = Drinking Water	GW: Groundwater Threats	LB = Low Birth Weight	POV = Poverty
TR = Toxic Releases	HZ = Hazardous Waste	CVD = Heart Disease	UE = Unemployment
TD = Traffic Density	IW = Impaired Waters		HB = Housing Burden
	SW = Solid Waste Sites/Facilities		ED = Educational Attainment

As shown in Table 3, above, the majority of census tracts in Bloomington have high composite and pollution burden scores. Whether measured by a composite, pollution, or population score, nearly all tracts measure in the upper quartile. The Project site is located in Census Tracts 6071004001 and 6071002601. Census Tract 6071004001 has a Composite Score of 86 and a Pollution Score of 91, while Census Tract 6071002601 has a Composite Score of 71 and Pollution Score of 99. Census Tract 6071004001 is located within a County EJFA. It should be noted that the Composite Score includes other environmental and socioeconomic indicators, not just air quality emissions. These indicators are: Pesticides, Toxic Releases, Traffic, Drinking Water Contaminants, Lead in Housing, Cleanups, Groundwater Threats, Hazardous Waste, Impaired Water, Solid Waste, Education, Housing Burden, Linguistic Isolation, Poverty, and Unemployment.

In terms of pollution burden, the Project site has similar levels of air pollution emissions within the EJFA and adjacent to the EJFA as shown in Table 4, Air Pollution Setting, EJFA Comparison.

Table 4: Air Pollution Setting, EJFA Comparison

Census Tract Number	Location	Ozone	PM 2.5	Diesel PM
6071004001 (within EJFA)	Specific Plan Area	97	91	80
6071002601	Specific Plan Area	95	94	78

As discussed in detail throughout the Draft EIR, the following policies are applicable to the Project. Under each policy identified below, a response as to how the Draft EIR complies with the policy is provided.

Policy HZ-3.16 Notification. We notify the public through the County website when applications are accepted for conditional use permits, changes in zoning, and Policy Plan amendments in or adjacent to environmental justice focus areas. We prepare public notices in the predominant language(s) spoken in the communities containing environmental justice focus areas.

Response: As discussed on Page 5.11-14 of the Public Review Draft EIR, the Project site is within an environmental justice focus area. A public meeting would be conducted for nearby residents, businesses, and property owners to obtain public input and address environmental justice concerns. A resident meeting occurred on December 12, 2018 and November 19, 2019. A scoping meeting occurred on January 14, 2021. Two additional resident meetings occurred on April 10, 2021 and July 28, 2021. Notices were mailed out to residents within a 1300 ft radius of the Specific Plan 2 weeks prior to the scoping meeting, 2 weeks prior to the community meeting on August 5, 2021, and 2 weeks prior to the Bloomington MAC meeting. In addition, the notices were sent out with an English and Spanish version for community members. Thus, the Project is consistent with Policy HZ-3.16.

Policy HZ-3.17 Community stakeholders. We identify and coordinate with key community stakeholders through advisory committees or other methods to increase public awareness and obtain timely community input concerning potential funding opportunities, conditional use permits, changes in zoning, and amendments to the Policy Plan in or adjacent to environmental justice focus areas.

Response: In addition to the Notice of Availability of the Draft EIR, a Notice of Preparation and of a Scoping Meeting were sent out to public agencies, community stakeholders, and interested parties prior to the public review of the Draft EIR to increase public awareness and obtain community input during the public review period. Thus, the Project is consistent with Policy HZ-3.17.

Policy HZ-3.18 Application requirements. In order for a Planning Project Application (excluding Minor Use Permits) to be deemed complete, we require applicants to indicate whether the project is within or adjacent to an unincorporated environmental justice focus area and, if so, to:

- document to the County's satisfaction how an applicant will address environmental justice concerns potentially created by the project; and
- present a plan to conduct at least one public meeting for nearby residents, businesses, and property owners to obtain public input for applications involving a change in zoning or the Policy Plan. The County will require additional public outreach if the proposed project changes substantively in use, scale, or intensity from the proposed project presented at previous public outreach meeting(s).

Response: As discussed in the previous response and discussed on page 5.11-14 of the Public Review Draft EIR, the Project site is within an environmental justice focus area and a public meeting was conducted for nearby residents, businesses, and property owners to obtain public input and address environmental justice concerns. A resident meeting occurred on December 12, 2018 and November 19, 2019. A scoping meeting occurred on January 14, 2021. Two additional resident meetings occurred on April 10, 2021 and

July 28, 2021. Notices were mailed out to residents within a 1300 ft radius of the Specific Plan 2 weeks prior to the scoping meeting, 2 weeks prior to the community meeting on August 5, 2021, and 2 weeks prior to the Bloomington MAC meeting.

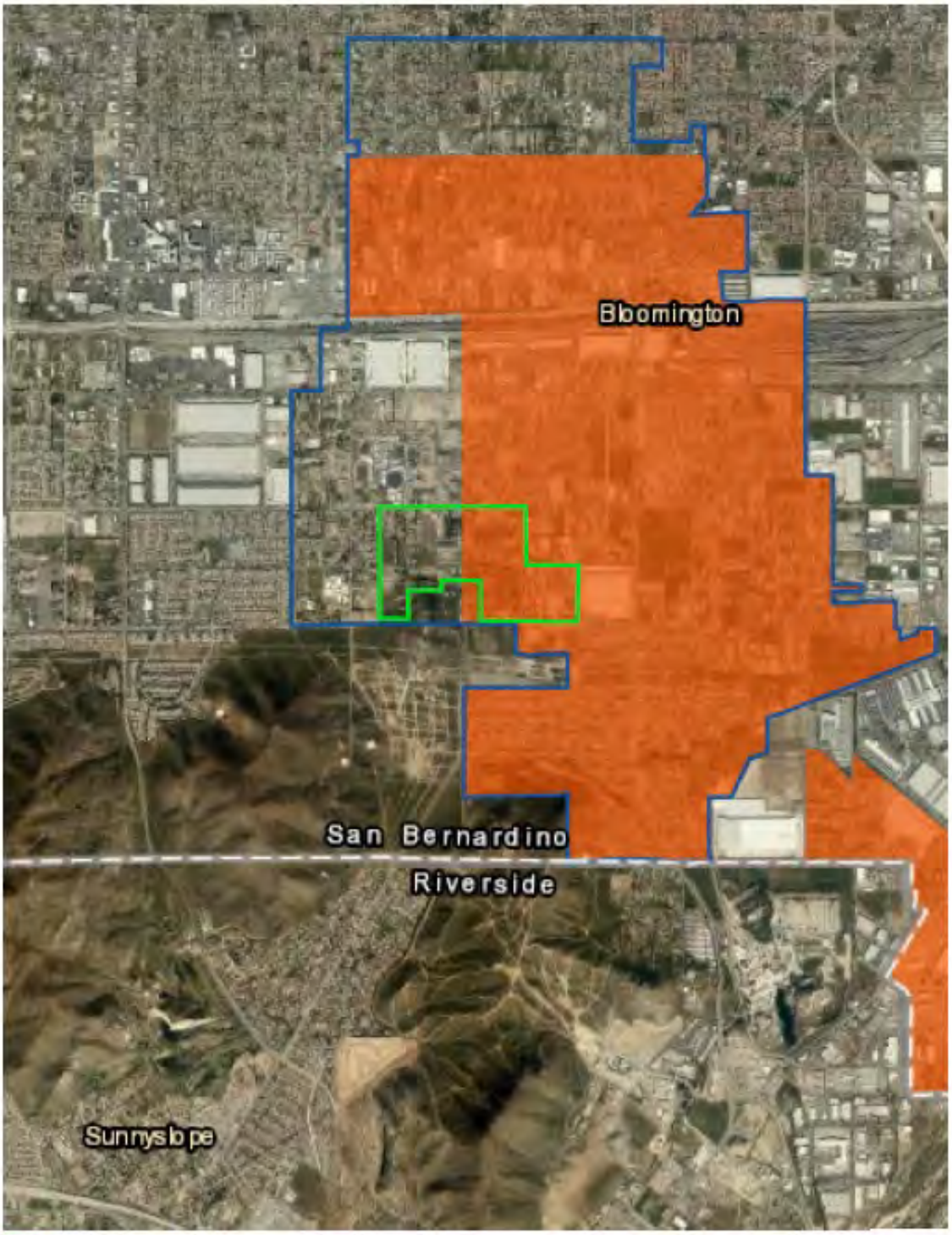
As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant. However, the Project voluntarily incorporates various measures, including measures from the California Attorney General's *Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act*, as PDF AQ-1 through PDF AQ-28, which would serve to reduce impacts from the Project to the surrounding community.

As shown in Tables 5.3-7 through 5.3-8, with implementation of Mitigation Measures AQ-1 and AQ-2, which require construction activities to utilize low VOC paints and require construction equipment greater than 50 horsepower to be CARB certified tier 4 or higher, emissions from construction activities would be below SCAQMD significance thresholds. Therefore, the Project would not expose the community to substantial emissions from construction activities.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Therefore, the proposed Project would not result in significant health risks to the existing community.

In addition, as detailed in the Impact NOI-1 discussion that begins on page 5.12-26 of the Draft EIR, each of the Project scenarios would implement Project Design Feature (PDF) NOI-2, which would require 12- to 14-foot-high cement block walls at Sites 1 and 2 and 9-foot-high cement walls at Site 4. With implementation of PDF NOI-2, operational noise levels for all scenarios would not exceed the County's exterior noise level standards, as adjusted to reflect the ambient noise levels at all nearby sensitive receiver locations. Additionally, the increase in ambient noise levels would range from 0.1 to 3.0 dBA with the implementation of PDF NOI-2, which would not generate a significant daytime or nighttime operational noise level increase at nearby receiver locations. Thus, the Project is consistent with Policy HZ-3.18.

Project Proximity to Environmental Justice Focus Area



Bloomington Business Park Master Response **Figure 1**

PUBLIC COMMENTS

The following is a list of public agencies, organizations, and individuals or interested parties that submitted comments on the DEIR during the public review period. The comment letters received on the DEIR and responses to those comments are provided on the following pages.

Letter Number	Agency/Organization/Name	Comment Date Received	RTC Page Number
Agencies			
A1	South Coast Air Quality Management District	December 15, 2021	2-19
A2	California Air Resources Board	December 15, 2021	2-33
A3	Colton Joint Unified School District	January 12, 2022	2-47
A4	City of Fontana	February 15, 2022	2-157
A5	California Department of Transportation	February 23, 2022	2-169
A6	City of Riverside	March 9, 2022	2-181
Organizations			
O1	Concerned Neighbors of Bloomington	October 20, 2021	2-187
O2	Peoples Collective for Environmental Justice	December 15, 2021	2-191
O3	Blum Collins & Ho, LLP	December 3, 2021	2-209
O4	Robert Redford Conservancy for Southern California Sustainability, Pitzer College	December 14, 2021	2-527
O5	Center for Biological Diversity	December 15, 2021	2-537
O6	Earthjustice	December 15, 2021	2-591
O7	Law Office of Abigail Smith	December 15, 2021	2-679
O8	Public Interest Law Project	December 15, 2021	2-701
O9	Concerned Neighbors of Bloomington	December 15, 2021	2-711
O10	Center for Community Action and Environmental Justice	December 15, 2021	2-721
O11	Concerned Neighbors of Bloomington	October 13, 2021	2-733
Individuals			
I1	Emmanuel Rodriguez	November 18, 2021	2-737
I2	Teresa Torres	December 12, 2021	2-743
I3	Cruz Baca	December 13, 2021	2-747
I4	Caitlyn Towne	December 14, 2021	2-753
I5	Alejandra Gonzalez	December 14, 2021	2-765
I6	Lily Gutierrez	December 14, 2021	2-773
I7	State Assembly Majority Leader Eloise Gómez Reyes	December 15, 2021	2-777
I8	Ana Carlos	December 15, 2021	2-785
I9	Fanelly Millan	December 15, 2021	2-821
I10	Helen Castillejos	December 15, 2021	2-825
I11	Dipaali Reddy	December 15, 2021	2-829
I12	Mireya	December 15, 2021	2-833
I13	Cynthia Rivera	December 15, 2021	2-837

I14	Renato Gonzalez	December 15, 2021	2-841
I15	Unnamed	December 15, 2021	2-845
I16	Grecia	December 15, 2021	2-849
I17	Jonathan Del Toro	December 15, 2021	2-853
I18	Nathaly Ortiz	December 15, 2021	2-857
I19	Elizabeth Sena	December 15, 2021	2-861
I20	Carmen Perez	December 15, 2021	2-865
I21	Juan Cuevas	December 15, 2021	2-867
I22	Virginia	December 15, 2021	2-869
I23	Maria	December 15, 2021	2-871
I24	Javier Cerrato	December 15, 2021	2-875
I25	Various Residents	December 15, 2021	2-877
I26	State Senator Connie M. Leyva	December 15, 2021	2-947
I27	Ben Granillo III	December 15, 2021	2-957
I28	Cynthia Magana	December 15, 2021	2-963
I29	Liliana Garcia	December 15, 2021	2-965
I30	Susana Garita	December 15, 2021	2-967
I31	Alejandra Ramirez	December 15, 2021	2-969
I32	Alina Landa	December 15, 2021	9-971
I33	Claudia Enriquez	December 15, 2021	2-975
I34	Joanna Manzk	December 15, 2021	2-977
I35	Andrea Moreno	December 15, 2021	2-979
I36	Ernesto Saldivar	December 15, 2021	2-981
I37	DeAsy Gallardo	December 15, 2021	2-983
I38	Diana Campos	December 15, 2021	2-985
I39	Lori Nelson	December 15, 2021	2-987
I40	Desiree Lopez	December 15, 2021	2-989
I41	Rafael Garcia	December 15, 2021	2-991
I42	Jennifer Peñaloza	December 15, 2021	2-993
I43	Gina Cardenas	December 15, 2021	2-995
I44	Karen Martínez	December 15, 2021	2-997
I45	Estela Duran-Cerritos	December 15, 2021	2-999
I46	Alexandra Lopez	December 15, 2021	2-1001
I47	Kaylee Amezcua	December 15, 2021	2-1005
I48	Daniel Sarabia	December 15, 2021	2-1007
I49	Karlenne Rodriguez	December 15, 2021	2-1009
I50	Sofia Torres	December 15, 2021	2-1011
I51	Roxana Valleji	December 15, 2021	2-1013
I52	Vaness Rodriguez	December 15, 2021	2-1015
I53	Senaida Rivera	December 15, 2021	2-1017
I54	Edna Buenrostro	December 15, 2021	2-1019
I55	David Marin	December 15, 2021	2-1021

I56	Karina Mendoza	December 15, 2021	2-1023
I57	Hector Anaya	December 15, 2021	2-1025
I58	Ivette Macias	December 15, 2021	2-1027
I59	Marlet Juarez	December 15, 2021	2-1029
I60	Brenda Lugo	December 15, 2021	2-1031
I61	Candace Mendoza	December 15, 2021	2-1033
I62	Alyzza Cabrera	December 15, 2021	2-1035
I63	Amy Vasquez	December 15, 2021	2-1037
I64	Priscilla CaroRivas	December 15, 2021	2-1039
I65	Lorena Ornelas Sainz	December 15, 2021	2-1041
I66	Alberto Rivas	December 15, 2021	2-1043
I67	Sandra Barbosa	December 15, 2021	2-1045
I68	Arcelia Martinez	December 15, 2021	2-1047
I69	Emily Vasquez	December 15, 2021	2-1049
I70	Valeria Tuyu	December 15, 2021	2-1051
I71	Damian Lasheras	December 15, 2021	2-1053
I72	Vanessa Avalos	December 15, 2021	2-1055
I73	José Avalos	December 15, 2021	2-1057
I74	Brenda Reyes	December 15, 2021	2-1059
I75	Shannon Galasso	December 15, 2021	2-1061
I76	Guadalupe Solis	December 15, 2021	2-1063
I77	Mary Pound	December 15, 2021	2-1065
I78	Kimm Grady	December 15, 2021	2-1067
I79	Jennifer Boatman	December 15, 2021	2-1069
I80	Roxanne Flores	December 15, 2021	2-1071
I81	Terri Ramirez	December 15, 2021	2-1073
I82	Kathy Fleener	December 15, 2021	2-1075
I83	Elizabeth Amador	December 15, 2021	2-1077
I84	Valerie Rivera	December 15, 2021	2-1079
I85	Esmeralda Avalos	December 15, 2021	2-1081
I86	Margarita Martinez	December 15, 2021	2-1083
I87	Sandra Rodriguez	December 15, 2021	2-1085
I88	Daniel Spencer	December 15, 2021	2-1087
I89	Maria Durazo	December 15, 2021	2-1089
I90	Saul Ramirez	December 15, 2021	2-1091
I91	Herminia Matias	December 15, 2021	2-1093
I92	Viviana Bivian	December 15, 2021	2-1095
I93	Magdalena Matias	December 15, 2021	2-1097
I94	Sunni Ivey	December 15, 2021	2-1099
I95	Ada Trujillo	December 15, 2021	2-1101
I96	Naomi Radoi	December 15, 2021	2-1103
I97	Mary Radoi	December 15, 2021	2-1105

I98	Nina Radoi	December 15, 2021	2-1107
I99	Peter Radoi	December 15, 2021	2-1111
I100	Macedonio Gonzalez	December 15, 2021	2-1115
I101	Cecilia Gonzalez	December 15, 2021	2-1117
I102	Alejandra González	December 15, 2021	2-1119
I103	Amy Mendoza	December 15, 2021	2-1121
I104	Kimberly Conrad	December 15, 2021	2-1123
I105	Victor Montoya	December 15, 2021	2-1125
I106	Brenda Butler	December 15, 2021	2-1127
I107	Cristina Torres	December 15, 2021	2-1131
I108	Joslyn Santana	December 15, 2021	2-1133
I109	Luis Saavedra	December 15, 2021	2-1135
I110	Paola Yanez	December 15, 2021	2-1137
I111	Arcelia Mendoza	December 15, 2021	2-1139
I112	Darby Osnaya	December 15, 2021	2-1141
I113	Laura Blumberg	December 15, 2021	2-1143
I114	Jolene Saldivar	December 15, 2021	2-1145
I115	Femila Manoj	December 15, 2021	2-1149
I116	Ernesto Carlos	December 15, 2021	2-1151
I117	Cristi Caraveo	December 15, 2021	2-1155
I118	Guadalupe Duran	December 15, 2021	2-1157
I119	Francisco Ramirez	December 15, 2021	2-1159
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I121	Luis Ramirez	December 15, 2021	2-1163
I122	Brandalyne Evans	December 15, 2021	2-1165
I123	Maria Magallanes	December 15, 2021	2-1167
I124	Kathren Brooks	December 15, 2021	2-1169
I125	Victor Montoya	December 15, 2021	2-1171
I126	Ana Gonzalez Reyes	December 15, 2021	2-1173
I127	Brad Stott	December 15, 2021	2-1175
I128	Heather Butterworth	December 15, 2021	2-1177
I129	Gustavo Rojo	December 15, 2021	2-1179
I130	Armando Torres	December 15, 2021	2-1183
I131	Eduardo Martinez	December 15, 2021	2-1185
I132	Teresa Garcia	December 15, 2021	2-1187
I133	Alma Morrell	December 15, 2021	2-1189
I134	Susana Garita	December 15, 2021	2-1191
I135	Elisa Garcia	December 15, 2021	2-1193
I136	Maria Arellano	December 15, 2021	2-1197
I137	Kaleigh Lambaran	December 15, 2021	2-1199
I138	Jack Rubio	December 15, 2021	2-1203
I139	Pam Geil	December 15, 2021	2-1205

I140	Monica Sanchez	December 15, 2021	2-1209
I141	Ana Ipina	December 15, 2021	2-1211
I142	Natalie Lopez	December 15, 2021	2-1213
I143	Miguel Moreno	December 15, 2021	2-1215
I144	Charman Diaz	December 15, 2021	2-1217
I145	Jeanette Munoz	December 15, 2021	2-1219
I146	Jerry Navarro	December 15, 2021	2-1221
I147	Marisela Zermeno	December 15, 2021	2-1223
I148	Estrella H	December 15, 2021	2-1225
I149	Randy Underwood	December 15, 2021	2-1227
I150	Margarita Martinez	December 15, 2021	2-1229
I151	Tania Sandoval	December 15, 2021	2-1231
I152	Jim Walter	December 15, 2021	2-1233
I153	Jose L. Garcia Jr.	December 15, 2021	2-1235
I154	Efren Perez	December 15, 2021	2-1237
I155	Yesica Ortiz	December 15, 2021	2-1241
I156	Nicole Christensen	December 15, 2021	2-1243
I157	Rosa Ramos	December 15, 2021	2-1245
I158	Ramona Gutierrez	December 15, 2021	2-1247
I159	Christopher Castillo	December 15, 2021	2-1249
I160	Steve Boonkrong	December 15, 2021	2-1251
I161	Betty Hernandez	December 15, 2021	2-1253
I162	Arturo Casas	December 15, 2021	2-1255
I163	Mary Johnson	December 15, 2021	2-1257
I164	Edgar Garcia	December 15, 2021	2-1259
I165	Araceli Lopez	December 15, 2021	2-1261
I166	Sandra Valtierra	December 15, 2021	2-1263
I167	Manuel López	December 15, 2021	2-1265
I168	Eduardo Galvan	December 15, 2021	2-1267
I169	Andres Orozco	December 15, 2021	2-1269
I170	Maria Maribel Orozco	December 15, 2021	2-1271
I171	Amalia Cordova	December 15, 2021	2-1273
I172	Susana A.	December 15, 2021	2-1275
I173	Cinthya Cerrato	December 15, 2021	2-1277
I174	Kimm Hadnot	December 15, 2021	2-1279
I175	Andre Marshall	December 15, 2021	2-1283
I176	Priscilla Medina	December 15, 2021	2-1285
I177	Kathryn Probert	December 15, 2021	2-1287
I178	Henry Baltazar	December 15, 2021	2-1291
I179	America Rodriguez	December 15, 2021	2-1293
I180	Gabriel Gonzalez	December 15, 2021	2-1297
I181	Andrea Gonzalez	December 15, 2021	2-1299

I182	Martin Navarro	December 15, 2021	2-1301
I183	Penny Travis	December 15, 2021	2-1303
I184	Harold Cifuentes	December 15, 2021	2-1305
I185	Ryan Blackwood	December 15, 2021	2-1307
I186	Javier Cerrato	December 15, 2021	2-1309
I187	Veronica Lopez	December 15, 2021	2-1311
I188	Michael Oneal	December 15, 2021	2-1313
I189	Sharon Oneal	December 15, 2021	2-1315
I190	Emily Rangel	December 15, 2021	2-1317
I191	Gloria Moreno	December 15, 2021	2-1319
I192	Julio Quintero	December 15, 2021	2-1321
I193	Miguel Muñoz	December 15, 2021	2-1323
I194	Jennifer Boatman	December 15, 2021	2-1327
I195	Yolanda Felix	December 15, 2021	2-1329
I196	Hugo Feliz	December 15, 2021	2-1331
I197	Diana Mandujano	December 15, 2021	2-1335
I198	Sashi Juarez-Galindo	December 15, 2021	2-1339
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I200	Ben Vasquez	December 15, 2021	2-1343
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I204	Jim Walter	December 15, 2021	2-1351
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I206	Brenda Santacruz	December 15, 2021	2-1355
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I213	Maribel Aguilera	December 15, 2021	2-1371
I214	Leticia Avalos	December 15, 2021	2-1373
I215	Johnny Herrera	December 15, 2021	2-1375
I216	Nely Partida Manzano	December 15, 2021	2-1377
I217	David Delgado	December 15, 2021	2-1379
I218	Rosio Ramirez	December 15, 2021	2-1381
I219	Joel Ramirez	December 15, 2021	2-1383
I220	Jennifer Torres	December 15, 2021	2-1385
I221	Jorge Carrion	December 15, 2021	2-1387
I222	Patricia Morales	December 15, 2021	2-1389
I223	Roxana Ruiz	December 15, 2021	2-1391

I224	Mariana Enriquez	December 15, 2021	2-1393
I225	Maricela Real	December 15, 2021	2-1395
I226	Karen Ramirez	December 15, 2021	2-1397
I227	Brenda Holmes	December 15, 2021	2-1399
I228	Lorena Gilman	December 15, 2021	2-1401
I229	Mariana Hernandez	December 15, 2021	2-1403
I230	Melissa DeAnda	December 15, 2021	2-1405
I231	Sandra Barrera	December 15, 2021	2-1407
I232	Cindy Herrera	December 15, 2021	2-1411
I233	Elizabeth Amador	December 15, 2021	2-1413
I234	Roxanne Flores	December 15, 2021	2-1415
I235	Angelica Ramirez	December 15, 2021	2-1417
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I237	Monica Arzate	December 15, 2021	2-1421
I238	Rigoberto Munoz	December 15, 2021	2-1423
I239	Jenifer Aragon	December 15, 2021	2-1425
I240	Brenda Reyes	December 15, 2021	2-1427
I241	Jessica Salguero	December 15, 2021	2-1429
I242	Ema Ibarra	December 15, 2021	2-1431
I243	Victoria Ramirez	December 15, 2021	2-1433
I244	Dianna Cordero	December 15, 2021	2-1435
I245	Martha Espinoza	December 15, 2021	2-1437
I246	Sonia Rios	December 15, 2021	2-1439
I247	Nayelie Duran	December 15, 2021	2-1441
I248	Erika Perez	December 15, 2021	2-1443
I249	Marisa Lopez-Sevilla	December 15, 2021	2-1445
I250	Bianka Villasenor	December 15, 2021	2-1447
I251	Arcelia Salmeron	December 15, 2021	2-1449
I252	Elizabeth Sanchez	December 15, 2021	2-1451
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I254	German Cervantes	December 15, 2021	2-1455
I255	Andrea Sandoval	December 15, 2021	2-1457
I256	Jose Lopez	December 15, 2021	2-1459
I257	Patricia Garcia	December 15, 2021	2-1461
I258	Aprilia Noer	December 15, 2021	2-1463
I259	Paul Lucero	December 15, 2021	2-1465
I260	Laura Garcia	December 15, 2021	2-1467
I261	Amber Murray	December 15, 2021	2-1469
I262	Marlene Espinoza	December 15, 2021	2-1471
I263	Imelda Fierros	December 15, 2021	2-1473
I264	Alyssa Garcia	December 15, 2021	2-1475
I265	Nina Radoi	December 15, 2021	2-1477

I266	Donna Wagoner	December 15, 2021	2-1479
I267	Cain Trevino	December 15, 2021	2-1481
I268	Valerie Tuyu	December 15, 2021	2-1483
I269	Concepcion Ramirez	December 15, 2021	2-1485
I270	Jose Montes	December 15, 2021	2-1493
I271	Francisco Ramirez	December 15, 2021	2-1495
I272	Juan Lasso	December 15, 2021	2-1497
I273	Maritza Gomez	December 15, 2021	2-1499
I274	Lawrence Saldana	December 15, 2021	2-1501
I275	Jose Jimenez	December 15, 2021	2-1503
I276	Cinthya Cerrato	December 15, 2021	2-1505
I277	Javier Cerrato	December 15, 2021	2-1507
I278	Santina Lojero	December 15, 2021	2-1509
I279	Maddhi Jayagoda	December 15, 2021	2-1511
I280	Harold Cifuentes	December 15, 2021	2-1513
I281	Joslyn Santana	December 15, 2021	2-1515
I282	Raylene Borrego	December 15, 2021	2-1517
I283	Samuel Armando/Castro Marrón	December 15, 2021	2-1519
I284	Ricardo Olea	December 15, 2021	2-1521
I285	Valerie Martinez	December 15, 2021	2-1523
I286	Arthur Levine	December 15, 2021	2-1525
I287	Anysia Aguirre	December 15, 2021	2-1529
I288	Cristina Canales	December 15, 2021	2-1531
I289	Nataly Morales	December 15, 2021	2-1533
I290	Wendi Mejia	December 15, 2021	2-1535
I291	Janet Perez	December 15, 2021	2-1537
I292	Grecia Lizaola	December 15, 2021	2-1539
I293	Katherine Ferwerda	December 15, 2021	2-1541
I294	Guadalupe Dolan	December 15, 2021	2-1545
I295	Anthony Gomez	December 15, 2021	2-1547
I296	Femila Manoj	December 15, 2021	2-1549
I297	Stephanie Acosta	December 15, 2021	2-1551
I298	Ada Trujillo	December 15, 2021	2-1553
I299	Joshua Siegel	December 15, 2021	2-1555
I300	Joaquin Castillejos	December 15, 2021	2-1559
I301	Molly Green	December 15, 2021	2-1563
I302	Eric Mariscal	December 15, 2021	2-1565
I303	Jayn Mills	December 15, 2021	2-1567
I304	Rosa Murillo	December 15, 2021	2-1571
I305	Rigo Murillo	December 15, 2021	2-1573
I306	Kimberly Conrad	December 15, 2021	2-1575
I307	Cynthia Magana	December 15, 2021	2-1577

I308	Nolby Cayetano	December 15, 2021	2-1579
I309	Vanessa Cayetano	December 15, 2021	2-1581
I310	Georgette Villareal-Dollins	December 15, 2021	2-1583
I311	Marivel Angulo	December 15, 2021	2-1585
I312	Jack Rubio	December 15, 2021	2-1587
I313	Gary Grossich	December 15, 2021	2-1589
I314	RCH Group	November 23, 2021	2-1593
I315	Dien Lang	October 12, 2021	2-1595

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LETTER A1: South Coast Air Quality Management District (7 pages)

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:
Aron.Liang@lus.sbcounty.gov
Aron Liang, Senior Planner
County of San Bernardino, Land Use Services Department
385 North Arrowhead Avenue, First Floor
San Bernardino, California 92415-0187

December 15, 2021

Draft Environmental Impact Environmental Impact Report (EIR) for the Proposed Bloomington Business Park Specific Plan Project (Proposed Project) (SCH No.: 2020120545)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The County of San Bernardino is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments on the Draft EIR include recommended revisions to existing air quality project design features, new air quality project design features or mitigation measures, and a discussion of South Coast AQMD permits that the Lead Agency should include in the Final EIR.

Based on the Draft EIR, the Proposed Project consists of construction and operation of 3,235,836 square feet of light industrial, manufacturing, warehousing, and trailer parking uses on a 213-acre site that is located on the southeast corner of Santa Ana Avenue and Alder Avenue in the community of Bloomington. Development will be implemented in two planning areas. Planning Area A has two design options, resulting in either 2,113,640 square feet or 2,712,040 square feet of warehousing uses[1]. Construction of Planning Area A is anticipated to begin in the fourth quarter of 2021 and will be completed by the fourth quarter of 2022[2]. Planning Area B includes future development of industrial business park uses and has a proposed buildout year of 2040[3]. A1.1

The Proposed Project consisting of both planning areas as a whole will include 25 project design features (PDFs) for air quality[4]. These features include requirements such as heavy-duty haul trucks used during construction to be equipped with 2010 model year or newer engines, if feasible, and that all facility-owned and operated truck fleets accessing the site during operation are also equipped with 2010 model year or newer engines, among other requirements[5]. Once operational, the Proposed Project is anticipated to generate 8,555 trip-ends per day, 1,290 of which would be made by light-, medium-and heavy-heavy-duty trucks[6]. Although the warehouse tenant is unknown at the time of the release of the Draft EIR, the Proposed Project is not

[1] Draft EIR. Page 1-3.
[2] *Ibid*. Appendix C1 Air Quality Report.
[3] *Ibid*. Page 3-16.
[4] *Ibid*. Pages 5.3-57 to 59.
[5] *Ibid*. Section 5.3 Air Quality. Pages 5.3-57 to 5.3-59.
[6] *Ibid*. Appendix K1 Traffic Impact Assessment. Pages 67 to 69.

anticipated to include refrigerated logistics uses[7]. Based on the Draft EIR, existing sensitive receptors are 11 feet of the Proposed Project[8]. **A1.1 cont.**

Based on a review of the Draft EIR and supporting technical documents, South Coast AQMD staff has three main comments. A summary of these comments is provided as follows with additional details provided in the attachment.

1. Recommended Revisions to Existing Air Quality Project Design Features (PDFs): The Lead Agency requires the use of cleaner on- and off-road construction equipment and operational vehicles, including zero-emission light- and medium-duty trucks, if such trucks are widely available and economically feasible, and installation of electric charging infrastructure (PDF AQ-3, PDF AQ-4, PDF AQ-10, PDF AQ-12, and PDF AQ-13). Additional information on how widely available and economically feasible will be determined should be provided in the Final EIR. Given the close proximity of sensitive receptors, the Lead Agency should strengthen and expand the requirement of using zero-emissions or near-zero emission standards, or at a minimum 2010 model year on-road trucks during operation to all trucks accessing the Proposed Project, and not limit the requirement to those trucks that are owned or contracted by warehouse tenants and/or operators (PDF AQ-9). **A1.2**

2. Additional Recommended Air Quality PDFs or Mitigation Measures: In the Draft EIR, operation of the Proposed Project is found to have significant and unavoidable air quality impacts for VOC and NOx emissions. The Lead Agency should include additional PDFs or mitigation measures to identify clean construction and operational equipment and trucks that are already available and in-use, require their uses by the opening date for Planning Area A in 2022, develop considerations of potential cleaner technologies that will become feasible and available during the lifetime of the Proposed Project (buildout year 2040), develop a process for periodic technology assessment with performance standards, ensure future buildout at the Proposed Project does not exceed what was previously evaluated in the Draft EIR, and clearly mark truck routes with trailblazer signs to ensure truck travel avoids traversing by existing sensitive receptors. **A1.3**

3. Responsible Agency and South Coast AQMD Permits: If the Proposed Project will require the use of stationary equipment such as emergency generator(s) and fire pump(s), permit(s) from South Coast AQMD will be required. The Final EIR should include a discussion of stationary equipment that will require South Coast AQMD permits and identify South Coast AQMD as a CEQA Responsible Agency for the Proposed Project. **A1.4**

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will **A1.5**

[7] *Ibid.* Chapter 3 Project Description. Page 3-15.
[8] *Ibid.* Section 5.12 Noise. Pages 5.12-15 to 5.12-16.

Aron Liang December 15, 2021

not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, if the Lead Agency makes the finding that the recommended revisions to the existing PDFs and the recommended new air quality project design features or mitigation measures are not feasible, the Lead Agency should describe the specific reasons supported by substantial evidence for rejecting them in the Final EIR (CEQA Guidelines Section 15091). **A1.5 cont.**

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Air Quality Specialist, at amullins@aqmd.gov, should you have any questions or wish to discuss the comments. **A1.6**

Sincerely,

Lijin Sun

Lijin Sun
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

Attachment
LS:AM
SBC210928-09
Control Number

3

Aron Liang December 15, 2021

ATTACHMENT

South Coast AQMD Staff's Summary of Air Quality Analysis and Health Risk Assessment in the Draft EIR

In the Air Quality Analysis Section of the Draft EIR, the Lead Agency quantified the Proposed Project's maximum daily construction emissions. The Lead Agency considered three different construction options: Opening Year Option 1 and Opening Year Option 2 for Planning Area A, and Future Development/Specific Plan Buildout for Planning Area B. The Lead Agency compared the Proposed Project's construction emissions to South Coast AQMD's recommended regional air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that, for all three construction options evaluated, the Proposed Project's regional construction air quality impacts would be significant for VOC and NOx emissions[9]. Mitigation Measures (MMs) AQ-1 and AQ-2 would require the use low VOC architectural coatings with no more than 10g/L of VOC and require all off-road construction equipment 50 horsepower or greater to meet Tier 4 emission standards. With implementation of these mitigation measures, both regional VOC and NOx emissions from construction activities from all three construction options would be reduced to less than significance levels[10].

A1.7

The Lead Agency also considered three different operational options: Opening Year Option 1, Opening Year Option 2, and Future Development/Specific Plan Buildout. Based on the analysis, the Lead Agency found that all three options would result in significant regional operational air quality impacts from VOC and NOx emissions[11]. MMs AQ-3 through AQ-7 require postage of idling restriction signage, contractual specifications that vendor trucks include energy efficiency improvement features through Carl Moyer, electric vehicle charging stations, installation of infrastructure to support electric forklifts and other interior equipment, and implementation of a transportation management association to coordinate carpooling. However, the Lead Agency found that air quality impacts from operating the Proposed Project under all three options would remain significant and unavoidable for VOC and NOx emissions[12].

In the Draft EIR, the Lead Agency also quantified the Proposed Project's localized construction and operational emissions and compared them to the applicable South Coast AQMD's localized significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's localized construction and operational air quality impacts would be less than significant[13]. Additionally, the Lead Agency calculated cancer risks from Proposed Project's operational activities under Opening Year Option 1, Opening Year Option 2, and Future Development/Specific Plan Buildout and found that the maximum cancer inhalation risk would be of 4.58 in one million, 5.78 in one million, and 3.11 in one million[14], respectively, all of which would be below South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk[15]. Finally, the Draft EIR discussed South Coast AQMD Rules 2305 and 316[16].

[9] *Ibid.* Section 5.3 Air Quality. Page 5.3-33.
[10] *Ibid.*
[11] Ibid. Page 5.3-34
[12] *Ibid.*
[13] Draft EIR. Appendix C1 Air Quality Report. Pages 56 to 62.
[14] *Ibid.* Pages 13 to 35.
[15] South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk is based on the most current methodology recommended by the California Office of Environmental Health Hazard assessment.

South Coast AQMD staff's detailed comments on the Draft EIR are provided as follows.

1. Recommended Revisions to Existing Air Quality Project Design Features (PDFs)

a) PDF AQ-3, PDF AQ-4, PDF AQ-10, PDF AQ-12, PDF AQ-13

In the Draft EIR, the Lead Agency incorporated 25 PDFs related to air quality. Several PDFs (PDF AQ-3, PDF AQ-4, PDF AQ-10, PDF AQ-12, and PDF AQ-13) would require implementation of cleaner on- and off-road construction equipment and operational vehicles, including zero-emission light- and medium-duty trucks, and installation of electric charging infrastructure to further support electric vehicle (EV) usage onsite. However, these PDFs will only be implemented by the Lead Agency when they are "widely available and economically feasible" or "whenever feasible"[17]. South Coast AQMD staff recommends that the Lead Agency provide additional information on how "widely available and economically feasible" will be defined and determined in the Final EIR. The recommended information would establish a clear set of standards and criteria for assessing the technological, commercial, and economic availability and feasibility of using both cleaner on- and off-road construction equipment and operational vehicles and installing EV infrastructure, provide public transparency in the Lead Agency's decision-making regarding cleaner on- and off-road construction equipment, operational vehicles, and EV infrastructure, demonstrate a commitment by the Lead Agency to using cleaner on- and off-road construction equipment and operational vehicles and EV infrastructure, ensure implementation when they are available, strengthen the Proposed Project's air quality commitments, and facilitate the purpose and goal of CEQA on public disclosure. **A1.7 cont.**

b) PDF AQ-9

PDF AQ-9 requires that applicant/developer/tenant require that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater that 14,000 pounds accessing the site meet or exceed 2010 model year emissions standards. Since the Proposed Project's operators, which are unknown at this time, may not have their own fleet equipment, and to further reduce the Proposed Project's significant and unavoidable NOx emissions during operation, South Coast AQMD staff recommends that the Lead Agency strengthen the PDF as follows to require all trucks accessing the Proposed Project are zero-emissions (ZE) or near-zero emissions (NZE) during operation, or at a minimum meet 2010 model year emission standards, not limited to those trucks that are owned or contracted by warehouse tenants and/or operators. This recommendation is needed to protect public health on nearby sensitive receptors that are located within 11 feet of the Proposed Project. It would also support and facilitate implementation of South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule. **A1.8**

> **PDF AQ-9:** The Project Applicant/Developer/Tenant shall require that all ~~facility-owned and operated fleet~~ equipment with a gross vehicle weight rating greater than 14,000 pound accessing the site be ZE or NZE operation such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, this equipment shall meet or exceed 2010

[16] Draft EIR. Section 5.3 Air Quality. Page 5.3-9.
[17] Draft EIR. Chapter 1 Executive Summary

model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators which own vehicles subject to Section 2025 shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and state upon request. **A1.8 cont.**

2. Additional Recommended Air Quality PDFs or Mitigation Measures

In the Draft EIR, the Lead Agency found that the Proposed Project would result in significant and unavoidable air quality impacts from VOC and NOx emissions during operation. CEQA requires that the Lead Agency consider mitigation measures to minimize significant adverse impacts (CEQA Guidelines Section 15126.4) and that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse impacts. South Coast AQMD staff recommends that the Lead Agency consider including the following operational air quality PDFs or mitigation measures in the Final EIR to further reduce the Proposed Project's significant and unavoidable air quality impacts during operation.

Technology is transforming the goods transport and movement sector at a rapid pace. ZE or NZE construction equipment, cargo handling equipment, and trucks are already commercially available and in-use. Therefore, the Lead Agency should use good-faith efforts to identify the available types of ZE or NZE construction and cargo handling equipment and trucks in the Final EIR and require their uses by the opening date for Planning Area A in 2022. **A1.9**

Clean construction and cargo handling equipment and trucks will become increasingly more feasible and commercially available as technology advances. If using ZE or NZE technologies is not feasible today, it could become feasible in a reasonable period of time during the Proposed Project's buildout schedule by 2040 (CEQA Guidelines Section 15364). Therefore, it is recommended that the Lead Agency include considerations of potential cleaner technologies that will become feasible and available during the lifetime of the Proposed Project and develop a process with performance standards to require and/or accelerate the deployment of the lowest emission technologies and the utilization of ZE or NZE construction and cargo handling equipment and heavy-duty trucks (CEQA Guidelines Section 15126.4(a)). The Lead Agency can and should develop the following performance standards or any other comparable standards in the Final EIR.

- Develop a minimum amount of ZE or NZE construction and cargo handling equipment and heavy-duty trucks that the Proposed Project must use each year during construction and operation to ensure adequate progress. Include this requirement in the Proposed Project's Construction Management Plan, business development agreement(s), and contracts with operator(s).
- Establish a contractor(s), tenant(s), or operator(s) selection policy that prefers contractor(s), tenant(s), or operator(s) who can supply and use ZE or NZE construction and cargo handling equipment and heavy-duty trucks during construction and operation. Include this policy in the Request for Proposal, procurement documents, and purchase order(s) for selecting contractor(s), tenant(s), or operator(s).
- Establish a policy to select and use vendors that use ZE or NZE heavy-duty trucks. Include this policy in the vendor contracts and business agreements.

- Establish a purchasing policy to purchase and receive materials from vendors that use ZE or NZE heavy-duty trucks to deliver materials. Include this policy in the procurement documents and purchase orders with vendors.
- Develop a target-focused and performance-based process and timeline to implement the use of ZE heavy-duty trucks during operation that is consistent with the timeline and requirement for warehouse activities under South Coast AQMD Rule 2305. **A1.9 cont.**
- Develop a project-specific process and criteria for periodically assessing progress in implementing the use of ZE heavy-duty trucks during operation.

Additional air quality PDFs or mitigation measures to further reduce the Proposed Project's operational air quality impacts from mobile sources and design considerations that the Lead Agency should consider in the Final EIR may include the followings:

- At this time, the Lead Agency has received development applications for three warehouses and one truck trailer parking lot. The Lead Agency analyzed up to 3,235,836 square feet of development and 8,555 truck trip ends daily. Since the Proposed Project will be fully built out by 2040 and additional developments are unknown at this time, the Lead Agency should limit the daily number of trucks allowed at the Proposed Project to levels that were analyzed in the Final EIR (8,555 daily truck trip ends). If higher daily truck volumes are anticipated to visit the site, especially as the Proposed Project is continued to be built out until 2040, the Lead Agency should commit to re-evaluating the increase in daily truck trips from the Proposed Project through CEQA prior to allowing a higher activity level than previously analyzed. **A1.10**
- In the Draft EIR, the Lead Agency explains that the Proposed Project's truck routes will be limited to south of Laurel Avenue, Locust Avenue, Maple Avenue, Jurupa Avenue, and Cedar Avenue[18]. These routes were used to model the Proposed Project's air quality concentrations during operation[19]. South Coast AQMD staff recommends that the Lead Agency clearly mark truck routes with trailblazer signs to ensure truck travel utilizes the routes analyzed in the Draft EIR and avoids traversing by the existing sensitive receptors (e.g. residents and schools). **A1.11**

3. Responsible Agency and South Coast AQMD Permits

If implementation of the Proposed Project requires the use of stationary equipment, including but is not limited to, emergency generator(s) and emergency fire pump(s), permits from South Coast AQMD are required. The Final EIR should include a discussion on stationary equipment that will require South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used in the Final EIR will be used as the basis for permit conditions and limits for the Proposed Project. The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) methodology is being used by South Coast AQMD for determining operational health risks for permitting applications and also for all CEQA projects where South Coast AQMD is the Lead Agency. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits. **A1.12**

[18] Draft EIR. Section 5.9 Hazards and Hazardous Materials. Page 5.9-32.
[19] Draft EIR. Appendix C2 Health Risk Assessment Report. Pages 17 to 19.

Response to Comment Letter A1: South Coast Air Quality Management District, dated December 15, 2021

Comment A1.1: The comment states that the South Coast Air Quality Management District (South Coast AQMD) appreciates the opportunity to comment on the EIR, and that following comments include recommended revisions to air quality project design features or mitigation measures, and a discussion of South Coast AQMD permits. The comment also provides a summary of the Project Description.

Response A1.1: The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required or provided.

Comment A1.2: The comment states that the Lead Agency requires the use of cleaner on- and off-road construction equipment and operational vehicles, including zero-emission light- and medium-duty trucks, if such trucks are widely available and economically feasible, and installation of electric charging infrastructure (PDF AQ-3, PDF AQ-4, PDF AQ-10, PDF AQ-12, and PDF AQ-13). The comment states that additional information on how widely available and economically feasible will be determined should be provided in the Final EIR. Given the close proximity of sensitive receptors, the Lead Agency should strengthen and expand the requirement of using zero-emissions or near-zero emission standards, or at a minimum 2010 model year on-road trucks during construction to all trucks accessing the proposed Project, and not limit the requirement to those trucks that are owned or contracted by warehouse tenants and/or operators (PDF AQ-3 and PDF AQ-9).

Response A1.2: The Project includes the use of zero emissions trucks once the technological infrastructure becomes more available throughout the State and the region. Currently, the use of zero-emissions light- and medium-duty trucks is limited and an infrastructure network to support their use is limited throughout southern California. Thus, commercial use and availability throughout the State is currently limited. However, CARB passed its updated Advanced Clean Truck Rule on July 1, 2020 that requires medium-and heavy-duty truck manufacturers to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales are required to be 55% of Class 2b – 3 truck sales, 75% of Class 4 – 8 straight truck sales, and 40% of truck tractor sales[1]. The rule begins in 2024, at which point an infrastructure network to support zero-emission trucks throughout southern California is anticipated to begin to become available. CARB estimates that by 2030, nearly one in three new trucks will be zero-emissions[2]. Based on these CARB estimates, PDF AQ-10 *requires* that all heavy-duty trucks entering or operated on the Project site to be zero-emission beginning in 2030, should such trucks be widely available and economically feasible. PDF-12 requires tenants to use zero-emission light- and medium-duty trucks as part of business operations, if such trucks are widely available and economically feasible, as determined by the County. These PDFs, amongst others, are included in the EIR are to provide for cleaner technologies that become increasingly feasible and available during the lifetime of the proposed Project, as the buildout year is 2040.

The County's determination if use of zero-emissions trucks are widely available and economically feasible is based on their use and accessibility in southern California at the time each development project within the Specific Plan commence operation. The County, as Lead Agency, determines what measures are feasible, economically, and technologically, and required for each development project as part of the County's development processing and permitting process. Consistent with the comment and CARB regulations, on-road diesel vehicles with a Gross Vehicle Weight Rating (GVWR) that is 14,001+ lbs. must reduce exhaust emissions by meeting particulate matter (PM) filter requirements and upgrading to newer

[1] https://ww2.arb.ca.gov/resources/fact-sheets/advanced-clean-trucks-fact-sheet
[2] https://ww2.arb.ca.gov/rulemaking/2019/advancedcleantrucks

engines. Vehicles with 2010 engine model year or newer are fully compliant. This regulation would be implemented through PDF AQ-3 and PDF AQ-9.

CEQA requires that measures required for reduction of impacts be fully enforceable through permit conditions, agreements, or other legally binding instruments (CEQA Guidelines § 15126.4(a)(2)). Both the County and future tenants of the Specific Plan buildings would not be able to enforce the types of new technology (i.e., zero-emissions or near-zero emissions) on all of the trucks accessing the Specific Plan area. It is infeasible to both implement and enforce the types of vehicles driving to the site that are not owned or contracted by warehouse tenants and/or operators. For example, future tenants would not be able to control the types of FedEx, UPS, USPS, or other delivery trucks that access the site. In addition, even if such a PDF could be implemented, it would be economically infeasible for the Project applicant. Warehouses in southern California are not required to monitor or limit what types of trucks can enter warehouse properties. To impose such a condition on the Project would destroy the Project's marketability to potential tenants and end users because implementing the PDF would require extensive employee involvement to monitor each truck which enters the Project and refuse entry to non-qualifying trucks. Potential tenants and end users would choose other warehouses to rent or buy, which are not burdened with such a large enforcement obligation. Also, potential tenants and end users would not want to secure such warehouse space which could not be entered by non-qualifying trucks. Due to the infeasibility and enforceability of this recommended PDF, it has not been included.

Comment A1.3: The comment states that the Draft EIR, operation of the proposed Project is found to have significant and unavoidable air quality impacts for VOC and NOx emissions and that the Lead Agency should include additional PDFs or mitigation measures to identify clean construction and operational equipment and trucks that are already available and in-use, require their uses by the opening date for Planning Area A in 2022, develop considerations of potential cleaner technologies that will become feasible and available during the lifetime of the proposed Project (buildout year 2040), develop a process for periodic technology assessment with performance standards, ensure future buildout of the proposed Project does not exceed what was previously evaluated in the Draft EIR, and clearly mark truck routes with trailblazer signs to ensure truck travel avoids traversing by existing sensitive receptors.

Response A1.3: As described on page 5.3-58 of the Draft EIR, and further detailed below in Response A1.9, the Project includes PDFs to reduce air quality emissions from construction and operational equipment and involve considerations for future new technology. The PDFs identify technology that is already available and in-use, is required to be in use in the future, and potential new technology that could be implemented prior to the 2040 Specific Plan buildout, as verified by County permitting at the time of future building and occupancy permits. The County's existing development review and permitting process is the process for the assessment of technology requirements and assuring compliance with performance standards. In addition, the Draft EIR includes seven mitigation measures to reduce emissions of VOC and NOx emissions that require use of low VOC paints, Tier 4 Final construction equipment, implementation of idling regulations, energy efficient vendor trucks, electric interior vehicles, charging stations, and transportation management.

The Draft EIR evaluates full buildout of the Specific Plan area and identifies the maximum daily emissions that would occur from both construction and operation of the Project. Thus, future buildout of the Project would not exceed what was evaluated in the Draft EIR. Should there be future proposed changes to the Project, such as a Specific Plan amendment that would allow an increase of development, that may have the potential to increase vehicle trips, truck trips, or other sources of air quality emissions, a CEQA analysis would be required evaluate the potential impacts related to the increase. Should additional potential impacts be identified, new mitigation measures would be applied. In addition, the recommendation for truck route signage does not raise any specific concerns with the adequacy of the Draft EIR or raise any

other CEQA issue. Therefore, no further response is required or provided regarding the recommended signage.

Comment A1.4: The comment states that if the proposed Project will require the use of stationary equipment such as emergency generator(s) and fire pump(s), permit(s) from South Coast AQMD will be required. The Final EIR should include a discussion of stationary equipment that will require South Coast AQMD permits and identify South Coast AQMD as a CEQA Responsible Agency for the Proposed Project.

Response A1.4: The EIR evaluates a Specific Plan for development of the two planning areas that would be built out through the year 2040. Building occupants are assumed to be warehouse distribution and logistics operators and light manufacturers; however, specific tenants and uses are currently unknown. Future occupants' proposed uses would be processed through the County's permitting system. Should future tenants require stationary equipment such as an emergency generator, and fire pump, or other machinery, a permit from South Coast AQMD would be required, and would be verified by the County's permitting process. In addition, the South Coast AQMD has been identified as a CEQA Responsible Agency in Chapter 3, of this Final EIR for construction permitting and permitting of onsite equipment as needed by building tenants.

Comment A1.5: The comment requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088I). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, if the Lead Agency makes the finding that the recommended revisions to the existing PDFs and the recommended new air quality project design features or mitigation measures are not feasible, the Lead Agency should describe the specific reasons supported by substantial evidence for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

Response A1.5: The County will comply with the requirements imposed by Public Resources Code §21092.5 and CEQA Guidelines §15088(b), which require a Lead Agency to provide a written response to a public agency on comments made on environmental issues by that public agency at least ten days prior to certifying an EIR. The comment does not express any specific concern or question regarding the adequacy of the EIR. No further response is required or provided.

Comment A1.6: The comment states that AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter and provides AQMD contact information.

Response A1.6: The comment is conclusionary in nature and does not raise any specific concerns with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required or provided.

Comment A1.7: The comment summarizes the EIR air quality and health risk assessment analyses and describes that the EIR includes 27 PDFs related to air quality. The comment states that these PDFs will be implemented by the Lead Agency when they are "widely available and economically feasible" or "whenever feasible". The comment recommends that the Lead Agency provide additional information on how "widely available and economically feasible" will be defined and determined in the Final EIR. The comment requests a clear set of standards and criteria for assessing the technological, commercial, and

economic availability and feasibility of using both cleaner on- and off-road construction equipment and operational vehicles and installing EV infrastructure.

Response A1.7: Some of the PDFs included in the EIR are to provide for the potential of cleaner technologies that may become feasible and available during the lifetime of the proposed Project, as the buildout year is 2040. As described previously, CARB rules regarding EV truck sales begin in 2024, at which point an infrastructure network to support zero-emission trucks throughout southern California is anticipated to begin to become available. CARB estimates that by 2030, nearly one in three new trucks will be zero-emissions. The determination by the County if the use of zero-emissions trucks are commercially available would be based on their use and accessibility in southern California at the time each development project within the Specific Plan commences operation. The County, as Lead Agency, determines what measures are feasible due to infrastructure availability, economically, and technologically, and required for operation of each development project as part of the County's development processing and permitting process. Also, please see Response to Comment A 1.2.

Comment A1.8: The comment states that PDF-9 should be strengthened to require all trucks accessing the Specific Plan are zero-emissions or near zero-emissions during operations, or at a minimum meet 2010 model year emissions standards, not limited to those trucks that are owned or contracted by warehouse tenants and/or operators. The comment states that this requirement would protect public health and implement SCAQMD Rule 2305 – Warehouse Indirect Source Rule.

Response A1.8: As described in Response A1.2, currently, the use of zero-emissions light- and medium-duty trucks is limited and an infrastructure network to support their use is limited throughout southern California. However, new CARB regulations provide for an increased zero-emission truck infrastructure and an increasing percentage of zero-emission trucks to be available in the future. The PDFs are provided to support zero-emission truck use consistent with CARB regulations and estimates of availability (as detailed in Response A1.2). In addition, CARB regulations for 2010 model year emissions standards are implemented through PDF AQ-3 and PDF AQ-9.

The County and the future tenants of the Specific Plan buildings would not be able to enforce the types of technology (i.e., zero-emissions or near-zero emissions) on all of the trucks accessing the Specific Plan area. It is infeasible to both implement and enforce the types of vehicles driving to the site that are not owned or contracted by warehouse tenants and/or operators. For example, future tenants would not be able to control the types of FedEx, UPS, postal, or other delivery trucks that access the site. Due to the infeasibility and enforceability of this recommended change, PDF AQ-9 has not been revised. In addition, even if this PDF were revised as requested and could be implemented, it would be economically infeasible for the Project applicant. Warehouses in southern California are not required to monitor or limit what types of trucks can enter warehouse properties. To impose such a condition on the Project would destroy the Project's marketability to potential tenants and end users because implementing the PDF would require extensive employee involvement to monitor each truck which enters the Project and refuse entry to non-qualifying trucks. Potential tenants and end users would choose other warehouses to rent or buy, which are not burdened with such a large enforcement obligation. Also, potential tenants and end users would not want to secure such warehouse space which could not be entered by non-qualifying trucks.

Also, described on page 5.3-9 of the Draft EIR the Project would comply with SCAQMD Rule 2305. The rule imposes a "Warehouse Points Compliance Obligation" (WPCO) on warehouse operators. Operators would be allowed to satisfy the WPCO by accumulating "Warehouse Actions and Investments to Reduce Emissions Points" (WAIRE Points) in a given 12-month period. WAIRE Points will be awarded by implementing measures to reduce emissions listed on the WAIRE Menu, or by implementing a custom WAIRE

Plan approved by the SCAQMD. Thus, the Project would facilitate implementation of South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule.

Comment A1.9: The comment states that zero-emissions or near-zero emissions construction equipment, cargo handling equipment, and trucks are commercially available and in use. The comment also states that the Lead Agency should use good-faith efforts to identify the available types of zero-emissions or near-zero emissions construction and handling equipment and require their use for the opening date of Planning Area A in 2022. The comment also states that newer technologies will become increasingly available by 2040 and that the Project should develop a process with performance standards to require the use of the newest technologies. The comment further lists recommended processes to implement the use of near-zero emissions trucks.

Response A1.9: The comment provides no substantial evidence supporting its assertion that such equipment and trucks are commercially available. As described in response A1.2, the existing and future use of zero-emissions light- and medium-duty trucks and the related infrastructure network is limited. However, CARB passed its updated Advanced Clean Truck Rule on July 1, 2020 that begins in 2024, at which point an infrastructure network to support zero-emission trucks throughout southern California is anticipated to begin to become available. CARB estimates that by 2030, nearly one in three new trucks will be zero-emissions, and based on these CARB estimates, PDF AQ-10 requires that all heavy-duty trucks entering or operated on the Project site to be zero-emission beginning in 2030 and PDF-12 requires tenants to use zero-emission light- and medium-duty trucks as part of business operations. The process to require the use of various technologies (such as the PDFs identified in the Draft EIR) is implementation of the MMRP by the County through the existing development permitting process. As described on page 5.3-58 of the Draft EIR, the Project includes PDFs to reduce air quality emissions from construction equipment, cargo handling equipment, and trucks. These PDFs include reducing emissions from construction, use of zero emissions trucks, and implementation of future new technologies, including the following:

- PDF AQ-4: The Project shall provide electrical hook ups to the power grid, rather than use diesel-fueled generators, for electric construction tools, such as saws, drills, and compressors, and shall use electric tools whenever feasible.
- PDF AQ-10: The Project Applicant/Developer/Tenant shall require that all heavy-duty trucks entering or operated on the project site to be zero-emission beginning in 2030, if such trucks are commercially available, as reasonably determined by the County Planning Division.
- PDF AQ-11: The Project Applicant/Developer/Tenant shall require all on-site equipment, such as forklifts and yard trucks, to be electric, propane or natural gas with the necessary electrical charging stations provided.
- PDF AQ-12: The Project Applicant/Developer/Owner shall require tenants to use zero-emission light- and medium-duty trucks as part of business operations, if such trucks are commercially available, as reasonably determined by the County Planning Division.
- PDF AQ-13: The Project Applicant/Developer shall construct electric truck charging infrastructure consisting of infrastructure (i.e., conduit) to support future installation of charging stations, when such trucks are commercially available, as reasonably determined by the County Planning Division.
- PDF AQ-14: The Project Applicant/Developer shall construct electric light-duty truck charging infrastructure consisting of infrastructure (i.e., conduit) proportional, i.e., conduit for one charging station for every five light-duty truck parking spaces at the Project.

These PDFs are included in the Project's Mitigation Monitoring and Reporting Program (MMRP) to ensure implementation along with the Specific Plan. In addition, Mitigation Measure AQ-6, *Electric Interior Vehicles*, requires that the industrial buildings include infrastructure to support use of electric-powered forklifts and/or other interior vehicles. However, as detailed by in previous responses, the technology and regulations do not exist to provide for zero emissions construction and cargo handling equipment by the year 2022. In addition, it is unknown at this time when such equipment will become commercially available and therefore it is infeasible and speculative to attempt to impose quotas concerning the use of equipment or trucks which include zero-emissions or near-zero emissions technologies. Thus, the PDFs provide for implementation of new technology as it becomes economically available, which would be required by the County through the development approval and permit process, that would verify feasibility for each development project.

Comment A1.10: The comment states that the Lead Agency should limit the daily number of trucks allowed at the Proposed Project to levels that were analyzed in the Final EIR (8,555 daily truck trip ends). If higher daily truck volumes are anticipated to visit the site, especially as the Proposed Project is continued to be built out until 2040, the Lead Agency should commit to re-evaluating the increase in daily truck trips from the Proposed Project through CEQA prior to allowing a higher activity level than previously analyzed.

Response A1.10: The Draft EIR incorporates a conservative, worst-case analysis, evaluating full buildout of the Specific Plan area and identifies the maximum daily emissions that would occur from both construction and operation of the Project. Should there be future proposed changes to the Project, such as a Specific Plan amendment that would allow an increase of development, that may have the potential to increase vehicle trips, truck trips, or other sources of air quality emissions, a CEQA analysis would be required to evaluate (and thus model) the potential impacts related to the increase. Should additional potential impacts be identified, new mitigation measures would be applied.

Comment A1.11: The comment recommends that the Lead Agency clearly mark truck routes with trailblazer signs to ensure truck travel utilizes the routes analyzed in the Draft EIR and avoids traversing by the existing sensitive receptors (e.g., residents and schools).

Response A1.11: The comment is a recommendation for truck route signage. PDF AQ-22 provides that signs would be posted at every truck exit driveway providing directional information to the truck route. As shown on Draft EIR Figure 3-4, the truck route would avoid routing trucks adjacent to schools and would utilize Cedar Avenue for access to the I-10 and SR-60. The comment does not raise any specific concerns with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required or provided. Also, the comment does not provide any substantial evidence that use of such signs would reduce Project impacts.

Comment A1.12: The comment states that If implementation of the proposed Project requires the use of stationary equipment, including but is not limited to, emergency generator(s) and emergency fire pump(s), permits from South Coast AQMD are required. The comment states that the Final EIR should include a discussion on stationary equipment that will require South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the proposed Project. Any assumptions used in the Final EIR will be used as the basis for permit conditions and limits for the proposed Project.

Response A1.12: The EIR evaluates a Specific Plan for development of the two planning areas that would be built out through the year 2040. Building occupants are assumed to be warehouse distribution and logistics operators and light manufacturers; however, specific tenants and uses are currently unknown. Future occupants would be processed through the County's permitting system. Should future tenants require

stationary equipment such as an emergency generator, fire pump, or other machinery, a permit from South Coast AQMD would be required, and would be ensured by the County's permitting process. In addition, the South Coast AQMD has been identified as a CEQA Responsible Agency in Chapter 3, of this Final EIR.

LETTER A2: California Air Resources Board (6 pages)

CALIFORNIA AIR RESOURCES BOARD

Gavin Newsom, Governor
Jared Blumenfeld, CalEPA Secretary
Liane M. Randolph, Chair

December 15, 2021

Aron Liang, Senior Planner
County of San Bernardino
Land Use Services Department - Planning Division
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Dear Aron Liang:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Bloomington Business Park Specific Plan (Project) Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2020120545. The Project is proposed within an unincorporated area of the County of San Bernardino (County), California, which is the lead agency for California Environmental Quality Act (CEQA) purposes.

The Project would allow for the development of up to 3,235,836 square feet of light industrial and business park uses on a 213-acre site. The Project is separated into two planning areas. Approximately 141 acres of the Project, designated as Planning Area A, are anticipated to be developed in 2022. The reaming portions of the Project site, designated as Planning Area B, would be developed by the year 2040. Within Planning Area A, the County proposes two buildout options: Opening Year Development Option 1 and Option 2. Opening Year Development Option 1 would result in the construction of 2,113,640 square feet of fulfillment center and high-cube warehouse uses. Opening Year Development Option 2 would result in the construction of 2,712,040 square feet of fulfillment center and high-cube warehouse uses. Once fully developed in 2040, the Project is expected to generate up to approximately 6,626 daily vehicle trips, including 1,289 daily heavy-duty truck trips, along local roadways. **A2.1**

If approved, the Project will expose nearby communities to elevated levels of air pollution beyond the existing baseline emissions at the Project site. The Project site is surrounded by residential homes, with the closest homes located within 100 feet of the Project's boundary. In addition to residences, Walter Zimmerman Elementary School, Sycamore Hills Elementary School, Crestmore Elementary School, Ruth O. Harris Middle School, and Bloomington High School are located within approximately half a mile of the Project site. These residences and schools are already exposed to toxic diesel particulate matter (diesel PM) emissions generated by existing industrial buildings, vehicle traffic along Interstate 10 (I-10), and rail traffic along existing Union Pacific rail lines and rail yards.

The State of California has placed additional emphasis on protecting local communities from the harmful effects of air pollution through the passage of Assembly Bill 617 (AB 617) **A2.2**

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(Garcia, Chapter 136, Statutes of 2017). AB 617 is a significant piece of air quality legislation that highlights the need for further emission reductions in communities with high exposure burdens, like those in which the Project is located. Diesel PM emissions generated during the construction and operation of the Project would negatively impact neighboring communities, which are already impacted by air pollution from existing industrial buildings, vehicle traffic, and local rail traffic.

Through its authority under Health and Safety Code section 39711, the California Environmental Protection Agency (CalEPA) is charged with the duty to identify disadvantaged communities. CalEPA bases its identification of these communities on geographic, socioeconomic, public health, and environmental hazard criteria (Health and Safety Code, section 39711, subsection (a)). In this capacity, CalEPA currently defines a disadvantaged community, from an environmental hazard and socioeconomic standpoint, as a community that scores within the top 25 percent of the census tracts, as analyzed by the California Communities Environmental Health Screening Tool Version 3.0 (CalEnviroScreen). CalEnviroScreen uses a screening methodology to help identify California communities currently disproportionately burdened by multiple sources of pollution. The census tract containing the residences and schools near the Project is within the top one percent for Pollution Burden[1] and is considered a disadvantaged community; therefore, the County must ensure that the Project does not adversely impact neighboring disadvantaged communities.

A2.2 cont.

Industrial development, such as those proposed under the Project, can result in high daily volumes of heavy-duty diesel truck traffic and operation of on-site equipment (e.g., forklifts and yard tractors) that emit toxic diesel emissions, and contribute to regional air pollution and global climate change.[2] Due to the Project's proximity to residences and schools already disproportionately burdened by multiple sources of pollution, CARB's comments below express concerns with the potential cumulative air quality impacts associated with the construction and operation of the Project. To protect the health of these communities, County and applicant have an obligation to construct and operate the Project using the zero-emission technologies provided in this letter.

A2.3

1. Pollution Burden represents the potential exposure to pollutants and the adverse environmental conditions caused by pollution.
2. With regard to greenhouse gas emissions from this project, CARB has been clear that local governments and project proponents have a responsibility to properly mitigate these impacts. CARB's guidance, set out in detail in the Scoping Plan issued in 2017, makes clear that in CARB's expert view, local mitigation is critical to achieving climate goals and reducing greenhouse gases below levels of significance.

The Final Environmental Impact Report Should Restrict the Operation of Transport Refrigeration Units within the Project Area

Chapter 3.4.3 (Site Operations) of the DEIR states that the proposed buildings constructed within the Project site are not designed to accommodate any warehouse cold storage or refrigerated uses. Consequently, air pollutant emissions associated with cold storage operation were not included in the DEIR. Should the Project later include cold storage uses, residences near the Project-site could be exposed to significantly higher levels of toxic diesel PM and nitrogen oxides (NO_x), and greenhouse gases than trucks and trailers without TRUs. To ensure TRUs will not operate within the Project site without first quantifying and mitigating their potential impacts, CARB urges the County to include one of the following design measures in the Final Environmental Impact Report (FEIR):

- A Project design measure requiring contractual language in tenant lease agreements that prohibits tenants from operating TRUs within the Project-site; or
- A condition requiring a restrictive covenant over the parcel that prohibits the applicant's use of TRUs on the property, unless the applicant seeks and receives an amendment to its conditional use permit allowing such use.

A2.4

If the County and applicant later chooses to allow TRUs to operate within the Project site, the County must re-model the Project's air quality impact analysis and HRA to account for potential health risk impacts. The updated air quality impact analysis and HRA should include the following air pollutant emission reduction measures:

- Include contractual language in tenant lease agreements that requires all loading/unloading docks and trailer spaces to be equipped with electrical hookups for trucks with Transport Refrigeration Units (TRU) or auxiliary power units. This requirement will substantially decrease the amount of time that a TRU powered by a fossil-fueled internal combustion engine can operate at the Project-site. Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration are encouraged and can also be included in lease agreements.[3]
- Include contractual language in tenant lease agreements that requires all TRUs entering the project site to be plug-in capable

3 CARB's Technology Assessment for Transport Refrigerators provides information on the current and projected development of TRUs, including current and anticipated costs. The assessment is available at: https://www.arb.ca.gov/msprog/tech/techreport/tru_07292015.pdf.

The County Must Include Enforceable Mitigation Measures to Minimize the Project's Significant and Unavoidable Impact on Air Quality

Chapter 5.3 (Air Quality) of the DEIR concludes that nitrogen oxides (NOx) and volatile organic compounds (VOC) emitted during Project construction and operation would exceed the South Coast Air Quality Management District's significance thresholds. To reduce the Project's impact on air quality, the DEIR included 25 design features (PDF AQ-1 through PDF AQ-25) and seven mitigation measures (MM AQ-1 through MM AQ-7). These design features and mitigation measures include requiring the applicant to use on-road heavy-duty haul trucks to be model year 2010 or newer and off-road equipment 50 horsepower or greater to be equipped with Tier 4 engines during Project construction, have all heavy-duty trucks entering or operating on the Project site to be zero-emission beginning in 2030, use zero to near zero-emission onsite equipment, have tenants use zero-emission light- and medium-duty trucks as part of business operations, and construct onsite infrastructure to support onsite electric trucks and equipment. Even after implementing these design features and mitigation measures, the County concludes in the DEIR that the Project's operational emissions of NOx and VOC would remain significant after mitigation.

Although the design features listed in Chapter 5.3 of the DEIR would reduce the Project's air pollutant emissions by implementing zero-emission technologies, CARB Staff are concerned that they lack enforceable language that could provide the applicant with the option of not fully implementing them. For example, PDF AQ-3, PDF AQ-10, and PDF AQ-12 would require the applicant to utilize heavy-duty haul trucks to be model year 2010 or newer during Project construction and zero-emission trucks by 2030 if "such trucks are widely available and economically feasible." In the DEIR, the County leaves it up to the applicant to decide when certain types of equipment are "not commercially available," which makes the design features virtually unenforceable since there is no objective standard for determining what constitutes unavailability. To make the design features listed in the DEIR fully enforceable, the County must require the implementation of these measures through permit conditions, agreements, or other legally binding instruments in the FEIR. In addition to make the existing design measures in the DEIR enforceable, CARB urges the County to include the following mitigation measures in the FEIR o reduce the Project's significant and unavoidable impact on air quality. **A2.5**

- In construction contracts, include language that requires all heavy-duty trucks entering the construction site, during the grading and building construction phases be model year 2014 or later.
- Include contractual language in tenant lease agreements that requires future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans.
- Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available and can be

purchased using incentive funding from CARB's Clean Off-Road Equipment Voucher Incentive Project (CORE).[4]

- Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering or on the Project site to be model year 2014 or later, expedite a transition to zero-emission vehicles, and be fully zero-emission beginning in 2023. A list of commercially available zero-emission trucks can be obtained from the Hybrid and Zero-emission Truck and Bus Voucher Incentive Project (HVIP).[5] Additional incentive funds can be obtained from the Carl Moyer Program and Voucher Incentive Program.[6]
- Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than two minutes while on site.
- Include contractual language in tenant lease agreements, requiring the installing of vegetative walls[7] or other effective barriers that separate loading docks and people living or working nearby.

A2.5 cont.

Conclusion

CARB is concerned about the potential cumulative air quality and public health impact should the County approve the Project. The Project is located within close proximity to residences and schools that already suffer from exposure to existing air pollution sources and reside in census tracts that score within the top one percent for pollution burden, according to CalEnviroScreen. These sources include existing industrial facilities, vehicle traffic along the I-10, and local rail traffic. To protect the health of the residences and students within these communities, the County must include legally enforceable design features and mitigation measures that promote the use of zero-emission trucks and onsite equipment and the infrastructure to support those technologies.

A2.6

Given the breadth and scope of projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts, coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues on which CARB does not substantively submit comments.

A2.7

4 Clean Off-Road Equipment Voucher Incentive Project. Accessible at: https://californiacore.org/how-toparticipate/
5 Zero-Emission Truck and Bus Voucher Incentive Project. Accessible at: https://californiahvip.org/
6 Carl Moyer Program and Voucher Incentive Program. https://ww2.arb.ca.gov/carl-moyer-program-apply
7 Effectiveness of Sound Wall-Vegetation Combination Barriers as Near-Roadway Pollutant Mitigation Strategies (2017) is available at: https://ww2.arb.ca.gov/sites/default/files/classic//research/apr/past/13-306.pdf

CARB appreciates the opportunity to comment on the DEIR for the Project and can provide assistance on zero-emission technologies and emission reduction strategies, as needed. Please include CARB on your list of selected State agencies that will receive the FEIR. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist via email at *stanley.armstrong@arb.ca.gov*. **A2.8**

Sincerely,

Robert Krieger, Branch Chief, Risk Reduction Branch

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Response to Comment Letter A2: California Air Resources Board, dated December 15, 2021

Comment A2.1: This comment provides a summary of the project description and the number of vehicle and truck trips that would be generated by the buildout of the proposed Specific Plan. The comments also states that the Project would expose nearby communities to elevated levels of air pollution beyond the existing baseline emissions at the Project site. The comment states that the Project site is surrounded by residences, and five schools are located within approximately half a mile of the Project site. The comment states that these residences and schools are already exposed to toxic diesel particulate matter (diesel PM) emissions generated by existing industrial buildings, vehicle traffic along I-10, and rail traffic along existing Union Pacific rail lines and rail yards.

Response A2.1: Section 5.3, *Air Quality,* of the Draft EIR describes in Table 5.3-2 that data from the Central San Bernardino Valley 1 monitoring station that is located approximately 5.7 miles northwest of the Project site shows that in 2019 there were 41 days that exceeded the state ozone standard and 67 days that exceeded the federal standard. In addition, 12 days exceeded the PM_{10} state standard and 2 days exceeded the federal standard for $PM_{2.5}$. However, ambient air quality standards (NAAQS and CAAQS) were exceeded on one or more days for ozone, PM_{10}, and $PM_{2.5}$ at most monitoring locations throughout the South Coast Air Basin (SCAB).

Consistent with the comment, due to the existing limited low-density development and vacancies within the Specific Plan area, buildout and operation of the proposed Specific Plan would increase emissions generated from the area. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate Project health risk impacts to residents, schools, and workers as a result of exposure to Diesel Particulate Matter (DPM) from heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The maximum non-cancer risks to nearby residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million; and the maximum non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0, and therefore, be less than significant.

Also, as detailed in Master Responses 2 and 3, in response to comments received to the public review Draft EIR additional DPM and AERMOD dispersion modeling was completed (and is included as Appendix A of this Final EIR) to model worst-case conditions, which is the highest daily peak on-site emissions resulting

from overlapping operational and construction activity at the nearest land use to the Project site where an individual could remain. This additional modeling shows that neither DPM emissions or localized significance emissions would not exceed the applicable AQMD thresholds. As such, operation of the Specific Plan at buildout would not cause a significant human health or cancer risk related to DPM emissions and impacts would be less than significant. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment A2.2: This comment states that AB 617 highlights the need for further emission reductions in communities with high exposure burdens, like those in which the Project is located. The comment states that Diesel PM (DPM) emissions generated during the construction and operation of the Project would negatively impact neighboring communities, which are already impacted by air pollution from existing industrial buildings, vehicle traffic, and local rail traffic.

The comment also states that under Health and Safety Code section 39711, the California Environmental Protection Agency (CalEPA) is charged with the duty to identify disadvantaged communities. CalEPA bases its identification of these communities on geographic, socioeconomic, public health, and environmental hazard criteria (Health and Safety Code, section 39711, subsection (a)). In this capacity, CalEPA currently defines a disadvantaged community, from an environmental hazard and socioeconomic standpoint, as a community that scores within the top 25 percent of the census tracts, as analyzed by the California Communities Environmental Health Screening Tool Version 3.0 (CalEnviroScreen). CalEnviroScreen uses a screening methodology to help identify California communities currently disproportionately burdened by multiple sources of pollution. The census tract containing the residences and schools near the Project is within the top one percent for Pollution Burden and is considered a disadvantaged community; therefore, the County must ensure that the Project does not adversely impact neighboring disadvantaged communities.

Response A2.2: Assembly Bill 617 (AB 617) requires the California Air Resources Board (CARB) and air districts to develop and implement additional emissions reporting, monitoring, reduction plans and measures in an effort to reduce air pollution exposure in disadvantaged communities. State funding under AB 617 provides for air quality monitoring and helps to reduce air pollution by changing out older trucks and other equipment for newer, cleaner technologies[3]. Health and Safety Code section 39711 requires the California EPA to identify disadvantaged communities for investment opportunities and provides criteria for identification of these areas[4]. The comments related to AB 617 and Health and Safety Code section 39711 do not raise any specific concerns with the adequacy of the Draft EIR. The regulations idented in the comment address social issues and are not relevant to CEQA.

As detailed beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate the health risk impacts to residents, schools, and workers as a result of exposure to DPM as a result of heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to residences attributable to TAC source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The non-cancer risks to residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding school children, the Mobile Source Health Risk Assessment

[3] http://www.aqmd.gov/nav/about/initiatives/environmental-justice/ab617-134

[4] https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=HSC&division=26.&title=&part=2.&chapter=4.1.&article=

determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million; and the non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0. As such, operation of the Specific Plan at buildout would not cause a significant human health or cancer risk and impacts would be less than significant.

In addition, the Draft EIR evaluates the potential of the Project to expose sensitive receptors, such as residences and schools with substantial pollutant concentrations. As detailed in Draft EIR Tables 5.3-15 through 5.3-18, after implementation of Mitigation Measure AQ-2, emissions during construction activities would not exceed the SCAQMD's localized significance threshold. Therefore, with implementation of mitigation measures, impacts related to localized significant emissions from construction activity would be less than significant. Also, as detailed in Draft EIR Tables 5.3-19 through 5.3-21, emissions from operation of the Specific Plan at buildout would not exceed the SCAQMD's localized significance thresholds for any criteria pollutant at the nearest sensitive receptors. Therefore, operation of the Specific Plan at buildout would result in a less than significant impact related to localized emissions. Because the Project would not exceed thresholds for either DPM or localized significance thresholds, the Project would not adversely impact neighboring disadvantaged communities.

Comment A2.3: This comment states that industrial development, such as those proposed under the Project, can result in high daily volumes of heavy-duty diesel truck traffic and operation of on-site equipment (e.g., forklifts and yard tractors) that emit toxic diesel emissions, and contribute to regional air pollution and global climate change. The comment further states that due to the Project's proximity to residences and schools already disproportionately burdened by multiple sources of pollution, the County and applicant have an obligation to construct and operate the Project using the zero-emission technologies.

Response A2.3: As described in Response A2.2, operation of the Specific Plan at buildout would not exceed thresholds related to human health or cancer risk to local sensitive receptors, such as residences and schools, and impacts would be less than significant with implementation of the mitigation measures provided in the Draft EIR for use of Tier 4 Final equipment during construction activities. Also, as detailed on page 5.3-58 of the Draft EIR, the Project includes Project Design Features (PDFs) to reduce air quality emissions from construction equipment, cargo handling equipment, and trucks. As stated on page 5.3-57 of the Draft EIR, emissions reductions from these PDFs were not included in the Draft EIR calculations to show the maximum potential impact. The PDFs involve use of zero emissions technologies and implementation of future new technologies, and including the following:

- PDF AQ-4: The Project shall provide electrical hook ups to the power grid, rather than use diesel-fueled generators, for electric construction tools, such as saws, drills, and compressors, and shall use electric tools whenever feasible.
- PDF AQ-10: The Project Applicant/Developer/Tenant shall require that all heavy-duty trucks entering or operated on the project site to be zero-emission beginning in 2030, if such trucks are commercially available, as reasonably determined by the County Planning Division.
- PDF AQ-11: The Project Applicant/Developer/Tenant shall require all on-site equipment, such as forklifts and yard trucks, to be electric, propane or natural gas with the necessary electrical charging stations provided.
- PDF AQ-12: The Project Applicant/Developer/Owner shall require tenants to use zero-emission light- and medium-duty trucks as part of business operations, if such trucks are commercially available, as reasonably determined by the County Planning Division.

- PDF AQ-13: The Project Applicant/Developer shall construct electric truck charging infrastructure consisting of infrastructure (i.e., conduit) to support future installation of charging stations, when such trucks are commercially available, as reasonably determined by the County Planning Division.
- PDF AQ-14: The Project Applicant/Developer shall construct electric light-duty truck charging infrastructure consisting of infrastructure (i.e., conduit) proportional, i.e., conduit for one charging station for every five light-duty truck parking spaces at the Project.

These PDFs are included in the Project's Mitigation Monitoring and Reporting Program (MMRP) to ensure implementation along with the Specific Plan. In addition, Mitigation Measure AQ-6, *Electric Interior Vehicles*, requires that the industrial buildings include infrastructure to support use of electric-powered forklifts and/or other interior vehicles.

Comment A2.4: This comment describes that the proposed buildings would not be designed to accommodate any warehouse cold storage or refrigerated uses. Consequently, air pollutant emissions associated with cold storage operation were not included in the Draft EIR. The comment states that should the Project later include cold storage uses, residences near the Project-site could be exposed to higher levels of DPM and NOx, and greenhouse gases than trucks and trailers without TRUs. The comment also states that to ensure TRUs will not operate within the Project site without first quantifying and mitigating their potential impacts, CARB urges the County to include one of the following design measures in the Final EIR:

- A Project design measure requiring contractual language in tenant lease agreements that prohibits tenants from operating TRUs within the Project-site; or
- A condition requiring a restrictive covenant over the parcel that prohibits the applicant's use of TRUs on the property, unless the applicant seeks and receives an amendment to its conditional use permit allowing such use.

The comment also states that if the County and applicant later chooses to allow TRUs to operate within the Project site, the County must re-model the Project's air quality impact analysis and HRA to account for potential health risk impacts. The comment recommends that the updated air quality impact analysis and HRA should include the following air pollutant emission reduction measures:

- Include contractual language in tenant lease agreements that requires all loading/unloading docks and trailer spaces to be equipped with electrical hookups for trucks with Transport Refrigeration Units (TRU) or auxiliary power units. This requirement will substantially decrease the amount of time that a TRU powered by a fossil-fueled internal combustion engine can operate at the Project-site. Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration are encouraged and can also be included in lease agreements.
- Include contractual language in tenant lease agreements that requires all TRUs entering the project site to be plug-in capable.

Response A2.4: The proposed Project includes adoption and implementation of a Specific Plan that would regulate uses within the Project site. Draft EIR, Table 3-2, *Permitted Uses*, shows the allowable principal and accessory land uses permitted within the proposed I/BP Specific Plan designation for the Project site, and details that no cold storage or refrigerated uses are permitted. Should future operations within the Specific Plan area propose cold storage, refrigerated uses, or other operations involving TRUs, a Specific Plan amendment would be required, which would trigger CEQA requirements to evaluate (and thus model) the potential impacts related to the cold storage and TRUs. Based on the Project specific evaluation, air pollutant emission reduction measures would be applied. In addition, as described in Response A2.3, PDF-

11 provides for all onsite equipment to be to be electric, propane or natural gas with the necessary electrical charging stations provided, and PDF-13 and PDF-14 provides electric truck charging infrastructure consisting of infrastructure (i.e., conduit) to support installation of truck charging stations at a ratio of one charging station for every five light-duty truck parking spaces. These PDFs are included in the Project's Mitigation Monitoring and Reporting Program (MMRP) to ensure implementation along with the Specific Plan.

Comment A2.5: This comment summarizes the significant impacts of the Project related to regional NOx and VOC emissions and describes that the Draft EIR includes 25 PDFs and 7 mitigation measures. The comment also states that CARB staff is concerned that the PDFs lack enforceable language that could provide the applicant with the option of not fully implementing them. For example, PDF AQ-3, PDF AQ-10, and PDF AQ-12 would require the applicant to utilize heavy-duty haul trucks to be model year 2010 or newer during Project construction and zero-emission trucks by 2030 if "such trucks are widely available and economically feasible." The comment states that this makes the design features virtually unenforceable since there is no objective standard for determining what constitutes unavailability. The comment states that to make the design features fully enforceable, the County must require the implementation of these measures through permit conditions, agreements, or other legally binding instruments in the Final EIR. In addition, the comment recommends that the County include the following mitigation measures in the Final EIR to reduce the Project's impact on air quality.

- In construction contracts, include language that requires all heavy-duty trucks entering the construction site, during the grading and building construction phases be model year 2014 or later.
- Include contractual language in tenant lease agreements that requires future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans.
- Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available and can be purchased using incentive funding from CARB's Clean Off-Road Equipment Voucher Incentive Project (CORE).
- Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering or on the Project site to be model year 2014 or later, expedite a transition to zero-emission vehicles, and be fully zero-emission beginning in 2023. A list of commercially available zero-emission trucks can be obtained from the Hybrid and Zero-emission Truck and Bus Voucher Incentive Project (HVIP). Additional incentive funds can be obtained from the Carl Moyer Program and Voucher Incentive Program.
- Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than two minutes while on site.
- Include contractual language in tenant lease agreements, requiring the installing of vegetative walls or other effective barriers that separate loading docks and people living or working nearby.

Response A2.5: The determination by the County if the use of zero-emissions trucks or other such technology is widely available and economically feasible is based on their use and accessibility in southern California at the time each development project within the Specific Plan commences operation. As described in Response A2.4, the PDFs are included in the Project's MMRP, which is a legally binding instrument of the Final EIR, to ensure implementation along with the Specific Plan. Regarding the recommended mitigation measures:

- Requiring use of model year 2014 or later for trucks during the grading and building construction phases is not feasible as it far exceeds the existing CARB requirements that provides for 2010 engine model years and would not be widely in use by vendors and haul trucks accessing the site. In addition, impacts related to construction emission already are determined to be less than significant with mitigation. CEQA does not require additional mitigation if existing mitigation reduces impacts to a level of insignificance. Thus, no additional mitigation is required for the grading and building construction phases of the Project.

- The PDFs do provide for zero-emission trucks as they become available through the CARB updated Advanced Clean Truck Rule that was approved on July 1, 2020 and becomes effective in 2024. Consistent with the comment, PDF AQ-12 requires tenants to use zero-emission light- and medium-duty trucks as part of business operations and PDF AQ-10 requires all heavy-duty trucks entering or operated on the project site to be zero-emission beginning in 2030. Both of these measures are based on the availability of such technology and whether it is economically and technological feasible, as determined by the County Planning Director through implementation of the PDFs, which must be implemented through the MMRP during the County's development permitting process.

- Mitigation Measure AQ-6, *Electric Interior Vehicles*, requires that all of the industrial buildings include infrastructure to support use of electric-powered forklifts and/or other interior vehicles. In response to this comment, the measure has been revised, as detailed in Chapter 3, to require lease documents to incorporate requirements to use zero-emissions yard hostlers, yard equipment, forklifts, and pallet jacks. Thus, Mitigation Measure AQ-6 provides infrastructure to be implemented for each new development project.

- Requiring use of model year 2014 or later for trucks entering the Project site during operations, as suggested by the comment, is not feasible as it far exceeds the existing CARB requirements that provides for 2010 engine model years and would not necessarily be widely in use by vendors and delivery trucks accessing the site. It is unknown whether heavy-duty trucks accessing the Project site would be owned and operated by the prospective tenants or would be owned and operated by third parties. Requiring as yet-unknown tenants or third parties to commit to exclusive use of model year 2014 or newer heavy-duty trucks is not enforceable. Similarly, it is considered infeasible to preclude access to the Project site by other than model year 2014 or newer heavy-duty trucks.

  Also, requiring trucks accessing the site to be zero-emission vehicles by 2023 is unrealistic. Currently, the use of zero-emissions light- and medium-duty trucks is limited and an infrastructure network to support their use is limited throughout southern California. CARB just recently passed the updated Advanced Clean Truck Rule on July 1, 2020 that requires medium-and heavy-duty truck manufacturers to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales are required to be 55% of Class 2b – 3 truck sales, 75% of Class 4 – 8 straight truck sales, and 40% of truck tractor sales. The rule begins in 2024, at which point an infrastructure network to support zero-emission trucks throughout southern California is anticipated to begin to become available. CARB estimates that by 2030, nearly one in three new trucks will be zero-emissions. Based on these CARB estimates, PDF AQ-10 requires that all heavy-duty trucks entering or operated on the Project site to be zero-emission beginning in 2030 and PDF-12 requires tenants to use zero-emission light- and medium-duty trucks as part of business operations, if such trucks are widely available as determined by the County Planning Director during development permitting. These PDFs, amongst others, are included in the EIR are to provide for use of zero-emission trucks as such trucks become feasible and available during the lifetime of the proposed Project.

- Mitigation Measure AQ-3, *Idling Regulations*, provides that signs at loading dock facilities that include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for trucks drivers to restrict idling to no more than 5 minutes once the vehicle is stopped, the transmission is set to "neutral" or "park", and the parking brake is engaged pursuant to Title 13 of the California Code of Regulations, Section 2485; and 3) telephone numbers of the building facilities manager and CARB to report violations. Signs shall be installed prior to receipt of an occupancy permit. A requirement to restrict idling longer than two minutes while on site is beyond existing CARB requirements and such a rule is not required because CEQA does not require additional mitigation for impacts which are not significant, as is the case here with operational DPM and localized emissions, as detailed in the Draft EIR on pages 5.3-42 through 5.-3-54.
- Mitigation Measure AQ-4, *Energy Efficient Vendor Trucks*, provides (by contract specifications) that vendor trucks for the industrial buildings include energy efficiency improvement features through the Carl Moyer Program—including truck modernization, retrofits, and/or aerodynamic kits and low rolling resistance tires—to reduce fuel consumption.
- The Project includes installation of vegetative barriers that separate loading docks and offsite areas. As detailed on page 3-11 of the Draft EIR, landscaping would be focused along the perimeters of each site, building exteriors, along screen walls that secure the trailer parking and loading dock areas, and around onsite detention basins. A variety of trees, shrubs, accents, and groundcover would be planted. Tree species include Desert Willow, Chitalpa, Crape Myrtle, Toyon, Olive, Date Palm, Afghan Pine, Chinese Pistache, California Sycamore, Coast Live Oak, and African Sumac. The conceptual landscape plans for the four sites are shown in Draft EIR Figures 3-14 through 3-17.

Comment A2.6: This comment states that CARB is concerned about the potential cumulative air quality and public health impact should the County approve the Project. The Project is located within close proximity to residences and schools that already suffer from exposure to existing air pollution sources and reside in census tracts that score within the top one percent for pollution burden, according to CalEnviroScreen. These sources include existing industrial facilities, vehicle traffic along the I-10, and local rail traffic. To protect the health of the residences and students within these communities, the County must include legally enforceable design features and mitigation measures that promote the use of zero-emission trucks and onsite equipment and the infrastructure to support those technologies.

Response A2.6: Although the Project would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOX emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8, impacts related to DPM would be less than significant, and impacts related to localized significance thresholds would be less than significant with mitigation. CEQA does not require additional mitigation for impacts which are not significant and unavoidable. As described in Response A2.2, operation of the Specific Plan at buildout would not exceed thresholds related to human health or cancer risk to local sensitive receptors, such as residences and schools. Also, as detailed on page 5.3-58 of the Draft EIR, the Project includes PDFs to reduce air quality emissions from construction and operation of the Project, which include the use of zero emissions technologies and implementation of future new technologies. The PDFs are included in the Project's MMRP to ensure implementation and legal enforceability.

Comment A2.7: This comment states that given the breadth and scope of projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts, coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments based on staff time, resources, and its assessment of impacts. The comment states that

CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the Lead Agency's findings and conclusions on any issues on which CARB does not substantively submit comments.

Response A2.7: The comment identifies that CARB prioritized its substantive comments related to the Project. The comment does not identify concerns with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required or provided.

Comment A2.8: This comment states that CARB appreciates the opportunity to comment on the Draft EIR for the Project and can provide assistance on zero-emission technologies and emission reduction strategies, as needed. The comment also requests that CARB be included on the list of State agencies that will receive the Final EIR and provides CARB staff contact information.

Response A2.8: CARB shall be included on the list of State agencies that will receive the Final EIR and other CEQA noticing for the proposed Project and will be contacted as needed regarding assistance with zero-emission technologies and emission reduction strategies. The comment does not identify concerns with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required or provided.

LETTER A3: Colton Joint Unified School District (65 pages), withdrawn August 4, 2022

Colton Joint Unified School District

Frank Miranda, Ed.D., Superintendent
Tina Daigneault, Interim Assistant Superintendent, Business Services Division
Owen Chang, Director of Facilities and Energy Management

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Commitment to Equal Opportunity

August 4, 2022

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

Transmitted via Electronic Mail: aron.liang@lus.sbcounty.gov

Subject: Comments on Draft EIR for the Proposed Bloomington Business Park Specific Plan Project, SCH No. 2020120545

Dear Mr. Liang:

Please accept this correspondence as a follow up to the Colton Joint Unified School District's (District) December 15, 2021, and January 12, 2022, comment letters pertaining to the Draft Environmental Impact Report (EIR) for the proposed Bloomington Business Park Specific Plan Project (Project).

The District's letters focused primarily on anticipated impacts to Zimmerman Elementary School, which is located adjacent to the Project site. Those impacts included air quality, noise, transportation, and health risk impacts.

Subsequent to the District's submission of its comment letters, the District has begun developing a plan to relocate Zimmerman Elementary School to new facilities on a site farther from the Project. The relocation will greatly reduce the Project's impacts to Zimmerman Elementary School's students and staff. **A3.0**

In light of the foregoing, the District wishes to formally withdraw its opposition to the Project as it is currently described in the EIR and corresponding land use planning application documents. The District reserves the right submit further comments on the Project in the event it is significantly altered in the future.

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

Thank you for your consideration of the District's comments. Please do not hesitate to contact me with any questions. **A3.0 cont.**

Sincerely,

Owen Chang
Facilities & Energy Management Director

Cc: Dr. Frank Miranda, Superintendent
Tina Daigneault, Interim Assistant Superintendent Business Services

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

Colton Joint Unified School District
Frank Miranda, Ed.D., Superintendent
Rick Jensen, Assistant Superintendent, Business Services Division
Owen Chang, Director, Facilities & Energy Management

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Commitment to Equal Opportunity

January 12, 2022

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

Transmitted via Electronic Mail: aron.liang@lus.sbcounty.gov

Subject: Supplemental Comments on Draft EIR for the Proposed Bloomington Business Park Specific Plan Project, SCH No. 2020120545

Dear Mr. Liang:

Please accept this letter as a supplement to the comment letter submitted on December 15, 2021 (the Comment Letter) by the Colton Joint Unified School District (District or CJUSD) regarding the Draft Environmental Impact Report (DEIR) for the proposed Bloomington Business Park Specific Plan Project (Project). A copy of the Comment Letter is attached for your reference as Attachment C. **A3.1**

As discussed in the Comment Letter, the Draft EIR is fatally flawed in several respects. Among the most serious is the failure to provide a thorough health risk assessment (HRA) adequately evaluating the dangers to sensitive receptors in the vicinity of the Project. The DEIR did not conduct an Air Quality Impact Analysis (AQIA) for PM_{10}, $PM_{2.5}$, NO_x and other emissions, including fugitive dust and fine particulate from diesel-fueled vehicles. Per Section 3.22 of the Comment Letter, the District has conducted additional air quality analysis to verify the Project's air quality impacts at Zimmerman Elementary School. Zimmerman's location directly adjacent to the Project makes it particularly vulnerable to the anticipated impacts of converting a low-density residential zone to millions of square feet of warehouse and logistics uses. The District has retained BlueScape Environmental to conduct the analysis. Their technical letter is enclosed as Attachment A. **A3.2**

BlueScape completed AQIA modeling using AERMOD for Project construction and operations, based on the emissions files prepared for the DEIR. The results of the analysis, as shown in Table 1, indicate Project construction and operations would generate PM_{10}, $PM_{2.5}$, and NO_2 emissions that exceed significance thresholds Those emissions constitute a significant effect on the environment not disclosed in the DEIR. **A3.3**

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Frank Miranda, Ed.D., Superintendent
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Table 1
Particulate Matter and Nitrogen Dioxide Impacts
Proposed Bloomington Business Park Specific Plan Project

Pollutant	Averaging Period	Construction Modeled Result (µg/m³)	Operations Modeled Result from DEIR (µg/m³)	Operations Modeled Result with Trip Correction (µg/m³)	Significance Threshold (µg/m³)	Exceed Threshold?
PM_{10}	24-hr	**9.4**	4.9	**13.8**	5	**YES**
	Annual	0.3	**2.9**	**8.2**	1	**YES**
$PM_{2.5}$	24-hr	**2.7**	**1.2**	**3.4**	1.2	**YES**
	Annual	0.1	**0.9**	**2.5**	0.3	**YES**
NO_2	1-Hr	19.8	**24**	**68.4**	20	**YES**
	Annual	0.4	**9.2**	**25.9**	1	**YES**

A3.3 cont.

BlueScape supplemented the operational Health Risk Assessment (HRA) completed for the DEIR with additional receptor locations and Project trips based on trip rates included in the industry standard, ITE *Trip Generation Manual* (Attachment B). The analysis also used more conservative exposure assumptions appropriate for children. The supplement found that the operational cancer risk impacts at Zimmerman Elementary School and the community are drastically underestimated in the Draft EIR. As shown in Table 2, cancer risk impacts at nearby resident and school locations are well above the 10 in one million cancer risk significance threshold.

Table 2
Comparison of Cancer Risk Impacts for Bloomington BPSP Project from Operations
Pollutant: Diesel Particulate Matter

Cancer Risk Basis	Maximum 30-Year Cancer Risk	Cancer Risk Significance Threshold	Exceed Threshold?
1. DEIR Operations Only[1]	8.4 in one million	10 in one million	No
2. Updated 30-year, DEIR Traffic[2]	12.2 in one million		**YES**
3. Updated 30-year, Updated Trips Traffic[3]	29.8 in one million		**YES**

NOTES:
1. From DEIR Appendix C-2 page 29, for Opening Year Development Option 2 results, corrected for the maximum impact location from the receptor grid.
2. Maximum cancer risk for updated receptor grid, correcting the FAH from 0.85 to 1.0 for the third trimester and age bin 0 to 2, and using a 95% DBR for all age groups.
3. Same as #2, with corrected, higher estimated truck trips using ITE generation rates; see attachment from Garland Associates.

A3.4

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Colton Joint Unified School District

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With prevailing winds blowing from the southwest to the northeast in the Bloomington area, the Project—which is immediately west and south of Zimmerman Elementary School—would significantly impact air quality at the school. Figures 1 and 2 of BlueScape's technical letter are isopleth maps that illustrate cancer risk and $PM_{2.5}$ concentrations around the Project's Specific Plan Area. As shown in the figures, the Project will impact the entire Zimmerman Elementary School campus. Conditions in the southern half of the school are most severe. As shown, the Project will exceed acceptable thresholds for cancer risk and $PM_{2.5}$ in the southern half of the campus. The Project's air quality impacts at Zimmerman Elementary School are unacceptable and represent a significant impact the Draft EIR fails to address. **A3.5**

The District requests that the County neither certify the Draft EIR nor approve the Project until the Draft EIR has been supplemented and recirculated. The District further requests to meet with the County and Applicant to discuss appropriate mitigation to address not only air quality impacts identified in this supplemental comment letter, but also other Project impacts discussed in the CJUSD Comment Letter, including Comment 8, *Public Services – School Facilities*. **A3.6**

The District looks forward to working with the County and the Applicant to resolve our concerns related to the Project. Please contact the undersigned at 909-580-6642 or via email at owen_chang@cjusd.net to schedule a meeting.

Sincerely,

Owen Chang

Owen Chang
Director, Facilities & Energy Management

Cc Dr. Frank Miranda, Superintendent

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

Attachment A

Technical Review and Comments on the Draft EIR for the
Proposed Bloomington Business Park Specific Plan Project;
Verification of Health Risk and Air Quality Impacts at
Residential Locations and School Sites

BlueScape Environmental

December 30, 2021

BLUESCAPE ENVIRONMENTAL

December 30, 2021

Owen Chang
Director of Facilities & Energy Management
Colton Joint Unified School District
325 Hermosa Avenue, Building 5
Colton CA 92324

via email: owen_chang@cjusd.net

Subject: Technical Review and Comments on the Draft EIR for the Proposed Bloomington Business Park Specific Plan Project; Verification of Health Risk and Air Quality Impacts at Residential Locations and School Sites

Dear Mr. Chang:

BlueScape Environmental has prepared comments herein as detailed technical verification review and follow-up to a letter submitted by Colton Joint Unified School District (CJUSD or District) to the County of San Bernardino (County) on December 15, 2021 (or the 12/15/21 letter) concerning the *Draft Environmental Impact*[1] *Report* (DEIR) for the Bloomington Business Park Specific Plan Project (Project), dated September 2021, SCH No. 2020120545.[2] The focus of this technical review is on the studies that the DEIR failed to complete, as discussed in the 12/15/21 letter, and to estimate the highest expected health impacts at residential locations and school sites for either Project Development Option 1 or Option 2. The comments in this letter address primarily the DEIR Appendix C1 Air Quality Impact Analysis and the Appendix C2 Health Risk Assessment.[3][4] **A3.7**

[1] Bloomington Business Park Specific Plan Draft Environmental Impact Report, County of San Bernardino, California, September, 2021, State Clearinghouse No. 2020120545.
[2] *Bloomington Business Park Specific Plan Air Quality Impact Analysis*, prepared by Urban Crossroads, Appendix C1 to the Draft EIR, July 23, 2021, 12991-04 AQ Report
[3] *Bloomington Business Park Mobile Source Health Risk Assessment*, prepared by Urban Crossroads, Appendix C2 to the Draft EIR, July 23, 2021, 12991-04 HRA Report.
[4] *Comments on the Draft EIR for the Proposed Bloomington Business Park Specific Plan Project, SCH No. 2020120545*, Letter from O. Chang, Colton Joint Unified School District, to A. Liang, County of San Bernardino Land Use Services Department Planning Division, December 15, 2021.

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This verification review confirms the need for additional publicly-vetted EIR review work, and the high importance of enforcing appropriate mitigation for Project-related significant emissions impacts. The additional impacts associated with Specific Plan Buildout have not been addressed in this letter, but are considered to be additive to the health impact conclusions and comments stated in this letter.

The Project will be a large source of pollutant emissions that will expose sensitive residents, school children and others located nearby to high levels of toxic and carcinogenic diesel exhaust, or diesel particulate matter (DPM), particulate matter with aerodynamic diameter less than or equal to 10 microns or 2.5 microns (PM_{10} or $PM_{2.5}$), and nitrogen dioxide (NO_2), from construction and operations. CJUSD's primary concern should be the cancer risk and respiratory health impacts of these pollutants. During construction, diesel-powered equipment such as graders and bulldozers will be operated throughout the day. Fine dust emissions will be generated from earth dropped into piles and loaded onto haul trucks. These emissions will be particularly high and upwind of sites such as Zimmerman Elementary School, on both a maximum daily and annual basis, due to the highly compressed construction schedule of the Project. DPM, $PM_{2.5}$ and NO_x emissions will also result from traffic associated with the operation of the resulting facilities, with many heavy-duty diesel-fueled trucks travelling through the community. **A3.8**

In the first section, this letter recommends that CJUSD requests that the County adopt appropriate and stringent air quality review significance thresholds that address the much higher potential health impacts from large projects on nearby sensitive residential and school sites. The recommended significance thresholds for construction cancer health risk assessment (HRA) review and air quality impact analysis (AQIA) will provide an added measure of health protection that ensures effective mitigation will be employed to reduce health impacts on sensitive receptors such as school children and residents to acceptable levels. This is needed especially in neighborhoods surrounding the Project area that already suffer a disproportionate share of health burden from air pollution. **A3.9**

The remaining sections present the results of verification modeling completed using DEIR Project emissions and modeling files, including an updated HRA for Project operational DPM emissions, an HRA for Project construction DPM emissions, and an AQIA for PM_{10}, $PM_{2.5}$ and NO_2 emissions impacts. The 12/15/21 letter and this technical verification review address several flaws and technical errors in the DEIR air quality analysis and HRA work that lead to underreporting health impacts in the community. In addition, exposure assumptions have been updated to provide adequate analysis conservatism and health protection to sensitive residents and school children that will be located near the Project.

1. To protect sensitive children attending school and living near Project construction and operations, CJUSD should request that the EIR review utilize health-protective air quality impact significance thresholds. Thresholds should be used that are more stringent than general SCAQMD **A3.10**

CEQA significance thresholds, but will provide an added measure of protection for children and families living and attending school within 1,000 feet of Project construction and operations, including heavily traveled truck transportation routes.

The South Coast Air Quality Management District (SCAQMD) publishes California Environmental Quality Act (CEQA) review significance thresholds on their website.[5] These thresholds are generally acceptable for CEQA review, but are not sufficiently health-protective for sensitive children and other persons (such as asthmatic or immunocompromised individuals) living or attending school near (within 1,000 feet) of large project developments such as the Bloomington Business Park Specific Plan (BPSP) (also see Section 3.1 in the 12/15/21 letter on CARB's land use guidance). The high pollution from these projects obligates review standards that the County should use to ensure health risk impacts to these susceptible individuals are minimized to the maximum extent possible.

CJUSD should request that the County use the health-protective thresholds summarized in Table 1 below, for cancer risk impacts from DPM emissions during Project construction, for PM_{10} and $PM_{2.5}$ emissions, including fugitive emissions and diesel exhaust emissions from Project construction and operations, and for the NO_2 emissions from diesel equipment and trucks during Project construction and operations. The health impacts from these pollutants on children should be of the utmost concern to CJUSD and the County. The recommended health-protective thresholds in Table 1 are compared with the SCAQMD CEQA significance thresholds, and used to complete the technical verification review provided in this letter. Further discussion and justification for use of the health-protective thresholds is provided below.

A3.10 cont.

TABLE 1
HEALTH-PROTECTIVE SIGNIFICANCE THRESHOLDS AS COMPARED TO SCAQMD CEQA SIGNIFICANCE THRESHOLDS

Pollutant	Scenario/ Time Period	SCAQMD Air Quality Significance Thresholds	Health-Protective Thresholds
Toxic Air Contaminants (TACs) Thresholds			
DPM	Construction	Maximum Incremental Cancer Risk ≥ 10 in 1 million	Maximum Incremental Cancer Risk ≥ 1 in 1 million
	Operations		Maximum Incremental Cancer Risk ≥ 10 in 1 million

[5] South Coast AQMD Air Quality Significance Thresholds, South Coast Air Quality Management District, www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf, Revision April 2019.

Owen Chang
December 30, 2021
Page 4

TABLE 1
HEALTH-PROTECTIVE SIGNIFICANCE THRESHOLDS AS COMPARED TO SCAQMD CEQA SIGNIFICANCE THRESHOLDS

Pollutant	Scenario/ Time Period	SCAQMD Air Quality Significance Thresholds	Health-Protective Thresholds
Ambient Air Quality Standards for Criteria Pollutants			
NO_2	1-hour average	0.18 ppm (state) (Equivalent to 339 µg/m³)	20 µg/m³
	Annual arithmetic mean	0.03 ppm (state) (Equivalent to 56.4 µg/m³) and 0.0534 ppm (federal) (Equivalent to 100 µg/m³)	1.0 µg/m³
PM_{10}	24-hour average	10.4 µg/m³ (construction)	5.0 µg/m³
		2.5 µg/m³ (operation)	2.5 µg/m³
	Annual average	1.0 µg/m³	1.0 µg/m³
$PM_{2.5}$	24-hour average	10.4 µg/m³ (construction)	1.2 µg/m³
		2.5 µg/m³ (operation)	1.2 µg/m³
	Annual average	(no standard)	0.3 µg/m³

A3.10 cont.

Children, such as students at Zimmerman Elementary School or living near the proposed Project location, are generally more susceptible to adverse health impacts from exposure to toxins than adults, according to the EPA Integrated Science Assessment for Particulate Matter (p. 8-5).[6] Students under age 18 undergo significant growth and development. Knowing that children bear a greater health burden when exposed to toxic air pollution and need greater protection under California state laws, the legislature passed the Children's Protection Act of 1999 (or SB25). Following the Act, OEHHA prepared several Technical Support Documents to update the methods for health risk assessors to use to review impacts at various life stages, and then updated the recommended air toxics health risk assessment procedures in February 2015.[7] Children breathe at a faster rate than adults per unit

[6] *Integrated Science Assessment for Particulate Matter*, U.S. Environmental Protection Agency, Office of Research and Development, Research Triangle Park, North Carolina, EPA/600/R-08/139F, December 2009.

[7] *Air Toxics Hot Spots Program Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments*, Office of Environmental Health Hazard Assessment, California Environmental Protection Agency, Sacramento, California, February 2015, p. 8-18.

body weight, especially when engaged in outdoor activities. These and other concerns about Project impacts, and the need for enforceable mitigation, have been expressed by the California Air Resources Board (ARB) in a letter to the County dated December 15, 2021.[8] Thus, in accordance with the Children's Protection Act and the OEHHA Guidelines, the County's analysis of health impacts from Project construction and operational emissions should account properly for the vulnerability of CJUSD children, with impacts mitigated to the fullest extent feasible to protect those children.

A3.10 cont.

The Project proposes to complete construction during daytime hours that overlap with the hours when classes at Zimmerman Elementary School are in session, into the afternoon hours, when students use outdoor recreational facilities. From review of five years of wind data from the Fontana monitoring station, the prevailing winds blow from the southwest to the northeast nearly all of the time students are located at Zimmerman School. Therefore, any toxic emissions, dust and odors from proposed Project construction or operation activities during these hours will likely be blown directly downwind into the property classrooms, administrative buildings and recreational facilities.

While significance thresholds are useful to review public health impacts and to make risk management decisions, any real health impact risk greater than zero by the Project on community residents, children and other persons should be unacceptable to CJUSD. A wide range of uncertainty exists in estimating the real future health impacts, due to uncertainty in the assumptions used to calculate Project air emissions, in theoretical computer health impact modeling methods, and in the availability and efficacy of proposed emission controls. To protect CJUSD school children and sensitive resident populations near the Project, it is incumbent on the County to mitigate and minimize any real impacts from the Project to the fullest extent possible. The following sections provide more details on the suggested thresholds.

A3.11

Cancer Risk from Construction-Related Diesel Particulate Matter Emissions

Diesel exhaust from internal combustion engines is a mixture of thousands of gases and fine particles, with more than 40 substances that are toxic and hazardous to human health. CARB has designated diesel exhaust as a state-regulated Toxic Air Contaminant (TAC), based upon the determination that such exhaust is a human carcinogen.[9] In doing so, ARB designated diesel exhaust as *"an air pollutant which may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health"* (p. ES-1). The mixture of toxic gases and particles combine together to form DPM, which persons

A3.12

[8] Letter from R. Krieger, California Air Resources Board, to A. Liang, County of San Bernardino Land Use Services Department Planning Division, December 15, 2021.
[9] *Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant*, California Air Resources Board and the Office of Environmental Health Hazard Assessment, as approved by the Scientific Review Panel, Sacramento, California, April 22, 1998.

are exposed to when breathing emissions from diesel-fueled engines. DPM lodges in the human lungs of children and other sensitive individuals, delivering more than 16 potent substances known to cause cancer such as polycyclic aromatic hydrocarbons (PAHs) including benzo(a)pyrene, benzene, formaldehyde, 1-3,butadiene, and ethylene dibromide. Diesel exhaust is also associated with long-term, non-cancer immunological effects, such as respiratory diseases including asthma and other allergic diseases. High short-term exposures to diesel exhaust can lead to increased symptoms of irritation, compromised pulmonary function, and new cases of asthma. According to the SCAQMD, about 68% of the air toxics-related cancer risk to persons living in the Los Angeles Basin is due to exposure to diesel exhaust.[10] DPM is the toxic air contaminant of primary concern in the South Coast Air Basin.[11] The DPM emissions from the Project, therefore, contribute to an already existing high health burden from local and regional DPM emissions.

The Project DEIR was deficient by not completing a construction emissions HRA. When completed, the cancer risk significance threshold used by the SCAQMD for CEQA review, 10 in one million, should not be used, as it is not health-protective for sensitive individuals such as children living and going to school near large projects. During construction activities, large amounts of DPM will blow directly toward school sites such as Zimmerman Elementary School and nearby residents. To protect children from contracting cancer due to the impacts from construction emissions, a 1 in one million cancer risk threshold would be more appropriate and health-protective. **A3.12 cont.**

The County has the discretion to set more stringent and health-protective thresholds for children than SCAQMD provides for general CEQA review. In the *Air Toxics Hot Spots Guidance Manual*,[12] OEHHA states, "*There is valid scientific concern that the rate of exposure may influence the risk – in other words, a higher exposure to a carcinogen over a short period of time may be a greater risk than the same total exposure spread over a much longer time period. In addition, it is inappropriate from a public health perspective to allow a lifetime acceptable risk to accrue in a short period of time (e.g., a very high exposure to a carcinogen over a short period of time resulting in a 1 $\times 10^{-5}$ cancer risk). Thus, consideration should be given for very short-term projects to using a lower cancer risk trigger for permitting decisions.*"

The CJUSD should request that the County adopt the 1 in one million cancer risk significance review threshold for Project construction-related emission impacts as appropriate and health-protective for school children and sensitive receptors.

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[10] *Final 2016 Air Quality Management Plan (AQMP), Appendix I Health Effects*, South Coast Air Quality Management District, Diamond Bar, California, March 2017, p. I-65.

[11] *Air Quality Issues in School Site Selection Guidance Document*, prepared by ICF Consulting for the South Coast Air Quality Management District, Diamond Bar, California, revised May 2007, p. ES-2.

[12] *Air Toxics Hot Spots Program Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments*, p. 8-18.

Health Impacts from PM_{10} and $PM_{2.5}$ Emissions

The health effects of exposure to PM emissions, especially fine and ultrafine particles including DPM and fugitive PM, is well documented in the SCAQMD Air Quality Management Plan (AQMP), pp. I-19 to I-49.[13] Major health effects from exposure to PM include increased mortality, and exacerbation of respiratory disease and cardiovascular disease, leading to increased hospital visits and school absences, adverse birth outcomes, and changes in lung morphology. Based upon one study, a 10 $\mu g/m^3$ increase in PM_{10} concentration leads to a 3.4% increase in respiratory deaths, 1.4% increase in cardiovascular deaths, 3% increase in asthmatic attacks, 12.2% increase in bronchodilator use, and 3.4% increase in emergency room visits, among other impacts. Greater mortality rates and respiratory effects are associated with smaller particles, because these particles cannot be expelled easily and become lodged in the lungs.

The Project DEIR was deficient by not completing an AQIA for PM_{10}, $PM_{2.5}$, and NO_2 emissions impacts, as well as for other pollutant emissions. The DEIR review should select review thresholds for short-term or 24-hour average, and long-term or annual average $PM_{2.5}$ impacts, that are health-protective for school children and other sensitive individuals. The SCAQMD's 10.4 $\mu g/m^3$ significance threshold for short-term PM_{10} and $PM_{2.5}$ construction emission impacts was based upon fugitive dust impacts from construction projects only, and without specific regard to health impacts on sensitive children.[14] **A3.13**

Given the potentially high impacts of PM_{10} and $PM_{2.5}$ emissions on nearby residents and school sites on a daily and long-term basis, and to protect sensitive children and others from the short-term health impacts from Project $PM_{2.5}$ emissions, including while located outdoors and experiencing higher activity levels, the federal significance thresholds of 5.0 $\mu g/m^3$ for PM_{10} and 1.2 $\mu g/m^3$ for $PM_{2.5}$ for 24-hour average impacts, that is taken from EPA guidance,[15] would be more appropriate and health-protective than the 10.4 $\mu g/m^3$ threshold. CJUSD should request that the County adopt these review significance thresholds for short-term, or 24-hour average, Project PM_{10} and $PM_{2.5}$ emissions.

Similarly, the long-term, or annual average CEQA significance threshold listed by SCAQMD for operations for PM_{10} and $PM_{2.5}$ emissions, 2.5 $\mu g/m^3$ for both pollutants, is not health-protective for review of impacts on children. The SCAQMD CEQA thresholds table does not list a review threshold for annual average $PM_{2.5}$ impacts

[13] Final 2016 AQMP, Appendix I, p.I-19 to I-49.
[14] *Final Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds*, South Coast Air Quality Management District, Diamond Bar, California, October 2006.
[15] *Guidance on Significant Impact Levels for Ozone and Fine Particles in the Prevention of Significant Deterioration Program*, U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Research Triangle Park, North Carolina, Revised August 18, 2016.

from operations. The federal significance thresholds of 1.0 μg/m³ for PM_{10} and 0.3 μg/m³ for $PM_{2.5}$ are recommended for the annual average impact review. A lower threshold than PM_{10} should be used for $PM_{2.5}$ because of the greater health concerns regarding fine particulate health impacts.

Given the potential high short-term and long-term impacts of PM_{10} and $PM_{2.5}$ emissions on the community residents and school sites, in order to protect sensitive children and others, CJUSD should request that the County require the update of the DEIR review for the AQIA, to use the federal significance thresholds stated in this letter.

A3.13 cont.

Health Impacts from NO_x Emissions

NO_x emissions include nitrogen oxide (NO) and nitrogen dioxide (NO_2) from mobile source fuel combustion. As with particulate emissions, NO_2 emissions have also been linked to respiratory effects. The SCAQMD AQMP Table 2-1 states NO_2 has the potential to aggravate chronic respiratory disease in children with asthma.[16] According to CalEnviroScreen 4.0, the area east of Locust Avenue is associated with a 90-100% prevalence of asthma in the population.[17]

The SCAQMD CEQA review thresholds table lists use of the federal and state ambient standards for short-term (or 1-hour) and long-term (or annual average NO_2 impacts) which involves adding Project impacts from construction or operational NO_2 emissions to area background levels. CJUSD should recommend that the County use review thresholds that are more health-protective for school children. These are based upon the SCAQMD Rule 1303 Table A-2 thresholds that cannot be exceeded for stationary projects: 20 μg/m³ for 1-hour average NO_2 impacts and 1 μg/m³ for annual average impacts. CJUSD should request that the County utilize these health-protective thresholds for the impacts on school children and other sensitive individuals located near the Project construction and operations.

A3.14

2. The DEIR operational HRA has flaws and technical errors including using too few receptor locations to assess health risk impacts, substantially underestimating truck traffic for the Project, and using child exposure assumptions that are not considered to be health-protective. As a result, the operational cancer risk impacts at school sites such as Zimmerman Elementary School and the community are underestimated. When these flaws and errors are corrected, cancer risk impacts at nearby resident and school locations are well above the 10 in one million cancer risk significance threshold.

A3.15

[16] Final AQMP Chapter 2, Table 2-1, p. 2-4.
[17] CalEnviroScreen 4.0, Office of Environmental Health Hazard Assessment, https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40, October 20.2021.

As stated in the CJUSD's 12/15/21 letter Section 3 (page 6) and 3.1 (page 8), the receptor placement in the DEIR operational HRA is inadequate and fails to locate the maximum residential cancer risk impacts. BlueScape placed a grid of 50-meter spacing near Project sites and roadways leading to the sites, out to 100 meters, 100-meter spacing out to 200 meters, and 200-meter spacing in the surrounding community, into the DEIR operational HRA files. Using the same exposure assumptions as in the DEIR, BlueScape calculated a higher maximum resident 30-year cancer risk value than in the DEIR: 8.4 in a million. This is 45% higher than the maximum resident cancer risk reported in the DEIR: 5.8 in a million.

A3.16 cont.

The 12/15/21 comment letter Section 5.1 discusses the fact the DEIR Traffic Study trip generation rates are incorrectly estimated. BlueScape received re-calculated trip generation rates from Garland Associates for the High Cube Transload Warehouse, Fulfillment Center Warehouse, Industrial Park and Manufacturing areas of Project Option 2, using the Institute of Transportation Engineer (ITE) manual reference.[18] Project Opening Year Development Option 2 was reviewed as the worst-case of either Project Option 1 or 2. The updated daily trip volumes increase by 182% overall (13,698 / 4,861 vehicles, or a factor of about 2.82 times higher). Therefore, DPM emissions from truck trips and cancer risk impacts at the resident and school sites nearest the Project sites are vastly underreported. When these errors in trip generation rates are corrected, the maximum 30-year cancer risk impacts at residential locations and the Zimmerman Elementary School site are calculated to be significantly over the 10 in one million cancer risk significance threshold, as discussed below.

A3.17

BlueScape applied re-calculated trip generation rates to the DEIR CalEEMod operational DPM emissions estimates, to re-calculate the increased DPM emissions from increased truck trips. BlueScape apportioned DPM emissions according to vehicle types and routes, with truck trips along main routes to the north (75% of traffic), and the south (25% of traffic). The DPM emissions were modified in two separate ways. First, the LHD2 traffic was split from the LHD1 traffic, with the percentage of diesel and emission factors applied to LHD2 volumes. Second, the traffic volumes were increased according to the ITE values. These volumes were applied for each land use type. Though vehicle emission rates should be updated to EMFAC2021 values, as mentioned in the CJUSD's 12/15/21 letter Section 3.3 (page 9), emission rates from EMFAC2017 were used for this updated operational HRA modeling, as supplied from the DEIR.

Updated air dispersion modeling was completed with AERMOD, using files provided with the DEIR, to obtain updated DPM air concentrations. Cancer risk calculations for DPM impacts were developed in Excel spreadsheets. The emissions calculation apportionment, AERMOD files, and risk calculation files are available to the County

[18] Bloomington Business Park Specific Plan DEIR Re-Calculation of Project Generated Traffic Volumes, Memorandum from Richard Garland P.E> Consulting Engineer, Garland Associates, Huntington Beach, California, December 15, 2021.

for review upon request. AERMOD was run with the added receptor grid in order to obtain more accurate maximum cancer risk results and to produce community-wide risk isopleths.

For the cancer risk calculations, the fraction of time at home (FAH) assumption was corrected from 0.85 to 1.0 for residents under age 16 (as per SCAQMD Guidelines, and referenced in the CJUSD 12/15/21 letter Section 3.2). In addition, the daily breathing rate (DBR) assumption was adjusted to the 95th percentile for all age groups, to provide a more conservative, but realistic, upper bound cancer risk calculation, following the OEHHA Hot Spots Guidelines Table 5.7.[19] This DBR assumption is higher, and therefore more health-protective, than the 80th percentile assumption typically used for ages 2 to 70. The intent of using the 95th percentile breathing rate for all age groups is to provide a more health-protective risk calculation for persons who both live and attend schools near Project construction and operations. **A3.17 cont.**

The results of the verification modeling and Project operational health risk calculations are shown below in Table 2.

[19] *Air Toxics Hot Spots Program Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments*, Table 5.7. p. 5-25.

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TABLE 2
COMPARISON OF CANCER RISK IMPACTS FOR
BLOOMINGTON BPSP PROJECT FROM OPERATIONS
POLLUTANT: DIESEL PARTICULATE MATTER

Cancer Risk Basis	Maximum 30-Year Cancer Risk	Cancer Risk Significance Threshold	Exceed Threshold?
1. DEIR Operations Only[1]	8.4 in one million	10 in one million	No
2. Updated 30-year, DEIR Traffic[2]	12.2 in one million		**YES**
3. Updated 30-year Updated Trips Traffic[3]	29.8 in one million		**YES**

NOTES:
1. From DEIR Appendix C-2 page 29, for Opening Year Development Option 2 results, corrected for the maximum residential impact location from the receptor grid.
2. Maximum cancer risk for updated receptor grid, correcting the FAH from 0.85 to 1.0 for the third trimester and age bin 0 to 2, and using a 95% DBR for all age groups.
3. Same as #2, with corrected, higher estimated truck trips using ITE generation rates.

A3.17 cont.

As shown in Table 2, when the Project operational HRA in the DEIR is corrected for technical flaws and errors, as well as including exposure assumptions that are more health-protective for children, **the cancer risk impacts are significantly high, well above and nearly three times the 10 in one million threshold**.

A 70-year risk cancer risk isopleth for Project Option 2 is shown in Figure 1 below. For the purpose of cancer risk calculations, the 70-year period represents a lifetime exposure, for persons that both live and attend school within the community. As shown in Figure 1, the updated cancer risk calculations show that **the 10 in one million cancer risk isopleth (shown in red) extends outward near the Project and along truck routes, impacting residents and the Zimmerman Elementary School and others.**

A3.18

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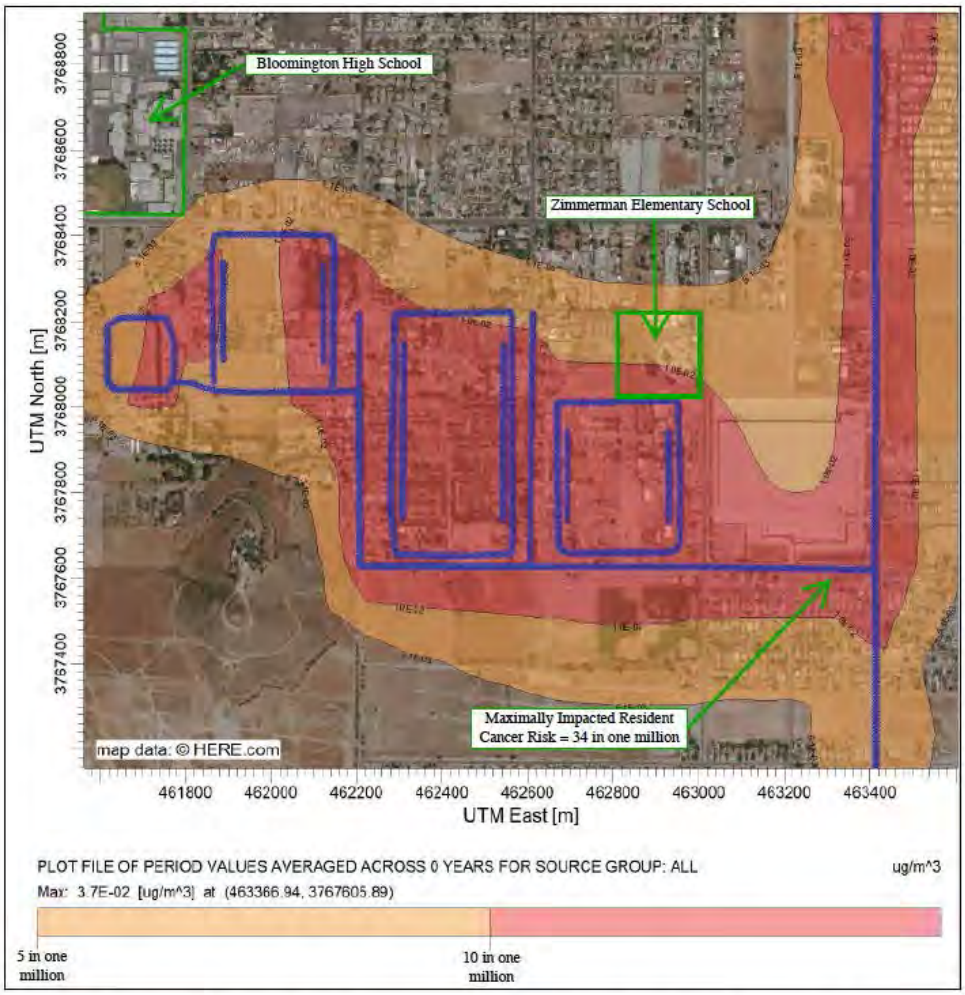


FIGURE 1. 70-YEAR CANCER RISK ISOPLETH SHOWING AREAS OF SIGNIFICANT IMPACT

A3.18 cont.

Cancer risk impacts may be greater than shown in Table 2 (see the next section) when construction and operational impacts are combined for full Project Buildout, for a 30- to 70-year lifetime period. The updated cancer risk calculations shown above do not include the Specific Plan Update or cumulative impacts with nearby projects such as the West Valley Logistics Center. **With those**

A3.19

additional Project and cumulative impacts, the health risk impacts in the community are expected to be much greater.

CJUSD should request that the County require an update to the DEIR Project operational HRA to include the worst-case Project emissions and risk impacts, to update to the correct trip generation rates, to correct technical assumptions (FAH 1.0 for all age groups), and to utilize exposure assumptions that are more health-protective for children (DBR 95th percentile for all age groups). The updated HRA should include the maximum cancer risk impacts, and noncancer chronic and acute risk impacts. In addition, the cumulative health risks from nearby projects should be included. Any 70-year cancer risk impacts in the community from the Bloomington BPSP Project that are above the 10 in one million lifetime cancer risk calculations need to be fully mitigated to below that level. **A3.19 cont.**

3. The DEIR did not complete an HRA for Project construction emissions, to include the overlap of impacts with Project operational emissions. As has been confirmed by a cancer risk modeling study completed by BlueScape, construction activities will expose nearby residents and CJUSD schools such as Zimmerman Elementary School to high levels of diesel particulate emissions (DPM) over a relatively short time frame. Residents, students, and the community will see a substantially increased and significant risk of short-term health impairment and long-term disease, including cancer and asthma.

As stated in CJUSD's 12/15/21 letter Section 3.2, the DEIR failed to conduct an HRA for construction activities, including cancer and noncancer chronic and acute risk impacts from Project construction emissions. BlueScape prepared construction cancer risk calculations for Project Option 2, utilizing the CalEEMod emission files prepared for the DEIR. Emissions from diesel-fueled equipment and such site activities as earth movement, grading and truck traffic were modeled using area or volume sources and the AERMOD dispersion model. Health risks were calculated following procedures provided by OEHHA[20] and the SCAQMD.[21] **A3.20**

The 30-year cancer risk results were maximum of 1.1 in one million. This result exceeds the 1 in one million cancer risk threshold that CJUSD should recommend as the health-protective cancer risk significance threshold for construction emission impacts. The County should require a construction HRA to be completed for public review and comment, mitigating any impacts above the recommended cancer risk review threshold of 1 in one million.

[20] *Air Toxics Hot Spots Program Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments*.

[21] *Risk Assessment Procedures for Rules 1401, 1401.1 and 212*, Version 8.0, South Coast Air Quality Management District, Diamond Bar, California, June 5, 2015.

4. The DEIR did not complete an Air Quality Impact Analysis for PM_{10}, $PM_{2.5}$, NO_x and other emissions from construction and operations, including fugitive dust and fine particulate from diesel-fueled vehicles.

As stated in CJUSD's 12/15/21 letter Section 3.1, the DEIR failed to conduct an air quality impact analysis (AQIA) for both construction and operational activities, including PM_{10}, $PM_{2.5}$, NO_x, SO_2 and CO emissions impacts. The applicant should have completed the AQIA as required by SCAQMD for projects greater than 5 acres in size, where the Localized Significance Thresholds (LST) guidance is not acceptable. In particular, CJUSD should be concerned about high short-term fugitive particulate (PM_{10} and $PM_{2.5}$) impacts from dust during construction activities, as well as both the short-term and long-term PM_{10}, $PM_{2.5}$ and NO_2 impacts from truck diesel exhaust and other fugitive roadway particulate emissions.

BlueScape completed AQIA modeling using AERMOD for Project construction and operations, and using the emissions files prepared for the DEIR. The following assumptions were used by BlueScape:

1. The emissions modeled were not corrected for re-calculated ITE trip generation rates, as was completed for the updated operational HRA. However, impacts can be scaled up to the ITE generation rates as discussed below. **A3.21**

2. Emissions were modeled using area or volume source release parameters, as appropriate.

3. NO_x impacts were converted to NO_2 impacts using a 0.5 NO_2/NO_x in-stack ratio as recommended by SCAQMD and EPA guidance.

4. The ARM2 NO_x to NO_2 conversion method was selected.

5. The highest concentrations at resident or school sites (not the maximum offsite locations as is typical for air quality studies) are reported in this letter.

6. Emissions were assumed to occur from 7 AM to 5 PM for Project construction, and 24 hours per day for Project operations.

As shown in Table 3 below, the impacts from Project construction and operational PM_{10}, $PM_{2.5}$ and NO_2 emissions (shown in bold typeface) at the maximum exposed resident or school locations are above the recommended review significance thresholds. The Project operational impacts are compared to those using DEIR emissions and estimated as corrected for 182% increase in trip rates (see Section 2 of this letter), or about a factor of 2.82 higher.

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TABLE 3
PARTICULATE MATTER AND NITROGEN DIOXIDE IMPACTS
PROPOSED BLOOMINGTON BUSINESS PARK SPECIFIC PLAN PROJECT

Pollutant	Averaging Period	Construction Modeled Result (µg/m³)	Operations Modeled Result from DEIR (µg/m³)	Operations Modeled Result with Trip Correction (µg/m³)	Significance Threshold (µg/m³)	Exceed Threshold?
PM_{10}	24-hr	**9.4**	4.9	**13.8**	5	**YES**
	Annual	0.3	**2.9**	**8.2**	1	**YES**
$PM_{2.5}$	24-hr	**2.7**	**1.2**	**3.4**	1.2	**YES**
	Annual	0.1	**0.9**	**2.54**	0.3	**YES**
NO_2	1-Hr	19.8	**24**	**68.4**	20	**YES**
	Annual	0.4	**9.2**	**25.9**	1	**YES**

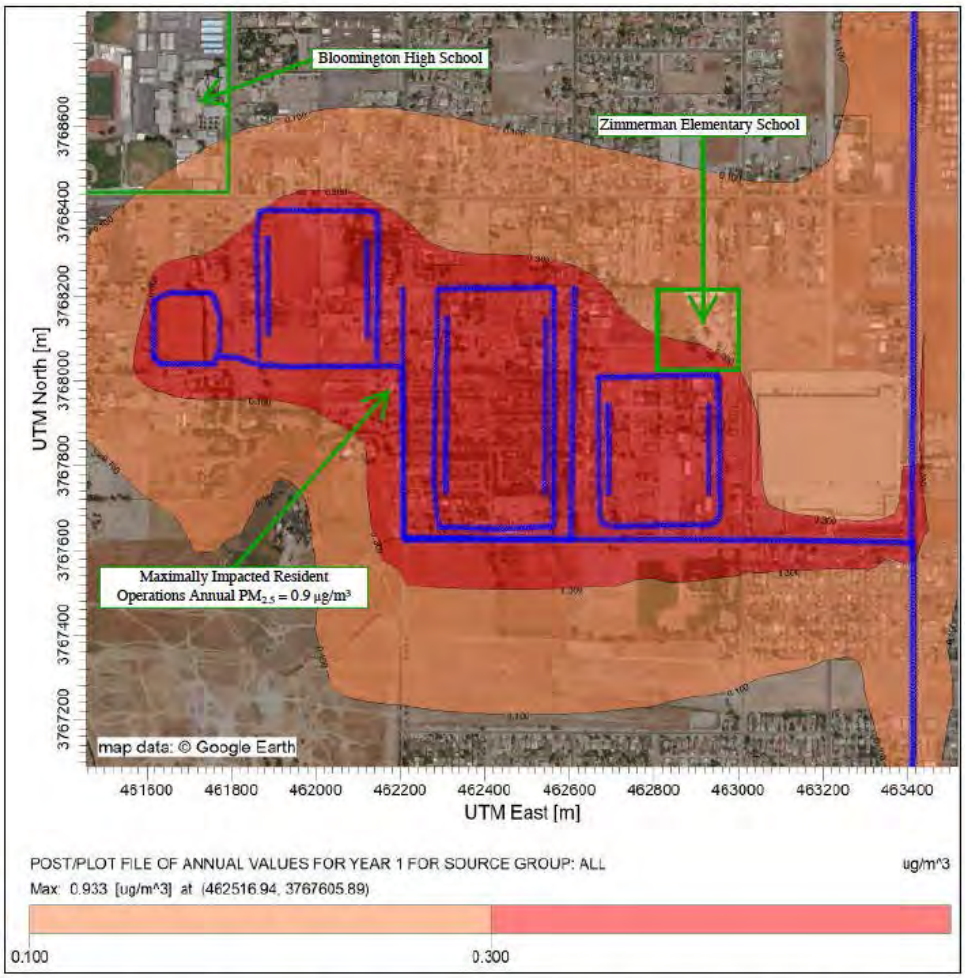
Results in **Bold** text exceed the threshold

A3.21 cont.

The most notable conclusion from Table 3 is that the annual average $PM_{2.5}$ impact exceeds the 0.3 µg/m³ federal significance threshold by three times before the ITE trip generation rate re-calculation. After re-calculation of trip generation rates, the impact is more than eight times the standard. It is also important to note that the impacts after the trip generation rates are re-calculated also exceed the SCAQMD's CEQA operational significance thresholds for 24-hour average and annual average PM_{10}, and the 24-hour average and annual average for $PM_{2.5}$. The County should require a new mitigation analysis to show how impacts for these pollutants will be mitigated below CEQA significance thresholds. The impacts would be even greater if combined with cumulative projects such as the West Valley Logistics Center project.

Figure 2 below shows the $PM_{2.5}$ annual average impacts from Project operations, compared with the 0.3 µg/m³ significance threshold, before re-calculation of trip generation rates.

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A3.21 cont.

FIGURE 2. PM2.5 ANNUAL AVERAGE CONCENTRATION ISOPLETH FOR PROJECT OPERATIONS - COMPARED TO THE 0.3 MG/M3 SIGNIFICANCE THRESHOLD

This AQIA verification review confirms that the DEIR deficiency of not including an AQIA is a serious omission. The County should require an AQIA to be completed for public review and comment, mitigating any impacts above the recommended review significance thresholds.

A3.22

BlueScape appreciates the opportunity to provide technical verification review and comment support regarding the Bloomington BPSP Project. We encourage CJUSD's continued commitment to protecting the public health of children and residents in the community.

Sincerely,

BLUESCAPE ENVIRONMENTAL
a California Corporation

James A. Westbrook, CCM, CPP
Principal Scientist

Certified Consulting Meteorologist
Certified Permitting Professional

Attachment B

Bloomington Business Park Specific Plan DEIR
Re-Calculation of Project Generated Traffic Volumes

Garland Associates

December 15, 2021

GARLAND ASSOCIATES

MEMORANDUM

FROM: Richard Garland, P.E., Consulting Traffic Engineer

DATE: December 15, 2021

SUBJECT: Bloomington Business Park Specific Plan DEIR
Re-Calculation of Project Generated Traffic Volumes

Based on the discrepancies between the trip generation rates that were used in the DEIR traffic analysis and the more appropriate rates from the ITE *Trip Generation Manual*, the volumes of traffic that would be generated by the development have been re-calculated to demonstrate that the traffic volumes used for the DEIR traffic analysis are substantially lower than the volumes that are calculated by using the ITE rates. The two tables below present the DEIR volumes and the re-calculated volumes.

GENERATED TRAFFIC VOLUMES FROM DEIR TRAFFIC ANALYSIS

Land Use	Time Period		
	Daily	AM Peak Hour	PM Peak Hour
TRIP GENERATION RATES (trips per 1,000 square feet)			
High Cube Transload Warehouse	1.40	0.08	0.10
Fulfillment Center Warehouse	2.129	0.122	0.165
Industrial Park	3.37	0.40	0.40
GENERATED TRAFFIC VOLUMES			
High Cube Transload Warehouse (1,251.64 KSF)	1,752	100	125
Fulfillment Center Warehouse (1,460.4 KSF)	3,109	178	241
Industrial Park (523.796 KSF)	1,765	209	209
TOTAL	6,626	487	575

A3.23

Traffic Engineering, Transportation Planning, and Parking Studies

16787 Beach Boulevard, #234, Huntington Beach, CA 92647
Telephone: 714-330-8984

GENERATED TRAFFIC VOLUMES
RE-CALCULATED USING ITE RATES

Land Use	Time Period		
	Daily	**AM Peak Hour**	**PM Peak Hour**
TRIP GENERATION RATES (trips per 1,000 square feet)			
High Cube Transload Warehouse	1.40	0.08	0.10
Fulfillment Center Warehouse	8.18	0.59	1.37
Industrial Park	3.37	0.40	0.40
Manufacturing	3.93	0.62	0.67
GENERATED TRAFFIC VOLUMES			
High Cube Transload Warehouse (1,251.64 KSF)	1,752	100	125
Fulfillment Center Warehouse (1,460.4 KSF)	11,946	862	2,000
Industrial Park (261.898 KSF)	883	105	105
Manufacturing (261.898 KSF)	1,029	162	175
TOTAL	15,610	1,229	2,405
Total from DEIR Table	6,626	487	575
% Increase	135.6 %	152.4 %	318.3 %

As shown in the tables, the volumes of project generated traffic are substantially higher when the ITE rates from the manual are used instead of the rates used in the DEIR traffic analysis. It was also assumed that 50 percent the industrial park land use could potentially be occupied by manufacturing uses, which is consistent with the project description in the Specific Plan.

A3.23 cont.

2

Attachment C

Comments on Draft EIR for the
Proposed Bloomington Business Park Specific Plan Project,
SCH No. 2020120545

Colton Joint Unified School District

December 15, 2021

Colton Joint Unified School District

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

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Mr. Frank Ibarra
Ms. Berenice Sandoval

Commitment to Equal Opportunity

December 15, 2021

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

Transmitted via Electronic Mail: aron.liang@lus.sbcounty.gov

Subject: Comments on Draft EIR for the Proposed Bloomington Business Park Specific Plan Project, SCH No. 2020120545

Dear Mr. Liang:

Colton Joint Unified School District (District or CJUSD) appreciates the opportunity to comment on the Draft Environmental Impact Report (Draft EIR) for the proposed Bloomington Business Park Specific Plan Project (Project). Our review has led us to conclude that the Draft EIR is deficient in several respects. Neither the Draft EIR's analysis, nor its proposed mitigation of impacts, satisfies the requirements of CEQA. The vast project area covers 213 acres in southern unincorporated Bloomington (Specific Plan Area) and a 24-acre "Upzone Site" in northern Bloomington. However, the Project's impacts will extend far beyond those boundaries. The Project will cause significant impacts to the District's students and staff, and the community it serves. The operations of several schools will be negatively affected. Chief among those is Zimmerman Elementary School which will be surrounded by the project on two sides. The District therefore opposes certification of the EIR and implementation of the Project as it is currently conceived. **A3.24**

As listed below and shown in Figure 1, *Schools Near the Project Sites,* the District operates eight schools in the vicinity of Project areas.

Specific Plan Area. CJUSD operates the following six schools within one mile of the Specific Plan Area:

1. Zimmerman Elementary School (11050 Linden Ave, Bloomington), adjacent, north of Site 1 of the Specific Plan Area.
2. Bloomington High School (10750 Laurel Ave, Bloomington), adjacent, north of Site 4 of the Specific Plan Area.

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Colton Joint Unified School District

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3. Harris Middle School (11150 Alder Ave, Bloomington), 0.14 mile west of Site 4 of the Specific Plan Area.
4. Crestmore Elementary School (18870 Jurupa Ave, Bloomington), 0.44 mile east of Site 1 of the Specific Plan Area.
5. Slover Mountain High School (18829 Orange Street, Bloomington), 0.85 mile northwest of Site 2 of the Specific Plan Area.
6. Sycamore Hills Elementary School (11036 Mahogany Dr, Fontana), 0.57 mile west of Site 4 of the Specific Plan Area.

A3.24 cont.

Upzone Site. CJUSD operates the following two schools within one mile of the Upzone Site:

1. Lewis Elementary School (18040 San Bernardino Ave, Bloomington), adjacent, west of the Upzone Site.
2. Smith Tech Academy (9551 Linden Ave, Bloomington), 0.36 mile east of the Upzone Site.

Project Understanding

The Project includes three general components that affect two areas within unincorporated Bloomington:

1. Amendment to the land use designation and zoning district of the 213-acre Specific Plan Area from rural residential to Special Development and Specific Plan, respectively,
2. Development of Planning Area A of the Specific Plan Area with either Option 1 or Option 2 warehouse and logistics project configurations, and
3. Amendment to the land use designation and rezoning of the 24-acre Upzone Site from rural residential to multifamily residential.

Bloomington Business Park Specific Plan

The Bloomington Business Park Specific Plan sets development standards and guidelines for industrial, warehousing, processing, and manufacturing developments for the 213-acre Specific Plan Area. If the proposed Specific Plan were approved, the existing low-density residential land uses and zoning districts within the Specific Plan Area would be eliminated. Future developments in the Specific Plan Area would therefore not require further environmental review if they are consistent with the standards set forth in the Specific Plan and with the Draft and Final EIR. This means that all land use decisions and environmental effects that could eventually result from approval of the proposed Specific Plan must be analyzed in the Draft EIR. Instead, that analysis is improperly deferred. For this reason alone the Draft EIR should not be certified.

A3.25

Development within the Specific Plan

The Specific Plan Area is separated into Planning Areas A and B. Two development scenarios within Planning Area A are considered in the Draft EIR. Both options involve the construction and operation of three high-cube warehouses on three separate sites and a trailer truck parking facility on a fourth site. Tables 1 and 2 summarize the two development scenarios.

Table 1. Option 1 Development Summary (Draft EIR Page 3-11)

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Development Site	Land (Acres)	Land Use	Proposed Development[1]	Trailer truck Parking Stalls	Traffic Land Use Category[2]
Site 1	17.72	Fulfillment Center	383,000 SF Warehouse with 62 docks	66	TUMF High-cube Warehouse
Site 2	57.60	High Cube Warehouse	1,251,640 SF Warehouse with 180 docks	385	ITE Transload Warehouse
Site 3	30.52	Fulfillment Center	479,000 SF Warehouse with 61 docks	253	TUMF High-cube Warehouse
Site 4	9.5	Trailer truck Parking	--	289	ITE Industrial Park
Total:	115.34 Ac		2,113,640 SF 303 docks	993 Trailer Stalls	

1. Each warehouse structure is 50 feet in height and considered "high cube."
2. E | P | D Solutions, Inc. Bloomington Business Park Specific Plan Traffic Impact Analysis. 2021, July 13.

Table 2. Option 2 Development Summary (Draft EIR Page 3-14)

Development Site	Land (Acres)	Land Use	Proposed Development[1]	Trailer truck Parking Stalls	Traffic Land Use Category
Site 1	36.65	Fulfillment Center	710,400 SF Warehouse (unknown # docks)	Unknown	TUMF High-cube Warehouse
Site 2	57.60	High Cube Warehouse	1,251,640 SF Warehouse with 180 docks	Unknown	ITE Transload Warehouse
Site 3	37.66	Fulfillment Center	750,000 SF Warehouse (unknown # docks)	Unknown	TUMF High-cube Warehouse
Site 4	9.5	Trailer truck Parking	--	289	ITE Industrial Park
Total:	141.41 Ac		2,712,040 SF (unknown # docks)	Unknown Trailer Stalls	

1. Each warehouse structure is 50 feet in height and considered "high cube."
2. E | P | D Solutions, Inc. Bloomington Business Park Specific Plan Traffic Impact Analysis. 2021, July 13

A3.25 cont.

The Applicant has submitted a development application only for the proposed Development Option 1. No other development applications have been submitted at this time. Thus, should applications for Development Option 2 and/or other future developments be submitted in the future, they may undergo no additional environmental review if they are consistent with the development standards specified in the Specific Plan, and the Draft and Final EIR, if certified. The Draft EIR therefore leaves a gaping hole in

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the analysis and mitigation of project-level impacts. That deficiency is compounded by the inadequacy of the project-level impact analysis and mitigation that actually has been provided.

Residential Density Upzone

Pursuant to Senate Bill 300, the Project also includes the proposed amendment to the land use designation of the 24-acre site in northern Bloomington from Low Density Residential (LDR) to Medium Density Residential (MDR). The zoning district of the site would undergo a corresponding change from Residential Single with 20,000 SF lot minimums (RS-20M) to Residential Multiple (RM). The existing RS-20M zone allows development of up to 52 residential units on the 24-acre site. The proposed RM zone would allow development of up to 480 dwelling units. Counting the loss of residential capacity in the Specific Plan Area, the Project would result in an overall increase of residential development capacity in unincorporated Bloomington by 215 dwelling units. No development within the 24-acre site is proposed as a part of the Draft EIR, and project-level impacts are ignored.

A3.25 cont.

Comments on the Draft EIR

1. Whole of the Action

CEQA Guidelines Section 15378(a) defines a "project" as "the whole of an action" and CEQA Guidelines Appendix G summarizes the approach to conduct environmental analysis and provides that the analysis "must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts."

As further detailed below, many sections of the Draft EIR fail to analyze all three Project components, in particular impacts related to rezoning the Upzone Site with higher density residential. Neither program- nor project-level impact analysis (for air quality, noise, and traffic) was conducted for the proposed increase of up to 428 residential units at the 24-acre Upzone Site.

In addition to operational impacts, the Draft EIR is required to analyze project-level impacts including construction impacts. Sections in the Draft EIR failed to analyze construction impacts, including air quality, specifically toxic air contaminant health risks during construction. Construction-phase transportation impacts were also not conducted.

A3.26

The Draft EIR and related technical studies do not fully capture cumulative project effects. The list of related projects in Draft EIR Section 4.6 does not include all developments that are currently planned or underway in the area of unincorporated Bloomington. These related developments, as shown in Figure 2, *Cumulative Projects in Bloomington,* will use the same truck routes and freeway on/offramps as the proposed Project., They will incrementally contribute to cumulative, regional air quality impacts and traffic impacts throughout the community including at the I-10 on/offramps, especially at Cedar Avenue. The full list of related projects is provided in Comments 5.9 and 5.10. The cumulative projects listed herein need to be reviewed by the County, the Draft EIR cumulative project list expanded, and the analysis supplemented, as needed.

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2. Project Description

The Draft EIR fails to articulate and analyze certain project components of the whole action that will be considered by County decisionmakers. Draft EIR Table 3-8, *Project Approvals/Permits*, provides that the Project will require "Site Plan Approvals, Conditional Use Permits, Vesting Tentative Parcel Maps, Community Benefits Agreement/Development Agreement, and Community Facilities District." If an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis.[1] The Draft EIR fails to disclose, analyze, or mitigate the impacts of those components. **A3.27**

2.1 Please clarify what Site Plan Approvals will be considered by decisionmakers and both the entitlement and environmental processes that will be taken for Development Option 2 and other future developments in the Specific Plan Area. **A3.28**

2.2 Please clarify what features of the Project will require Conditional Use Permits. **A3.29**

2.3 Please describe and provide maps of the proposed Vesting Tentative Parcel Maps. **A3.30**

2.4 Please further describe what is proposed under the Community Benefits Agreement (CBA), Development Agreement (DA), and Community Facilities District (CFD). These agreements would commit to the construction of improvements for the proposed Project and must be disclosed.

CEQA Guidelines Section 15124 requires a general description of economic characteristics in the project description, which Draft EIR Section 3, *Project Description*, does not provide. CEQA Guidelines Section 15131(a) provides that a Project's economic effects shall not be treated as significant effects on the environment. However, the EIR may trace the chain of cause and effect from a proposed decision on a project through anticipated economic changes resulting from the project to physical changes caused in turn by the economic changes.

The Bloomington Specific Plan states that the Project would include a planned CBA and/or CFD for the maintenance of public and private improvements constructed as a part of the proposed Project. The Specific Plan further states that the CBA will bring "funding for construction of a variety of public facilities and/or the provision of public services." The project description in Draft EIR Section 3, however, provides no information on these improvements. It is not clear what public facilities and road improvements would be made as a part of the CBA and CFD and what public services would be implemented. In addition, no impact analysis or mitigation is provided for the construction of these improvements and related facilities. **A3.31**

[1] AEP CEQA Portal Topic Paper, Project Description. Updated 2020, February 10. https://ceqaportal.org/tp/CEQA%20Project%20Description%202020%20Update.pdf

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2.5 Table 5-1 of the Specific Plan footnotes that "If a maintenance mechanism cannot be established under Special Districts prior to final County acceptance of drainage facilities, the property owner/applicant shall bear the cost for its maintenance until such time that the formation of a public maintenance entity is established and funded." It is not clear whether a mechanism has been conceptualized to ensure that improvements proposed as a part of the proposed Project will be maintained in perpetuity. Deferral of the proposed Project's maintenance funding mechanism is unacceptable. The County must ensure that public infrastructure proposed as part of the Project will be maintained prior to its consideration of the Project. **A3.32**

3. Air Quality / Toxic Air Contaminants

The Draft EIR does not adequately address CEQA Air Quality thresholds b and c, whether the Project would:

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

c) Expose sensitive receptors to substantial pollutant concentrations?

The Draft EIR fails to provide a health risk assessment (HRA) for construction at the project site. in addition, the HRA conducted for operations at the project site inadequately limited the number of sensitive receptor locations evaluated. The Draft EIR further failed to conduct a health risk assessment for either the construction operations at the Upzone Site. **A3.33**

The Draft EIR also inappropriately relies on a screening tool to assess ambient concentrations due to construction and operations at the project site and the Upzone site. Moreover, the Draft EIR underestimates the distances between the Project site and the surrounding sensitive uses, such as Walter Zimmerman Elementary School. The construction and operational Localized Significance Thresholds (LST) thresholds must be revised to reflect the appropriate distances.

3.1 **Ambient Air Quality Impacts.** The Draft EIR fails to adequately examine the ambient air quality impacts from Project construction and operational activities. Draft EIR Table 5.3-5 and Table 5.3-6 (page 5.3-26) provide the derived- South Coast Air Quality Management District (SCAQMD) Construction and Operational LSTs, respectively (SCAQMD's Localized Significance Threshold Methodology, dated July 2008).

According to SCAQMD's LST Methodology, Construction Localized Significance Thresholds for Central San Bernardino Valley (Source Receptor Area of 34), a five-acre project site with a receptor at 25 meters (82 feet) would be 270 lbs/day for NO2, 1,746 lbs/day for CO, 14 lbs/day for PM10, and 8 lbs/day for PM2.5. The thresholds are inconsistent with those identified in Draft EIR Table 5.3-5, and there is no explanation for the deviation. **A3.34**

The SCAQMD Operational Localized Significance Thresholds (in pounds per day) for Central San Bernardino Valley for a five-acre project site with a receptor at 25 meters (82 feet) would be 270 (for NO2), 1,746 (for CO), 4 (for PM10), and 2 (for PM2.5). Like the construction analysis, the thresholds used in Draft EIR Table 5.3-6 are not the same as those used by SCAQMD, and no explanation as to why the thresholds deviate from the adopted SCAQMD values is provided.

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LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor.

According to SCAQMD, the LST screening tool only applies to projects that are less than or equal to five acres. According to SCAQMD, if the project area exceeds five acres, it is recommended that the project perform project-specific air quality analysis for these larger projects and undergo air dispersion modeling to determine localized air quality impacts. The Specific Plan Area consists of approximately 213 acres of land and the Upzone Site consists of 24 acres of land. The size of the project site far exceeds the level in which use of the screening tool is appropriate.

Secondly, the LSTs are designed to provide screening information associated with air quality impacts for a receptor distance of 25 meters (82 feet) or higher. According to the Draft EIR, the closest sensitive receptor to the Project area is 59 feet from the Opening Year Development area boundary and 19 feet from the Future Development area boundary. There are numerous sensitive receptors within 25 feet of the project site. The nearest receptors are closer to the project site than which use of the screening tool is appropriate.

It is also important to note that the project site is irregular shaped (not a simple square or circle geographical area in which the screening tool was developed for) and is surrounded by residential, schools, offsite workers, and other sensitive receptors in various directions. The irregular project site area, the variability of wind direction and distance to nearby sensitive receptors, the significant and unavoidable operational emissions, the duration of the construction activities, and the variety of emission sources (construction equipment, idling trucks, truck movement onsite and offsite), make the use of the LST screening tool inappropriate.

Therefore, the proposed Project should complete a refined air dispersion modeling analysis to assess localized air quality impacts to determine if the impacts exceed ambient air quality standards. It is also important to note that the operational emissions associated with the proposed Project exceed the SCAQMD emission thresholds. Thus, it is important to determine if those excessive operational emissions cause an exceedance of the ambient air quality standards. The region is in nonattainment of ambient air quality standards for ozone, PM10, and PM2.5, and additional operational emissions jeopardize compliance with state and federal regulations. Table 2-4 of Draft EIR Appendix C1, Air Quality Impact Analysis shows numerous exceedances of the ambient air quality standards at the air monitoring station nearest the project site. Given that air quality is a major issue in the region and the local area, a refined air dispersion modeling analysis should be conducted to fully disclose the air quality conditions as a result of the proposed Project.

A3.34 cont.

The air quality dispersion modeling should be performed based on the SCAQMD Modeling Guidance for AERMOD and the USEPA *Guideline on Air Quality Models*. The air quality dispersion modeling should be conducted to determine the air quality impacts, in terms of ambient pollutant concentrations, using the appropriate significance levels identified by SCAQMD. The air quality dispersion modeling should include appropriate meteorological data, terrain data, background concentrations, receptor placement (including project boundary and locations in which the public has access), NOx top NO2 conversion methods, source release characteristics, equipment/truck

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schedule (including any nighttime activities), and dispersion coefficients. The dispersion modeling for PM10 and PM2.5 should include roadway dust, brake and tire wear fugitive dust as well as combustion emissions.

The air quality dispersion modeling should be conducted to estimate CO, NO2, SO2, PM10, and PM2.5 concentrations due to the construction and operation of the proposed Project. The air quality dispersion modeling should be conducted for each year in which construction activities occur and for Options 1 and 2 and Specific Plan Buildout. The air quality dispersion modeling should be conducted to estimate CO, NO2, SO2, PM10, and PM2.5 concentrations caused by the proposed Project for receptors near the project site ***and*** along truck routes to/from the freeway (i.e., Jurupa Avenue and Cedar Avenue).

The air quality dispersion modeling should include all air emissions sources, including construction equipment, onsite sources such as generators, truck idling, and truck/employee trips. The size of the modeling domain and placement of the receptors should be at such a distance and resolution to identify the maximum impacts to the surrounding areas and the significant concentration gradients from the proposed Project. Generally, this requires a receptor spacing of 100 meters or less and a receptor domain out to five kilometers. **A3.34 cont.**

An air quality dispersion modeling analysis should also be included for the construction and operation of the proposed Upzone project component with the same level of detail and methodology as the Project site analysis.

If the air quality dispersion modeling analysis demonstrates exceedances of the ambient air quality standards, mitigation measures or adjustments to the proposed Project should be required, to include, but not limited to reduction in the project size and adjustment to project design.

3.2 **Health Risk Impacts.** The Draft EIR fails to adequately examine the health risk impacts from Project construction and operational activities. The proposed Project did not conduct a HRA for construction activities. CEQA requires analysis of all project phases, including both short and long-term conditions for each phase. Specifically, Guidelines Section 15126.2 provides, "Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects."

Additionally, the HRA should be conducted for the unmitigated and mitigated construction activities as well as the operations for Options 1 and 2 and Specific Plan Buildout.

A3.35

The construction HRA should incorporate PDF AQ-5 which states that construction plans and specifications shall prohibit off-road diesel-powered construction equipment from being in the "on" position for more than 10 hours per day during project construction.

The proposed Project conducted a HRA for twelve receptors associated with the Opening Year – Option 1, eleven receptors associated with the Opening Year – Option 2, and six receptors associated with the Future Development Area – Specific Plan Buildout. The HRA should include ***all*** residential, schools, offsite workers, and other sensitive receptors within ¼ mile of the project site (including along the truck routes to/from the freeway) and not just a select few nearby receptors.

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The school receptors should include Slover Mountain High School, Sycamore Hills Middle School, Bloomington High School, Ruth O Harris Middle School, and Zimmerman Elementary School and include an analysis of school children and teachers.

It should be further noted that Zimmerman Elementary School operates a state preschool program with students as young as three years of age. The HRA should incorporate the correct ages of school occupants.

The HRA should be prepared based on the California Office of Environmental Health Hazard Assessment's *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, SCAQMD's *Risk Assessment Procedures for Rule 1401, 1401.1* and *212*, and SCAQMD Modeling Guidance for AERMOD.

The HRA should include appropriate meteorological data, terrain data, receptor placement, source release characteristics, equipment/truck schedule (including any nighttime activities), and dispersion coefficients.

As construction activities are followed by operations, the HRA should account for both construction and operations including any overlapping activity. The sensitive receptor's exposure is additive as the exposure occurs during the construction activities and then operations over a period of 12, 25, or 30 years for a school child, offsite worker, and residence, respectively. The health impacts due to construction activities would be expected to be much higher than the health impacts due to operations, and exclusion of the health impacts due to construction activities greatly underestimates the health impacts on nearby sensitive receptors. Completing the HRA on a select few receptors potentially underestimates the maximum health impacts given the variability of meteorological data, the geographic configuration of the project site, and the magnitude/complexity of the emission sources. **A3.35 cont.**

As an example, a similar and recent project (South Ontario Logistics Center Specific Plan) provided results for a construction HRA of 8.8 persons per million and for an operational HRA of 1.4 person per million. By excluding the construction activities from the HRA, the Draft EIR is greatly underestimating the health impacts associated with the project site and nearby sensitive receptors.

If the HRA demonstrates exceedances of the health risk/hazards thresholds, mitigation measures or adjustments to the project should be required, to include, but not limited to reduction in the project size.

The HRA should also be conducted for the proposed Upzone project component for both construction and operations with the same level of detail and methodology as the project site analysis. **A3.36**

The operational HRA used a fraction time at home of 0.85 for third trimester and age bin 0 to 2. A value of 1.0 should be used. The HRA does not present the cancer burden values compared to the SCAQMD significance thresholds of 0.5. **A3.37**

3.3 **Erroneous HRA Emission Rates.** The Draft EIR fails to adequately present the emission rates used in the HRA. The proposed Project HRA used CARB's EMFAC2017 instead of EMFAC2021. The **A3.38**

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proposed Project used PM10 emission factors to determine the input emission rates for the HRA. The emission factors were determined for 2022 (Option 1 and 2) and 2023 (Specific Plan Buildout), and the emission rates were assumed to be constant throughout the analysis period. The following tables present a summary of the emission factor used in the HRA.

No explanation is given towards the large decrease in emission factors associated with Option 1 and 2 versus Specific Plan Buildout for MHD and HHD trucks. Most of the truck trips are related to MHD and HHD, and thus, the HRA may be underestimating the health impacts associated with truck idling and movement. It appears that the emission factors are weighted based on population of trucks within the San Bernardino County fleet. Consideration should be given to weighting based on VMT within the San Bernardino County fleet.

Year	Speed	LHD1	MHD	HHD	Composite
Option 1	Idle	0.356	0.114	0.01588	0.08778
Option 1	5	0.03186	0.0529	0.0418	0.0423
Option 1	25	0.01155	0.02679	0.01757	0.01835

A3.38 cont.

Year	Speed	LHD1	MHD	HHD	Composite
Option 2	Idle	0.356	0.114	0.01588	0.08535
Option 2	5	0.03186	0.0529	0.0418	0.04224
Option 2	25	0.01155	0.02679	0.01757	0.01827

Year	Speed	LHD1	MHD	HHD	Composite
Buildout	Idle	0.3558	0.031827	0.01337	0.09124
Buildout	5	0.0293	0.005341	0.01251	0.01491
Buildout	25	0.01083	0.002725	0.00658	0.00683

3.4 **Feasibility of Project Design Features.** The Draft EIR fails to adequately explain how project design features would be implemented. The following project design features are part of the proposed Project. However, they include stipulations that implementation would be dependent on feasibility. It is not clear whether the air quality analysis and the HRA was conducted to include implementation of these project design features and what would be done if the measure turned out to be infeasible. **A3.39**

- **PDF AQ-3:** Project construction plans and specifications shall require on-road heavy-duty haul trucks to be model year 2010 or newer if diesel-fueled, if such equipment is widely available and economically feasible.

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- **PDF AQ-4:** The Project shall provide electrical hook ups to the power grid, rather than use diesel-fueled generators, for electric construction tools, such as saws, drills and compressors, and shall use electric tools whenever feasible.
- **PDF AQ-10:** The Project Applicant/Developer/Tenant shall require that all heavy-duty trucks entering or operated on the project site to be zero-emission beginning in 2030, if such trucks are widely available and economically feasible.
- **PDF AQ-12:** The Project Applicant/Developer/Owner shall require tenants to use zero-emission light- and medium-duty trucks as part of business operations, if such trucks are widely available and economically feasible.
- **PDF AQ-13:** The Project Applicant/Developer shall construct electric truck charging infrastructure consisting of infrastructure (i.e., conduit) to support future installation of charging stations, when such trucks are widely available and economically feasible.

A3.39 cont.

3.5 **Inconsistent with CARB's Community Health Perspective Handbook.** Page 5.3-4 of the Draft EIR mentions CARB's Air Quality and Land Use Handbook: A Community Health Perspective (Handbook) but does not list the Handbook's advisory recommendations that are specific to the Project. Within the Handbook, CARB recommends a 1,000-foot buffer between residences, schools, daycare centers, playgrounds, and medical facilities between the following:

- A distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week).

A3.40

While the Draft EIR and Air Quality Report do not explicitly state the number of truck trips per day, at 8,555 new PCE trips per day, the Project would generate far more than 100 trucks per day and the closest sensitive receptor is 11 feet away, and schools are within 100 feet. This poses significant health risks to the existing sensitive receptors and is inconsistent with CARB's guidance.

3.6 **Mitigation Measure AQ-1** should also include that parking lot coatings shall not exceed 50 g/L of VOC, consistent with the CalEEMod modeling for the mitigated construction cases in the Air Quality Report.

A3.41

3.7 **Mitigation Measure AQ-2.** Page 5.3-32 of the Draft EIR states that Mitigation Measure AQ-2 would "require all construction equipment greater than 150 horsepower (>150 HP) to be CARB certified tier 4 or higher." This is inconsistent with other statements in the Draft EIR such as on page 1-8 and page 5.3-59, which state the mitigation measure would apply to "off-road diesel construction equipment rated at 50 horsepower (hp) or greater."

A3.42

3.8 **Mitigation Measure AQ-2** should state that construction equipment greater than 150 HP shall be Tier 4 final, consistent with the CalEEMod modeling for the mitigated construction cases in the Air Quality Report.

A3.43

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3.9 **New AQ Mitigation.** The Draft EIR should also include a mitigation measure requiring that a maximum of 20 acres per day can be actively disturbed, since that assumption is relied upon in the CalEEMod modeling for the unmitigated and mitigated construction cases in the Air Quality Report. **A3.44**

3.10 **Draft EIR Tables 5.3-7 and 5.3-8** display maximum daily construction emissions without and with mitigation but does not include construction emissions estimates related to the Upzone Site. While construction of the Future Development Area under the Specific Plan Buildout would not occur until construction of either Opening Year Option 1 or 2 is complete, construction activities could still overlap with construction of the Upzone Site. Therefore, Draft EIR Tables 5.3-7 and 5.3-8 should display maximum daily construction emissions for the Future Development Area under the Specific Plan Buildout plus the Upzone Site, and then compare the sum to SCAQMD's Regional Threshold of Significance. Even with incorporation of Mitigation Measure AQ-1 and AQ-2, mitigated maximum peak daily construction emissions for the Future Development Area under the Specific Plan Buildout plus the Upzone Site would exceed SCAQMD's Regional Thresholds of Significance for VOC and NOx and require additional mitigation or result in significant and unavoidable impacts. **A3.45**

3.11 **Draft EIR Tables 5.3-9 and 5.3-10** display peak summer and winter daily operational emissions with the opening year options (Opening Year Option 1 and 2) and the Future Development Area under the Specific Plan Buildout. However, the total maximum daily summer and winter daily emissions only consider Opening Year Option 1 plus the Future Development Area under the Specific Plan Buildout. The total maximum daily summer and winter emissions should be displayed for Opening Year Option 2 plus the Future Development Area under the Specific Plan Buildout, since it is the worst-case scenario producing the greatest emissions. Furthermore, the projected change in emissions from the Upzone Site (Draft EIR Table 5.3-11) should also be added to the total maximum daily summer and winter emissions for Opening Year Option 2 plus the Future Development Area under the Specific Plan Buildout since the increase in emissions is attributable to the Project. Therefore, the maximum daily summer and winter daily operational emissions associated with Opening Year Option 2, Future Development under the Specific Plan Buildout, and the Upzone Site should be summed and compared to the SCAQMD's Regional Threshold of Significance and would exceed SCAQMD's Regional Thresholds of Significance for VOC and NOx and require additional mitigation or result in significant and unavoidable impacts. **A3.46**

3.12 **Greenhouse Gas Emissions.** Draft EIR Tables 5.8-2 and 5.8-3 display the annual GHG emissions with the opening year options (Opening Year Option 1 and 2). Draft EIR Table 5.8-4 displays the annual GHG emissions with the Future Development Area under the Specific Plan Buildout. Draft EIR Table 5.8-5 displays the GHG emissions associated with the Upzone project. The annual GHG emissions are well above the screening threshold of 3,000 metric tons. The project uses the 2021 GHG Emissions Reduction Plan Update Screening Tables to assess significance. The project should quantify the GHG reductions achieved by implementation of the Screening Table for GHG **A3.47**

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Reduction Measures (Draft EIR Table 5.8-6). Secondly, if the mitigated GHG emissions are still significant, the project should provide further mitigation from onsite activities (for example, solar panels), offsite mitigation, and purchase of carbon offsets.

This is especially important because a vast majority of the project emissions are due to truck usage and a vast majority of the Project Points for GHG Reduction Measures are related to installation of Electric Vehicle Chargers for passenger vehicles, but no installation of electric chargers for medium duty and heavy-duty trucks have been identified. Given that PDF AQ-10 stipulates that "all heavy-duty trucks entering or operated on the project site to be zero-emission beginning in 2030, if such trucks are widely available and economically feasible." Therefore, until zero emission heavy-duty trucks are implemented, the GHG emissions would be significant, and should be mitigated in the interim. **A3.47 cont.**

3.13 **Draft EIR Tables 5.3-9 and 5.3-10** should be expanded to include separate emissions totals for the Future Development Area under the Specific Plan Buildout to improve the presentation of the emissions values so readers can see the contribution of the Future Development Area under the Specific Plan Buildout compared to other elements of the Project. **A3.48**

3.14 **Page 3 of Draft EIR Appendix C1, Air Quality Report** omits that project construction would also have the potential to exceed SCAQMD regional thresholds for VOC emissions prior to mitigation (in addition to NOx) and incorrectly states that "after application of Mitigation Measure AQ-1, Project construction-source emissions will not exceed SCAQMD regional thresholds for NOx emissions." Mitigation Measure AQ-1 ("Super-Compliant" low VOC paints) is intended to reduce VOC emissions to a less than significant level while Mitigation Measure AQ-2 (Tier 4 Construction equipment) is intended to reduce NOx emissions to a less than significant level. **A3.49**

3.15 **Draft EIR Table 5.3-2** provides 3 years of data of the Central San Bernardino Valley 1 monitoring station spanning between the years of 2017 – 2019. However, the most recent data available by CARB provides pollutant data spanning between 2018 – 2020. Thus, the table should be revised. **A3.50**

3.16 **Sensitive Receptors.** On p. 5.3-16 of the Draft EIR, the closest sensitive receptors for Opening Year 1 are listed as OYD1-R1 through R-2, for Opening Year 2 are listed as OYD2-R1 through R-11 and for Future Development Areas of the Specific Plan Buildout are listed as SP-R1 through R-6. However, the analysis appears to ignore other sensitive uses. These include but are not limited to the Ruth O. Harris Middle School located west of the Project site across Alder Avenue. Additionally, the analysis provides distances measured from the Project site boundary to the outdoor living areas (e.g., backyards) or at the building façade, whichever is closer. However, the analysis incorrectly provides distances from the Project site boundary to the building façade for school uses, such as Walter Zimmerman Elementary School. The analysis is therefore distorted, understating the distance which should be at the boundary and include outdoor playground areas for students. **A3.51**

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3.17 **Study Year for SP-R3.** The analysis incorrectly identifies sensitive receptor SP-R3 (Bloomington High School) only as a Sensitive Receptor near Future Development Area – Specific Plan Buildout. SP-R3 should also be identified as a sensitive receptor for Development Options 1 and 2. **A3.52**

3.18 **Wrong AQ Modeling Year.** The modeling assumes construction of all four sites is to commence in the fourth quarter of 2021 with operation of the four sites by fourth quarter 2022. The modeling assumes an outdated construction schedule starting October 1, 2021. **A3.53**

3.19 **Availability of Tier 4 Construction Equipment.** Mitigation Measure AQ-2 requires off-road diesel construction equipment rated at 50 horsepower or greater to comply with EPA/CARB Tier 4 off-road emissions standards or equivalent. As shown in Table 5.3-8 of the Draft EIR, implementation of MM AQ-2 would reduce NOx emissions to levels less than significant. The US EPA has slowly adopted stringent standards to lower the emission from off-road construction equipment. The additions of Tier 1, Tier 2, Tier 3, Tier 4 Interim and Tier 4 construction equipment have been phased over in time. It is unclear if the construction modeling assumes all Tier 4 Final or Interim standards and whether Tier 4 equipment for all pieces of equipment remain readily available. **A3.54**

3.20 **Policy Consistency.** The Draft EIR does not provide a consistency analysis with the applicable policies presented from the San Bernardino Countywide Plan which includes Policy NR-1.2, Policy NR-1.8, Policy NR-1.9, Policy HZ-3.1. Additionally, the analysis does not provide a consistency analysis with the regulatory requirements from the San Bernardino CWP EIR which includes RR-AIR-1, RR-AIR-2, and RR AIR-3. **A3.55**

3.21 **New Automobile and Trailer Truck Trips.** The updated operational air quality analysis must account for the updated and/or additional automobile and trailer truck trips resulting from the suggested changes to the Project's traffic study (per Comment 5, *Transportation and Pedestrian Safety*). **A3.56**

3.22 **CJUSD Proposed Mitigation for Impacts at Zimmerman Elementary School.** The District is extremely concerned with the potential health risks that the Project will generate at its schools. Because the Draft EIR has not conducted construction-related health risk analysis and the operational HRA that has been completed for Project operations is inadequate, the District is preparing under separate cover a Toxic Air Contaminants HRA for the construction and operation of the proposed Project. The HRA is underway and will be submitted to the County as an amendment to this comment letter by the end of December 2021. Notwithstanding a completed HRA, the District strongly believes the proposed Project will cause significant health risks at its schools and submits the below mitigation for consideration. **A3.57**

In May of 2021, SCAQMD adopted the Warehouse Indirect Source Rule, Rule 2305. This rule seeks to reduce nitrogen oxide and particulate matter emissions produced by light- and heavy-duty trucks and tractor-trailers (mainly diesel) traveling to and from warehouses. **A3.58**

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Rule 2305 implements SCAQMD's Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and applies to owners and operators of existing and new warehouses within the South Coast Air Basin with at least 100,000 square feet of indoor floor space, with those that conduct warehousing activities in at least 50,000 of those square feet required to earn "points" to offset emissions.

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

Walter Zimmerman Elementary School is located adjacent to the Bloomington Business Park Specific Plan Project. While the analysis in the Draft EIR is not complete and will need to be revised and circulated, we expect Zimmerman Elementary to be subject to elevated health impacts due to its proximity to the proposed Project construction and operational activities. Those impacts may make it impossible to continue school programs at the site, in which case the Zimmerman students will need to be accommodated in new facilities either at a new site or at other existing District schools. If it is possible continue school programs at Zimmerman, the following mitigation measures would be necessary: **A3.58 cont.**

a) Prior to the construction of either proposed development option, Zimmerman Elementary School shall be upgraded to limit poor air quality and noise caused by Project construction and operations from entering classrooms and indoor instructional spaces.

b) To ensure adequate health protection to school occupants, indoor classrooms and instructional spaces must be improved to limit doors and windows from opening to the outside. Windows should be restricted from opening to the outside, except for emergencies. Doors to classrooms and instructional spaces must be improved to open into an enclosed hallway, and hallway doors that open to the outside must be via separate foyer rooms, ventilated with positive air pressure.

c) Air filtration systems should be installed to reduce noise and health impacts, including particulate matter exposure. Air filter devices shall be rated Minimum Efficiency Reporting Value (MERV)-16 or higher as defined by the American Society of Heating, Refrigerating and Air Conditioning Engineers Standard 52.2. MERV-16 air filters are considered high efficiency filters able to remove 95 percent of fine particulate from indoor air. As part of implementing this measure, an ongoing maintenance plan for the building's air filtration system shall be required.

   The ventilation system should meet the following minimal design standards:

   - A MERV-16, or higher, rating that represents a minimum of 95 percent efficiency to capture fine particulates;

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- At least one air exchange(s) per hour of fresh outside filtered air;
- At least four air exchange(s) / hour recirculation; and
- At least 0.25 air exchange(s) per hour in unfiltered infiltration.

d) Where appropriate, install passive electrostatic filtering systems with low air velocities (i.e., one mile per hour).

e) Operable windows and building air intakes should be located as far away from Project emission sources as possible and should not be located on the west and south side (adjacent to the project site) of Zimmerman Elementary School.

f) Plant dense rows of trees and other vegetation between Zimmerman Elementary School (along the west and south side) and Bloomington Business Park Specific Plan Project emission sources. Trees that are best suited to trapping air pollution should be planted, including one or more of the following: Pine (Pinus nigra var. maritima), Cypress (X Cupressocyparis leylandii), Hybrid poplar (Populus deltoids X trichocarpa), and Redwood (Sequoia sempervirens). **A3.58 cont.**

g) Incorporate solid barriers into the site design, like a sound wall, between Zimmerman Elementary School and Bloomington Business Park Specific Plan Project emission sources (along northern boundary of project site 2 and northeast boundary of project site 3). The presence of solid barriers often leads to pollutant concentration reductions behind the barrier during meteorological conditions with winds directionally from the emission source. Particulate matter concentrations generally decrease between 15 and 50 percent behind a solid barrier.

4. Noise

The Draft EIR does not adequately address CEQA Noise threshold a, whether the Project would:

a) Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Noise Impacts. The Draft EIR underestimates construction noise impacts. The Draft EIR states that construction noise levels at Zimmerman Elementary School would generate a maximum noise level of 74.3 dBA, less than the identified threshold of 80 dBA. This conclusion, however, is erroneous. The analysis shows construction noise as an independent noise source that occurs in isolation from the existing ambient noise conditions. The calculation of construction noise should include a logarithmic sum of the existing noise level and the future construction noise level; this was not conducted. **A3.59**

The existing daytime noise level of 56.5 dBA measured at Zimmerman Elementary would result in a logarithmic increase of +17.9 dBA above existing noise levels. Accordingly, offsite sensitive uses adjacent to the Project would be exposed to higher noise levels than those presented in the Draft EIR, and construction noise levels have the potential to exceed the 80 dBA threshold identified in the analysis and result in significant construction noise impacts. Furthermore, a 10 dB increase is generally perceived as a doubling in loudness and would almost certainly cause an adverse change in community response.

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Accordingly, exterior noise impacts caused by construction activities would be potentially significant and require mitigation.

According to the World Health Organization, 35 dBA Leq is the recommended maximum background noise level for school classrooms. Additionally, Appendix A5, Section A5.507.5, of the California Building Code specifies a maximum background noise level of no more than 45 dBA Leq in classrooms. For young children and those experiencing hearing loss and/or Auditory Processing Disorder (APD), a limit of 40 dBA is used (McLaren, SJ, and Page, WH, 2015).

Assuming a minimum exterior-to-interior noise attenuation of 17 dBA, the interior noise levels at the school during construction would be 57.3 dBA, exceeding the maximum threshold identified by WHO and California Building Code. Consequently, construction activities would result in an increase in interior noise levels at Zimmerman Elementary School beyond that acceptable. The Draft EIR and construction noise analysis must be updated, in accordance with the below technical comments to confirm the magnitude of impact and to determine appropriate mitigation required to reduce potentially significant interior noise impacts during Project construction. **A3.59**

Operational Noise Impacts. The Draft EIR underestimates the overall operational noise impacts. The Draft EIR states that operational noise levels at Zimmerman Elementary School would be 52.0 dBA, below the ambient daytime noise levels of 56.5 dBA. However, similar to construction, the analysis fails to take into account the existing noise when projecting future noise levels, as noise from the loading dock, trailers, truck movements, roof-top air conditioning units, parking lot vehicle movements, and trash enclosure activity would occur in the context of the existing noise environment and not as an independent noise source that occurs in isolation. If the noise analysis accounts for the existing noise environment, the logarithmic sum of future noise levels would be 57.8 dBA, resulting in +1.3 dBA above the significance threshold identified in the Draft EIR. Thus, the impact would be potentially significant, and mitigation would be required. **A3.60**

Additionally, reference noise levels were used to estimate operational noise impacts, which include measurements at 50 feet and an anticipated duration of one hour. It can be reasonably assumed that under a worst-case basis, all noise sources could be operated at the same time within any part of the hour. Assuming all noise sources are operational at the same time, the logarithmic sum would be 56.5 dBA. At 50 feet, which is the distance between the Specific Plan Area and Zimmerman Elementary School, operational noise would be 66.4 dBA, above the ambient noise reading at Zimmerman. School occupants could be exposed to increased noise levels, and mitigation would be required to reduce operational noise impacts.

4.1 The Draft EIR does not provide a consistency analysis with the applicable policies presented from the San Bernardino Countywide Plan which includes Policy HZ-2.7, Policy HZ-2.8, and Policy HZ-2.9. Additionally, the analysis does not provide a consistency analysis with the regulatory requirements from the San Bernardino Countywide Plan EIR which includes RR-NOI-1, RR-NOI-2, RR-NOI-3, RR-NOI-4, and RR-NOI-5. **A3.61**

4.2 Draft EIR Table 5.12-5, 5.12-6 and 5.12-7 of the Draft EIR provides construction noise levels for Opening Year Option 1, Option 2, and Future Development Area, respectively. The tables provide construction noise levels for the following construction phases: Demolition, Site Preparation, **A3.62**

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Grading, Building Construction, Paving, and Architectural Coating. However, the analysis fails to account for the existing noise level measurements presented in Table 5.12-3. As construction noise would occur in the context of the existing noise environment and not as an independent noise source that occurs in isolation, off site sensitive uses adjacent to the Project site would be exposed to higher noise levels than the levels presented in Table 5.12-5 through 7. The calculation of construction noise should include a logarithmic sum of the existing noise level and the future construction noise level. As such, construction noise levels have the potential to exceed the 80 dBA threshold identified in the analysis and would result in significant impacts. **A3.62 cont.**

4.3 As stated in the Draft EIR, operations would primarily be conducted within the enclosed buildings, except for traffic movement, parking, as well as loading and unloading of trucks at designated loading bays. The on-site Project-related noise sources are expected to include loading dock activity, trailer activity, truck movements, roof-top air conditioning units, parking lot vehicle movements, and trash enclosure activity. Reference noise levels from similar types of activities were used to estimate operational noise impacts. These measurements include reference noise levels measured at 50 feet and an anticipated duration within the hour. It can be reasonably assumed that in the worst case all noise sources can be operational at the same time within any part of the hour. Accordingly, assuming all noise sources are operational at the same time, the logarithmic sum of all these measurements at distance of 50 feet would be 66.4 dBA. Zimmerman Elementary School is located less than 50 feet from these noise sources and would be exposed to increased noise levels. Mitigation is required to reduce these impacts. **A3.63**

4.4 Table 5.12-11 of the Draft EIR provides Option 2 Daytime operational noise levels taking into account the noise sources previously mentioned. As shown, daytime operational noise levels at Zimmerman Elementary School (OLD2-R6) would result in 52.0 dBA. Table 5.12-13 of the Draft EIR then compares these noise levels to the ambient noise measurements and concludes operational noise levels would not exceed the County's exterior noise level standards.

Like the construction analysis, the operational analysis fails to take into account the existing noise level measurements presented in Table 5.12-3. As operational noise from loading docks, trailers, truck movements, roof-top air conditioning units, parking lot vehicle movements, and trash enclosure activity would occur in the context of the existing noise environment and not as an independent noise source that occurs in isolation, off site sensitive uses adjacent to the Project site would be exposed to higher noise levels than the levels presented in Table 5.12-11. The calculation of operational noise provided in Table 5.12-13 should include a logarithmic sum of the existing noise level and the future operational noise level assuming concurrent operation of all noise sources (66.4 dBA at 50 feet). **A3.64**

4.5 The updated noise analysis must account for the updated and/or additional automobile and trailer truck trips resulting from the suggested changes to the Project's traffic study (per Comment 5, *Transportation and Pedestrian Safety*). **A3.65**

5. Transportation and Pedestrian Safety

A3.66

The Draft EIR does not adequately address CEQA Transportation thresholds a and c, whether the Project:

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a) conflicts with County programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.
b) increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

5.1 **Project is Inconsistent with Countywide Plan Goals and Policies.** The San Bernardino County Transportation Impact Study Guidelines (County TIS Guidelines), dated July 9, 2019,[2] provides:

> The County has identified that vehicle level of service (LOS) is still of value to the residents of San Bernardino County. As such, the General Plan includes policies that address LOS and identify LOS standards for which County infrastructure will strive to maintain. Therefore, *County projects will also be required to complete a transportation impact study (TIS),* in addition to VMT assessment, *to demonstrate consistency with the General Plan. [Emphasis added]*

A3.66 cont.

Draft EIR Section 5.15, *Transportation,* provides that the transportation analysis is based on "Bloomington Business Park Specific Plan Traffic Impact Analysis," which is incorporated into the Draft EIR as Appendix K1 (Project traffic study). Other than the description of the existing roadways within the Specific Plan Area (Draft EIR Table 5.15-1), none of the transportation analysis provided in Draft EIR Section 5.15 articulates the findings of the Project traffic study and how the traffic analysis conducted supports the conclusion that the proposed Project is consistent with County programs, plans, ordinances or policies. This analysis should be provided in Draft EIR Impact TR-1.

Moreover, the Project traffic study is deficient. It has not been prepared in accordance with the requirements specified in the County TIS Guidelines. Section 3.1.2 of the County TIS Guidelines provides:

> *At a minimum*, the following subject/locations should be studied:
>
> a) Site access driveways
> b) On-site circulation
> c) Roadway(s) adjacent to the project (if requested by County staff)
> d) Intersections in the immediate vicinity of the project
> e) Pedestrian and bicycle circulation
> f) Consistency with County Plans and Policies
> g) Transit (bus and light commuter rail) accessibility to project site
> h) Any intersection on which the project will add 50 or more peak hour project trips
>
> [Emphasis added]

A3.67

Neither the Draft EIR nor Project traffic study adequately addresses the minimally required topics listed above. The Project traffic study addresses item h, related to intersection impacts; though as detailed below, the analysis needs to be updated. The Project traffic study does not analyze

[2] San Bernardino County Transportation Impact Study Guidelines. 2019, July 9. https://cms.sbcounty.gov/Portals/50/transportation/Traffic-Study-Guidelines.pdf?ver=2019-10-03-155637-153

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items a through g. Draft EIR Impact TR-1 briefly identifies transit, bicycle, and pedestrian facilities near the Specific Plan Area; however the write-up is conclusory and does not substantiate how the proposed Project would or would not significantly impact alternative transportation facilities and consequently, how the Project would or would not be consistent with County programs, plans, and the Countywide Policy Plan addressing these circulation facilities.

The Draft EIR and Project traffic study must be updated, per comments herein. The new findings must be incorporated into the Draft EIR, and the Draft EIR must be recirculated to allow the District and its Board of Education a meaningful way to participate, review, and comment on the Project's transportation impacts and to allow for the development of mitigation measures for potentially significant impacts to transportation facilities identified in County policies and to reduce potential vehicle-pedestrian conflicts. **A3.67 cont.**

5.2 **No Traffic Analysis Performed for Upzone Project Component.** As mentioned, there are three components associated with the proposed Project:

1) General Plan Amendment and Zone Change for the 213-acre Specific Plan Area,
2) Development Application for the 213-acre Specific Plan Area, and
3) General Plan Amendment and Zone Change for 24-acre Upzone Site.

The traffic study analyzes the 213-acre Specific Plan and development scenarios. However, no analysis was conducted for the proposed increased residential density at the Upzone Site. The proposed density increase at the Upzone Site would require an amendment to the general plan and a change in zoning. Consequently, a detailed analysis of the circulation system, including transit, roadway, bicycle and pedestrian facilities and vehicle miles traveled (VMT) must be evaluated for this component of the proposed Project. The traffic scoping document must be updated to include the Upzone component of the Project, including studying intersection and roadway segment impacts near the Upzone site. The new information must be recirculated for public review. **A3.68**

5.3 **No Traffic Analysis Performed for Proposed Roadway Reclassification.** The Draft EIR project description and Table 2-2, *Roadway Classifications*, of the public review draft of the Bloomington Business Park Specific Plan provides that the Specific Plan and proposed development options would require reclassification of roadways within and adjacent to the Specific Plan. A comparison of Specific Plan Table 2-2 with the County's TM-1 Roadway Network Policy Map indicates that the Project would change the classification of the following roadways:

- Jurupa Avenue from Maple Avenue to Locust Avenue segment to Major Highway,
- Linden Avenue south of Walter Zimmerman Elementary School to Jurupa Avenue to Industrial Collector (60-foot-wide),
- Maple Avenue south of Santa Ana Avenue to Jurupa Avenue to Industrial Collector (60-foot-wide),
- Laurel Avenue south of Santa Ana Avenue to Jurupa Avenue to Industrial Collector (60-foot-wide). **A3.69**

It is not clear what an Industrial Collector roadway is. The traffic study analyzes the proposed development options' trips on these roadways but does not address the ultimate operations

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based on the proposed reclassification. This component must be considered in the revised Project traffic study and disclosed in the Draft EIR. **A3.69 cont.**

5.4 **Erroneous Trip Generation Rates Applied to Specific Plan Project Component.** The Project traffic study analyzed the Specific Plan and development project components with three land use categories: high cube transload warehouse, fulfillment center warehouse, and industrial park. The trip generation rates used in the traffic study are shown below in Table 3:

Table 3. Land Use Categories and Trip Generation Rates Used in the Draft EIR

Land Use Category	Trip Generation Rates from Draft EIR Traffic Study (trips per 1,000 square feet)		
	Daily	AM Peak Hour	PM Peak Hour
High Cube Transload Warehouse	1.40	0.08	0.10
Fulfillment Center Warehouse	2.129	0.122	0.165
Industrial Park	3.37	0.40	0.40

Source: Environmental | Planning | Development Solutions, Inc., Bloomington Business Park Specific Plan Traffic Impact Analysis. 2021, July 13.

A comparison of the trip generation rates used in the Project traffic study with industry standard rates published in the Institute of Transportation Engineers (ITE) *Trip Generation Manual* indicates that the rates are identical for the high cube transload and short-term storage warehouse and industrial park land use categories. However, the rates used in the study for the fulfillment center warehouse category are substantially lower than the fulfillment center warehouse rates shown in the ITE *Trip Generation Manual*. Table 4, below, shows the comparable rates from the ITE *Trip Generation Manual*, as well as ITE rates for other land use categories that could have been considered. **A3.70**

Table 4. ITE Trip Generation Rates for High Cube Warehouses, Industrial Park, and Manufacturing Land Use Categories

Land Use Category	Trip Generation Rates from *Trip Generation Manual* (trips per 1,000 square feet)		
	Daily	AM Peak Hour	PM Peak Hour
High Cube Transload and Short-term Storage Warehouse	1.40	0.08	0.10
High Cube Fulfillment Center Warehouse	8.18	0.59	1.37
High Cube Parcel Hub Warehouse	7.75	0.70	0.64
Industrial Park	3.37	0.40	0.40
Manufacturing	3.93	0.62	0.67

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Source: 10th Edition of the ITE *Trip Generation Manual*

The ITE recognizes five high-cube warehouse groups: fulfillment center, parcel hub, cold storage facility, transload facility, and short-term storage facility. However, it combines the transload warehouse and short-term storage warehouse into one land use category. Accordingly, the ITE *Trip Generation Manual* provides trip generation rates for four types of high cube warehouse land use categories: 1) fulfillment center, 2) parcel hub, 3) cold storage facility, 4) transload facility and short-term storage facility. As the Specific Plan and EIR Project Description state that the proposed Project would not offer cold storage, Table 4 does not include the cold storage warehouse land use category's trip generation rates.

A3.70 cont.

5.4.1 ITE Trip Generation Rates for Fulfillment Center Warehouse Land Use Category Should Be Used. A comparison of Tables 3 and 4 show substantially higher trip generation rates from the ITE *Trip Generation Manual* for the fulfillment center warehouse category when compared to the rates used in the Draft EIR traffic analysis:

- The daily rate is nearly four times higher (8.18 trips per ksf vs. 2.129 trips per ksf),
- The AM peak hour rate is nearly five times higher (0.59 trips per ksf vs. 0.122 trips per ksf), and
- The PM peak hour rate is over eight time higher (1.37 trips per ksf vs. 0.165 trips per ksf).

The volumes of project generated traffic used for the Draft EIR traffic study are substantially lower than the volumes that would be if calculated using the higher trip rates from the ITE *Trip Generation Manual* for the fulfillment center warehouse category. If the fulfillment center warehouse trip rates from the ITE *Trip Generation Manual* were used, the volumes of traffic generated by the Specific Plan and development components would be substantially greater than what was indicated in the Draft EIR analysis, and traffic impacts would be more severe on study area roadways and intersections than that presented in the Draft EIR.

A3.71

Instead, the transportation impact study uses generic trip rates from the Western Riverside Council of Governments' Transportation Uniform Mitigation Fee (TUMF) Program. Neither the traffic study nor Draft EIR justify why the lower TUMF trip rates are applicable, nor do they explain why the transload storage warehouse land use category is appropriate. The TUMF rates were created by WRCOG to simplify the calculation of fair-share cost contributions for transportation-related improvements required to mitigate transportation impacts of development projects in Riverside County. These rates are oversimplified and represent an average trip rate for various types of high cube warehouse land use categories. They do not represent potential operations of same day e-commerce deliveries, such as by Amazon and other newer competitors, which have a greater frequency of trips.[3] These rates are inappropriate for the Project traffic study and do not represent the potential mix of operations specified in the Bloomington Business Park Specific Plan,

[3] WSP. TUMF High-Cube Warehouse Trip Generation Study Technical Memorandum. Western Riverside Council of Government. 2019, January 29. Exhibit 1: Data Plot for Daily Total Vehicle Trip Ends against Building Size (Fulfillment Center).

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which permits development of industrial, warehousing, processing, and manufacturing land uses. The Project's traffic study needs to be revised with industry standard ITE trip rates, and the Draft EIR needs to be recirculated for disclosure of the potentially greater impacts.

Further note, the TUMF high-cube warehouse daily trip rate is reported 2.21 trips per thousand square feet (TSF).[4] However, the Project traffic study uses the daily rate of 2.129 trips/TSF, 0.081 trip/TSF lower than the reported TUMF rate. The traffic study should update the trip rates accordingly. **A3.71 cont.**

5.4.2 **Erroneous Trip Rates for Site 4 Trailer truck Yard.** According to Table 12 of the Project traffic study (page 68 of Draft EIR Appendix K1) the proposed truck yard at Site 4 was analyzed under the buildout scenario of the Specific Plan and under the ITE land use category of Industrial Park.

1. The proposed truck yard at Site 4 should be analyzed as a part of Opening Year 1, and
2. Should considering using a truck terminal trip rate, as opposed to an Industrial Park land use category.

The Project traffic study uses ITE's Industrial Park land use category for trips generated at Site 4's 9.5-acre trailer truck yard that includes 289 trailer truck parking spaces. The Project traffic study forecasts 1,573 passenger car equivalent (PCE) daily trips from Site 4. The traffic study states that Site 4 is ancillary parking; however, Draft EIR Chapter 3, *Project Description* does not provide more information on operations of this facility.

It possible that operations of this facility would be like that of another development application in the County that is undergoing separate entitlement and environmental reviews. The proposed Cedar Avenue Truck Terminal Facility project (PROJ-2020-00035), located at 10746 Cedar Avenue, proposes 260 trailer truck spaces, 14 standard car spaces, and 1 handicap accessible space, as well as office space and a maintenance shop. The traffic study conducted for PROJ-2020-00035 used trip-generation statistics published in the City of San Diego Municipal Code Land Development Code Trip Generation Manual (2003) for the Truck Terminal land use category because the closest land use category provided in the ITE Trip Generation Manual is for an intermodal truck terminal, which was not applicable to PROJ-2020-00035's characteristics. The Cedar Avenue Truck Terminal Facility, which is smaller than the proposed truck yard on Site 4, would operate 1,716 daily PCE equivalent truck trips (and an additional 144 daily passenger trips), which is more trips than the proposed truck yard. **A3.72**

As the City of San Diego's "truck terminal" land use category appears more applicable than the "industrial park" land use category, we question whether the traffic study should consider applying the truck terminal trip rates from the San Diego Municipal Code instead.

5.4.3 **Inappropriate Trip Rate Land Use Categories Used for Specific Plan Project Component.** Neither the Project's traffic study nor Draft EIR justify why the land use categories (shown in Table 3, herein) were applied to both the Specific Plan and development scenarios of the proposed **A3.73**

[4] Western Riverside Council of Governments. Transportation Uniform Mitigation Fee, Fee Calculation Handbook. 2019, June 3. https://wrcog.us/DocumentCenter/View/2508/FeeCalculationHandbook-060319?bidId=

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Project. They appear to not accurately represent the potential uses of the Specific Plan and development components of the proposed Project.

The land use categories in Table 4 and the truck terminal trip rates mentioned in Comment 5.4.2 appear to better align with the proposed Project. As mentioned above, the Specific Plan permits development of industrial, warehousing, processing, and manufacturing land uses. The manufacturing land use category has a higher trip generation rate than the industrial park land use category (see Table 4, above). The District questions whether the manufacturing land use category be considered for areas outside of the development option scenarios (i.e., outside the development footprint of Planning Area A and the entirety of Planning Area B). The Draft EIR appears to underestimate the potential traffic impacts of the Specific Plan component of the Project. Trip rates used for all three project components must be justified, and the traffic study updated accordingly. **A3.73 cont.**

5.5 **Roadway Segment Analysis.** The traffic study addresses the impacts of the Project at study area intersections, but it does not evaluate the Project's impacts on roadway segments. While it is possible that a level of service analysis for the roadway segments is not required because of the relatively close spacing of the traffic signals, the Project's impacts on the study intersections require mitigation measures (see Draft EIR Appendix K1, Traffic Study Table 16 through Table 18) that require the addition of lanes and traffic signals at impacted study intersections. These proposed mitigating improvements require further analysis to determine if the existing roadways can support them and to determine if they are feasible mitigation measures. For example, if a mitigation measure indicates that a lane needs to be added at an intersection, it should also indicate whether the additional lane needs to be extended to the next upstream intersection, which would require roadway widening for the entire roadway segment between the intersections. The traffic study must be updated to fully disclose whether the proposed mitigation measures are feasible. The revised Draft EIR must be recirculated for public disclosure. **A3.74**

5.6 **Secondary Effects Caused by Traffic Mitigation Measures.** The traffic mitigation measures identified in Tables 16, 17, and 18 of Draft EIR Appendix K1 may require the acquisition of private property and/or may be developed in areas that are currently vacant and moderately disturbed. The offsite roadway improvements are required for the Project and are reasonably foreseeable. According to *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus (1994) 27 Cal. App. 4th 713,* a project requiring construction of offsite infrastructure must include the offsite infrastructure in the project description. The secondary effects may cause indirect physical changes in the environment that must be considered as secondary effects of the proposed Project. CEQA Guidelines Section 15378 defines "Project" as the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a *reasonably foreseeable* indirect physical change in the environment. Consequently, the secondary effects that may include but are not limited to the loss of private land, relocation/displacement of homes and businesses, impacts to biological resources, such as burrowing owls, to the loss of sensitive habitat must be evaluated in the Draft EIR. The secondary effects must be analyzed in the Draft EIR. **A3.75**

5.7 **Fair Share Cost Estimates of Mitigation Measures.** The calculations for the fair share cost estimates divide the volume of project generated traffic at each significantly impacted **A3.76**

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intersection by the total increase in traffic that would occur at the intersection for the buildout scenario. This methodology underestimates the amount of funding that the project should contribute because it assigns fair share costs to regional growth and to land use intensifications that do not have specific projects associated with them. There are, therefore, no applicants or developers from which to obtain the remainder of the costs for the proposed improvements. The calculations for the fair share cost contributions should include the project trips and the trips generated by proposed future development, as specified in Section 3.11, Fair Share Contributions, of County Transportation Impact Study Guidelines: **A3.76 cont.**

$$\text{Fair share} = \frac{\text{project trips}}{\text{project trips} + \text{future development trips}} \times 100\%$$

The fair share cost contributions should not include traffic increases from general regional growth. Also, some of the impacted intersections are in other jurisdictions and on Caltrans facilities that might not have a fair share contribution program, which would negate the success of the fair share funding.

5.8 **Construction Traffic Impacts on Circulation Facilities.** Neither the Draft EIR nor traffic study address potential construction-related traffic impacts on transportation facilities. CEQA requires analysis of short-term construction impacts, as well as long-term operational impacts. The traffic study analyzes only long-term operational effects but neglects to consider short-term effects. The District requests the Draft EIR be updated to address construction traffic impacts along construction haul routes and Project site access points. The analysis should consider potential roadway and sidewalk closures and impacts to school operations, especially during school start and dismissal bells in the morning and afternoon. The District is concerned with conflicts between construction vehicles and student drop-off and pick-up activities, and pedestrian safety, especially at Zimmerman Elementary School where students will be walking along the Specific Plan Area and crossing Jurupa Avenue at Linden Avenue. The District is also concerned with potential conflicts at Slover Mountain High School, which is adjacent to Cedar Avenue and close to the I-10 Freeway on/off ramps. **A3.77**

5.9 **Related Projects for Cumulative Analysis.** The related projects identified for cumulative impact analysis in the traffic impact study's scoping document were not analyzed in the traffic study or other Draft EIR environmental topics' cumulative impact analysis. The Draft EIR traffic study scoping memorandum (p 148 of Draft EIR Appendix K1) identifies the below ten related projects in unincorporated Bloomington: **A3.78**

1. Agua Mansa High Cube Warehouse
2. Alder Avenue Industrial
3. Bloomington Affordable Housing Project
4. Bloomington Business Center
5. Bloomington High Cube Warehouse
6. Bloomington Industrial Facility
7. Cedar Avenue Technology Center
8. Chevron Slover-Cedar
9. Slover High Cube Warehouse

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10. Slover-Cactus Warehouse

Not all ten of the scoped projects in unincorporated Bloomington were analyzed. Instead, the traffic study and Draft EIR cumulative impact analysis only included the following five related projects in Bloomington:

1. Alder Avenue Industrial
2. Bloomington Business Center
3. Slover High Cube Warehouse
4. Chevron Slover-Cedar
5. Slover-Cactus Warehouse

The traffic study and Draft EIR did not analyze the below five related projects in Bloomington that were identified in the traffic study scoping document. **A3.78 cont.**

1. Agua Mansa High Cube Warehouse
2. Bloomington Affordable Housing Project
3. Bloomington High Cube Warehouse
4. Bloomington Industrial Facility
5. Cedar Avenue Technology Center

Neither the traffic study nor Draft EIR justify why these related projects were excluded from analysis in the traffic impact study or other environmental topics in the Draft EIR. These five related projects should be added to the Draft EIR Table 4-8, *Cumulative Project List*. The cumulative impact analyses, including the traffic and air quality impact assessments, should be updated to reflect the proposed Project's augmented cumulative effects.

5.10 **Related Projects Listed in Cedar Avenue Truck Terminal Facility Project Traffic Study (PROJ-2020-00035).** Based on a quick review of the County's website and the traffic study prepared for the proposed Cedar Avenue Truck Terminal's Mitigated Negative Declaration (January 2021),[5] it appears that there are at least 15 other related projects in unincorporated Bloomington—not mentioned in the above Comment 5.9—that should be added to Draft EIR Table 4-8 and analyzed for each environmental topic's cumulative impact analysis, including the traffic study; see Figure 2, *Cumulative Projects in Bloomington*. These related projects are proposed along and/or may use Cedar Avenue to access I-10 and SR-60 freeways, which are part of the proposed Project's main truck route. It would be prudent to include these related projects for cumulative impact analysis of the Draft EIR. **A3.79**

1. Bloomington Center Project
2. Truck Terminal/Storage Yard
3. Arco AM/PM
4. CK Store at Santa Ana Avenue

[5] Cedar Avenue Trucking Storage Traffic Analysis, County of San Bernardino. Prepared by Urban Crossroads. 2020, June 19. Accessed: 2021, November 2. http://www.sbcounty.gov/Uploads/LUS/Valley/CedarTruckTerm/D.%20Traffic%20Study.pdf

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5. Cedar Avenue Truck Terminal
6. NWC of Slover Avenue and Locust Avenue (Warehouse, Retail, Fast Food)
7. NEC and NWC of Cedar Avenue and Orange Street (Warehouse)
8. Slover Avenue between Locust Avenue and Laurel Avenue (High-Cube Warehouse)
9. Linden Avenue north of Slover (Tire Store)
10. Cedar Avenue Technology Center (Warehouse).
11. NWC of Cedar Avenue and Jurupa Avenue (High-Cube Warehouse)
12. Cedar Avenue Technology Center (Warehouse)
13. South of Valley Boulevard, West of Cactus (Warehouse)
14. South of Slover Avenue, East of Cactus Avenue (Wheeler Trucking)
15. NWC of Cedar Avenue and Jurupa Avenue (High-Cube Warehouse

A3.79 cont.

County Planning Staff must confirm whether there are any other related projects (pending, planned, and approved and underway) in unincorporated Bloomington beyond those listed above for EIR cumulative impact analysis. This may include the proposed warehouse development application at the corner of Slover Avenue at Alder.

Related projects north of I-10 should also be included to capture cumulative impacts associated with the proposed Upzone planned growth. The cities of Fontana and Rialto should also be contacted for related projects in their jurisdictions that are south and north of I-10.

5.11 **Lack of Traffic and Pedestrian Safety Analysis at Sensitive Uses.** Neither the Draft EIR nor traffic study adequately addresses pedestrian safety hazards; impacts caused by the proposed Specific Plan, development Options 1 and 2, or proposed Upzone components of the Project; and whether the proposed Project conflicts with County goals and policies on pedestrian facilities. The Draft EIR does not address their potential conflicts with San Bernardino County policies, programs, and plans related to bicycle and pedestrian facilities. The analysis needs to analyze traffic and pedestrian safety impacts at sensitive land uses that are adjacent to or near the affected study area roadways. Specifically, evaluation must consider pedestrian safety at the eight District schools located within one mile of the Specific Plan area and Upzone Site. The impacts of the increased traffic and truck volumes on the streets that provide access to these schools and the increased safety risks to motorists, pedestrians, and bicyclists need to be addressed, particularly at the pedestrian crosswalks closest to each school. As mentioned above, the County TIS Guidelines states that at a minimum pedestrian and bicycle circulation issues should be studied. Neither the traffic study nor Draft EIR adequately addresses pedestrian and bicycle facilities, and the analysis is inconsistent with this guideline. The pedestrian safety analysis should identify all affected pedestrian crossing locations where school-age pedestrians will be walking across the travel paths of project-generated traffic, particularly trucks, and quantify the anticipated increases in vehicular-pedestrian conflicts. It should identify the types of traffic control devices that are currently in place at the pedestrian crossing locations and determine if the traffic control devices would need to be upgraded to ensure that there are no adverse pedestrian safety impacts.

A3.80

It should be further noted that many students walk to school in the Bloomington area. This is illustrated in Photo 4 of Draft EIR Figure 4-4B, which shows students walking on the west side of

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Linden Avenue, adjacent to the proposed Specific Plan, which is between the Crestmore community and Zimmerman Elementary School.

- Zimmerman students who live in the Crestmore community must cross the Linden Avenue at Jurupa Avenue intersection to get to/from home and school. According to the Specific Plan, all trailer truck trips access this intersection. According to Draft EIR Appendix K1, traffic-related mitigation proposed at this intersection involves converting the existing EB right-turn lane to a shared EB thru-right lane to accommodate increased trips accessing the Specific Plan. No mitigation is identified to address pedestrian safety at this intersection even though this is the main access point for Zimmerman Elementary students who live in the Crestmore community.
- Zimmerman students would also be required to cross Development Site 1's driveways on Linden Avenue, including designated driveways for truck-trailer access under both Development Options 1 and 2. These potential conflicts are significant and must be addressed in the Draft EIR and traffic study. Mitigation measures must be identified to eliminate potential pedestrian hazards. Alternatively, the County should restrict trailer truck traffic from using Site 1 driveways off Linden Avenue. **A3.80 cont.**
- Finally, there will be increased pedestrian and vehicle conflicts and hazards during the morning start and afternoon dismissal bells. The District requests the Draft EIR to include mitigation to limit trailer truck traffic access to the Specific Plan area 30 minutes before and after the Zimmerman Elementary School, Slover Mountain High School, and Bloomington High School morning start and afternoon dismissal bells.

These types of vehicle-pedestrian hazards near all six District schools south of I-10 freeway must be addressed in the Draft EIR. Mitigation measures must be clearly defined to ensure that incompatible uses between the proposed Project and school operations are rectified. The Draft EIR must be updated to analyze the increased safety risks to motorists, pedestrians, and bicyclists, particularly at the pedestrian crosswalks closest to each school to address whether the proposed Project meets County policies concerning pedestrian facilities.

5.12 **The Project Increases Hazards Caused by Incompatible Uses.** Draft EIR IMPACT TR-3 states that sight distance at each development sites' access point would be reviewed with respect to County standards at the time of final grading, landscape, and street improvement plan reviews. Three Project components are analyzed in the Draft EIR. While this may be applicable to the proposed general plan amendments and zone changes at the 213-acre Specific Plan Area and 24-acre Upzone Site, the Draft EIR must provide Project-level impact analysis for the proposed developments of Options 1 and 2. Specifically, the public review draft of the Bloomington Business Park Specific Plan identifies the following proposed development standards: **A3.81**

1. Where industrial and business park uses adjoin a residential use, a twelve-foot-high solid screen wall shall be located on the common property line, except in a required public right-of-way street setback where the screen wall shall be located behind the landscaped setback area.

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2. Where truck parking, loading areas, and/or truck maneuvering areas abut a public right-of-way, a twelve-foot-high solid screen wall shall be located behind the landscaped setback area unless a greater height is required per a site-specific noise study.
3. Where automobile parking areas abut a public right-of-way, a four-foot-high decorative screen wall, wrought-iron fence, tubular aluminum fencing or welded-wire fence shall be located behind the landscaped setback area.
4. All truck or trailer storage areas shall be completely screened from view by a minimumtwelve-foot solid concrete block wall. **A3.81 cont.**

The development standards in the proposed Specific Plan address adjacency to residential uses, but not school uses, even though two schools adjoin the Specific Plan: Zimmerman Elementary School and Bloomington High School. Please update the Specific Plan to address its adjacency to schools or substantiate why only residential uses and public areas are addressed and not other sensitive uses, such as schools. Please also confirm if the development standards applicable to residential uses are applicable to schools, and/or if more stringent standards are required for schools.

Assuming the Specific Plan and proposed development options implement the above listed standards for Zimmerman Elementary, please confirm the type of wall that would be constructed along the northern boundary of Site 1, under Options 1 and 2. Aside from the proposed development standards, potential noise impacts at Zimmerman School may also warrant a minimum 12-foot-high block wall (see Comment Section 4, *Noise*). **A3.82**

How would such a wall affect a driver's view of students and other pedestrians using the western sidewalk on Linden Avenue? The Draft EIR must include a horizontal site distance evaluation for each driveway proposed under the development component of the proposed Project and each study intersection. At unsignalized intersections, sight distance analysis must provide a substantially clear line of sight between the driver and vehicle waiting on the minor road (driveway) and the driver of an approaching vehicle. A minimum 7.5 second criterion should be applied to the outside travel lanes to provide an adequate sight distance. A 7.5 second criterion would allow waiting vehicles to either cross all lanes of through traffic by turning left or cross the near lanes by turning right without requiring through traffic to alter their speed. Vertical sight distance should be evaluated using a 3.5-foot eye height and 425-foot object height. The sight distance should be based on the proposed speed limit for the proposed roadway classifications, as well as the existing classifications. The analysis must be based on Caltrans Highway Design Manual and must be included in the Draft EIR for recirculation. **A3.83**

The updated traffic study should also evaluate potential hazards related to truck access and circulation at Development Sites 1 – 4. Large trailer trucks have wide turning radii. Consequently, a potential truck turning area should be overlaid on the proposed development plans to confirm that there is sufficient space for turning maneuvers, not only within the property, but also at all proposed development driveways on Jurupa Avenue, Linden Avenue, Maple Avenue, and Locust Avenue. The updated analysis must be recirculated in the Draft EIR for public review. **A3.84**

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6. Hazards/Hazardous Materials

The Draft EIR does not adequately address CEQA Hazards/Hazardous Materials threshold c, whether the Project:

> c) would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

6.1 There is substantial evidence that the proposed Specific Plan and proposed development options would cause significant impacts at District schools, in particular at Zimmerman Elementary School. Public Resources Code Section 21151.4(a) provides:

> An environmental impact report shall not be certified or a negative declaration shall not be approved for any project involving the construction or alteration of a facility within one-fourth of a mile of a school that might reasonably be anticipated to emit hazardous air emissions, or that would handle an extremely hazardous substance or a mixture containing extremely hazardous substances in a quantity equal to or greater than the state threshold quantity specified pursuant to subdivision (j) of Section 25532 of the Health and Safety Code, that may pose a health or safety hazard to persons who would attend or would be employed at the school, unless both of the following occur:
>
> (1) The lead agency preparing the environmental impact report or negative declaration has consulted with the school district having jurisdiction regarding the potential impact of the project on the school.
>
> (2) The school district has been given written notification of the project not less than 30 days prior to the proposed certification of the environmental impact report or approval of the negative declaration.

A3.85

As provided above in Comment Section 3, *Air Quality / Toxic Air Contaminants*, the Draft EIR has not adequately analyzed or disclosed the health risks caused by toxic air contaminants from construction and operation of the proposed Project. The analysis must address impacts at all schools within one-fourth mile of the Specific Plan area and Upzone Site. The analysis must be included in the Draft EIR and recirculated to ensure meaningful and useful information is provided to the District and its Board of Education.

A3.86

Moreover, the Lead Agency has not formally consulted with the District on this project. The County has notified the District of the Project through CEQA notices but has not offered consultation. If given the opportunity, the District would appreciate the opportunity to further discuss its concerns of the potential Project impacts and the District's recommendations to mitigate them, as provided herein.

6.2 Construction of the Specific Plan Area may require soil remediation and/or removal that could contain VOCs associated with the landfill south of Jurupa Avenue. The District requests that the Soil Management Plan required under Draft EIR Mitigation Measure HAZ-1 address potential health risks and exposures on contaminated soils to school occupants at all schools within one-quarter mile of the Project site. The Soils Management Plan must identify ways to limit exposure

A3.87

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to schools, including students who walk to/from school and home that may come in contact with soil hazards. **A3.87 cont.**

6.3 Due to the proximity of Site 1 to Zimmerman Elementary School and Sites 3 and 4 to Bloomington High School, the District requests that the Lead Agency consider limiting operations of areas of the Specific Plan Area within 1,000 feet of its schools. This would allow the County to meet the intent of CARB's recommendation to keep schools 1,000 feet from distribution centers. The District requests the County consider restricting trailer truck traffic and use of hazardous materials within areas 1,000 feet of its schools, including Zimmerman Elementary, Bloomington High School, and Harris Middle School. Uses within 1,000 feet of schools should be used for office and related support facilities and automobile parking. Accordingly, the County should not approve Development Option B, which would allow trucks to idle at a driveway within 50 feet of Zimmerman Elementary School. **A3.88**

7. Land Use and Planning

The Draft EIR does not adequately address CEQA Land Use and Planning thresholds a and b, whether the Project will:

a) Physically divide an established community; or
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

7.1 **The Specific Plan and Development Project Components Will Divide an Established Community and Result in Incompatible Land Uses.**

The Draft EIR fails to evaluate whether the proposed Project would physically divide an established community. As shown in Figure 3, *Division of Established Zimmerman Community*, the proposed Project in conjunction with an adjoining high-cube warehouse (at the northeast corner of Linden Avenue at Jurupa Avenue) would create a physical barrier and divide the established Zimmerman Elementary School attendance area, which is generally south of Slover Avenue, west of Cedar Avenue, east of Locust Avenue, and north of the Riverside County and San Bernardino County lines. The most direct access to the Crestmore community from Zimmerman Elementary is via Linden Avenue, for which the school is on. Due to its bulk and size, the proposed Specific Plan and Project development options in combination with the adjacent high-cube warehouse/logistics facility would create a block of large buildings that would stretch from Zimmerman's eastern attendance boundary along Cedar Avenue to its western boundary on Locust Avenue. The industrial/warehouse structures would bifurcate the Zimmerman Elementary School community into northern and southern halves. This significant impact that would divide the established Zimmerman Elementary community must be analyzed in the Draft EIR. **A3.89**

7.2 **The Specific Plan and Development Option Components Conflict with the San Bernardino County General Plan Policy Plan adopted in October 2020 for the Purpose of Avoiding or Mitigating Environmental Effects.** The Draft EIR inaccurately finds that the proposed Project would conform with the goals and policies of the Countywide Plan. The Project is inconsistent with the following Countywide Plan policies: **A3.90**

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Countywide Plan Policy	Project Compatibility with School Uses
Policy LU-2.1, Compatibility with existing uses We require that new development is located, scaled, buffered, and designed to minimize negative impacts on existing conforming uses and adjacent neighborhoods.	The proposed development options within the Specific Plan have not been located, scaled, buffered, or designed to limit negative impact on Zimmerman Elementary School or the adjacent residential uses. Per comments provided in this comment letter, the Draft EIR must be updated to accurately reflect Project effects. • **Buffering.** The California Air Resources Board recommends distribution centers with more than 100 trucks per day—the Project will exceed that number—be sited 1,000 feet from sensitive land uses, such as residences, schools, and playgrounds. According to CARB, compliance with their recommendations can reduce (localized) air pollution exposures as much as 80% at the sensitive receptors.[6] To minimize negative impacts at existing schools, the District requests the County consider limiting uses and operations within 1,000 feet of schools to office and other support operations, including employee automobile parking. • **Design.** The Specific Plan does not address adjacent school uses. Walls have been identified for developments adjacent to residents, but not schools. Please describe what, if any, sound wall would be installed adjacent to Zimmerman Elementary. To limit exposure of diesel particulate matter from idling trailer trucks, CARB further recommends not placing entry and exit points near sensitive uses. The proposed development at Site 1 under Option 2 proposes a designated trailer truck driveway less than 150 feet from Zimmerman Elementary School. To minimize negative impacts at existing schools, the District requests that the County prohibit truck-trailer driveways from being placed within 1,000 feet of existing schools. • **Location.** The location of the proposed Specific Plan and development options are adjacent to existing schools. The proximity of the proposed Project to Zimmerman Elementary and Bloomington High raise special considerations that have not been fully vetted in the Draft EIR. 1. **Pedestrian Safety Hazards.** All trailer trucks accessing the Specific Plan Area will use the Jurupa Avenue/Linden Avenue intersection, which is the main route for students accessing to/from the Crestmore community and local schools in Bloomington. To minimize negative impacts, the

A3.90 cont.

[6] California Air Resources Board. Air Quality and Land Use Handbook: A Community Health Perspective. 2005, April. https://www.arb.ca.gov/ch/handbook.doc

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	District requests that pedestrian safety considerations be made at this intersection, including the permanent placement of two crossing guards. Zimmerman students who walk to/from Crestmore would also be required to cross truck-trailer driveways off Linden Avenue. To minimize pedestrian-vehicle conflicts and risks to students, the District requests that the County prohibit truck-trailer access from Linden Avenue. 2. **Air Quality / Toxic Air Contaminants.** Zimmerman Elementary is adjacent to Site 1 and Bloomington High is adjacent to Site 4 of the Specific Plan. Construction and operational air quality impacts and health risks at the schools are anticipated to be significant once the Draft EIR analysis is updated per our comments provided herein. Outdoor air quality at playgrounds cannot be mitigated; however, indoor air quality can be with the installation of hospital-grade HVAC systems; see Comment 3.22 of this letter. To minimize negative air quality impacts, the District requests that the County and Applicant implement the mitigation measures identified in Comment 3.22 at nearby schools, including Zimmerman Elementary, Bloomington High, and Harris Middle. 3. **Noise.** Construction and operational noise impacts at Zimmerman Elementary are anticipated to be significant once the analysis is updated per our comments provided herein. While a sound wall would attenuate construction and operational noise, it is possible that it would not attenuate noise from trucks accessing a driveway from Linden Avenue near the school. Therefore, to minimize negative noise impacts, the District recommends designated truck driveways be relocated at least 1,000 feet from any school property line.
Policy LU-2.4, Land Use Map consistency We consider proposed development that is consistent with the Land Use Map (i.e., it does not require a change in Land Use Category), to be generally compatible and consistent with surrounding land uses and a community's identity. Additional site, building, and landscape design treatment, per other policies in the Policy Plan and development	The Specific Plan would be incompatible with approximately 75 percent of the surrounding land uses. As shown in Draft EIR Figure 4-8, existing land uses surrounding the Specific Plan include residential to the west, residential and institutional to the north and northeast, and institutional uses to the southeast. There is existing industrial immediately east of Site 1 and proposed industrial immediately south of Site 2. As the proposed Project would replace the existing residential land use designation with Special Development and a corresponding Specific Plan zoning district that would allow industrial, manufacturing, and warehouse uses, Project implementation

A3.90 cont.

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standards in the Development Code, may be required to maximize compatibility with surrounding land uses and community identity.	would conversely result in about 75 percent of surrounding incompatible land uses, including the adjacent school uses.
Policy LU-2.6, Coordination with adjacent entities We require that new and amended development projects notify and coordinate with adjacent local, state, and federal entities to maximize land use compatibility, inform future planning and implementation, and realize mutually beneficial outcomes.	The Applicant has contacted the District, and the County has notified the District via CEQA notices of the Project. Coordination conducted to date has not resulted in maximizing land use compatibility. Please see Comment 3.22 herein, which describes the minimum necessary mitigation to noise and air quality impacts to indoor instruction areas at Zimmerman Elementary School to make school operations possible. The District would appreciate consultation with the County to resolve concerns related to the issues raised herein.
Policy LU-6.4, Industrial amendments near schools and parks. We approve Land Use Plan amendments for new industrial development only if they are at least one-half mile from an existing or planned public primary or secondary school or public park. We may waive this requirement for obsolete school or park sites or for industrial amendments submitted through a specific plan.	The County must mitigate the incompatible land uses between the proposed Specific Plan and District schools within one-half mile. The District requests the County and Applicant implement Comment 3.22, which would require the Applicant to enhance Zimmerman facilities mitigate indoor noise and air quality impacts or provide for alternate facilities for Zimmerman students.
Policy HW-2.2, Land use compatibility We prioritize the safety and security of public schools in unincorporated areas by minimizing incompatible land uses near instructional facilities. We encourage school districts to place new schools where existing and planned land uses are compatible.	The District hopes the reverse of Policy HW-2.2 applies to the proposed development. As indicated above, the District recommends limiting Specific Plan uses and operations within 1,000 feet of schools to office, similar support uses, and automobile parking.
Policy HZ-3.1, Health risk assessment We require projects processed by the County to provide a health risk assessment when a project could	As provided above in Comment Section 3, *Air Quality / Toxic Air Contaminants*, the Draft EIR has not conducted a construction-phase Health Risk Assessment. A construction phase HRA must be prepared to determine if the Project could cause a cancer risk of 10 in 1 million during construction of the proposed Project.

A3.90 cont.

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potentially increase the incremental cancer risk by 10 in 1 million or more in unincorporated environmental justice focus areas, and we require such assessments to evaluate impacts of truck traffic from the project to freeways. We establish appropriate mitigation prior to the approval of new construction, rehabilitation, or expansion permits.	The operational HRA must also be updated based on comments provided herein, and it must analyze all Project components: 1. General Plan Amendment and Zone Change of Specific Plan Area. 2. Development Options 1 and of the Specific Plan. 3. General Plan Amendment and Zone Change of Upzone Site. Once completed, the construction and operational HRAs must be recirculated for public review and comment.

A3.90 cont.

8 Public Services – School Facilities

The Draft EIR does not adequately address Public Services – School Facilities, in that it fails to address whether the Project would:

- have a significant effect if it were to result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for public school services.

Draft EIR Impact PS-3 states that payment of school impact fees—pursuant to Senate Bill 50 (SB 50)—constitutes full and complete mitigation of the proposed Project's impacts on CJUSD school facilities. This finding is inaccurate because it fails to account for the Project's impacts on existing District facilities. The purpose of SB 50 school impact fees is to offset the costs associated with expanding school facilities beyond those already in existence in order to house students generated by new development (residential, commercial, and industrial).

SB 50 school fees, however, do not cover the expenses associated with improving an existing school to mitigate a development's direct and indirect environmental impacts on the school. For example, the cost to mitigate the Project's impacts on indoor noise levels and air quality (see Comment 3.22) would not be covered by SB 50 school fees.

A3.91

More important, SB 50 school fees are intended only to fund additional school facilities made necessary by a project's generation of additional students. SB 50 fees do not cover the loss of existing school facilities as a consequence of a project. SB 50 fees will provide no mitigation for expenses related to a potential closure of Zimmerman Elementary School and relocation of its programs to other school facilities. Due to anticipated air quality and noise impacts adjacent to the Project and reduced student enrollment at Zimmerman Elementary School, additional mitigation funding must be provided.

Based on the size of the Project, there is no doubt that the Project will have a negative impact on sensitive land uses, including schools. The extent of which, however, has not been adequately disclosed in the Draft EIR.

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Owen Chang, Director, Facilities & Energy Manager

The District believes the Project will have an undue burden on Zimmerman Elementary and requests that the Draft EIR be updated per comments provided herein. The District has a substantial stake in this Project. We believe the Project's environmental effects—from diesel particulate emissions generated by trucks and off-road equipment during construction and operation, noise levels during construction and operation, to transportation and pedestrian safety effects—will have a significant impact at Zimmerman Elementary. These effects have substantial weight on the District's decision on how to best conduct school operations at Zimmerman Elementary and other nearby schools. The corrected analysis will allow for a more meaningful engagement between the District, County, and Applicant on the appropriateness of new and/or altered school facilities and school operations. **A3.91 cont.**

Based on our review of the Draft EIR, we believe the corrected analysis will show significant air quality and noise impacts at Zimmerman Elementary School. For example, all indoor instructional spaces at Zimmerman Elementary School would require mitigation such as the installation of a high-grade HVAC system to mitigate indoor noise and air quality impacts; see Comment 3.22 of this letter. As the Zimmerman Elementary school buildings are old, the existing school buildings would also need to be improved to accommodate a higher-grade HVAC system. Cost for adequate may be between $50 million and $61 million. Due to the high cost, the the only feasible option may be relocating Zimmerman operations to a new location or other nearby District schools or District-owned property that would, in turn, require substantial expansion and upgrades. **A3.92**

Accordingly, Draft EIR Impact PS-3 concerning school facilities has not been adequately addressed. The Project's impacts on school facilities remain potentially significant, and mitigation beyond SB 50 school fees are required.

9 Project Alternative

As provided throughout this comment letter, there are serious impacts caused by the proposed Project that have not been properly analyzed, disclosed, or mitigated in the Draft EIR. The District suggests the following project alternatives to reduce the severe air quality and noise impacts at its schools: **A3.93**

- Limit the boundaries of the proposed Specific Plan and development options to no closer that 1,000 feet of Zimmerman Elementary School, Bloomington High School, and Harris Middle School, consistent with CARB's recommendation to provide a 1,000-foot buffer between distribution centers and residences, schools, daycare centers, playgrounds, and medical facilities, or
- Limit operations within 1,000 feet of Zimmerman Elementary School, Bloomington High School, and Harris Middle School to office use, related support operations, and automobile parking.

10 Visual Resources

No renderings of the four developments under Development Option 2 have been provided. The District would like to understand whether a wall would be constructed between Site 1 and Zimmerman Elementary School. If so, what would be the height of the wall. Would there be shade and shadow impacts at Zimmerman Elementary? How much sunlight would be lost on the playground and how much impact would there be related to the school's solar panels? Moreover, would there be sufficient visibility of pedestrians by trailer trucks exiting the northernmost driveway of Site 1 under Option 2? **A3.94**

Colton Joint Unified School District

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

Draft EIR Figure 5.1-2, *Site 3 Conceptual Visual Simulation*, shows a driveway on Santa Ana Avenue that leads to passenger and trailer truck parking areas. Please address potential traffic and pedestrian safety impacts along Santa Ana Avenue is trailer trucks will be accessing Santa Ana Avenue. **A3.94 cont.**

11 Public Nuisance

Given their capacity to generate traffic, noise, and air pollutants, large warehouse, trucking, and logistics facilities in residential areas near schools may constitute public nuisances under Civil Code Section 3480. California courts have repeatedly held that land uses with major negative impacts on surrounding properties and neighborhoods are public nuisances.[7] **A3.95**

As potential public nuisances, the developments contemplated by the proposed Project could be subject to litigation. The County should make changes to the Project to prevent the creation of public nuisances, or at a minimum, to mitigate their impact. Failure to do so could result in protracted litigation even after the CEQA process is complete.

Conclusion

The District appreciates the opportunity to submit these comments on the Draft EIR and the proposed Project. As provided herein, the District has serious concerns about the potential impacts on its schools and the community they serve. We therefore request that the County neither certify the Draft EIR nor approve the Project until after adequate impact analysis and mitigation are conducted. The District looks forward to working with the County to resolve the concerns identified in this letter. **A3.96**

Sincerely,

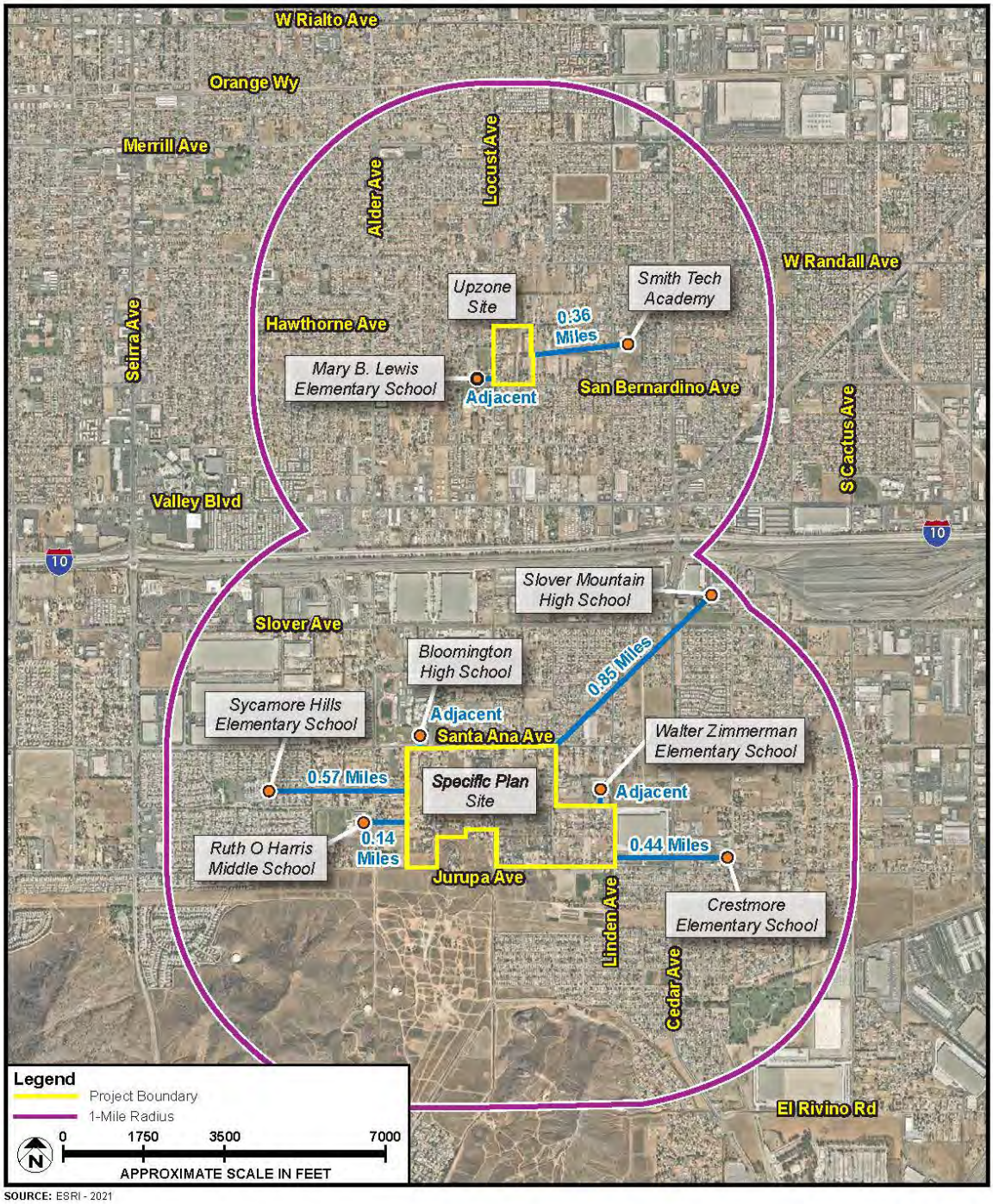
Owen Chang

Owen Chang
Director Facilities & Energy Management

Cc Dr. Frank Miranda, Superintendent

[7] See, e.g., *Vowinckel v. N. Clark & Sons* (1932) 216 Cal. 156, 158, 13 P.2d 733 (vibrations, noise, and smoke resulting from operation of factory); *Wade v. Campbell* (1962) 200 Cal. App. 2d 54, 57–61, 19 Cal. Rptr. 173 (odors, mosquito infestation, and dust resulting from operation of dairy); *Williams v. Blue Bird Laundry Co.* (1927) 85 Cal. App. 388, 394–395, 259 P. 484 (noise, odors, and smoke resulting from operation of laundry).

37



SOURCE: ESRI - 2021

FIGURE 1

Meridian Consultants

Schools Near the Project Site

336-006-21



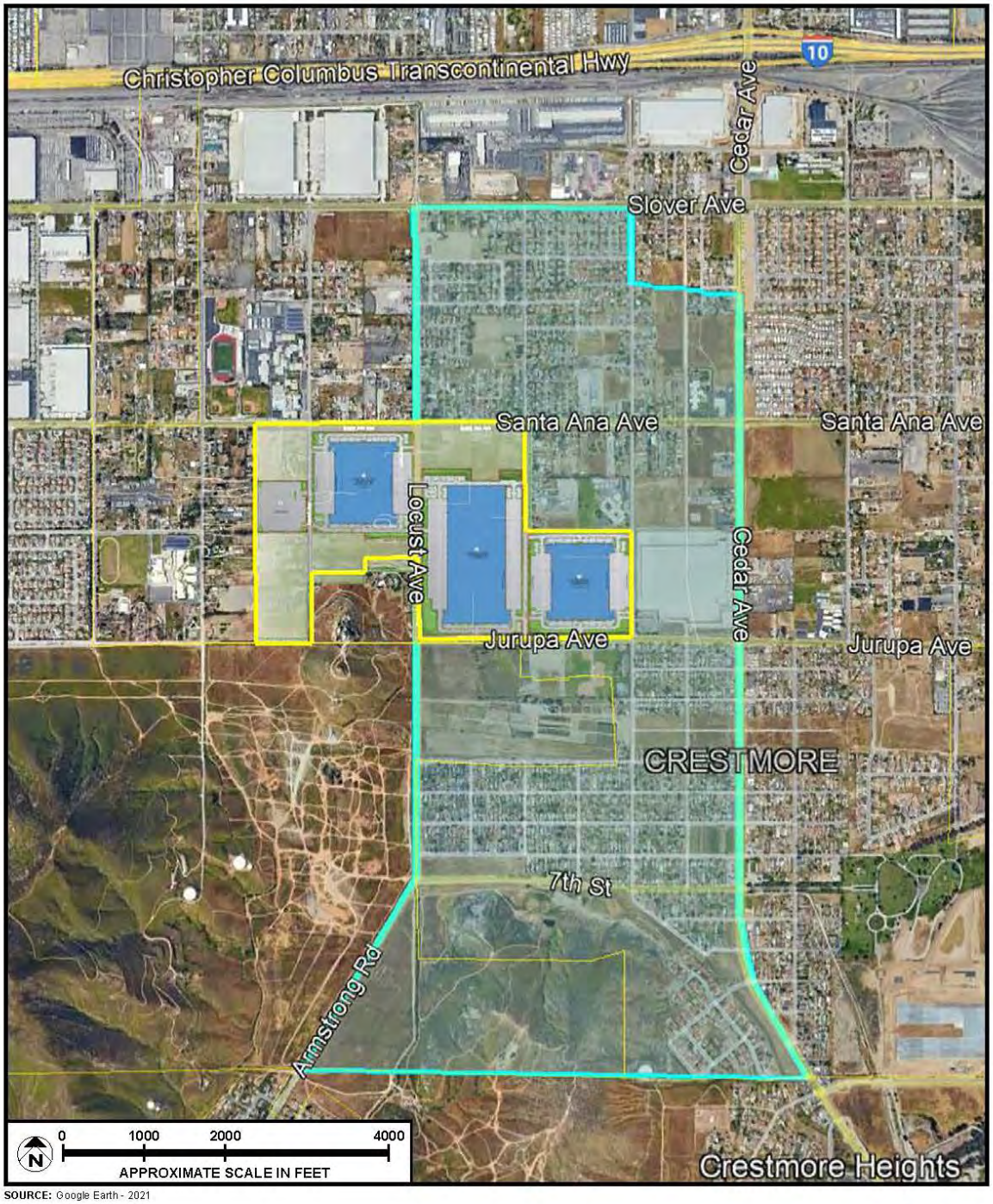
SOURCE: ESRI - 2021, Google Earth - 2021

FIGURE **2**

Meridian Consultants

Cumulative Projects in Bloomington

336-006-21



SOURCE: Google Earth - 2021

FIGURE **3**

Meridian Consultants

Division of Established Zimmerman Community

336-006-21

Response to Comment Letter A3: Colton Joint Unified School District, dated January 12, 2022 (Withdrawn August 4, 2022)

Comment A3.0: This letter formally withdrawals Colton Joint Unified School District's previous comment letters on the Project. The letter states that the District is planning on relocating Zimmerman Elementary School, which would significantly reduce the Project's impacts to Zimmerman Elementary School.

Response A3.0: The County appreciates the District's continued coordination with the County. This withdrawal letter will be forwarded to County decisionmakers as part of the Final EIR.

Comment A3.1: This comment states that the letter is a supplement to the comment letter that the Colton Joint Unified School District (CJUSD) submitted on December 15, 2021 that is attached as Attachment C.

Response A3.1: The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment A3.2: This comment states that the Draft EIR is flawed because it does not provide a thorough Health Risk Assessment (HRA) adequately evaluating the dangers to sensitive receptors in the vicinity of the Project. The comment states that the Draft EIR did not conduct an air quality analysis for PM_{10}, $PM_{2.5}$, NOx and other emissions, including fugitive dust and fine particulate from diesel-fueled vehicles. The comment states that the CJUSD has conducted additional air quality analysis to verify the Project's air quality impacts at Zimmerman Elementary School that is attached to the letter as Attachment A.

Response A3.2: This comment is incorrect that no air quality analysis was prepared to analyze the Project's particulate matter and other emissions on local sensitive receptors. As detailed beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate the Project's health risk impacts to residents, schools, and workers as a result of exposure to Diesel Particulate Matter (DPM) and other emissions from heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 3.11 in one million, which is less than the South Coast Air Quality Management District's (SCAQMD) significance threshold of 10 in one million. The maximum non-cancer risks to nearby residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million, which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. For nearby schools, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million, and the maximum non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0. As such, operation of the Specific Plan at buildout would not cause a significant human health or cancer risk related to DPM emissions, and impacts would be less than significant.

In addition, the Draft EIR evaluates the potential of the Project to expose local sensitive receptors, such as residences and schools, to substantial pollutant concentrations. As detailed in Draft EIR Tables 5.3-15 through 5.3-18, after implementation of Mitigation Measure AQ-2 (use of Tier 4 Final construction equipment), emissions during construction activities would not exceed the SCAQMD's localized significance thresholds. Also, as detailed in Draft EIR Tables 5.3-19 through 5.3-21, emissions from operation of the Specific Plan would not exceed the SCAQMD's localized significance thresholds for any criteria pollutant at the nearest sensitive receptors. Therefore, impacts related to localized emission would be less than significant. Because the Project would not exceed thresholds for either DPM or localized significance thresholds, the Project would not result in health risk impacts to the neighboring community.

Comment A3.3: This comment states that BlueScape completed AQIA modeling using AERMOD for Project construction and operations, based on the emissions files prepared for the Draft EIR. The comment states that results of the analysis indicate Project construction and operations would generate PM_{10}, $PM_{2}.5$, and NO_2 emissions that exceed significance thresholds The comment asserts that those emissions constitute a significant effect on the environment not disclosed in the Draft EIR.

Response A3.3: As detailed in specific responses to modeling comments below (please see Response A3.5, A3.13, A3.18, A3.34, and A3.35 and Master Response 3), additional emissions modeling was performed for the Project using AERMOD (see Supplemental Air Quality Analysis Memorandum, included as Appendix A to this Final EIR) in response to this comment, which shows that the peak daily construction and operational-source emissions would not result in pollutant concentrations of NO_2, CO, PM_{10}, or $PM_{2.5}$ that would exceed significance thresholds. As such, construction and operational-source emissions would result in a less than significant localized impact, consistent with the findings in the Draft EIR.

Comment A3.4: This comment states that BlueScape supplemented the operational HRA completed for the Draft EIR with additional receptor locations and Project trips based on trip rates included in the industry standard, *ITE Trip Generation Manual* (Attachment B). The comment states that analysis also used more conservative exposure assumptions appropriate for children. The comment states that the analysis found that the operational cancer risk impacts at Zimmerman Elementary School and the community are underestimated in the Draft EIR. The comment asserts that cancer risk impacts at nearby resident and school locations are well above the 10 in one million cancer risk significance threshold.

Response A3.4: The Draft EIR includes an evaluation of the maximum impacted receptor location on the receptor grid, which are the receptors located nearest to the Project site. Any other receptors located a further distance would experience lower concentrations of DPM and lower risk, as DPM dissipates rapidly with distance. As detailed, the closest location with the maximum potential impact would have a less than significant impact. Thus, other locations that are farther away would also not be significantly impacted.

The trip rates used for modeling emissions are consistent with those used in the Project's traffic study. The Traffic Impact Analysis (TIA), included as Appendix K1 to the Draft EIR, Trip Generation used the trip rates and truck splits provided in the *TUMF High-Cube Warehouse Trip Generation Study* (WSP, January 29, 2019) for Building 1 and Building 3; the trip rates provided by Institute of Transportation Engineer's *Trip Generation, 10th Edition, 2017* and truck splits provided in the Fontana *Truck Trip Generation Study* (City of Fontana, August 2003) for Building 2, Site 4, and Planning Area B. The County of San Bernardino *Traffic Impact Study Guidelines* (July 9, 2019) states that trip generation for high truck generating uses should be handled on a project-by-project basis, dependent on the intended project use. The City of Fontana (the closest jurisdiction) *Traffic Impact Analysis (TIA) Guidelines for Vehicle Miles Traveled (VMT) and Level of Service Assessment* (October 21, 2020) states that vehicle splits from the *Truck Trip Generation Study* prepared by the City of Fontana shall be used for industrial uses. In certain cases, for industrial projects in the vicinity of Fontana, the County recommends using truck splits from the *Truck Trip Generation Study* prepared by the City of Fontana. The County of San Bernardino Public Works Department also reviewed and approved the trip generation and vehicle splits. In addition, studies in the Bloomington area have previously used the vehicle splits that are used in the Bloomington Business Park Specific Plan TIA, as further discussed in the TIA (Appendix K1 to the Draft EIR). Thus, the TIA analysis is consistent with previously used truck rate methodology. Therefore, the Draft EIR appropriately analyzed the volume of truck and vehicle trip air quality emissions that would be generated by the Project.

Also, the potential risks to school children were modeled consistent with SCAQMD and the Office of Environmental Health Hazard Assessment (OEHHA) guidance and utilized the recommended and more conservative 9-year exposure duration for schoolchildren. Also, as described on page 26 of the HRA (included as Appendix C2 to the Draft EIR), CARB, the California Environmental Protection Agency, and OEHHA, recommends refinement to identify potential effects to smaller human body weights and breathing rates to assess risk for susceptible subpopulations such as children, which was done as detailed in the

methodology provided on page 27 of the HRA. In line with guidance from CARB, the California Environmental Protection Agency, and OEHHA, a dose algorithm was used in order to accurately determine the potential cancer risk estimate to children, based on their lower body weights and breathing rates. As detailed in the Draft EIR and in this Final EIR, the Project's specific evaluation utilizing AQMD methodology shows that the Project would result in less than significant impacts to sensitive receptors.

Comment A3.5: This comment states that with prevailing winds blowing from the southwest to the northeast in the Bloomington area, the Project—which is west and south of Zimmerman Elementary School—would significantly impact air quality at the school. The comment states that Figures 1 and 2 of BlueScape's technical letter are isopleth maps that illustrate cancer risk and $PM_{2.5}$ concentrations around the Specific Plan area that show that the Project would impact the Zimmerman Elementary School campus and would exceed acceptable thresholds for cancer risk and $PM_{2.5}$ in the southern half of the campus. The comment states that the Project's air quality impacts at Zimmerman Elementary School are unacceptable and represent a significant impact the Draft EIR fails to address.

Response A3.5: As noted in Master Response 3 and Response A3.3 above, additional emissions modeling for the Project was performed using AERMOD (see Supplemental Air Quality Memorandum, Appendix A to this Final EIR), which indicates that the peak daily construction and operational-source emissions would not result in pollutant concentrations of NO_2, CO, PM_{10}, or $PM_{2.5}$ that would exceed significance thresholds. As such, construction and operational-source emissions would result in a less than significant localized impact.

While the northeast wind pattern in the area could potentially result in an increase of pollutants traveling from south to north, the results of the operational-source HRA show that cancer risk at Zimmerman Elementary would be 0.60 in one million, which is less than the 10 in one million significance threshold. The analysis utilized the OEHHA recommended exposure duration of 9 years for schoolchildren. Additionally, a construction-source HRA was prepared, as detailed in Master Response 2, which shows that cancer impacts at all receptors would be well below the 10 in one million significance threshold.

Comment A3.6: This comment states that CJUSD requests that the County neither certify the Draft EIR nor approve the Project until the Draft EIR has been supplemented and recirculated and requests to meet with the County and Applicant to discuss appropriate mitigation to address air quality and school facility impacts.

Response A3.6: The comment is conclusionary in nature and refers to other comments in the letter that are addressed in other responses herein. The comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue, and based upon other responses herein, the Draft EIR does not require recirculation.

Comment A3.7: This comment states that BlueScape Environmental has prepared comments concerning the Draft EIR and states that the Draft EIR failed to complete an estimate the highest expected health impacts at residential locations and school sites.

Response A3.7: The comment is introductory in nature and does not identify specific recommended changes related to the Draft EIR. As described in Responses A3.2 and A3.3, the EIR completed assessments for potential impacts related to health impacts at sensitive receptor sites, which determined that impacts would be less than significant with construction related mitigation.

Comment A3.8: The comment states that the review by BlueScape Environmental confirms the need for additional EIR work, and the importance of enforcing appropriate mitigation for Project-related significant emissions impacts. The comment states that CJUSD's primary concern is the cancer risk and respiratory health impacts of these pollutants during construction from diesel-powered equipment such as graders and bulldozers. The comment states that fine dust emissions will be generated from earth dropped into piles and loaded onto haul trucks that would be particularly high and upwind of Zimmerman Elementary School

during construction. The comment also states that DPM, $PM_{2.5}$ and NOx emissions would result from traffic associated with the operation of the facilities, with many heavy-duty diesel-fueled trucks travelling through the community.

Response A3.8: As detailed in Responses A3.2, A3.3, and A3.5, after implementation of Mitigation Measure AQ-2 (use of Tier 4 Final construction equipment), emissions during construction activities would not exceed the SCAQMD's localized significance thresholds for schools or residences. Additionally, a construction-source HRA was prepared (included as Appendix A to this Final EIR), as detailed in Master Response 2, which shows that cancer impacts at all receptors would be well below the 10 in one million significance threshold. The results of the construction-source HRA indicate that cancer risk at Zimmerman Elementary would be 0.06 in one million which is less than the 10 in one million significance threshold. The results of the operational-source HRA indicate the cancer risk at Zimmerman Elementary would be 0.60 in one million, which is less than the 10 in one million significance threshold. Thus, impacts from construction-source and operational TAC emissions were determined to be less than significant.

Fine dust emissions during construction would be controlled by standard SCAQMD Rule 403 that governs emissions of fugitive dust during and after construction (as detailed on Draft EIR page 5.3-8) and included in the MMRP (Final EIR Chapter 4) to ensure inclusion on County construction permitting implementation during activities. As shown on Draft EIR Table 5.3-7 (page 5.3-32) related to regional construction emissions and Tables 5.3-15 through 5.3-18 related to localized construction emissions, impacts related to particulate matter would not occur during maximum peak construction activities with use of Tier 4 equipment that is rated 50 horsepower (hp) or greater. Additionally, although the Project would result in significant and unavoidable regional operational emissions of VOCs and NOX (Draft EIR page 5.3-34), as detailed in Response A3.2, impacts related to DPM and localized significance levels from trucks traveling to and from the Project site would be less than significant.

Comment A3.9: This comment requests that the County adopt air quality significance thresholds that address the much higher potential health impacts on nearby sensitive residential and school sites. The comment states that the recommended significance thresholds for construction cancer health risk assessment (HRA) review and air quality impact analysis will provide an added measure of health protection that ensures effective mitigation will be employed to reduce health impacts on sensitive receptors such as school children and residents to acceptable levels. The comment also states that the letter provides the results of BlueScape Environmental modeling that address flaws and technical errors in the Draft EIR air quality analysis and HRA work that lead to underreporting health impacts in the community.

Response A3.9: Lead Agencies have discretion to determine the appropriate significance thresholds based upon substantial evidence (See State CEQA Guidelines § 15064.7(b)), which was done by the County for preparation of the Draft EIR through compliance with Countywide Plan Policy HZ-3.1, below.

Policy HZ-3.1: Health risk assessment. *We require projects processed by the County to provide a health risk assessment when a project could potentially increase the incremental cancer risk by 10 in 1 million or more in unincorporated environmental justice focus areas, and we require such assessments to evaluate impacts of truck traffic from the project to freeways. We establish appropriate mitigation prior to the approval of new construction, rehabilitation, or expansion permits.*

In addition, the project is consistent with Countywide Plan Mitigation Measure AQ-3 below which uses a threshold of 10 in 1 million or more:

Countywide Plan MM AQ-3. *Applicants for new discretionary industrial or warehousing projects or commercial land uses that would generate substantial diesel truck travel—i.e., 100 diesel trucks per day or 40 or more trucks with diesel-powered transport refrigeration units per day based on the California Air Resources Board recommendations for siting new sensitive land uses—shall contact the South Coast Air Quality Management District (SCAQMD) or Mojave Desert Air Quality Management District (MDAQMD) in conjunction with County*

staff to determine the appropriate level of health risk assessment (HRA) required. If preparation of an HRA is required, all HRAs shall be submitted to the County Land Use Services Department and the SCAQMD or MDAQMD for evaluation. The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and SCAQMD, for projects within the South Coast Air Basin (SoCAB), or MDAQMD for projects within the Mojave Desert Air Basin (MDAB). The HRA shall consider cumulative impacts from industrial/warehouse projects within 1,000 feet of the boundary of the project site. If the HRA shows that the project-level or cumulative incremental cancer risk exceeds ten in one million (10E 06) or the risk thresholds in effect at the time a project is considered, or that the appropriate noncancer hazard index exceeds 1.0 or the thresholds as determined by SCAQMD or MDAQMD at the time a project is considered, the applicant will be required to identify and demonstrate that measures are capable of reducing potential cancer and noncancer risks to an acceptable level, including appropriate enforcement mechanisms. Measures to reduce risk impacts may include but are not limited to:

-Restricting idling onsite beyond Air Toxic Control Measures idling restrictions, as feasible.
-Electrifying warehousing docks
-Requiring use of newer equipment and/or vehicles.
- Restricting offsite truck travel through the creation of truck routes.
- Measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the proposed project.

As described on page 26 of the Mobile Source Health Risk Assessment (HRA) (included as Draft EIR Appendix C2), guidance from the SCAQMD in the document *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*, emissions of toxic air contaminants (TACs) are considered significant (result in excess cancer risks) if they meet or exceed a 10 in one million cancer risk threshold. Also, as described on page 26 of the HRA, included as Appendix C2 to the Draft EIR, CARB, the California Environmental Protection Agency, and OEHHA recommend refinement to identify potential effects to smaller human body weights and breathing rates to assess risk for susceptible subpopulations such as children, which was done as detailed in the methodology provided on page 27 of the HRA. In line with guidance from CARB, the California Environmental Protection Agency, and OEHHA, a dose algorithm was used in order to accurately determine the potential cancer risk estimate to children, based on their lower body weights and breathing rates. In addition, the HRA provides a conservative analysis by evaluating the closest sensitive receptors with the maximum potential emissions and continuous exposure (24-hours per day). Thus, the potential impacts of the Project were not underreported and the Draft EIR provides the appropriate conservative analysis pursuant to SCAQMD, CARB, and OEHHA recommended methodology.

Comment A3.10: This comment states that to protect sensitive children attending school and living near Project construction and operations, CJUSD should request that the EIR utilize health-protective air quality impact significance thresholds that are more stringent than general SCAQMD CEQA significance thresholds. The comment states that children are more susceptible to adverse health impacts from exposure to toxins than adults and in accordance with the Children's Protection Act and the OEHHA Guidelines, the EIR evaluation should account properly for the vulnerability of CJUSD children, with impacts mitigated to the extent feasible.

Response A3.10: As detailed in Response A3.9, the HRA that was completed for the Project provides the appropriate conservative analysis pursuant to SCAQMD, CARB, and OEHHA recommended methodology. Per OEHHA methodology, the HRA included refinements to identify potential effects to smaller human body weights and breathing rates to assess risk to children, which was done as detailed in the methodology provided on page 27 of the HRA. In addition, the HRA provides a conservative analysis by evaluating the closest sensitive receptors with the maximum potential emissions and continuous exposure (24-hours per day). Thus, stringent significance thresholds and methodology that is consistent with resource

agency direction was utilized in the Draft EIR to determine potential impacts to school children, which determined that impacts would be less than significant, and mitigation is not required.

The health protective thresholds provided in the comment letter were not utilized in the analysis provided for the Project as they would not be appropriate for determining potential impacts from construction and operation of the Project based on agency guidance. Thresholds utilized were based on the Lead Agency's discretion and are supported by substantial evidence from SCAQMD, CARB, and OEHHA. However, as demonstrated by the construction-source HRA and operation-source HRA, emissions of DPM would be below the health-protective thresholds.

Comment A3.11: This comment states that construction of the Project would occur during the school day and prevailing winds blow toward Zimmerman Elementary School. The comment states that any toxic emissions, dust, and odors from Project construction would blow to the school site. The comment states that any health impact risk greater than zero should be unacceptable and that to protect CJUSD school children the County should mitigate and minimize impacts from the Project.

Response A3.11: As detailed in Responses A3.2, A3.3, and A3.5, after implementation of Mitigation Measure AQ-2 (use of Tier 4 Final construction equipment), emissions during construction activities would not exceed the SCAQMD's localized significance thresholds for schools or residences. Additionally, a construction-source HRA was prepared, as detailed in Master Response 2, which shows that cancer impacts at all receptors would be well below the 10 in one million significance threshold. The analysis utilized the OEHHA recommended exposure duration of 9 years for schoolchildren. The results of the construction-source HRA indicate that the cancer risk at Zimmerman Elementary would be 0.06 in one million, which is less than the 10 in one million significance threshold. Additionally, the results of the operational-source HRA indicate that cancer risk at Zimmerman Elementary would be 0.60 in one million, which is less than the 10 in one million significance threshold. Additionally, while prevailing winds could result in emissions blowing toward Zimmerman Elementary, as demonstrated by the construction HRA and operation HRA, impacts would be less than significant, and students at Zimmerman Elementary would not be exposed to substantial pollutant emissions.

Comment A3.12: This comment states that diesel exhaust is an air pollutant which may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. The comment states that the Draft EIR is deficient by not completing a construction emissions HRA. The comment also requests that the County adopt a 1 in one million cancer risk significance review threshold for Project construction-related emission impacts as appropriate and health-protective for school children and sensitive receptors.

Response A3.12: This comment is incorrect that a construction-source HRA was not prepared. As detailed in Master Response 2, a construction-source HRA was prepared in response to the comments provided by the commenter, which shows that cancer impacts at all receptors would be well below the 10 in one million significance threshold. The results of the operational-source HRA indicate that cancer risk at all receptors would also be well below the 10 in one million significance threshold. The analysis utilized the OEHHA recommended exposure duration of 9 years for schoolchildren and the SCAQMD's significance threshold of 10 in one million. However, it should be noted that impacts at Zimmerman Elementary would also be below the comment's recommended threshold of 1 in one million. Thus, either way, impacts would be determined to be less than significant.

Comment A3.13: This comment states that there are increased health effects from exposure to PM emissions and that the Draft EIR should include thresholds for short-term or 24-hour average, and long-term or annual average PM impacts, that are health-protective for school children and other sensitive individuals. The comment states that the EIR should be updated to use the federal significance thresholds stated in this letter.

Response A3.13: As detailed in the Supplemental Air Quality Memorandum (included as Appendix A to this Final EIR), pursuant to receipt of these comments, additional modeling was performed using AERMOD that also indicate that the peak daily construction and operational-source emissions would not result in pollutant concentrations of NO_2, CO, PM_{10}, or $PM_{2.5}$ that would exceed significance thresholds. Furthermore, the County has used exposure durations recommended by SCAQMD and OEHHA. As such, construction and operational-source emissions would result in a less than significant localized impact consistent with the Draft EIR.

Comment A3.14: This comment provides information related to potential impacts from NO and NO_2 and states that County should use thresholds that are more health-protective for school children that are based upon the SCAQMD Rule 1303 Table A-2 thresholds that cannot be exceeded for stationary projects: 20 µg/m3 for 1-hour average NO_2 impacts and 1 µg/m3 for annual average impacts.

Response A3.14: As detailed in the previous response, the County has used thresholds that are identified by the SCAQMD and exposure durations recommended by OEHHA that are specific for schoolchildren, which determined that operational-source HRA indicate that cancer risk at Zimmerman Elementary would be 0.60 in one million, which is less than the 10 in one million significance threshold and even the 1 in one million threshold recommended by the commenter, and therefore would be less than significant.

Comment A3.15: This comment states that the Draft EIR operational HRA has flaws and technical errors including using too few receptor locations to assess health risk impacts, underestimating truck traffic for the Project, and using child exposure assumptions that are not considered to be health-protective; and as a result, the operational cancer risk impacts at school sites such as Zimmerman Elementary School and the community are underestimated.

Response A3.15: As detailed in Response A3.9, the HRA provides a conservative analysis by evaluating the closest sensitive receptors with the maximum potential emissions and continuous exposure (24-hours per day), which identifies the maximum potential impact, which is correct pursuant to CEQA. An evaluation of additional receptor locations that are farther away would result in identification of lower impacts and is not required by CEQA. As operational impacts at the closest receptors were determined to be less than significant, impacts at other receptors that are farther away would also be less than significant.

The trip rates used for modeling emissions are consistent with those used in the Project's traffic study. The Traffic Impact Analysis (TIA), included as Appendix K1 to the Draft EIR, Trip Generation used the trip rates and truck splits provided in the *TUMF High-Cube Warehouse Trip Generation Study* (WSP, January 29, 2019) for Building 1 and Building 3; the trip rates provided by Institute of Transportation Engineer's *Trip Generation, 10th Edition, 2017* and land truck splits provided in the Fontana *Truck Trip Generation Study* (City of Fontana, August 2003) for Building 2, Site 4, and Planning Area B. The County of San Bernardino *Traffic Impact Study Guidelines* (July 9, 2019) states that trip generation for high truck generating uses should be handled on a project-by-project basis, dependent on the intended project use. The City of Fontana (the closest jurisdiction) *Traffic Impact Analysis (TIA) Guidelines for Vehicle Miles Traveled (VMT) and Level of Service Assessment* (October 21, 2020) states that vehicle splits from the *Truck Trip Generation Study* prepared by the City of Fontana shall be used for industrial uses. In certain cases, for industrial projects in the vicinity of Fontana, the County recommends using truck splits from the *Truck Trip Generation Study* prepared by the City of Fontana. The County of San Bernardino Public Works Department also reviewed and approved the trip generation and vehicle splits. In addition, studies in the Bloomington area have previously used the vehicle splits that are used in the Bloomington Business Park Specific Plan TIA, as further discussed in the TIA (Appendix K1 to the Draft EIR). Thus, the TIA analysis is consistent with previously used truck rate methodology. Therefore, the Draft EIR appropriately analyzed the volume of truck and vehicle trip air quality emissions that would be generated by the Project.

As detailed in Response A3.9, the HRA that was completed for the Project utilized OEHHA methodology to identify potential effects to smaller human body weights and breathing rates to assess risk to children, which was done as detailed in the methodology provided on page 27 of the HRA.

Comment A3.16: This comment states that the receptor placement in the operational HRA is inadequate and fails to locate the maximum residential cancer risk impacts. BlueScape placed a grid of 50-meter spacing near Project sites and roadways leading to the sites, out to 100 meters, 100-meter spacing out to 200 meters, and 200-meter spacing in the surrounding community, into the operational HRA. The comment states that using the same exposure assumptions as in the Draft EIR, BlueScape calculated a maximum resident 30-year cancer risk of 8.4 in a million that is 45% higher than the maximum resident cancer risk reported in the Draft EIR of 5.8 in a million.

Response A3.16: The receptor placement utilized by BlueScape is flawed as it utilizes receptors that are inappropriately analyzed and flawed locations of receptors. The receptors that are evaluated in the HRA and air quality analysis are those that are nearest to the Project site. Any other receptors located a further distance would experience lower concentrations of DPM and lower risks as DPM dissipates rapidly with distance. The HRA was prepared in accordance with SCAQMD and OEHHA recommendations and utilized an exposure duration of 30 years for residential receptors, 9 years for schoolchildren, and 25 years for workers and results in emissions that would not exceed SCAQMD thresholds. Therefore, impacts would be less than significant.

Comment A3.17: This comment states that the Traffic Study trip generation rates are incorrectly estimated. The comment provides a re-calculated trip generation rates for the Project that asserts daily trip volumes are 182% greater than identified in the Draft EIR (13,698 / 4,861 vehicles, or a factor of about 2.82 times higher). The comment states that due to the higher trip rate DPM emissions was underreported, and that are actually over the 10 in one million cancer risk significance threshold. The comment includes details of the Bluescape HRA assumptions and methodology.

Response A3.17: As detailed in Response A3.15, the trip rates used for modeling emissions are consistent with those used in the Project's traffic study. The Traffic Impact Analysis (TIA), included as Appendix K1 to the Draft EIR, Trip Generation used the trip rates and truck splits provided in the *TUMF High-Cube Warehouse Trip Generation Study* (WSP, January 29, 2019) for Building 1 and Building 3; the trip rates provided by Institute of Transportation Engineer's *Trip Generation, 10th Edition, 2017* and land truck splits provided in the Fontana *Truck Trip Generation Study* (City of Fontana, August 2003) for Building 2, Site 4, and Planning Area B. The County of San Bernardino *Traffic Impact Study Guidelines* (July 9, 2019) states that trip generation for high truck generating uses should be handled on a project-by-project basis, dependent on the intended project use. The City of Fontana (the closest jurisdiction) *Traffic Impact Analysis (TIA) Guidelines for Vehicle Miles Traveled (VMT) and Level of Service Assessment* (October 21, 2020) states that vehicle splits from the *Truck Trip Generation Study* prepared by the City of Fontana shall be used for industrial uses. In certain cases, for industrial projects in the vicinity of Fontana, the County recommends using truck splits from the *Truck Trip Generation Study* prepared by the City of Fontana. The County of San Bernardino Public Works Department also reviewed and approved the trip generation and vehicle splits. In addition, studies in the Bloomington area have previously used the vehicle splits that are used in the Bloomington Business Park Specific Plan TIA, as further discussed in the TIA (Appendix K1 to the Draft EIR). Thus, the TIA analysis is consistent with previously used truck rate methodology. Therefore, the Draft EIR appropriately analyzed the volume of truck and vehicle trip air quality emissions that would be generated by the Project. As the vehicle trips are correctly estimated, the air quality and DPM emissions generated from those trips have also been accurately modeled. As described in other responses herein, impacts related to DPM from operation of the Project were determined to be less than significant.

Additionally, the fraction of time at home and daily breathing rates utilized in the comment are overly conservative and are not based on SCAQMD or OEHHA guidance. The FAH value of 0.85 was utilized based on OEHHA's *2015 Risk Assessment Guidelines*. OEHHA recommends a value of 1.0 to be utilized

when a school is within the 1E-6 cancer risk isopleth (i.e., one in one million); however, there are no schools in the vicinity with this level of risk for the proposed Project. The fraction of time at home and daily breathing rate assumptions utilized in the HRA analyses for the Project are based on SCAQMD, CARB, and OEHHA guidance, and provide an accurate and realistic analysis of potential DPM emissions.

Comment A3.18: This comment states that a 70-year risk cancer risk isopleth for Project Option 2 is provided to represent persons that both live and attend school within the community, which show that the 10 in one million cancer risk isopleth extends outward and impacts residents and the Zimmerman Elementary School.

Response A3.18: As detailed in Draft EIR Section 5.3, Air Quality and the Supplemental Air Quality Memorandum (included as Appendix A to this Final EIR), the HRA was prepared based on SCAQMD and OEHHA guidance, which recommends using a 9-year exposure duration for schoolchildren and 30-year for residents. A 70-year risk is overly conservative, as residents typically do not reside at the same location for 70 years. A 30-year exposure duration, which was utilized within the analysis prepared for the Project, represents the high-end estimate (95th percentile) and is the recommended value utilized for assessing cancer risk based on SCAQMD and OEHHA guidance. Thus, based on state and regional threshold recommendations, impacts would be less than significant. Nothing requires the County to use the 70-year exposure duration that the comment recommends as it is not based on guidance provided by SCAQMD and OEHHA or based on substantial evidence.

Comment A3.19: This comment states that the cancer risk calculations provided in the letter do not include the Specific Plan Update or cumulative impacts with nearby projects such as the West Valley Logistics Center, and therefore, the health risk impacts in the community are expected to be greater. The comment states that the operational HRA should include the worst-case Project emissions and risk impacts, to update to the correct trip generation rates, to correct technical assumptions (FAH 1.0 for all age groups), and to utilize exposure assumptions that are more health protective for children (DBR 95th percentile for all age groups). The comment also states that the HRA should include the maximum cancer risk impacts, non-cancer chronic and acute risk impacts, cumulative health risks from nearby projects, and mitigation should be included.

Response A3.19: Refer to Responses A3.15 and A3.17 related to trip generation estimates. Per OEHHA's 2015 Risk Assessment Guidelines, FAH 0.85 for 0<2 years and 0.72 for 2<16 years should be utilized, unless a school is located within the 1.0E-6 cancer risk isopleth, in which case 1.0 should be utilized. As there are no schools located within the 1.0E-6 cancer risk isopleth, FAH values of 0.85 and 0.72 were used for the 0<2 years and 2<16 years age groups, respectively. Nothing requires the FAH 1.0 that the comment recommends.

The analysis was performed based on SCAQMD and CARB Refrigerant Management Program (RMP) guidelines, which recommend using 95th percentile breathing rates for the -0.3<2 age group and 80th percentile breathing rates for all other ages. Nothing requires the 95th percentile breathing rates to be used for all age groups as the comment recommends, and these breathing rates are not meant to be utilized for all age groups per SCAQMD and CARB guidance. The Project's HRA provides the maximum cancer risk and non-cancer risks as requested in the comment. There is no acute non-cancer risk associated with DPM, only chronic.

A review of other industrial projects within 1,000 feet of the Project and the associated truck travel routes revealed four projects in the vicinity, including the West Valley Logistics Center. Two projects, Cedar Avenue Technology Park and Thrifty Oil Warehouse are located approximately 4,800 feet north of the proposed Project. It was determined that due to the distance between these and the proposed Project, the cumulative risk from these projects would not result in any significant impacts to nearby sensitive receptors.

Another project, the Cedar Avenue Truck Terminal, is located approximately 2,100 feet northwest of the proposed Project. A review of the health risk assessment prepared for this project revealed that the 1 in one million risk isopleth does not extend to any receptors modeled in the HRA for the proposed Project. As a result, the cumulative risk from this project would not result in any significant impacts for nearby sensitive receptors.

The Bloomington Industrial Warehouse, located at 11191 Linden Avenue, is adjacent to the eastern boundary of the proposed Project. As presented in the HRA (Draft EIR Appendix C2), the maximally exposed individual receptor (MEIR) is located west of the warehouse and on the site of the proposed Project. The results of the HRA indicate that the 30-year cancer risk at the MEIR is 4.14 in one million. It is estimated that the MEIR for the Bloomington Industrial Warehouse is located approximately 1,400 feet northwest of the MEIR for the proposed Project. The cancer risk at the MEIR for the proposed Project from construction and operations combined is 4.91 in one million. Should the maximum cancer risk from the two MEIRs be summed, the total risk would be 9.05, which is below the SCAQMD's significance threshold of 10 in one million. It should be noted that because the MEIRs are in different locations, the actual risk would be lower. As a result, any cumulative health risk impacts would be considered less than significant.

As described on Draft EIR page 5.3-55, per SCAQMD's methodology, if an individual project would result in air emissions that exceeds the SCAQMD's thresholds for project-specific impacts, then it would also result in a cumulatively considerable impact. As detailed on page 5 of the Mobile Source Health Risk Assessment (Draft EIR Appendix C2), both the SCAQMD maximum individual cancer risk (MICR) and the cancer burden use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts. As detailed on Draft EIR page 5.3-44, the Project would not exceed these thresholds; and therefore, both Project level and cumulative impacts would be less than significant, and no mitigation measures are required.

Comment A3.20: This comment states that the Draft EIR did not complete an HRA for Project construction emissions, to include the overlap of impacts with Project operational emissions. The comment states that the modeling study completed by BlueScape indicates that construction activities would expose nearby residents and CJUSD schools such as Zimmerman Elementary School to high levels of DPM emissions over a relatively short time frame that would result in increased risk of short-term health impairment and long-term disease, including cancer and asthma. The comment states that the 30-year cancer risk results were estimated at a maximum of 1.1 in one million that exceeds the 1 in one million cancer risk threshold that is recommend for construction emissions.

Response A3.20: In response to this comment, a construction-source HRA was prepared that includes the overlap of Project construction and operational emissions. As detailed in Master Response 2, at the MEIR during the overlap of construction and operational emissions, the maximum incremental cancer risk attributable to Project construction and operational-source DPM emissions is estimated at 4.91 in one million, which is less than the threshold of 10 in one million. Nothing requires the County to use the 1 in one million threshold recommended by the comment. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. As such, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction and operational activity. All other receptors during construction and operational activity would experience less risk than what is identified for this location. Therefore, impacts would be less than significant.

Comment A3.21: This comment states that the Draft EIR did not complete an analysis of PM_{10}, $PM_{2.5}$, and NOx for projects greater than 5 acres in size, where the Localized Significance Thresholds (LST) guidance is not acceptable. The comment provides a description of analysis that was completed by BlueScape that shows that thresholds would be exceeded. This comment also provides a figure that shows the comment's estimated $PM_{2.5}$ annual average emissions from Project operations, compared with the 0.3 $\mu g/m^3$ significance threshold.

Response A3.21: As detailed in previous responses, based on the comments received, additional modeling was performed using AERMOD (see Supplemental Air Quality Analysis Memorandum Appendix A to this Final EIR), which indicates that the peak daily Project construction and operational-source emissions would not result in pollutant concentrations of NO_2, CO, PM_{10}, or $PM_{2.5}$ that would exceed significance thresholds. Per SCAQMD guidance, a LST analysis for SO_2 is not required. As such, construction and operational-source emissions would result in a less than significant localized impact.

Comment A3.22: This comment states that the BlueScape review confirms that the Draft EIR air quality analysis is deficient and should mitigate any impacts above the comment letter's recommended significance thresholds. The comment expresses encouragement to protect the public health of children and residents in the community.

Response A3.22: The comment is conclusionary in nature and refers to other comments in the letter that are addressed in other responses herein. As addressed in previous responses, the localized air quality analysis provided within the Draft EIR is not deficient, the appropriate resource-agency-endorsed thresholds are used, and no mitigation measures are required, as emissions would not exceed the thresholds.

Comment A3.23: This comment states that the volumes of traffic that would be generated by the development have been re-calculated to demonstrate that the traffic volumes used by the Draft EIR traffic analysis are lower than the volumes that are calculated by using the ITE rates. The comment states that the TIA also assumed that 50 percent the industrial park land use could potentially be occupied by manufacturing uses. The tables provided in the comment indicate a 135.6 percent increase in trips compared to the TIA trip generation estimate.

Response A3.23: Refer to Responses A3.15 and A3.17 related to the Draft EIR trip generation estimates. The trip generation and traffic volumes provided by the comment letter is incorrect as it utilizes trip rates that do not accurately reflect the proposed Project's uses.

Comment A3.24: This comment states that the Draft EIR is deficient in several respects and that neither the Draft EIR's analysis, nor its proposed mitigation of impacts, satisfies the requirements of CEQA. The comment states that the Project will cause significant impacts to students, CJUSD staff, and the community it serves. The operations of several schools will be negatively affected and that CJUSD opposes the Project. The comment states that there are six schools within one mile of the Specific Plan area and two schools within one mile of the Upzone site.

Response A3.24: The comment is introductory in nature and provides general concerns about the Project but does not raise a specific issue with the adequacy of the Draft EIR that can be specifically responded to. Therefore, no further response is required.

Comment A3.25: This comment summarizes the Project description and states that the Applicant has submitted a development application only for the proposed Development Option 1. No other development applications have been submitted at this time. Thus, should applications for Development Option 2 and/or other future developments be submitted in the future, they may undergo no additional environmental review if they are consistent with the development standards specified in the Specific Plan, and the Draft and Final EIR, if certified. The Draft EIR therefore leaves a gaping hole in the analysis and mitigation of project-level impacts. That deficiency is compounded by the inadequacy of the project-level impact analysis and mitigation that actually has been provided. The comment also asserts that no development within the 24-acre Upzone Site is proposed as a part of the Draft EIR, and project-level impacts are ignored.

Response A3.25: As described on pages 44 through 45 of the Specific Plan, in order for the Director to make a conformity determination, the applicant must provide a Trip Generation and Distribution Analysis

in order to ensure that the trips resulting from the proposed project would be in line with those analyzed within the Draft EIR. As stated in the Specific Plan, Development Plan Permits are ministerial in nature and do not require further review under CEQA.

As detailed in Section 3.0, *Project Description*, starting on page 3-2, the Draft EIR provides a project-level analysis for aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, greenhouse gas, land use and planning, noise, population and housing, public services, transportation, tribal cultural resources, and utilities. The Draft EIR provides a programmatic analysis for the Future Development – Specific Plan Buildout Scenario and Upzone Site as providing a project-level analysis for these portions of the Specific Plan would be speculative as no physical developments are currently proposed within these areas. As substantiated by CEQA case law, the Draft EIR is not required to analyze impacts from hypothetical buildout conditions as this analysis would be speculative (Rodeo Citizens Ass'n v County of Contra Costa (2018) 22 CA5th 214, 226; Anderson First Coalition v City of Anderson (2005) 130 CA4th 1173; Marin Mun. Water Dist. v KG Land Cal. Corp. (1991) 235 CA3d 1652, 1662).

Under CEQA Guidelines Section 15168, later activities in the Specific Plan must be examined in light of the Program EIR to determine whether additional environmental documentation must be prepared. If a later activity would have effects that were not examined in the Program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration. That later analysis may tier from the Program EIR as provided in Section 15152. If the County of San Bernardino finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Furthermore, all future developments would be required to incorporated mitigation measures in the Draft EIR. Therefore, the Draft EIR appropriately analyzed programmatic impacts from development of Planning Area B and the Upzone Site.

Comment A3.26: This comment provides a summary of the requirement for a project to encompass the whole of the action and states that many sections of the Draft EIR fail to analyze all Project components, in particular impacts related to upzoning the Upzone Site. The comment states that neither programmatic nor project-level impact analysis for air quality, noise, and traffic was conducted for the Upzone Site. The comment states that the Draft EIR failed to analyze construction impacts including air quality and transportation impacts. The comment further states that the Draft EIR and technical studies did not fully capture cumulative project effects and that the Draft EIR's cumulative project list does not include all developments that are currently planned or underway in Bloomington.

Response A3.26: The comment provides a broad introduction to later comments in the School District's letter regarding analysis in the Draft EIR. The comment is conclusionary in nature and refers to other comments in the letter that are addressed in other responses herein. As addressed in previous and future responses, the air quality analysis, transportation analysis, and cumulative analysis provided within the Draft EIR is not deficient.

Comment A3.27: This comment states that the Draft EIR fails to discuss certain Project components that will be considered by County decisionmakers. The comment states that if an activity or facility is necessary for the operation of the Project or a reasonably foreseeable consequence of approving the Project, then it should be analyzed within the environmental analysis. The comment states that the Draft EIR fails to disclose, analyze, or mitigate the impacts of those components.

Response A3.27: As detailed in the Draft EIR in Section 3.0, *Project Description,* all Project components including necessary approvals, infrastructure improvements, and potential buildout scenarios are analyzed within the Draft EIR's impact analysis. The comment broadly asserts that the Draft EIR fails to disclose, analyze, or mitigate impacts of these components, but does not provide evidence of any issues with the Draft EIR's analysis. As detailed in Section 3.0, *Project Description*, starting on page 3-2, the Draft EIR provides a project-level analysis for aesthetics, agriculture and forestry resources, air quality, biological

resources, cultural resources, energy, greenhouse gas, land use and planning, noise, population and housing, public services, transportation, tribal cultural resources, and utilities. The Draft EIR provides a programmatic analysis for the Future Development – Specific Plan Buildout Scenario and Upzone Site as providing a project-level analysis for these portions of the Specific Plan would be speculative as no physical developments are currently proposed within these areas. As substantiated by CEQA case law, the Draft EIR is not required to analyze impacts from hypothetical buildout conditions as this analysis would be speculative (Rodeo Citizens Ass'n v County of Contra Costa (2018) 22 CA5th 214, 226; Anderson First Coalition v City of Anderson (2005) 130 CA4th 1173; Marin Mun. Water Dist. v KG Land Cal. Corp. (1991) 235 CA3d 1652, 1662).

Comment A3.28: This comment asks for clarification regarding which Site Plan Approvals will be considered by decisionmakers as part of this Project. The comment requests clarification on the entitlement and environmental review processes for Development Option 2 and other future developments in the Specific Plan Area.

Response A3.28: As detailed in Section 3.0, *Project Description*, Site Plan Approvals considered by the County of San Bernardino Planning Commission and County of San Bernardino Board of Supervisors as part of the proposed Project would be for the four development sites within Opening Year Development – Option 1.

Should Opening Year Development – Option 2 be developed at a later date or should future developments be proposed within the Specific Plan Area, as discussed starting on page 44 of the Specific Plan, the applicant would be required to submit development application materials to the County Land Use Services – Planning Department. If the Director determines that the application conforms with the Specific Plan, as specified above, a Development Plan Permit shall be processed and approved for the new development project and findings shall be made. Development Plan Permits do not require a public hearing or the need to complete further review under CEQA and are ministerial in nature.

Under CEQA Guidelines Section 15168, later discretionary actions, such as projects that require a Conditional Use Permit, in the Specific Plan must be examined in light of the Program EIR to determine whether additional environmental documentation must be prepared. If a later activity would have effects that were not examined in the Program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration. That later analysis may tier from the Program EIR as provided in Section 15152. If the County of San Bernardino finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Furthermore, all future developments would be required to incorporated mitigation measures in the Draft EIR.

Comment A3.29: This comment asks for clarification regarding which features of the Project would require a Conditional Use Permits.

Response A3.29: The proposed developments in Opening Year Development – Option 1 would require Conditional Use Permits under San Bernardino County Code Section 85.06.050, as they require a Health Risk Assessment and propose three buildings, each with greater than 80,000 square feet of structure area in an industrial zone.

Comment A3.30: This comment asks for a description of the proposed Vesting Tentative Parcel Maps and asks that the maps be provided to the commenter.

Response A3.30: As detailed in Section 3.0, *Project Description,* on page 3-9, development applications for three Vesting Tentative Parcel Maps for the construction and operation of three warehouses on Development Sites 1 through 3 have been submitted to the County. The proposed warehouses are described on pages 3-9 through 3-11 of the Draft EIR.

The proposed site plans for the Vesting Tentative Parcel Maps are included in the Draft EIR as Figures 3-10 through 3-12. Should the commenter want copies of applications and maps, the commenter should submit a public records request via the San Bernardino County Public Records Portal. The comment does not raise a specific issue with the adequacy of the Draft EIR evaluation or raise any other CEQA issue. Therefore, no further response is required.

Comment A3.31: This comment states that the Community Benefits Agreement (CBA), Development Agreement (DA), and Community Facilities District (CFD) need to be described further and since these agreements would commit to the construction of improvements for the proposed Project and must be disclosed. The comment states that while CEQA Guidelines Section 15131(a) provides that a project's economic impacts shall not be treated as significant effects on the environment, the EIR may trace the chain of cause and effect from a proposed decision on a project through anticipated economic changes resulting from the project to physical changes caused by the economic changes.

The comment states that the Project would include a CBA and a CFD for the maintenance of public and private improvements constructed as part of the Project. The comment states that the Project Description in Draft EIR Section 3.0 provides no information on the improvements included in the CBA or CFD. The comment states that there is no impact analysis or mitigation for construction of these improvements or related facilities.

Response A3.31: As detailed in Section 3.0, *Project Description*, the Project would include multiple infrastructure improvements such as:

- Water improvements, consistent with the West Valley Water District's master plans (as shown in Figure 3-5 of the Draft EIR)
- Sewer improvements in accordance with the City of Rialto master sewer plans (as shown in Figure 3-6 of the Draft EIR)
- Stormwater drainage improvement in accordance with the County's Master Plans of Drainage and Comprehensive Storm Drain Plan objectives for the southwest portion (as shown in Figure 3-7 of the Draft EIR)
- Roadway improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue, and Santa Ana Avenue

These infrastructure improvements would be maintained through a combination of public and private entities as described in Table 5-1 of the Specific Plan. Major infrastructure costs related to the improvements disclosed in the Draft EIR may be offset by public assistance such as a Community Facilities District. The San Bernardino County Board of Supervisors' approval is necessary for the implementation of any and all special district financing mechanisms. As described above, these infrastructure improvements, that could potentially be maintained by a Community Facilities District, are included as part of the proposed Project and are analyzed throughout the Draft EIR as part of the proposed Project.

As suggested by the Bloomington Municipal Advisory Council, the Project would include a Community Benefits Agreement (CBA). The purpose of the CBA would be to memorialize additional public benefits that the Project would commit to enhance County services in the Bloomington area. The CBA would include a community enhancement fee that would be used for service enhancement activities in Bloomington. However, an analysis of specific environmental impacts from future service enhancement activities would be speculative in nature as none of these service enhancement activities are known at this time. As substantiated by CEQA case law, the Draft EIR is not required to analyze indirect impacts from hypothetical conditions as this analysis would be speculative (Rodeo Citizens Ass'n v County of Contra Costa (2018) 22 CA5th 214, 226; Anderson First Coalition v City of Anderson (2005) 130 CA4th 1173; Marin Mun. Water Dist. v KG Land Cal. Corp. (1991) 235 CA3d 1652, 1662).

Comment A3.32: This comment states that it is not clear whether a mechanism has been conceptualized to ensure that improvements related to drainage facilities proposed as part of the Project will be maintained in perpetuity. The comment states that the County must ensure that public infrastructure proposed as part of the Project will be maintained prior to its consideration of the Project.

Response A3.32: As detailed in Table 5-1 of the Specific Plan and the in the comment, if a maintenance mechanism, such as a Community Facilities District cannot be established under Special Districts prior to final County acceptance of drainage facilities, the property owner/applicant shall bear the cost for its maintenance until such time that formation of the entity is established and funded. As such, if a Community Facilities District, or other public maintenance mechanism, is not established by the time the County approved the final drainage facilities, the Project owner/applicant shall pay for the continued maintenance of the infrastructure facilities. The comment does not raise a specific issue with the adequacy of the Draft EIR evaluation or raise any other CEQA issue. Therefore, no further response is required.

Comment A3.33: This comment states that the Draft EIR fails to provide a HRA for construction of the Project and the HRA conducted for operations inadequately limited the number of sensitive receptor locations evaluated. The comment states that the Draft EIR also inappropriately relies on a screening tool to assess ambient concentrations due to construction and operations at the Project site and the Upzone site and underestimates the distances between the Project site and the surrounding sensitive uses, such as Walter Zimmerman Elementary School. The construction and operational Localized Significance Thresholds (LST) thresholds must be revised to reflect the appropriate distances.

Response A3.33: As detailed in Response A3.15, the HRA provides a conservative analysis by evaluating the closest sensitive receptors with the maximum potential emissions and continuous exposure (24-hours per day). An evaluation of additional receptor locations that are farther away would result in identification of lower impacts and is not required by CEQA. Per SCAQMD's Localized Significance Thresholds Methodology, a distance of 25 meters should be used in cases where receptors may be located less than 25 meters from the project boundary. Thus, for receptor distances less than 25 meters, a 25-meter receptor distance was utilized per SCAQMD guidance, which provides an accurate representation of potential impacts.

Also as detailed in previous responses, in response to the comment that the Draft EIR inappropriately relies on a screening tool, additional modeling was performed using AERMOD, which indicates that the peak daily construction and operational-source emissions would not result in pollutant concentrations of NO_2, CO, PM_{10}, or $PM2.5$ that would exceed significance thresholds. As such, construction and operational-source emissions would result in a less than significant localized impact.

Comment A3.34: This comment states that the Draft EIR fails to adequately examine the ambient air quality
impacts from Project construction and operational activities, and a refined air dispersion modeling analysis should be completed to assess localized air quality impacts to determine if the impacts exceed ambient air quality standards.

Response A3.34: As detailed in previous responses, based on the comments received additional modeling was performed using AERMOD dispersion modeling (see Supplemental Air Quality Analysis Memorandum Appendix A to this Final EIR), which indicates that the peak daily Project construction and operational-source emissions would not result in pollutant concentrations of NO_2, CO, PM_{10}, or $PM_{2.5}$ that would exceed significance thresholds. As such, construction and operational-source emissions would result in a less than significant localized impact.

Comment A3.35: This comment states that a construction HRA should be prepared and provides methodology and thresholds to be used.

Response A3.35: As detailed in in Master Response 2 (and Supplemental Air Quality Analysis Memorandum, Final EIR Appendix A), a construction-source HRA was prepared pursuant to SCAQMD and OEHHA methodology, which shows that cancer impacts at all receptors would be well below the 10 in one million significance threshold. The results of the construction-source HRA indicate that the cancer risk at Zimmerman Elementary would be 0.06 in one million, which is less than the 10 in one million significance threshold. As Zimmerman Elementary is the maximally exposed individual school child, the potential cancer risk at other nearby schools would be less than those at Zimmerman Elementary. Thus, impacts were determined to be less than significant.

Comment A3.36: This comment states that an HRA should also be conducted for the proposed Upzone site for both construction and operations with the same level of detail and methodology as the Specific Plan analysis.

Response A3.36: As detailed in draft EIR section 3.0, *Project Description*, the Project includes a shift of potential residential development from the Project site to another site and provides for an allowable increase of up to 215 dwelling units. The Project does not propose physical developments or improvements at the Upzone Site; therefore, these impacts are analyzed at the programmatic level. It is unknown what actual development would eventually be proposed for the site. However, the maximum potential development of the Upzone Site would be less than that which is authorized by the Specific Plan for the Specific Plan area and studied in the EIR, which would not generate significant impacts. Therefore, the potential maximum construction and operation of the Upzone Site would also not result in significant impacts.

Comment A3.37: This comment states that the operational HRA used a fraction time at home of 0.85 for third trimester and age bin 0 to 2. A value of 1.0 should be used. The HRA does not present the cancer burden values compared to the SCAQMD significance thresholds of 0.5.

Response A3.37: Per OEHHA's 2015 Risk Assessment Guidelines, a FAH 0.85 for 3rd trimester and 0<2 years and 0.72 for 2<16 years should be utilized, unless a school is located within the 1.0E-6 cancer risk isopleth, in which case 1.0 should be utilized. As there are no schools located within the 1.0E-6 cancer risk isopleth, FAH values of 0.85 and 0.72 were used for the 3rd Trimester/0<2 years and 2<16 years age groups, respectively. The HRA did not calculate cancer burden as the cancer burden analysis assumes a 70-year exposure duration. A 70-year risk is overly conservative, as residents typically do not reside at the same location for 70 years. A 30-year exposure duration represents the high-end estimate (95th percentile) and is the recommended value utilized for assessing cancer risk. The 30-year exposure duration is consistent with and recommended by OEHHA and SCAQMD for evaluating risk for residential receptors.

Comment A3.38: This comment states that the Draft EIR fails to adequately present the emission rates used in the HRA, which used CARB's EMFAC2017 instead of EMFAC2021 and used PM10 emission factors to determine the emission rates for the HRA. The comment states that there is No explanation is given towards the large decrease in emission factors associated with Option 1 and 2 versus Specific Plan Buildout for MHD and HHD trucks. Most of the truck trips are related to MHD and HHD, and thus, the HRA may be underestimating the health impacts associated with truck idling and movement. It appears that the emission factors are weighted based on population of trucks within the San Bernardino County fleet. Consideration should be given to weighting based on VMT within the San Bernardino County fleet.

Response A3.38: The emission rates utilized in the HRA are presented in Table 2-4 and in Appendix 2.1 of the HRA report. EMFAC2017 was utilized as this is the latest model approved by EPA and is utilized in the latest version of CalEEMod. EMFAC2021 was not used as this model is not approved by the EPA. Option 1 and 2 emission factors differ from the Specific Plan scenario as a different fleet mix is assumed for each scenario based on the traffic generation methodology. Additionally, an opening year of 2022 is assumed for Options 1 and 2, while an opening year of 2023 is assumed for the Specific Plan scenario. All emission factors were obtained from EMFAC. Emission factors are weighted based on the percentage of

diesel vehicles of each type within the San Bernardino County fleet population. Utilizing VMT rather than population data for the San Bernardino County fleet would not be appropriate as this would not account for the fact that different vehicle classes may experience significantly differing trip distances, and the HRA only accounts for emissions that occur on the Project site and on the immediate surrounding roadways.

Comment A3.39: This comment states that the Draft EIR fails to adequately explain how PDFs would be implemented. The PDFs are part of the proposed Project; however, they include stipulations that implementation would be dependent on feasibility. The comment states that it is not clear whether the air quality analysis and the HRA was conducted to include implementation of the PDFs and what would be done if the measure turned out to be infeasible.

Response A3.39: The PDFs are included in the Project's Mitigation Monitoring and Reporting Program (MMRP) in Chapter 4 of this Final EIR to ensure implementation along with the Specific Plan. Regarding stipulations related to feasibility, the proposed Project is a Specific Plan for buildout of the area that would occur through the year 2040 and provides for a variety of future tenants on the site. The PDFs provide for future technology (as directed by the California Attorney General) and would be required at the time each measure is feasible and infrastructure to support exists as determined by the County (as Lead Agency) during each development's permitting process. As stated on page 5.3-57 of the Draft EIR, emissions reductions from these PDFs were not included in the Project calculations to show the maximum potential impact, in compliance with CEQA.

Comment A3.40: This comment states that that the Project is not consistent with guidance from the CARB Community Health Perspective Handbook regarding the siting of a distribution center with more than 100 truck trips per day within 1,000-foot buffer of sensitive receptors. The comment states that the closest receptor is 11 feet away, which poses health risks to the sensitive receptors.

Response A3.40: The CARB Community Health Perspective Handbook[5] cited by the comment provides advisory recommendations to avoid siting new sensitive land uses within 1,000 feet of a distribution center that accommodates more than 100 trucks per day. The Handbook states on pages 4 and 5 that the recommendations are advisory and that land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality of life issues; and that the relative risk for these categories varies greatly. The Handbook states that to determine the actual risk near a particular facility, a site-specific analysis would be required, and that risks from DPM will decrease over time as cleaner technology phases in. As detailed in Response A3.2, a Mobile Source Health Risk Assessment was prepared to evaluate Project health risk impacts to residents, schools, and workers as a result of operation of the Project, which determined that impacts to sensitive receptors would be less than significant.

Comment A3.41: This comment states that Mitigation Measure AQ-1 should also include that parking lot coatings shall not exceed 50 g/L of VOC, consistent with the CalEEMod modeling for the mitigated construction cases in the Air Quality Report.

Response A3.41: Mitigation Measure AQ-1 has been modified to clarify that the low VOC parking lot coatings shall not exceed 50 g/L of VOC consistent with the mitigated modeling provided in the Air Quality Impact Analysis (Draft EIR Appendix C1). This modification is shown in Chapter 3, *Revisions to the Draft EIR*, and in the MMRP provided as Chapter 4 of this Final EIR.

Comment A3.42: This comment states that text regarding Mitigation Measure AQ-2 on page 5.3-32 of the Draft describes that the measure would "require all construction equipment greater than 150

[5] http://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf

horsepower (>150 HP) to be CARB certified tier 4 or higher." This is inconsistent with other statements in the Draft EIR such as on page 1-8 and page 5.3-59, which state the mitigation measure would apply to "off-road diesel construction equipment rated at 50 horsepower (hp) or greater.

Response A3.42: As detailed on Draft EIR page 5.3-59 and in Chapter 4, of this Final EIR, Mitigation Measure AQ-1 would apply to all off-road diesel construction equipment rated at 50 horsepower (hp) or greater. Text on page 5.3-32 of the Draft EIR has been clarified, as shown in Chapter 3, *Revisions to the Draft EIR*, of this Final EIR.

Comment A3.43: This comment states that Mitigation Measure AQ-2 should state that construction equipment greater than 150 HP shall be Tier 4 final, consistent with the CalEEMod modeling for the mitigated construction cases in the Air Quality Report.

Response A3.43: As detailed on Draft EIR page 5.3-59 and in Chapter 4, of this Final EIR, Mitigation Measure AQ-1 would apply to all off-road diesel construction equipment rated at 50 horsepower (hp) or greater. Text on page 5.3-32 of the Draft EIR has been clarified, as shown in Chapter 3, *Revisions to the Draft EIR*, of this Final EIR.

Comment A3.44: This comment states that the Draft EIR should include a mitigation measure requiring that a maximum of 20 acres per day can be actively disturbed, since that assumption is relied upon in the CalEEMod modeling for the unmitigated and mitigated construction cases in the Air Quality Report.

Response A3.44: As detailed on Draft EIR page 5.3-57, PDF AQ-2 provides that during Project grading operations, Project contractors shall limit the amount of daily grading disturbance area to not exceed the assumptions specified in the Draft EIR Air Quality Impact Analysis. The PDFs are included in the MMRP, provided as Chapter 4 of this Final EIR to ensure implementation with each development project.

Comment A3.45: This comment states that Draft EIR Tables 5.3-7 and 5.3-8 display maximum daily construction emissions without and with mitigation but does not include construction emissions estimates related to the Upzone Site. The comment states that while construction of the Future Development Area under the Specific Plan Buildout would not occur until construction of either Opening Year Option 1 or 2 is complete, construction activities could still overlap with construction of the Upzone Site. Therefore, Draft EIR Tables 5.3-7 and 5.3-8 should display maximum daily construction emissions for the Future Development Area under the Specific Plan Buildout plus the Upzone Site, and then compare the sum to SCAQMD's Regional Threshold of Significance. The comment states that even with incorporation of Mitigation Measure AQ-1 and AQ-2, mitigated maximum peak daily construction emissions for the Future Development Area under the Specific Plan Buildout plus the Upzone Site would exceed SCAQMD's Regional Thresholds of Significance for VOC and NOx and require additional mitigation or result in significant and unavoidable impacts.

Response A3.45: As detailed in Section 3, *Project Description*, of the Draft EIR, the Upzone Site would be re-zoned as part of the Project in compliance with the Housing Crisis Act of 2019 (Senate Bill 330) to offset the rezoning of the Specific Plan Area from residential to a non-residential use. This shifts the capacity of land for new housing from the Project site to another site that can accommodate the residential uses. The shift of development capacity for residential uses does not result in the actual development of housing; just the location of where housing would occur. Draft EIR page 3-2 describes that the Project does not propose physical developments or improvements at the Upzone Site; therefore, impacts are analyzed at the programmatic level. It is speculative to assume that the Upzone Site would be developed at the same time as the maximum feasible development of the Specific Plan. As substantiated by CEQA case law, (High Sierra Rural Alliance v County of Plumas (2018) 29 CA 5th 102, 126) an analysis of a speculative worst-case scenario is not required. There is no current development proposal for the Upzone Site. When a development plan is submitted to the County, a specific analysis of construction emissions would be required by the County and the timing of other developments within the area will be evaluated by the

County's Building and Safety Division and either conditions of approval or development specific mitigation would be implemented, if needed, through the County's standard permitting process.

Comment A3.46: This comment states that Draft EIR Tables 5.3-9 and 5.3-10 display peak summer and winter daily operational emissions with the opening year options (Opening Year Option 1 and 2) and the Future Development Area under the Specific Plan Buildout. However, the total maximum daily summer and winter daily emissions only consider Opening Year Option 1 plus the Future Development Area under the Specific Plan Buildout. The total maximum daily summer and winter emissions should be displayed for Opening Year Option 2 plus the Future Development Area under the Specific Plan Buildout, since it is the worst-case scenario producing the greatest emissions. Furthermore, the projected change in emissions from the Upzone Site (Draft EIR Table 5.3-11) should also be added to the total maximum daily summer and winter emissions for Opening Year Option 2 plus the Future Development Area under the Specific Plan Buildout since the increase in emissions is attributable to the Project. Therefore, the maximum daily summer and winter daily operational emissions associated with Opening Year Option 2, Future Development under the Specific Plan Buildout, and the Upzone Site should be summed and compared to the SCAQMD's Regional Threshold of Significance and would exceed SCAQMD's Regional Thresholds of Significance for VOC and NOx and require additional mitigation or result in significant and unavoidable impacts.

Response A3.46: Draft EIR Tables 5.3-9 and 5.3-10 display the maximum peak summer and winter daily operational emissions from the Specific Plan buildout. As shown on Table 5.3-9, the total peak summer operational emissions at Specific Plan buildout would be 100.63 of VOC and 291.71 of NOx, which would exceed the SCAQMD thresholds. Also, as shown on Table 5.3-10, the total peak winter operational emissions at Specific Plan buildout would be 99.04 of VOC and 298.17 of NOx, which would also exceed SCAQMD thresholds. As detailed on Draft EIR page 5.3-34, a majority of VOC emissions are derived from consumer products, and the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. Thus, operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage, and there are no feasible mitigation measures that would reduce these emissions to levels that are less-than-significant. As described in the previous response, Project changes to the Upzone Site shift the location of where future housing is planned to occur. No actual development is proposed as part of the Project. However, Draft EIR Table 5.3-11 provides the net change in emissions that would occur from buildout of the Upzone Site. Future development of the Upzone site would be considered a separate development project that would be implemented through a separate development application that is unrelated to the Specific Plan.

Comment A3.47: This comment states that the EIR should quantify the GHG reductions achieved by implementation of the Screening Table for GHG Reduction Measures, and if the mitigated GHG emissions are significant, the project should provide further mitigation from onsite activities (for example, solar panels), offsite mitigation, and purchase of carbon offsets. The comment states that the EIR includes installation of Electric Vehicle Chargers for passenger vehicles, but no installation of electric chargers for medium duty and heavy-duty trucks have been identified. The comment states that given that PDF AQ-10 stipulates the feasibility of zero-emission heavy-duty trucks beginning in 2030, if such trucks are widely available and economically feasible, that GHG emissions should be assumed to be significant until zero emission heavy-duty trucks are implemented.

Response A3.47: As described on Draft EIR page 5.3-57, in order to ensure a conservative disclosure of Project impacts, no reductions in emissions have been assumed due to the incorporation of the PDFs. It is described on page 5.8-13 of the Draft EIR, that any project that adopts at least 100 points of GHG performance standards listed in the 2021 Screening Tables, would be consistent with the County's GHG Emissions Reduction Plan Update to reduce emissions to 40 percent below 2007 levels, which would be consistent with the State's long-term goal to achieve statewide carbon neutrality (zero net emissions) by 2045, and therefore, would result in a less than significant impact related to GHG emissions. Tables 5.8-6 and 5.8-7 (beginning on page 5.8-14), show that the proposed Specific Plan Project (including all three

development scenarios) would earn 171 points and the Upzone Site would earn 104 points on the County's 2021 GHG Screening Tables, which would both exceed 100 points and exceed a 40 percent reduction below 2007 levels.

Mitigation Measure GHG-1 has been included to ensure application of the GHG reduction measures. Additionally, as stipulated by Mitigation Measure GHG-1, individual projects can utilize different measures than those chosen in Draft EIR Tables 5.8-6 and 5.8-7 as long as the total of the measures utilized meet 100 points, which would be verified by the County's Building and Safety Division during permitting of each development within the Specific Plan area. Thus, installation of electric chargers for medium duty and heavy-duty trucks is not required for the Project to reduce impacts to a less than significant level. However, PDF AQ-13 provides that the Project construct electric truck charging infrastructure consisting of infrastructure (i.e., conduit) to support future installation of charging stations, when such trucks are commercially available.

Comment A3.48: This comment states that Draft EIR Tables 5.3-9 and 5.3-10 should be expanded to include separate emissions totals for the Future Development Area under the Specific Plan Buildout to improve the presentation of the emissions values so readers can see the contribution of the Future Development Area under the Specific Plan Buildout compared to other elements of the Project.

Response A3.48: Draft EIR Tables 5.3-9 and 5.3-10 show the peak summer and winter operational emissions that would occur from the from Specific Plan buildout. The contribution of emissions from each development scenario is identified in the tables.

Comment A3.49: This comment states that Page 3 of the Air Quality Impact Analysis (Draft EIR Appendix C1) omits that Project construction would also have the potential to exceed SCAQMD regional thresholds for VOC emissions prior to mitigation (in addition to NOx) and incorrectly states that "after application of Mitigation Measure AQ-1, Project construction-source emissions will not exceed SCAQMD regional thresholds for NOx emissions." Mitigation Measure AQ-1 ("Super-Compliant" low VOC paints) is intended to reduce VOC emissions to a less than significant level while Mitigation Measure AQ-2 (Tier 4 Construction equipment) is intended to reduce NOx emissions to a less than significant level.

Response A3.49: The comment identifies a typographical error where Mitigation Measure AQ-1 is related to reduction of VOCs and not NOx. The error has been addressed and revised in Chapter 3, *Revisions to the Draft EIR*.

Comment A3.50: This comment states that Draft EIR Table 5.3-2 provides 3 years of data of the Central San Bernardino Valley 1 monitoring station spanning between the years of 2017 – 2019. However, the most recent data available by CARB provides pollutant data spanning between 2018 – 2020. Thus, the table should be revised.

Response A3.50: As requested by the comment, Table 5.3-2 has been updated with year 2020 air quality data and is included in Chapter 3, *Revisions to the Draft EIR*.

Comment A3.51: This comment states that that the analysis appears to ignore other sensitive uses, including the Ruth O. Harris Middle School located west of the Project site across Alder Avenue. The comment also states that the analysis incorrectly provides distances from the Project site boundary to the building façade for school uses, such as Walter Zimmerman Elementary School, instead of the outdoor playground areas.

Response A3.51: As detailed in Responses A3.9 and A3.15, the air quality analysis provides a conservative evaluation by modeling the closest sensitive receptors with the maximum potential emissions and continuous exposure (24-hours per day), which identifies the maximum potential impact. An evaluation of additional receptor locations that are farther away (such as the Ruth O. Harris Middle School) would

result in identification of lower impacts and is not required by CEQA. As operational impacts at the closest receptors were determined to be less than significant, other receptors would also not be significantly impacted.

As described on Draft EIR page 5.3-16, all distances are measured from the Project site boundary to the outdoor living areas (e.g., backyards) or at the building façade, whichever is closer. The school playground areas are not living areas and are used on an intermittent basis during the school day. However, as detailed on Draft EIR page 5.3-37, the LSTs for a receptor distance of 25 meters (82 feet), which is the closest distance threshold identified by SCAQMD was used to evaluate LST emissions, and from which it was determined that operational impacts would be less than significant, which is applicable to the Walter Zimmerman Elementary School. The 25-meter threshold is applicable to the Walter Zimmerman playground areas as it is the most conservative threshold available for LST analysis, per SCAQMD guidance. In addition, the maximum potential operational DPM emissions were identified by the Mobile Source Health Risk Assessment (Draft EIR Appendix C2), which determined that impacts to the closest school at a distance of 92-feet from the Project boundary, would not exceed the thresholds; and therefore, would be less than significant (Draft EIR page 5.3-54).

Comment A3.52: This comment states that the analysis incorrectly identifies sensitive receptor SP-R3 (Bloomington High School) only as a Sensitive Receptor near Future Development Area – Specific Plan Buildout. The comment states that SP-R3 should also be identified as a sensitive receptor for Development Options 1 and 2.

Response A3.52: As detailed on Draft EIR page 5.3-54, potential operational DPM emissions impacts to Bloomington High School were identified for all three Specific Plan scenarios, including: Opening Year Option 1, Opening Year Option 2, and the Future Development Area/Specific Plan Buildout. As determined, emissions in all three scenarios would not exceed the thresholds, and impacts would be less than significant. Also, potential impacts to LSTs were identified at the nearest sensitive receptor, which are the residences adjacent to the Project site. The LST emissions at the school sites would be less, as they are farther from the site. Therefore, potential impacts to the Bloomington High School were appropriately evaluated.

Comment A3.53: This comment states that the air quality modeling assumes construction of all four sites is to commence in the fourth quarter of 2021 with operation of the four sites by fourth quarter 2022. The comment states that the modeling assumes an outdated construction schedule starting October 1, 2021.

Response A3.53: Although, the Project is behind the initial estimated timeline, the modeling of construction and operational emissions remains valid. As detailed on Draft EIR page 3-16, for the purposes of a conservative analysis, it was assumed that construction of all four sites in Planning Area A (Phase 1 and Phase 2) under Option 1would commence concurrently over approximately a 14-month period and would be operational in 2022. Buildout of Planning Area B would occur by 2040 as Phase 3. Emissions from the Project would not increase with the Project timing delay; conversely, future construction activities have the potential to incorporate newer technologies as they become available that could reduce emissions.

Comment A3.54: This comment states that Mitigation Measure AQ-2 requires off-road diesel construction equipment rated at 50 horsepower or greater to comply with EPA/CARB Tier 4 offroad emissions standards or equivalent. The comment states that it is unclear if the construction modeling assumes all Tier 4 Final or Interim standards and whether Tier 4 equipment for all pieces of equipment remain readily available.

Response A3.54: As detailed in Draft EIR Appendix C1, the air quality modeling assumes Tier 4 Final off-road diesel construction equipment for all equipment rated at 50 horsepower or greater, which is available. This has been clarified in Chapter 3, *Revisions to the Draft EIR*, and is provided for in Mitigation Measure AQ-2 listed in Chapter 4, MMRP, of this Final EIR.

Comment A3.55: This comment states that the Draft EIR does not provide a consistency analysis with San Bernardino Countywide Plan Policy NR-1.2, Policy NR-1.8, Policy NR-1.9, Policy HZ-3.1 or regulatory requirements RR-AIR-1, RR-AIR-2, and RR AIR-3.

Response A3.55: As detailed on Draft EIR page 5.3-9 and 5.3-10, a majority of the policies and regulations listed by the comment are applicable to the proposed Project. The RRs are requirements that are applied to all development on the basis of federal, state, or local law, which effectively reduce environmental impacts. To ensure the implementation of the RRs for each development of the proposed Specific Plan, they have been included in the Project MMRP (Chapter 4 herein). Project consistency with the policies and regulations listed in this comment are detailed in the table below.

Policy/Regulation	Consistency
Policy NR-1.2 Indoor air quality. We promote the improvement of indoor air quality through the California Building and Energy Codes and through the provision of public health programs and services.	As described on Draft EIR page 5.11-11, the Project would comply with the CALGreen standards that are applicable to the Specific Plan. Thus, the proposed Project is consistent with Policy NR-1.2.
Policy NR-1.8 We invest in County facilities and fleet vehicles to improve energy efficiency and reduce emissions. We encourage County contractors and other builders and developers to use low-emission construction vehicles and equipment to improve air quality and reduce emissions.	This policy is not applicable to the proposed Project, which does not involve County facilities or fleet vehicles. However, the air quality PDFs included in the Project improve energy efficiency and reduce emissions. Thus, the Project is consistent with the general objective of the policy.
Policy NR-1.9 Building design and upgrades. We use the CALGreen Code to meet energy efficiency standards for new buildings and encourage the upgrading of existing buildings to incorporate design elements, building materials, and fixtures that improve environmental sustainability and reduce emissions.	As described on Draft EIR page 5.11-12, Compliance with current Title 24 and California Building Standards for building design would be in effect at the time of building permit issuance. Thus, the proposed Project is consistent with Policy NR-1.9.
Policy HZ-3.1 Health risk assessment. We require projects processed by the County to provide a health risk assessment when a project could potentially increase the incremental cancer risk by 10 in 1 million or more in unincorporated environmental justice focus areas, and we require such assessments to evaluate impacts of truck traffic from the project to freeways. We establish appropriate mitigation prior to the approval of new construction, rehabilitation, or expansion permits.	As described on Draft EIR page 5.11-11a Mobile Source Health Risk Assessment was prepared to evaluate the health risk impacts as a result of exposure to DPM as a result of heavy-duty diesel trucks entering and leaving the site during operation of the proposed industrial uses, which determined that impacts would be less than significant.
RR AIR-1 New buildings are required to achieve the current California Building Energy and Efficiency Standards (Title 24, Part 6) and California Green Building Standards Code (CALGreen) (Title 24, Part 11).	As described on Draft EIR page 5.11-11, the Project would comply with the CALGreen standards that are applicable to the Specific Plan. Thus, the proposed Project is consistent with RR AIR-1.
RR AIR-2 Construction activities are required to adhere to Title 13 California Code of Regulations (CCR) Section 2499, which requires that nonessential idling of construction equipment is	Compliance with idling regulations are described in Draft EIR Section 5.3, *Air Quality,* and have been included in the Project MMRP to ensure inclusion in construction permitting and

Policy/Regulation	Consistency
restricted to five minutes or less.	implementation during construction activities.
RR AIR-3 Construction activities in the SoCAB will be conducted in compliance with any applicable SCAQMD rules.	Compliance with SCAQMD Rules are described throughout Draft EIR Section 5.3, *Air Quality,* and have been included in the Project MMRP to ensure inclusion in construction permitting and implementation during construction activities.

Comment A3.56: This comment states that the updated operational air quality analysis must account for the updated and/or additional automobile and trailer truck trips resulting from the suggested changes to the Project's traffic study.

Response A3.56: As detailed in Responses A3.15 and A3.17, the TIA analysis is consistent with previously used truck rate methodology and was reviewed and approved by the County of San Bernardino Public Works Department. The Draft EIR appropriately identified the volume of trucks that would be generated by the proposed Project. As the vehicle trips are correctly estimated, the air quality and DPM emissions generated from those trips have also been accurately modeled.

Comment A3.57: This comment states that the Draft EIR has not conducted construction-related health risk analysis and the operational HRA that has been completed for Project operations is inadequate. The comment states that CJUSD strongly believes the proposed Project will cause significant health risks at CJUSD schools and submits mitigation for consideration.

Response A3.57: Refer to Responses A3.5, A3.8, A3.12, A3.20 regarding the construction HRA and impacts related to Zimmerman Elementary School and Responses A3.16, A3.17, and other previous responses regarding the operational HRA that was completed for the Project.

Comment A3.58: This comment describes SCAQMD adopted the Warehouse Indirect Source Rule, Rule 2305 and requests that it be used to implement measures at Zimmerman Elementary School including improved windows and doors, air filtration systems, vegetation be installed between the Project and Zimmerman Elementary School, and installation of walls between the Project site and the Elementary School.

Response A3.58: SCAQMD Rule 2305 is described on Draft EIR page 5.3-9, which details that the rule applies to owners and operators of warehouses "with greater than or equal to 100,000 square feet of indoor space in a single building that may be used for warehousing activities by one or more warehouse operators." The rule imposes a "Warehouse Points Compliance Obligation" (WPCO) on warehouse operators. Operators would be allowed to satisfy the WPCO by accumulating "Warehouse Actions and Investments to Reduce Emissions Points" (WAIRE Points) in a given 12-month period. WAIRE Points will be awarded by implementing measures to reduce emissions listed on the WAIRE Menu, or by implementing a custom WAIRE Plan approved by the SCAQMD.

Once a warehouse building is constructed and issued a certificate of occupancy, the owner or operator of the building is required to notify the SCAQMD within 14 days of issuance of the occupancy permit. Details of how the WAIRE Point requirements will be met at that time. CJUSD can coordinate with AQMD to ensure inclusion in the WAIRE Plan for the Project. As described on Draft EIR page 3-11, landscaping would be focused along the perimeters of each site, building exteriors, along screen walls that secure the trailer parking and loading dock areas, and around onsite detention basins. A variety of trees, shrubs, accents, and groundcover would be planted. Tree species include Desert Willow, Chitalpa, Crape Myrtle, Toyon, Olive, Date Palm, Afghan Pine, Chinese Pistache, California Sycamore, Coast Live Oak, and African Sumac.

Furthermore, as demonstrated by PDF NOI-2, the Project would include a 12-foot-high masonry concrete wall along the perimeter of Site 1, where the site is adjacent to Walter Zimmerman.

Comment A3.59: This comment states that the calculation of construction noise should include a logarithmic sum of the existing noise level and the future construction noise level. The comment asserts that this would result in a logarithmic increase of +17.9 dBA above existing noise levels that have the potential to exceed the 80 dBA threshold identified in the analysis and result in significant construction noise impacts. The comment also states that a 10 dB increase is generally perceived as a doubling in loudness and would almost certainly cause an adverse change in community response. The comment also states that assuming a minimum exterior-to-interior noise attenuation of 17 dBA, the interior noise levels at the school during construction would be 57.3 dBA, exceeding the maximum threshold identified by WHO and California Building Code.

Response A3.59: The comment suggests that the construction noise analysis should include the logarithmic sum of the existing noise level and the future construction noise. When two noise levels are 10 dB or more apart, the lower value does not contribute significantly to the total noise level. The existing exterior daytime ambient noise levels at the Walter Zimmerman Elementary School (OYD2-L6) were measured at 56.5 dBA Leq. The highest potential noise levels at Walter Zimmerman Elementary School would be 74.3 dBA Leq, during the grading phase. Combining the estimated worst-case short-term construction noise level with the existing ambient noise levels adds only 0.1 dBA Leq, producing a combined noise level of 74.4 dBA Leq. Adding the existing ambient noise level to the construction noise level does not meaningfully change the construction noise analysis findings.

The comment correctly states that during worst case peak construction noise conditions that the noise levels at the Walter Zimmerman Elementary School would result in a logarithmic increase of +17.9 dBA above existing noise levels. However, the comment suggests that the offsite sensitive uses adjacent to the Project would be exposed to higher noise levels than those presented in the Draft EIR, and construction noise levels have the potential to exceed the 80 dBA threshold identified in the analysis. This suggestion is inconsistent with the findings of the noise analysis and the comment provides no substantial evidence that construction noise levels would exceed the 80 dBA threshold. The noise analysis demonstrates that the worst-case construction noise levels at the Walter Zimmerman Elementary School of 74.3 dBA Leq, which would not exceed the 80 dBA Leq exterior noise level significance threshold.

To assess the worst-case construction noise levels, the Project construction noise analysis relies on the highest noise level impacts when the equipment with the highest reference noise level is operating at the closest point from the edge of primary construction activity (Project site boundary) to each receiver location. This conservative approach overstates the Project construction noise levels. The construction noise increases at the Walter Zimmerman Elementary School are generally limited to the Opening Year Development Option 2 (OYD2) condition.

As discussed above, the worst-case construction noise levels at Walter Zimmerman Elementary School would not exceed the 80 dBA Leq exterior noise level significance threshold. However, solely for informational purposes, while a 10 dB increase is generally perceived as a doubling of loudness, it does not necessarily represent a substantial temporary increase since no single noise increase level renders the noise impact significant. The Federal Interagency Committee on Noise (FICON) developed guidance to be used for the assessment of project-generated increases in noise levels that consider the ambient noise level. The FICON recommendations are based on long-term studies that relate aircraft noise levels to the percentage of persons highly annoyed by aircraft noise mostly due to increases over a 24-hour period with emphasis on nighttime impacts. While incremental noise level increase criteria are commonly applied for long-term off-site traffic/aircraft and operational noise level increases, there is no commonly accepted guidance on evaluating construction related noise level increases.

This lack of guidance on short-term construction noise level increases for assessing significance of impacts is unique to CEQA since the County of San Bernardino Development Code Section 83.01.080(g)(3) considers noise sources associated with construction activities as exempt if activities do not take place between the hours of 7:00 p.m. of any one day and to 7:00 a.m. of the next day, or on Sundays or federal holidays. The proposed Project's construction activities would occur pursuant to these regulations with no planned construction activities between the hours of 7:00 p.m. of any one day and to 7:00 a.m. of the next day. This approach is consistent with state agencies, such as Caltrans. However, to minimize the Project related construction noise level increases, the Project will develop and implement a Construction Noise Plan through PDF NOI-1 that outlines the noise-reducing construction practices that will be employed to reduce noise levels from construction activities, which are detailed on Draft EIR page 5.12-54 and Chapter 4, MMRP, herein.

The Draft EIR identifies Walter Zimmerman Elementary School (OYD2-L6) as a noise sensitive receiver location. The comment suggests that the maximum recommended background noise levels for school classrooms should be 35 dBA Leq or 45 Leq. The 35 dBA Leq is simply a recommendation and not enforceable, and the 45 dBA Leq standard of the building code specifically only applies to new construction. The most applicable regulatory standard is the California Streets and Highways Code Section 216, which states the indoor classroom noise limit is 52 dBA Leq.

The interior noise level is the difference between the predicted exterior noise level at the building facade and the noise reduction of the structure. Typical masonry building construction provides a Noise Reduction (NR) of approximately 25 dBA with "windows closed." With the highest construction noise levels at the Walter Zimmerman Elementary School (OYD2-R6) ranging from 62.3 to 74.3 dBA Leq, the interior noise levels are estimated at 49.3 dBA Leq and would be less than the indoor classroom noise limit of 52 dBA Leq.

Comment A3.60: This comment states that The Draft EIR underestimates the overall operational noise impacts because the analysis fails to take into account the existing noise when projecting future noise levels, as noise from the Project would occur in the context of the existing noise environment and not as an independent noise
source that occurs in isolation. The comment states that if the noise analysis accounts for the existing noise environment, the logarithmic sum of future noise levels would be 57.8 dBA, resulting in +1.3 dBA above the significance threshold identified in the Draft EIR.

Additionally, the comment states that reference noise levels were used to estimate operational noise impacts, which include measurements at 50 feet and an anticipated duration of one hour. It can be reasonably assumed that under a worst-case basis, all noise sources could be operated at the same time within any part of the hour. Assuming all noise sources are operational at the same time, the logarithmic sum would be 56.5 dBA. At 50 feet, which is the distance between the Specific Plan area and Zimmerman Elementary School, operational noise would be 66.4 dBA, above the ambient noise reading at Zimmerman, and mitigation would be required to reduce operational noise impacts.

Response A3.60: This comment suggests that the analysis fails to consider the existing noise levels when project future noise levels. This statement is incorrect. Draft EIR Tables 5.12-17 through 5.12-22 present the incremental operational noise levels attributed to the Project when combined with the existing ambient noise levels measurements. The comment also implies that when all noise sources are operational at the same time the combined noise levels would be higher. Also, Draft EIR page 5.12-35 describes that the projected noise levels assume the worst-case noise environment with all operating continuously. These sources of noise activity will likely vary throughout the day.

As indicated on Draft EIR Tables 5.12-17 through 5.12-22, the Project-related operational noise level increases would not exceed the significance criteria presented. Therefore, the incremental Project operational noise level increase is less than significant.

Comment A3.61: This comment states that the Draft EIR does not provide a consistency analysis with the applicable policies from the San Bernardino Countywide Plan or applicable regulatory requirements, which includes Policy HZ-2.7, Policy HZ-2.8, Policy HZ-2.9, RR-NOI-1, RR-NOI-2, RR-NOI-3, RR-NOI-4, and RR-NOI-5.

Response A3.61: As detailed in Draft EIR page 5.12-3 through 5.12-5, the policies and regulations listed by the comment are applicable to the proposed Project. The RRs are requirements that are applied to all development on the basis of federal, state, or local law, which effectively reduce environmental impacts. To ensure the implementation of the RRs for each development of the proposed Specific Plan they have been included in the Project MMRP (Chapter 4 herein). Project consistency of the policies and regulations listed in this comment are detailed in the table below.

Policy/Regulation	Consistency
Policy HZ-2.7 Truck delivery areas. We encourage truck delivery areas to be located away from residential properties and require associated noise impacts to be mitigated.	As described on Draft EIR page 5.11-15, loading doors would be screened with a tilt up wall between 12-feet-high to 14-feet-high and oriented so they are not visible from public streets. Trucks would not be allowed to use public right-of-way to maneuver into loading spaces. In addition, as mentioned in Section 5.12, operational noise from truck delivery areas would be less than significant. Thus, the proposed Project is consistent with Policy HZ-2.7.
Policy HZ-2.8 We limit or restrict new noise sensitive land uses in proximity to existing conforming noise generating uses and planned industrial areas.	The Project does not implement new noise sensitive land uses in proximity to noise generating uses. As described on Draft EIR page 4-19, the Upzone Site, which is planned for additional residential uses by the Project is surrounded by single-family residential uses to the north, Mary Lewis Elementary School northwest of the San Bernardino Avenue/Locust Avenue intersection, single-family residences southwest of Hawthorne Avenue at Locust Avenue, and single-family residences to the south and east. Thus, the proposed Project is consistent with Policy HZ-2.8.
Policy HZ-2.9 We prioritize noise mitigation measures that control sound at the source before buffers, sound walls, and other perimeter measures.	As detailed on pages 3-10 and 3-11 of the Draft EIR, the Project includes 12 and 14-foot masonry screen walls and other concrete tilt up walls to buffer noise, views, and emissions from Project building activity areas.
RR-NOI-1 The California Building Code (CBC), Title 24, Part 2, Volume 1, Chapter 12, Interior Environment, Section 1207.11.2, Allowable Interior Noise Levels, and CALGreen, Chapter 5, Division 5.5 standards.	Compliance with CBC regulations related to interior noise levels are described in Draft EIR Section 5.12, *Noise,* and RR-NOI-1 is included in the Project MMRP to ensure inclusion in Project permitting and implementation.
RR-NOI-2 San Bernardino County Development Code, Construction Noise Sources. Section 83.01.080 establishes standards concerning acceptable noise levels for both noise-sensitive land uses and noise-generating land uses. It prohibits construction activities between 7:00 PM and 7:00 AM on weekdays, or at any time on	Compliance with construction timing regulations is described in Draft EIR Section 5.12, *Noise,* and have been included in the Project MMRP to ensure inclusion in construction permitting and implementation during construction activities.

Policy/Regulation	Consistency
Sunday or a federal holiday.	
RR-NOI-3 San Bernardino County Development Code, Stationary Noise Sources. Section 83.01.080 establishes standards for stationary noise sources.	Project compliance with San Bernardino County Development Code, Stationary Noise Sources. Section 83.01.080 is described on Draft EIR pages 5.12-43 through 5.12-46.
RR-NOI-4 San Bernardino County Development Code Mobile Noise Sources. Section 83.01.080 establishes standards for mobile noise sources in Table 83-3 including limiting construction to the daytime hours between 7 AM to 7 PM on Monday through Friday and 9 AM to 6 PM on Saturday. Construction is prohibited on Sundays.	Compliance with construction timing regulations is described in Draft EIR Section 5.12, *Noise,* and have been included in the Project MMRP to ensure inclusion in construction permitting and implementation during construction activities.
RR-NOI-5 San Bernardino County Development Code Vibration. Section 83.01.090 prohibits vibration that can be felt without the aid of instruments or produces a particle velocity greater than or equal to two-tenths inch per second peak particle velocity (i.e., 0.20 in/sec PPV) at or beyond the lot line of the source. Exceptions are made for temporary construction, maintenance, repair, or demolition activities between 7:00 AM and 7:00 PM, except Sundays and federal holidays; and motor vehicles not under control of the industrial or commercial use.	A discussion of impacts related to vibration and exceedance of the County's vibration requirements (RR-NOI-5) is provided in the Impact NOI-2 discussion starting on Draft EIR page 5.12-49. As detailed impacts related to vibration would be less than significant with construction related mitigation.

Comment A3.62: This comment states that the construction noise would occur in the context of the existing noise environment and not as an independent noise source that occurs in isolation, off site sensitive uses adjacent to the Project site would be exposed to higher noise levels than the levels presented in the Draft EIR. The comment states that the calculation of construction noise should include a logarithmic sum of the existing noise level and the future construction noise level. As such, construction noise levels have the potential to exceed the 80 dBA threshold identified in the analysis and would result in significant impacts.

Response A3.62: Refer to Responses A3.59 and A3.60. As detailed in previous responses, combining the estimated worst-case short-term construction noise level with the existing ambient noise levels adds only 0.1 dBA Leq, producing a combined noise level of 74.4 dBA Leq, which does not exceed the threshold. Also, the noise analysis demonstrates that the worst-case construction noise levels at the Walter Zimmerman Elementary School of 74.3 dBA Leq would not exceed the 80 dBA Leq exterior noise level significance threshold.

Comment A3.63: This comment states that it can be reasonably assumed that in the worst case all noise sources can be operational at the same time within any part of the hour. Accordingly, assuming all noise sources are operational at the same time, the logarithmic sum of all these measurements at distance of 50 feet would be 66.4 dBA. Zimmerman Elementary School is located less than 50 feet from these noise sources and would be exposed to increased noise levels, and that mitigation is required to reduce these impacts.

Response A3.63: As described in Response A3.60, Draft EIR Tables 5.12-17 through 5.12-22 present the incremental operational noise levels attributed to the Project when combined with the existing ambient noise levels measurements. As shown in these tables the Project-related operational noise level increases would not exceed the significance criteria presented. Therefore, the incremental Project operational noise level increase is less than significant, and mitigation is not required.

Comment A3.64: This comment states that the operational analysis fails to take into account the existing noise level measurements presented in Table 5.12-3. As operational noise would occur in the context of the existing noise environment and not as an independent noise source that occurs in isolation, off site sensitive uses adjacent to the Project site would be exposed to higher noise levels than the levels presented in Table 5.12-11. The comment states that the calculation of operational noise should include a logarithmic sum of the
existing noise level and the future operational noise level assuming concurrent operation of all noise sources (66.4 dBA at 50 feet).

Response A3.64: As described in Response A3.60, Draft EIR Tables 5.12-17 through 5.12-22 present the incremental operational noise levels attributed to the Project when combined with the existing ambient noise levels measurements. As shown in these tables the Project-related operational noise level increases would not exceed the significance criteria presented, and is less than significant

Comment A3.65: This comment states that the updated noise analysis must account for the updated and/or additional automobile and trailer truck trips resulting from the suggested changes to the Project's traffic study.

Response A3.65: As detailed in Responses A3.15 and A3.17, the TIA analysis is consistent with previously used truck rate methodology and was reviewed and approved by the County of San Bernardino Public Works Department. The Draft EIR appropriately identified the volume of trucks that would be generated by the proposed Project. As the vehicle trips are correctly estimated, the noise generated from those trips have also been accurately modeled.

Comment A3.66: This comment states that the Draft EIR does not adequately address CEQA Transportation thresholds "a" and "c". The comment provides an excerpt of the San Bernardino County Transportation Impact Study Guidelines that states that County projects are required to complete a transportation impact study to demonstrate consistency with the general plan. The comment states that the Draft EIR does not articulate findings of the Project's Traffic Impact Analysis or how the traffic analysis supports the conclusion that the proposed Project wis consistent with County programs, plans, ordinances, or policies.

Response A3.66: As detailed in Section 5.15, *Transportation,* on page 5.15-4, Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

Comment A3.67: This comment states that the TIA was deficient according to the County TIS Guidelines, specifically section 3.1.2, which includes the following:

At a minimum, the following subject/locations should be studied:

a) Site access driveways
b) On-site circulation
c) Roadway(s) adjacent to the project (if requested by County staff)
d) Intersections in the immediate vicinity of the project
e) Pedestrian and bicycle circulation
f) Consistency with County Plans and Policies
g) Transit (bus and light commuter rail) accessibility to project site
h) Any intersection on which the project will add 50 or more peak hour project trips

Therefore, the comment recommends the Draft EIR and TIA be updated.

Response A3.67: It should be noted the automobile delay is no longer considered an environmental impact under CEQA, per CEQA Guidelines Section 15064.3. As a result, the effects of LOS are primarily addressed through County imposition of the Conditions of Approval. For informational purposes, the TIA was drafted in accordance with the County of San Bernardino *Traffic Study Guidelines*. As can be seen in the Figure 4: Project Study Area and Figure 14: Project Distribution, the Site access driveways and on-site circulation were discussed and analyzed. Analysis of roadways adjacent to the Project was not requested from the County, however mitigation of impacts on adjacent streets were addressed and analyzed (Santa Ana Avenue, Locust Avenue, and Jurupa Avenue). Intersections in the immediate vicinity of the Project were analyzed, and pedestrian/bicycle circulation were discussed. As the Project is not removing any sidewalks or bicycle lanes, and in fact are improving onsite sidewalks, no impact to pedestrian and bicycle circulation would occur. The Project proposes a specific plan, which includes a change in land use and roadway designations for a segment of Jurupa Valley, Linden Avenue, and Maple Avenue. The impacts of those designations were analyzed in the Air Quality, Noise, and Traffic studies. Similar to the pedestrian/bicycle circulation, the TIA addressed Transit accessibility to the Project, and does not propose to change or disrupt any current bus routes or stops, therefore, the Project would not have an impact on transit accessibility. Finally, as discussed with the County during the scoping process, all intersections adjacent to the Project and signalized intersections that add 50 or more peak hour Project trips were included in the analysis. Therefore, with the approved traffic study, the TIA fully addresses the County's requirements and does not require an update or recirculation.

Comment A3.68: This comment states that the Upzone site's traffic impacts were not analyzed and therefore, the transportation analysis for the proposed Project is incomplete.

Response A3.68: The Upzone site was analyzed in the Projects VMT Analysis (Table 4: Upzone Project Site VMT Impact Evaluation) and was found to have a less than significant impact on VMT. As for the Level of Service (LOS) analysis of the Upzone site, LOS is no longer considered an environmental impact under CEQA, per CEQA Guidelines Section 15064.3. As a result, effect of LOS can be handled separately when a development is proposed for the Upzone site through the entitlement process.

Comment A3.69: This comment states that the Draft EIR does not analyze the general plan amendment to change the roadway classifications, and that the traffic study does not fully address the ultimate operations based on the reclassifications.

Response A3.69: The traffic study does analyze the ultimate operations of the proposed Project in three analysis scenarios (Existing, Opening Year, and General Plan Buildout) and evaluates the roadways

consistent with the proposed street improvements and updated roadway classifications. Therefore, the Draft EIR appropriately addresses the potential impacts of the general plan amendment.

Comment A3.70: This comment states that erroneous Trip Generation Rates are applied to Specific Plan Project component and shows a comparison to standard rates published in the Institute of Transportation Engineers (ITE) Trip Generation Manual.

Response A3.70: Per CEQA (CEQA Guidelines Section 15064.3), trip generation is only a factor as it applies to the project's potential conflicts with transit, bicycle, and pedestrian facilities. For informational purposes, as detailed in Responses A3.15 and A3.17, the TIA analysis is consistent with previously used truck rate methodology and was reviewed and approved by the County of San Bernardino Public Works Department. The High Cube Fulfillment Center Warehouse ITE trip generation rate is based on projects that do not align with the expected tenants and uses for the proposed Project. As such, the High Cube Fulfillment Center Warehouse rate would grossly overestimate potential trips form the proposed Project as it does not propose a High-Cube Fulfillment Center use like the type analyzed in the ITE trip rate. The Draft EIR appropriately identified the volume of trucks that would be generated by the proposed Project.

Comment A3.71: This comment states that ITE Trip Generation Rates for fulfillment center warehouse land use category should be used, which are higher than the rates used for the EIR. The comment states that the TIA uses generic trip rates from the Western Riverside Council of Governments' Transportation Uniform Mitigation Fee (TUMF) Program and does not justify why the lower TUMF trip rates are applicable, nor do they explain why the transload storage warehouse land use category is appropriate. The comment states that these rates are oversimplified and represent an average trip rate for various types of high cube warehouse land use categories and are inappropriate for the Project traffic study. The comment also states that the TUMF high-cube warehouse daily trip rate is reported 2.21 trips per thousand square feet (TSF). However, the Project traffic study uses the daily rate of 2.129 trips/TSF, 0.081 trip/TSF lower than the reported TUMF rate. The traffic study should update the trip rates accordingly.

Response A3.71: Per CEQA (CEQA Guidelines Section 15064.3), trip generation is only a factor as it applies to the project's potential conflicts with transit, bicycle, and pedestrian facilities. For informational purposes, as detailed in Responses A3.15 and A3.17, the TIA analysis is consistent with previously used truck rate methodology and was reviewed and approved by the County of San Bernardino Public Works Department. The Draft EIR appropriately identified the volume of trucks that would be generated by the proposed Project. The TIA analysis also uses the correct trip rates, which can be found in Exhibit 6: Summary of Trip Generation Rates per Thousand Square Feet of Gross Floor Area for Fulfillment Centers in the WSP Technical Memorandum *TUMF High-Cube Warehouse Trip Generation Study*. The daily trip rate of 2.21 trips per thousand square feet is an incorrect trip rate. The High Cube Fulfillment Center Warehouse ITE trip generation rate is based on projects that do not align with the expected tenants and uses for the proposed Project. As such, the High Cube Fulfillment Center Warehouse rate would grossly overestimate potential trips form the proposed Project as it does not propose a High-Cube Fulfillment Center use like the type analyzed in the ITE trip rate. The trip rates provided by the *TUMF High-Cube Warehouse Trip Generation Study* provide a more accurate representation of the warehouse product type proposed by the Project.

Exhibit 6: Summary of Trip Generation Rates per Thousand Square Feet of Gross Floor Area for Fulfillment Centers

Vehicle Class	AM Peak Hour		PM Peak Hour		Daily	
	Conventional Warehouse*	Fulfillment Center	Conventional Warehouse	Fulfillment Center	Conventional Warehouse	Fulfillment Center
Cars	0.057	0.103	0.086	0.144	1.000	1.750
2-4 Axle Trucks	0.009	0.008	0.013	0.011	0.221	0.162
5-Axle Trucks	0.015	0.011	0.010	0.010	0.233	0.217
Total	0.082	0.122	0.108	0.165	1.432	2.129
% Higher than Conventional		49%		52%		49%

* Transload, Short-Term Storage category in 2016 TIE/ NAIOP/ SCAQMD study

Comment A3.72: This comment states that the Site 4 trailer truck yard should have been analyzed in Opening Year 1 and should have used the truck terminal trip rates from the City of San Diego Municipal Code Land Development Code Trip Generation Manual (2003).

Response A3.72: The Site 4 trailer truck yard was analyzed, along with the full Specific Plan, in the VMT analysis along with the TIA in all three analysis scenarios (Existing, Opening Year, and General Plan Buildout). The proposed trailer truck yard would be an open parking lot for truck/trailer parking and is an ancillary use to the onsite uses. A truck terminal is generally an industrial building that facilitates transfer of goods from one truck to another, and therefore the open truck parking area would not operate as an independent truck terminal. The use of Industrial Park is used to analyze the potential future buildout of Site 4 that could occur under the specific plan, providing a conservative analysis.

Comment A3.73: This comment states that the Project does not use the appropriate land uses and underestimates the potential traffic impacts of the Specific Plan. The comment states that truck terminal land use rates and manufacturing land use rates should be used.

Response A3.73: Per CEQA (CEQA Guidelines Section 15064.3), trip generation is only a factor as it applies to the Project's potential conflicts with transit, bicycle, and pedestrian facilities. For informational purposes, the proposed Project used appropriate trip rates for the traffic impact study and was approved by the county during scoping process of the TIA. As seen in the Institute of Transportation Engineers *Trip Generation Manual*, Industrial Park (Land Use Code 130) Includes uses that include a mix of Manufacturing, service, and warehouse facilities. This matches the proposed land uses better to analyze the potential use than just Manufacturing. Therefore, the Industrial Park land use is more appropriate. As mentioned in Response A3.72, truck terminal is also an inappropriate land use for the proposed project since the Site 4 truck yard would be an open parking lot for truck/trailer parking and is an ancillary use to the building on Site 3. This site was analyzed as Industrial Park for future potential development that would be allowed under the Specific Plan.

Comment A3.74: This comment states that the Project failed to analyze roadway segments that are widened as a mitigation measure to determine if the mitigation is feasible.

Response A3.74: The proposed roadway widening is not proposed as mitigation for CEQA impacts, as the TIA analyzes LOS which is not used to determine environmental impacts under CEQA (CEQA Guidelines Section 15064.3). The roadway widening is proposed to occur on Locust Avenue, the south side of Santa Ana Avenue, and the north side of Jurupa Avenue. These changes are in alignment with the existing General Plan Roadway Classification or the proposed Roadway Classification of the Specific Plan. Therefore, the widening of the roadway would not interfere with the General Plan. In addition, the

roadways would be designed in Accordance with the California Manual of Uniform Traffic Control Devices, making them consistent with County and State guidelines.

Comment A3.75: This comment states that the traffic mitigation measures identified in Draft EIR Appendix K1 may require the acquisition of private property and/or may be developed in areas that are currently vacant and moderately disturbed. The comment states that a project requiring offsite infrastructure improvements must include the offsite infrastructure in the project description and must be analyzed within the Draft EIR.

Response A3.75: As discussed on pages 3-11 through 3-13 of the Project Description, the Project would include roadway improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Local Avenue, Laurel Avenue, and Santa Ana Avenue based on the improvements determined to be needed in the Traffic Impact Analysis, included in the Draft EIR as Appendix K1. Impacts from the development of these roadway improvements were analyzed throughout the Draft EIR and are included as part of the Project. For example, impacts from construction of the Specific Plan Area and offsite infrastructure improvements to sensitive biological species are analyzed under Impact BIO-1, and mitigation measures, including those applicable to offsite infrastructure areas are provided to mitigate impacts to a less significant level. As such, the Draft EIR adequately analyzes impacts related to offsite infrastructure improvements, including those to existing roadways.

Comment A3.76: This comment states that the fair share calculation done for the Traffic Study undercounts the percentage of responsibility the Project has on proposed improvements. The calculation should only be done for project trips and future development trips, without accounting for regional growth.

Response A3.76: The commentor is inaccurate to believe regional growth should not be considered as part of the future development trips, as future growth is generated by development. The County reviewed the fair share estimates and found that the calculation was done correctly when the TIA was approved. In addition, all fees and cost for intersection improvements are not considered mitigation as Level of Service (LOS) is not considered an environmental impact (CEQA Guidelines Section 15064.3).

Comment A3.77: This comment states that the Draft EIR and TIA fail to address construction impacts on local facilities roadways and the pedestrian and bike activity, especially for the Zimmerman Elementary School and Slover Mountain High School. The commenter also states that roadway/sidewalk closures and impacts to student drop-off and pick-up activities could occur and should be analyzed.

Response A3.77: Construction traffic from the Project would be required to follow the same truck routes as Project truck trips; therefore, no heavy construction equipment or truck trips would be on roadways that are adjacent to schools. In addition, the construction of the Project would be subject to a construction management plan that would address and disclose the potential street closures/sidewalk closures. The access point for construction equipment, trucks, and vehicles would be along Jurupa Avenue; therefore, the student drop off and pick up at the Zimmerman Elementary School, Bloomington High School, and Slover Mountain High School would not be impacted. Finally, the intersection of Linden Avenue/Jurupa Avenue is currently a four way stop with striped crosswalks; therefore, the construction traffic would be subject to the same roadway laws as existing and proposed traffic. As previously discussed, LOS is no longer considered a CEQA environmental impact (CEQA Guidelines Section 15064.3); therefore, impacts related to LOA at intersections, if any, as a result of construction traffic are not required to be analyzed in the Draft EIR.

Comment A3.78: This comment states that the projects identified for the cumulative impact analysis is incomplete, referencing the cumulative list in the scoping agreement.

Response A3.78: As stated in the scoping agreement, the list provided during the scoping agreement was preliminary. After consultation with the County, as well as surrounding jurisdictions, including Fontana, Rialto, Jurupa Valley, and the City of Riverside, a final list was compiled and used for the analysis. In addition, all potential development in the area was analyzed using the San Bernardino Travel Analysis Model SBTAM; therefore, all potential development based on existing land uses were analyzed in the traffic analysis for a cumulative analysis. These volumes were used throughout the technical studies in the Draft EIR.

Comment A3.79: This comment states that the cumulative list for the proposed projects defers from a project within the unincorporated Bloomington area published in January of 2021. The commenter states that the Project should update the list and coordinate with other jurisdictions.

Response A3.79: As stated in response A3.78, the cumulative list was created during the scoping process with the County staff and input from the surrounding jurisdictions, including Fontana, Rialto, Jurupa Valley, and City of Riverside, to create a finalized cumulative list using the available information at the time of the Notice of Preparation (NOP) (December 2020). In addition, all potential development in the area, including development in Riverside County, was analyzed using the San Bernardino Travel Analysis Model SBTAM and appropriate growth factors; therefore, all potential development based on existing land uses were analyzed in the traffic analysis for a cumulative analysis. These volumes were used throughout the technical studies in the Draft EIR.

Comment A3.80: This comment states that the Draft EIR and the Traffic study were inadequate in discussing impacts to pedestrian and bicycle circulation and the hazards that increased traffic would cause on sensitive areas. They specify the pedestrian circulation to the Zimmerman Elementary school.

Response A3.80: The County Traffic Impact Study Guidelines do not require a Draft EIR or TIA to provide an off-site pedestrian and bicyclist safety analysis that is alluded to by the comment. However, per Appendix G of the CEQA Guidelines, Draft EIR in Section 5.15, *Transportation,* under Impact TR-1, discusses any potential conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. The Project does not propose to have truck access on Linden Avenue, and the Project proposes mitigation to direct truck trips away from Santa Ana Avenue, therefore minimizing traffic impacts to schools. In addition, truck trips would not be generated by the Upzone site, which is a residential project. Therefore, no trucks would be traveling adjacent to schools in the Bloomington area. The Project does not propose the removal of any sidewalk or bike lanes and proposes to develop sidewalks along all streets within and adjacent to the Specific Plan. Finally, the intersection of Linden Avenue/Jurupa Avenue is currently a four way stop with striped crosswalks; therefore, roadway safety measures are in place to facilitate pedestrian circulation. Utilizing the Transportation Injury Mapping System, there have been 2 accidents at or within 150 feet of the intersection of Linden Avenue/Jurupa Avenue, both of which did not involve pedestrians, and neither accident resulted in fatalities.

As shown on Figure 3-4 of the Draft EIR, Project trucks would utilize County-established truck routes and would be directed away from existing residential neighborhoods. Furthermore, the proposed Project would implement PDF AQ-22, which would require the Project Applicant/Developer/Owner to post signs at every truck exit driveway providing directional information to the truck route. Additionally, as detailed in the Draft EIR for Impact TR-1, starting on page 5.15-6, sidewalks currently exist on Cedar Avenue

intermittently on both side of the roadway, on Santa Ana Avenue intermittently on the north side of the roadway, on Jurupa Avenue on the north side east of Linden Avenue. Implementation of the Specific Plan would include roadway improvements within the Specific Plan area that would provide for new sidewalks where none exist currently, thereby improving pedestrian facilities and the sidewalk network.

Comment A3.81: This comment states that the Draft EIR must provide a Project-level impact analysis for the proposed developments for Options 1 and 2 related to each development site access point's sight distance. The comment states that the Specific Plan includes development standards for screening which address adjacency to residential uses. The comment requests that the Specific Plan be updated to address adjacency to schools and whether certain standards are applicable to schools.

Response A3.81: As discussed on page 35 of the Specific Plan, where industrial and business park uses adjoin a residential use, a minimum twelve-foot-high solid screen wall shall be located on the common property line, except in a required public right-of-way street setback where the screen wall shall be located behind the landscaped setback area. Additionally, where truck parking, loading areas, and/or truck maneuvering areas abut a public right-of-way, a twelve-foot-high solid screen wall shall be located behind the landscaped setback area unless a greater height is required per a site-specific noise study. These development standards would also apply to developments adjacent to schools, such as the proposed Site 1 development. As the screen walls would be located behind the landscaped setback area, each development site's access points would provide adequate line of sight. Furthermore, sight distance would be reviewed during plan reviews and development permitting to ensure that there is adequate line of sight for each specific development in order to limit hazards.

Comment A3.82: This comment requests confirmation as to the type of wall that would be constructed along the northern boundary of Site 1 under Options 1 and 2. The comment states that potential noise impacts at Walter Zimmerman may warrant a minimum 12-foot high block wall.

Response A3.82: In order to clarify the discussion in the Draft EIR, PDF NOI-2 has been revised to detail that a 12-foot-tall masonry wall shall be constructed along the entire northern perimeter of Development Site 1, as shown below.

> **PDF NOI-2: Industrial/Warehousing Operational Noise:** Construction Plans, specifications, and permits for development of Development Sites 1, 2, and 4 shall include development of the following walls that shall be completed prior to receipt of certificates of occupancy or operational permits for industrial/warehousing uses on Development Sites 1, 2, and 4:
>
> - Development Site 1: a 12-foot-tall masonry wall shall be constructed along the entire northern perimeter of Development Site 1.
> - Development Site 2: a 12-foot-tall masonry wall shall be constructed along the entire northern perimeter of Development Site 2, and 14-foot-high masonry walls shall be constructed along Locust Avenue and Maple Avenue to screen the truck trailer parking and loading dock areas.
> - Development Site 4: a 9-foot-high masonry wall shall be constructed along the perimeter of the truck trailer lot to screen the truck trailer parking lot.

The comment does not raise a specific issue with the adequacy of the Draft EIR evaluation or raise any other CEQA issue. Therefore, no further response is required.

Comment A3.83: This comment states that the analysis should include a line of site analysis at unsignalized intersections, and the driveways on Linden Avenue. In addition, the comment questions the impact on line of site from the wall at the north of Site 1.

Response A3.83: The wall proposed north of Site 1 would end 40 feet from the street, therefore, it would not impact line of site from the Project driveway. In addition, there is no proposed developments at the intersections that would impact line of site at the unsignalized driveways, therefore, no impacts to the line of site would be expected.

Comment A3.84: This comment states that truck turning radius analysis should be included in the TIA and the Draft EIR on Linden Avenue, Maple Avenue, Jurupa Avenue, and Locust Avenue.

Response A3.84: The proposed development and specific plan does not include truck accessible driveways along Linden Avenue. The proposed development does not propose truck access along Maple Avenue, therefore, truck turning radius analysis on these roadways is not necessary. The driveways along Jurupa Avenue and Locust Avenue are developed to Truck Access standards, and there are no unique bends or obstacles along Jurupa Avenue or Locust Avenue, therefore, there is no reasonable issue that would prevent trucks from turning into Sites 1-4 from Jurupa Avenue and Locust Avenue.

Comment A3.85: This comment states that Draft IER did not adequately address CEQA Hazards and Hazardous Materials threshold C. The comment states that there is substantial evidence that the Project would cause significant impacts at CJUSD schools, in particular Zimmerman Elementary School. The comment provides an outline of Public Resources Code Section 21151.4(a) which provides that an EIR shall not be certified for any project involving a facility with 0.25-mile of a school that might reasonably be anticipated to emit hazardous air emissions or that would handle extremely hazardous substances unless the Lead Agency has consulted with the school district and given written notification of the project properly.

Response A3.85: This comment provides an introduction to following comments and does not include any substantial evidence relating to any environmental impact. The comment does not raise a specific issue with the adequacy of the Draft EIR evaluation or raise any other CEQA issue. Therefore, no further response is required.

Comment A3.86: This comment states that the Draft EIR has not adequately analyzed or disclosed the health risks caused by toxic air contaminants from construction and operation of the proposed Project. The comment states that the analysis must address impacts at all schools within one-fourth mile of the Specific Plan area and Upzone Site. The analysis must be included in the Draft EIR and recirculated to ensure meaningful and useful information is provided to the District and its Board of Education.

The comment also states that the Lead Agency has not formally consulted with the CJUSD on this Project, that the County has notified the CJUSD of the Project through CEQA notices but has not offered consultation. If given the opportunity, the District would appreciate the opportunity to further discuss its concerns of the potential Project impacts and the District's recommendations to mitigate them, as provided herein.

Response A3.86: As detailed in Response A3.4, the HRA that was completed for the Project provides the appropriate conservative analysis pursuant to SCAQMD, CARB, and OEHHA recommended methodology, which determined that impacts to schools would be less than significant, and mitigation is not required. As detailed in Response A3.9, the HRA evaluates the closest sensitive receptors with the maximum potential emissions and continuous exposure (24-hours per day), which identifies the maximum potential impact,

which is correct pursuant to CEQA. An evaluation of additional receptor locations that are farther away would result in identification of lower impacts and is not required by CEQA. Thus, the EIR does not need to evaluate all of the schools within 0.25 mile of the site.

Additionally, a construction-source HRA was prepared, as detailed in Master Response 2, which shows that cancer impacts at all receptors would be well below the 10 in one million significance threshold. The results of the operational-source HRA indicate that cancer risk at Zimmerman Elementary would be 0.60 in one million which is less than the 10 in one million significance threshold. The analysis utilized the OEHHA recommended exposure duration of 9 years for schoolchildren. Thus, impacts were determined to be less than significant.

Furthermore, the proposed Project would not result in emissions of any of the toxic air contaminants set forth by CARB pursuant to Health and Safety Code Section 39655. As such, the Project would not result in the type of hazardous emissions or handling of extremely hazardous substances that would trigger the provisions set forth in Public Resources Code Section 21151.4(a).

Comment A3.87: This comment states that construction within the Specific Plan Area may require soil remediation and/or removal of soils that the contain VOCs associated with the closed landfill south of Jurupa Avenue. The commenter requests that Soil Management Plan required by Mitigation Measure HAZ-1 identify ways to limit exposure to schools, including students walking to and from schools that could potentially come into contact with soils hazards.

Response A3.87: As discussed under Impact HAZ-2, a Phase II subsurface investigation was conducted for total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), organochlorine pesticides (OCPs), and metals. A Phase II subsurface investigation was conducted for TPH, VOCs, OCPs and metals on three properties within the Opening Year Development—Option 1 development footprint to determine the extent of the potential contamination and whether additional investigation and/or remediation would be necessary prior to the Project's construction activities. Soil and soil vapor collected at the boring sites were analyzed for the chemicals of concern (TPH, VOCs, OCPs, and metals). The results were compared to established screening criteria from the San Francisco Bay Regional Water Quality Control Board (SFB-RWQCB) Environmental Screening Levels (ESLs), Los Angeles Regional Water Quality Control Board (LA-RWQCB) Soil Screening Levels (SSLs), United States Environmental Protection Agency (USEPA) Regional Screening Levels (RSLs), and California Department of Toxic Substances Control (DTSC) Ambient Screening Levels. All detections for VOCs in the soil samples were below the ESLs and RSLs. Acetone and chloromethane were detected in vapor from all five borings and benzene was detected in one boring. All detections were below their respective ESLs (Tier 1 Subslab / Soil Gas) and are not indicative of a significant impact. As such, impacts related to VOCs from construction within the Specific Plan Area. However, Mitigation Measure HAZ-1 is included to require the preparation of a Soil Management Plan as one of the soil samples detected TPH concentrations that is greater than the ESLs and SSLs. The Soil Management Plan, as is, would minimize exposure from potentially contaminated soils to workers, the environment, and children. As such, no revisions to Mitigation Measure HAZ-1 are necessary.

Comment A3.88: This comment states that due to the proximity of Site 1 to Zimmerman Elementary School and Sites 3 and 4 to Bloomington High School, the Lead Agency should consider limiting operations within 1,000 feet of its schools. The comment also requests consideration of restricting trailer truck traffic and use of hazardous materials within areas 1,000 feet of its schools. The comment asserts that uses within 1,000 feet of schools should be used for office and related support facilities and automobile parking. Accordingly, the comment states that the County should not approve Development Option 2, which would allow trucks to idle at a driveway within 50 feet of Zimmerman Elementary School.

Response A3.88: Refer to Response A3.40. The CARB Community Health Perspective Handbook states that the recommendations related to sitting new sensitive uses are advisory and that the relative risks

varies greatly. The Handbook states that to determine the actual risk near a particular facility, a site-specific analysis would be required, and that risks from DPM will decrease over time as cleaner technology phases in. As detailed in Response A3.2, a Mobile Source Health Risk Assessment was prepared to evaluate Project health risk impacts to residents, schools, and workers as a result of operation of the Project, which determined that impacts to sensitive receptors would be less than significant.

Comment A3.89: This comment states that the Project will divide an established community and result in incompatible land uses. The comment also states that the DEIR fails to evaluate whether the proposed Project would physically divide an established community. The comment states that the Project in conjunction with an adjoining high-cube warehouse would create a physical barrier and divide an established Zimmerman Elementary school attendee area. The comment states that the Project would create a block of large buildings that would create northern and southern halves of the Zimmerman Elementary School. The comment also states that the significant impact from dividing the established Zimmerman Elementary community must be analyzed in the Draft EIR.

Response A3.89: As discussed on page 5.11-6 and 5.11-7 of Section 5.11, *Land Use and Planning*, the physical division of an established community could occur if a major road (expressway or freeway, for example) were built through an existing community or neighborhood, or if a major development were built which was inconsistent with the land uses in the community such that it divided the community. Project implementation of the Specific Plan would result in the redevelopment of residential and non-conforming commercial-business uses with special development, i.e., industrial-business park land uses. The Project would be built to the south of Zimmerman Elementary and is located within the attendance area for the Zimmerman Elementary School. However, the Project would not result in physical division of an established community. Although the Project would result in a change of land uses and development of industrial buildings, the Project would not develop any physical barriers that would divide an established community or sever travel corridors that connect residents with important neighborhood and community facilities and institutions, such as Zimmerman Elementary School. Conversely, the Project includes roadway improvements that would maintain the existing travel corridors.

Comment A3.90: This comment states that the Specific Plan and Development Option components conflict with the San Bernardino County Policy Plan adopted in October 2020 for the purpose of avoiding or mitigating environmental effects. The Draft EIR is not consistent with Countywide policies LU-2.1, LU-2.4, LU-2.6, LU-6.4, HW-2.2, and HZ-3.1. The comment states that the proposed development options within the Specific Plan have not been located, scaled, buffered, or designed to limit negative impacts on Zimmerman Elementary School or the adjacent residential uses. The comment states that the California Air Resources Board (CARB) recommends distribution centers with more than 100 trucks per day be sited 1,000 feet from sensitive land uses. The comment states that the Specific Plan does not address adjacent school uses and requests to know where sound walls would be installed adjacent to Zimmerman Elementary. The comment also states to limit exposure of diesel particulate matter from idling trailer trucks, CARB recommends not placing entry and exit points near sensitive uses. The Project proposes a designated trailer truck driveway less than 150 feet from Zimmerman Elementary School at Site 1 under Option 2. To minimize negative impacts to existing schools, the district requests that the County prohibits truck-trailer driveways from being placed within 1,000 feet of existing schools. The comment also states that the location of the proposed Specific Plan and development options are adjacent to existing schools. The comment states that all trailer trucks accessing the Specific Plan Area will use the Jurupa Avenue/Linden Avenue intersection, which is the main route for students accessing to/from the Crestmore community and local schools in Bloomington. The District also requests that the County prohibit truck-trailer access from Linden Avenue. Zimmerman elementary is adjacent to Site 1 and Bloomington High is adjacent to Site 4 of the Specific Plan. Construction and operational air quality impacts and health risks at the schools are

anticipated to be significant once the Draft EIR analysis is updated per the comments provided and states that outdoor air quality impacts at playgrounds can't be mitigated. The comment also states that the indoor air quality can be with the installation of hospital-grade HVAC systems but requests adding mitigation measures that are stated throughout the comment letter. The District recommends designated truck driveways be relocated at least 1,000 feet from any school property line. The comment states that the Specific Plan would be incompatible with approximately 75% of the surrounding land uses. The District would appreciate consultation with the County to resolve concerns related to the issues discussed in the comment letter. The comment also states that the County must mitigate the incompatible land uses between the proposed Specific Plan and District schools within one-half mile. The comment states that a construction HRA has not been conducted but must be prepared to determine if the Project could cause a cancer risk of 10 in 1 million during construction of the proposed Project. The comment states that the operational HRA must be updated to include the General Plan Amendment and Zone Change of the Specific Plan Area, development option 1, and Zone Change of Upzone site. The comment also states that the construction and operational HRAs must be recirculated for public review and comment.

Response A3.90: As discussed in Section 5.11 of the Draft EIR in Table 5.11-2, the Project would be consistent with LU-2.1, LU-2.4, LU-2.6, LU-6.4, HW-2.2, and HZ-3.1. As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

As discussed in response A3.82 above, in order to clarify the discussion in the Draft EIR, PDF NOI-2 has been revised to detail that a 12-foot-tall masonry wall shall be constructed along the entire northern perimeter of Development Site 1, as shown below.

> **PDF NOI-2: Industrial/Warehousing Operational Noise:** Construction Plans, specifications, and permits for development of Development Sites 1, 2, and 4 shall include development of the following walls that shall be completed prior to receipt of certificates of occupancy or operational permits for industrial/warehousing uses on Development Sites 1, 2, and 4:
>
> - Development Site 1: a 12-foot-tall masonry wall shall be constructed along the entire northern perimeter of Development Site 1.
> - Development Site 2: a 12-foot-tall masonry wall shall be constructed along the entire northern perimeter of Development Site 2, and 14-foot-high masonry walls shall be constructed along Locust Avenue and Maple Avenue to screen the truck trailer parking and loading dock areas.
> - Development Site 4: a 9-foot-high masonry wall shall be constructed along the perimeter of the truck trailer lot to screen the truck trailer parking lot.

As discussed on page 5.9-32 of Section 5.9 Hazards and Hazardous Materials, Project truck routes would be limited to south of Site 4 on Laurel Avenue, south of Sites 2 and 3 on Locust Avenue, south of Site 2 on Maple Avenue, Jurupa Avenue, and Cedar Avenue. As shown on Figure 3-4 of the Draft EIR, trucks would follow the designated truck routes established by the County.

As discussed in Response A3.5 above, a construction-source HRA was prepared, as detailed in Master Response 2, which shows that cancer impacts at all receptors would be well below the 10 in one million significance threshold. The results of the operational-source HRA indicate that cancer risk at Zimmerman Elementary would be 0.60 in one million which is less than the 10 in one million significance threshold. The

analysis utilized the OEHHA recommended exposure duration of 9 years for schoolchildren. Thus, impacts were determined to be less than significant.

Comment A3.91: This comment states that the Draft EIR does not adequately address public services school facilities because it fails to address whether the Project would have a significant effect if it were to result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities. The comment states that Impact PS-3 states that payment of school impact fees pursuant to SB 50 constitutes full and complete mitigation of the proposed Project's impacts on CJUSD school facilities but fails to account for the Project's impacts on existing District facilities. SB 50 school fees do not cover the expenses associated with improving an existing school to mitigate a development's direct and indirect environmental impacts on the school. Further, SB 50 school fees are intended only to fund additional school facilities made necessary by a Project's generation of additional students. SB 50 fees will not provide mitigation for expenses related to a potential closure of Zimmerman Elementary School and relocation of its programs to other school facilities. Due to anticipated air quality and noise impacts, additional mitigation funding must be provided. The Project will have a negative impact on sensitive land uses including schools which has not been adequately disclosed in the Draft EIR. The District believed that the Project will have an undue burden on Zimmerman Elementary and requests that the Draft EIR be updated per comments provided herein. The comment states that the Project's environmental effects from diesel particulate emissions generated by trucks and off-road equipment during construction and operation, noise levels during construction and operation, to transportation and pedestrian safety effects will have a significant impact at Zimmerman Elementary and other nearby schools.

Response A3.91: According to California Government Code Section 65995(3)(h), the payment of statutory fees is "deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization...on the provision of adequate school facilities." The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers due to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. As discussed on page 5.12-26 of Section 5.12, *Noise*, although construction noise impacts would be less that the 80 dBA threshold, sensitive receptors adjacent to the Project site will be exposed to higher noise levels. To reduce construction impacts to sensitive receptors to the maximum extent feasible, PDF NOI-1 would be incorporated into the Project to require construction best management practices related to noise. With inclusion of PDF NOI-1, impacts related to construction noise would be less than significant. As indicated on Tables 5.12-17 through 5.12-22 of Section 5.12, Noise, the increase in noise would range from 0.1 to 3.0, which would not generate a significant daytime or nighttime operational noise level increase at the nearby receiver locations. Therefore, impacts would be less than significant with implementation of mitigation. The Air Quality and Noise impacts would not result in significant and unavoidable impacts and would not require additional mitigation beyond what was included in the Draft EIR.

The Project will not result in significant impacts to nearby schools because the Project does not exceed the significance thresholds promulgated by the SCAQMD relating to air quality, health risk, or for noise as established by the Countywide Plan and Development Code. As such, there will not be costs associated

with direct or indirect impacts to nearby schools, which the comment speculates will occur without providing substantial evidence of such impacts.

Comment A3.92: This comment states that the corrected analysis will show significant air quality and noise impacts at Zimmerman Elementary School. The comment states that all indoor instructional space at Zimmerman Elementary School would require mitigation such as the installation of a high-grade HVAC system to mitigate indoor noise and air quality impacts. The comment also states that cost for adequate mitigation may be between $50 million and $61 million and due to the high cost the only feasible option may be relocating Zimmerman to a new location or other nearby District schools. The comment states that Draft EIR Impact PS-3 concerning school facilities has not been adequately addressed and mitigation beyond SB 50 school fees are required.

Response A3.92: As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. As discussed on page 5.12-26 of Section 5.12, *Noise*, although construction noise impacts would be less that the 80 dBA threshold, sensitive receptors adjacent to the Project site will be exposed to higher noise levels. To reduce construction impacts to the residential uses adjacent to the maximum extent feasible, PDF NOI-1 would be incorporated into the Project to require construction best management practices related to noise. With inclusion of PDF NOI-1, impacts related to construction noise would be less than significant. As indicated on Tables 5.12-17 through 5.12-22 of Section 5.12, Noise, the increase in noise would range from 0.1 to 3.0, which would not generate a significant daytime or nighttime operational noise level increase at the nearby receiver locations. Therefore, impacts would be less than significant with implementation of mitigation. The Air Quality and Noise impacts would not result in significant and unavoidable impacts and would not require additional mitigation beyond what was included in the Draft EIR.

The Project will not result in significant impacts to nearby schools. As such, there will not be costs associated with direct or indirect impacts to nearby schools, which the comment speculates will occur without providing substantial evidence of such impacts.

Comment A3.93: This comment states that there are serious impacts caused by the Project that have not been properly analyzed, disclosed, or mitigated in the Draft EIR. The commenter suggests that alternatives related to limiting the boundaries of the proposed Specific Plan to no closer than 1,000 feet of Zimmerman Elementary School, Bloomington High School, and Harris Middle School. The comment also suggests an alternative that would limit operations within 1,000 feet of Zimmerman Elementary School, Bloomington High School, and Harris Middle School to office use, related support operations, and automobile parking.

Response A3.93: As discussed in Section 7.0, *Alternative,* the Draft EIR provides Alternative 3: Reduced Project/No Specific Plan Alternative, which would only develop Opening Year Development – Option 1. This alternative would represent a 35 percent decrease from the maximum buildout potential of the Specific Plan and a 46 percent decrease in land acreage that would be developed by the Project. As shown in Figure 3-8 of the Draft EIR, the Opening Year Development would include building loading docks and truck parking on the eastern side of Building 3, directed away from Bloomington High School, and on the southern side of Building 1, directed away from Walter Zimmerman Elementary School. As shown, landscaping and automobile parking would be located in the building setback areas adjacent to the

schools. The comment does not raise a specific issue with the adequacy of the Draft EIR evaluation or raise any other CEQA issue. Therefore, no further response is required.

Comment A3.94: This comment states that no renderings of the four developments under Development Option 2 have been provided. The District would like to understand whether a wall would be constructed between Site 1 and Zimmerman Elementary School and if so, what the height would be. The District asked if there would be shade and shadow impacts at Zimmerman Elementary and would the school's solar panels be impacted. The comment states that there is a concern regarding visibility of pedestrians by trailer trucks exiting the northernmost driveway of Site 1 under Option 2. The commend states that Figure 5.1-2 of the Draft EIR shows a driveway on Santa Ana Avenue that leads to passenger and trailer truck parking areas. The comment requests potential traffic and pedestrian safety impacts along Santa Ana Avenue as trailer trucks will be accessing Santa Ana Avenue.

Response A3.94: As discussed in response A3.82 above, in order to clarify the discussion in the Draft EIR, PDF NOI-2 has been revised to detail that a 12-foot-tall masonry wall shall be constructed along the entire northern perimeter of Development Site 1, as shown below.

> **PDF NOI-2: Industrial/Warehousing Operational Noise:** Construction Plans, specifications, and permits for development of Development Sites 1, 2, and 4 shall include development of the following walls that shall be completed prior to receipt of certificates of occupancy or operational permits for industrial/warehousing uses on Development Sites 1, 2, and 4:
>
> - Development Site 1: a 12-foot-tall masonry wall shall be constructed along the entire northern perimeter of Development Site 1.
> - Development Site 2: a 12-foot-tall masonry wall shall be constructed along the entire northern perimeter of Development Site 2, and 14-foot-high masonry walls shall be constructed along Locust Avenue and Maple Avenue to screen the truck trailer parking and loading dock areas.
> - Development Site 4: a 9-foot-high masonry wall shall be constructed along the perimeter of the truck trailer lot to screen the truck trailer parking lot.

In addition, the County of San Bernardino does not recognize shade and shadow impacts as an environmental impact associated with aesthetics and visual resources. Thus, a shade and shadow analysis is not required for the proposed Project. As discussed on page 5.9-32 of Section 5.9, *Hazards and Hazardous Materials*, Development would comply with County Development Code standards, which will require design and construction specifications to allow adequate emergency access to the site and ensure that roadway improvements would meet public safety requirements.

Comment A3.95: This comment states that large warehouse, trucking, and logistics facilities in residential areas near schools may constitute public nuisances under Civil Code Section 3480. California courts have repeatedly held that land uses with major negative impacts on surrounding properties and neighborhoods are public nuisances. The comment also states that the developments contemplated by the proposed Project could be subject to litigation. The County should make changes to the Project to prevent the creation of public nuisances, or at a minimum, mitigate their impact. Failure to do so could result in protracted litigation even after the CEQA process is complete.

Response A3.95: As substantiated by Responses A3.1 through A3.95, above, the comment letter does not provide substantial evidence supporting the need for updated impact analyses or additional mitigation. The comment is conclusory in nature and does not raise a specific issue with the adequacy of the Draft EIR evaluation or raise any other CEQA issue. Therefore, no further response is required.

Comment A3.96: This comment states that CJUSD appreciates the opportunity to submit the above comments on the Draft EIR and that the District has serious concerns related to the Project's potential impacts on schools and the local community. The comment request that the County neither certify the Draft IER nor approve the Project until adequate impact analysis and mitigation are conducted.

Response A3.96: As substantiated by Responses A3.1 through A3.95, above, the comment letter does not provide substantial evidence supporting the need for updated impact analyses or additional mitigation. The comment is conclusory in nature and does not raise a specific issue with the adequacy of the Draft EIR evaluation or raise any other CEQA issue. Therefore, no further response is required.

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LETTER A4: City of Fontana (4 pages)

FONTANA
CALIFORNIA

City Council

Acquanetta Warren
Mayor

Peter A. Garcia
Mayor Pro Tem

John B. Roberts
Council Member

Jesus "Jesse" Sandoval
Council Member

Phillip W. Cothran
Council Member

February 15, 2022

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

RE: NOA DEIR Bloomington Business Park Specific Plan Project

Dear Mr. Liang:

Thank you for the Notice of Availability for the Draft Environmental Impact Report (DEIR) for the proposed Bloomington Business Park Specific Plan Project. Upon review of the draft the City has concerns detailed below. We request that the Land Use Services Department consider these comments and provide responses to these comments in the Final Environmental Impact Report (EIR). A4.1

The City has the following comments on the May 19, 2021 VMT Analysis:

1. Page 3: Under Project VMT Impact Analysis and subsequent Table 3 information, the document discusses that VMT/Employee "was obtained" from SBTAM but no documentation was provided as to how that information was obtained. Provide additional such as which TAZ the project was coded into and what methodology was used (Production/Attraction, Origin/Destination, etc.). A4.2

2. Page 4: The specific plan VMT/Employee is documented to be 18.95 for the specific plan. As discussed above, methodology and other details on how VMT/Employee was calculated are not included in the document. Specific questions related to how VMT/Employee is calculated are noted below: A4.3

   a. Is this relying on the existing VMT/Employee for the TAZ (which includes other uses) or did it apply a different method?

   b. Was it based on a new travel demand model run, and, if so, how were the employees disaggregated into the SED inputs of the model?

   c. Was the project land use incorporated into its own, isolated TAZ? If so, was land use appropriately disaggregated into the appropriate employment categories?

   d. Does it use ITE trip generation rates and average trip length information from the travel demand forecasting model?

3. Page 4: Update to discuss how VMT/Person is estimated for unincorporated areas. Practically speaking, the noted threshold of 50.76 VMT/Person for the A4.4

unincorporated area appears higher than expected. Please provide documentation related to extraction of the VMT information and how the threshold was evaluated. Additional information should be provided such as which TAZ the project was coded into and what methodology was used (Production/Attraction, Origin/Destination, etc.). Specific questions related to how VMT/Person is calculated are noted below:

a. Is this relying on the existing VMT/Person for the TAZ (which includes other uses) or did it apply a different method?

b. Was it based on a new travel demand model run, and if so, how were demographic details such as persons per household determined?

c. Was the project land use incorporated into its own, isolated TAZ?

d. Does it use ITE trip generation rates and average trip length information from the travel demand forecasting model?

A4.4 cont.

4. Page 4: Please provide an explanation as to why project is adding 3,235,836 sq. ft. plus adding 1,603 residents in the upzone location and total Countywide VMT decreases? Typically, an increase in residents and employment uses would result in an increase in total VMT. A4.5

The City has the following comments on the July 13, 2021 TIA Analysis:

5. Throughout: remove the CEQA language "impact", "significant impact" and "mitigation" in relation to LOS and intersection operations, as LOS is no longer the metric to evaluate significant transportation impacts under CEQA. A4.6

6. Throughout: Have the improvements proposed at City of Fontana intersections been discussed with City of Fontana staff to determine the appropriateness of the recommended improvements? Some of these improvements may require roadway widening which may not be feasible within the existing infrastructure or right-of-way. Coordinate with City of Fontana staff to review of the feasibility of each of the recommend improvements somewhere in the report. A4.7

7. Throughout: The study does not include a site access or safety analysis as documented in the City of Fontana Traffic Impact Analysis Guidelines. Please include this analysis or documenting why it is not necessary with driveways adjacent to the City of Fontana. A4.8

8. Page 6: The Operational Year is proposed as 2022. Given that the EIR was published in 2021 the demolition of existing buildings and construction of approximately 2 million square feet of warehouse uses may not be achievable. Consider addressing the potentiation effect of the project if it were to open at a later date. A4.9

9. Page 7: The summation of the proposed development in Table 2 is not equal to what is presented in the Table. Please address the inconsistency and updating the analysis if necessary. A4.10

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10. Page 7: The paragraph prior to Table 2 documents the sizes of the different buildings proposed in OY2, however it is difficult to understand how the numbers identified in the paragraph correspond to Table 2. A4.11

11. Figure 2 does not identify the location of the Future Fulfillment Center or Future Industrial Park. Please update the figure to identify these buildings and the associated driveway locations. A4.12

12. Figure 3 does not identify the location of the Future Industrial Park. Please update the figure to identify this building and the associated driveway locations. A4.13

13. Page 21: The significance criteria section identifies impact thresholds in the City of Fontana using intersection LOS. The City of Fontana utilizes VMT for determining transportation impacts. City of Fontana intersections should be referred to as deficient instead of impacted. A4.14

14. Page 40: Growth rates of 1% per year were utilized for developing 2022 traffic volumes. Consider discussing why interpolation of SBTAM was not used if SBTAM was utilized to develop 2040 traffic volumes. A4.15

15. Page 62: The paragraph describing OY2 documents the sizes of the different buildings proposed in OY2, however it is difficult to understand how the numbers identified in the paragraph correspond to Table 2. Suggest adding a new table or clarifying text. A4.16

16. Page 67: Table 12 only seems to document the trip generation breakdown of OY1. The breakdown of the entire OY2 project should be provided. It is not clear to understand what uses and square footages are combined to reflect OY1 or OY2. It is also not clear as to how the SP trip generation is the same regardless of which opening year option is selected. A4.17

17. Page 69: The totals presented at the end of Table 12 presents the autos and trucks combined, but Figure 14 presents the distribution of autos and trucks separate. The totals at the bottom should be separated so a reader can understand how much of the total is auto or truck. A4.18

18. Page 125: In Table 20, the intersection of Locust Avenue and Jurupa Avenue has a proposed improvement which will result in LOS D in the PM peak hour. According to the criteria identified in Chapter 2 of the report and the City of Fontana Traffic Impact Analysis Guidelines, the improvements should result in LOS C. Identify an intersection improvement which would result in LOS C at the intersection. A4.19

19. Page 126: In Table 21, the intersections of Sierra Avenue and I-10 Ramps, Sierra Avenue and Slover Avenue, Sierra Avenue and Santa Ana Avenue, and Locust Avenue and Jurupa Avenue has a proposed improvement which will result in LOS E or F in the PM peak hour. According to the criteria identified in Chapter 2 of the report and City of Fontana Traffic Impact Analysis Guidelines, the improvements should result in LOS C. Identify intersection improvements which would result in LOS C at the intersections. A4.20

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20. Page 134: Please document how the cost estimates for the improvements in Table 29 were developed. A4.21

Please include me in the distribution list for the Final EIR and responses to Comments. Thank you for affording the City the opportunity to provide input on the project and the DEIR. We look forward to continuing to work with the County of San Bernardino. A4.22

If you have any questions or concerns, please contact Gia Kim, Engineering Manager at (909) 350-6655 or gkim@fontana.org.

Sincerely,

Rina Leung
Senior Planner

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Response to Letter A4: City of Fontana, dated February 15, 2022

Comment A4.1: This comment provides an introduction to the comment letter and states that the City of Fontana has concerns related to the proposed Bloomington Business Park Specific Plan Draft EIR. The comment requests that the County consider these comments and provide responses to the comments in the Final EIR.

Response A4.1: The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment A4.2: This comment states that VMT/Employee was obtained from SBTAM, but no documentation was provided as to how it was obtained. This comment requests additional information as to how the TAZ within SBTAM was coded and what methodology was used.

Response A4.2: The VMT/Employee for the Project's Traffic Analysis Zones (TAZ) was calculated for the proposed Project and does not rely on the existing VMT/Employee for the TAZ. The VMT/Employee was obtained from a new travel demand model run. The Project was coded into TAZs 53733302 and 53742202. Because the Project would replace most of the land use in the Project's TAZs, the existing socio-economic data (SED) was replaced with Project SED. Some residential and educational land uses would remain, and these uses were transferred to the closest adjacent TAZ. The Project VMT/Employee was calculated for the home-based employment trip purpose (attractions) using the Production/Attraction (PA) trip matrices as required in the County's Transportation Impact Analysis (TIA) guidelines.

Comment A4.3: This comment states that the Specific Plan VMT/Employee is 18.95 and provides the following specific questions as to how the VMT/Employee is calculated:

a) Is this relying on the existing VMT/Employee for the TAZ (which includes other uses) or did it apply a different method?
b) Was it based on a new travel demand model run, and, if so, how were the employees disaggregated into the SED inputs of the model?
c) Was the Project land use incorporated into its own, isolated TAZ? If so, was land use appropriately disaggregated into the appropriate employment categories?
d) Does it use ITE trip generation rates and average trip length information from the travel demand forecasting model?

Response A4.3: As noted in Response A4-2, the Project VMT/Employee does not rely on the existing VMT/Employee for the TAZ. The Project was coded into TAZs 53733302 and 53742202. The existing SED that would be replaced by the Specific Plan was removed and replaced with Project SED. The remaining existing land uses were moved to adjacent TAZs. Two new SBTAM runs were completed for 2016 and 2040 conditions. The results from the two runs were interpolated to find the existing VMT/Employee. The Project SED was calculated using land use factors from the SCAG Sustainable Communities Strategy (SCS) Background Documentation, April 2016, Table 7 Building Square Footage Factors for Residential Units and Employees by Type. The calculation of VMT/Employee was prepared using the Production/Attraction trip matrices, multiplied by the appropriate skim matrix showing trip lengths per TAZ. The comment is an inquiry and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment A4.4: This comment states that the threshold of 50.76 VMT/Person for the unincorporated San Bernardino County area seems higher than expected. The comment requests documentation related to how the threshold was evaluated and additional information as to what methodology was used. The comment provides the following specific questions as to how VMT/Person is calculated:

a) Is this relying on the existing VMT/Person for the TAZ (which includes other uses) or did it apply a different method?

b) Was it based on a new travel demand model run, and if so, how were demographic details such as persons per household determined?
c) Was the Project land use incorporated into its own, isolated TAZ?
d) Does it use ITE trip generation rates and average trip length information from the travel demand forecasting model?

Response A4.4: Similar to Response A4.3, the calculation does not rely on the existing VMT/Person for the TAZ. Results were based on a new travel demand model run, and persons per household were taken from the SCAG SCS Background Documentation. The Project land use was added to the existing TAZ (53737202), which includes mostly residential land use. TAZ 53737202 only includes 21 employees in the 2016 model. The calculation of VMT/Person was prepared using the Production/Attraction trip matrices, multiplied by the appropriate skim matrix showing trip lengths per TAZ.

The threshold VMT/Person for the Upzone Site was calculated using the base year (no Project) model runs and was calculated using the same methodology as the Specific Plan Project VMT calculation, in line with the County TIA Guidelines. The calculated VMT/Person threshold of 50.76 VMT/Person utilized in the VMT Analysis (Appendix K2 to the Draft EIR) is higher than the San Bernardino County Transportation Authority (SBCTA) Screening tool VMT threshold. In response to the comment, and to provide a conservative analysis, the Production/Attraction VMT/Person threshold shown in the SBCTA tool was determined. The Countywide Production/Attraction VMT/Person within the SBCTA Screening tool is 24.3; therefore, the VMT threshold would be 23.33. The Project VMT/Person is 23.26 for the Upzone Site. Therefore, even with utilizing a conservative threshold of 23.33, the VMT/Person for the SB330 Upzone Site would be less than significant. The comment is an inquiry and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment A4.5: This comment asks for an explanation as to why a project adding 3,235,836 SF and 1,603 residents in the upzone site results in a Countywide VMT decrease.

Response A4.5: The Project's VMT analysis shows that the Project's VMT per employee and the VMT per person for the SB 330 site are lower than the County's averages for employment and residential uses. The shorter trip lengths for residents to commute to the Project's employment uses result in less VMT, which is likely why Countywide VMT is reduced with the Project. The comment is an inquiry and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment A4.6: This comment states that the City has comments on the TIA analysis including removing the language "impact", "significant impact", and "mitigation" in relation to LOS and intersection operations as LOS is no longer a metric used to evaluate transportation impacts under CEQA.

Response A4.6: It is acknowledged and agreed that LOS deficiencies are no longer considered a significant impact under CEQA. The TIA and the recommendations for intersection improvements needed to address a LOS deficiency were provided for informational purposes only Nevertheless, removal of the referenced language from the TIA would not change the conclusions of the report. Furthermore, CEQA impacts have been properly identified in the EIR.

Comment A4.7: This comment asks whether improvement proposed for intersections in Fontana have been discussed with City staff and asks for further coordination with the City.

Response A4.7: Further coordination with the City of Fontana on circulation improvements to intersections in Fontana will occur during the implementation of Project Conditions of Approval. . The comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment A4.8: This comment states that the TIA does not include a site access or safety analysis that is required by the City of Fontana Traffic Impact Analysis Guidelines. The comment states that this analysis should be included, or it should be documented why it is not needed given there are driveways adjacent to the City of Fontana.

Response A4.8: The only driveway intersection that has partial jurisdiction in the City of Fontana is Intersection 32: Driveway 7/Jurupa Avenue, and there is no south leg that would be in the City of Fontana's jurisdiction. In addition, the Project does not propose any design features that would restrict sight-line views at the Project driveway. The subject driveway is perpendicular to Jurupa Avenue, with a spacing of approximately 600 feet from Locust Avenue/Jurupa Avenue and Maple Avenue/Jurupa Avenue. Finally, using the University of California Berkeley's Transportation Injury Mapping System (TIMS), there has been one accident on Jurupa Avenue between Locust Avenue and Maple Avenue within the last five years. The accident occurred at the intersection of Locust Avenue/Jurupa Avenue, and there were no fatalities. Therefore, with no recent history of accidents, no proposed development within the site line of view at the intersection, and no geometric irregularities at the driveway, the intersection would comply with the safety standards for both the County of San Bernardino and the City of Fontana. Further review of the intersection design will take place during the plan check process.

Comment A4.9: The comment states that since the Draft EIR published in 2021, the Operational Year of 2022 seems unrealistic, and the County should consider addressing the potentiation effect of the Project if it were to open at a later date.

Response A4.9: The TIA includes an evaluation of the General Plan Buildout condition as well as identifies improvements that would be required for full buildout of the Specific Plan. This is the worst-case condition and is fully disclosed in both the TIA and Draft EIR. Evaluation of a later operational year would not change the conclusions of the General Plan Buildout (worst case) condition. The General Plan Buildout (2040) condition covers volumes up to and beyond a later operational year, such as an operational year of 2023. Therefore, analyzing a later operation year would not result in any additional impacts not disclosed in the TIA. The TIA and the recommendations for intersection improvements needed to address a LOS deficiency were provided for informational purposes only. . The comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment A4.10: The comment states that the summation of the development in Table 2 is not equal to what is presented in the Table and that this should be resolved, and the analysis updated if necessary.

Response A4.10: Table 2 contains a typo that did not affect the analysis. The total square footage (SF) for the four sites should be 2,692,040 SF, which together with the future industrial park, will total 3,235,836 SF. Below is the updated table that reflects the analysis done for the Project.

Table 1. Specific Plan Development Plan (Opening Year Development Option 2)

PD Area	Land (Acres)	Land Use	Operational Year	Proposed Development
Site 1	17.72	Fulfillment Center	2022	710,400 SF Warehouse
Site 2	57.60	High-Cube Warehouse	2022	1,231,640 SF Warehouse

PD Area	Land (Acres)	Land Use	Operational Year	Proposed Development
Site 3	30.52	Fulfillment Center	2022	750,000 SF Warehouse
Site 4	9.5	Trailer Parking	2022	289 Truck Trailers Stalls
Total	**141.41 Acres**		**2022**	**2,692,040 SF**
Future Industrial Park		Industrial Park	2040	523,796 SF Industrial Park
Total Specific Plan	**213 Acres**		**2040**	**3,235,836 SF**

The TIA and the recommendations for intersection improvements needed to address a LOS deficiency were provided for informational purposes only. . The comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment A4.11: This comment states that the paragraph prior to Table 2 identifies the sizes of different buildings proposed in Opening Year Development – Option 2, but it is difficult to understand how the numbers identified correspond to Table 2.

Response A4.11: The Specific Plan has the potential to develop up to 3,235,836 SF based on the Project's FAR, and the two opening year options, Option 1 and Option 2, analyze two initial development options for Sites 1 and 3. Option 1 proposes two smaller Fulfilment Centers at 383,000 SF and 479,000 SF respectively, while Option 2 proposes two larger Fulfilment Centers at 710,400 SF and 750,000 SF respectively. This is clearly displayed in Figures 2 and 3 in the TIA.

While the Project proposes two options for the Opening Year, the proposed Project is a specific plan, and therefore the traffic analysis analyzes the impact of full buildout based on the allowed FAR of the Project. The three analysis scenarios in the TIA analyze the impact of the entire specific plan (3,235,836 SF), with the Opening year options only being discussed when it comes to the fair share contribution in Section 6 of the TIA. The TIA and the recommendations for intersection improvements needed to address a LOS deficiency were provided for informational purposes only. . The comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment A4.12: The comment states that Figure 2 does not identify the location of the Future Fulfillment Center or Future Industrial Park and that the figure should be updated to identify the buildings and associated driveway locations.

Response A4.12: The Future Fulfillment Center and Future Industrial Park is conceptual in Opening Year Option 1; therefore, the future Fulfillment Center or Future Industrial Park location and design is unknown at this time. When actual development is proposed, the future site plan will be analyzed during the entitlement process.

Comment A4.13: This comment states that Figure 3 does not identify the location of the Future Industrial Park and that the figure should be updated to identify the building and associated driveway locations.

Response A4.13: As stated in Response A4.12, The Future Industrial Park is conceptual in Opening Year Option 2; therefore, the future Industrial Park location and design is unknown at this time. When actual development is proposed, the future site plan will be analyzed during the entitlement process.

Comment A4.14: This comment states that the significance threshold for the City of Fontana is identified as LOS, but the City uses VMT to determine transportation impacts. The comment states that intersections in the Fontana should be referred to as deficient instead of impacted.

Response A4.14: It is acknowledged and agreed that LOS deficiencies are not considered a significant transportation impact by the City of Fontana; removal/modification of the referenced language from the TIA does not change the conclusions of the report. The TIA and the recommendations for intersection improvements needed to address a LOS deficiency were provided for informational purposes only. . The comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment A4.15: This comment states that growth rates of 1% were used for developing 2022 traffic volumes and that the County should consider discussing why interpolation of SBTAM was not used if SBTAM was used to develop 2040 traffic volumes.

Response A4.15: Growth rates taken from SBTAM vary widely depending on the type and location of roadway and are not as applicable due to the fact that the opening year analysis includes traffic from known development projects that would affect the Project study area whereas the SBTAM growth assumes buildout of all proposed land uses. Application of the SBTAM growth rate implies that all planned land use would be built at a constant rate, which is not reflective of real-world land development patterns. Application of a growth rate of 1 percent to the existing counts to develop 2022 traffic volumes is consistent with the approach taken by other projects in the area and provides a general planning-level forecast of Project opening year conditions. The TIA and the recommendations for intersection improvements needed to address a LOS deficiency were provided for informational purposes only. . The comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment A4.16: This comment states that the paragraph describing Opening Year Development – Option 2 documents the sizes of different building sizes, but it is difficult to understand how the numbers identified in the paragraph correspond to Table 2.

Response A4.16: This comment was responded to in A4.11. No further response is required.

Comment A4.17: This comment states that Table 12 only seems to document the trip generation of Opening Year Development – Option 1 and the trip generation of the Opening Year Development – Option 2 should be provided. The comment states that it is difficult to understand what uses and square footages are combined to reflect the two options and it is not clear how the Specific Plan Buildout trip generation is the same regardless of which opening year option is developed.

Response A4.17: Table 12 shows the trip generation for the proposed Project, which is the entire Specific Plan. The Plus-Project analysis scenarios use the full 3,235,836 SF buildout of the Specific Plan. The Opening Year Option 1 and Option 2 are included for informational purposes and are included at the bottom of Table 12. Option 1 and Option 2 are included because the square footage identified for Site 1 and Site 3 correlate with Option 1 and the Site 2 square footage correlates with the potential square footage of Site 2 for both Options 1 and 2. The additional square footage for Sites 1 and 3 that would be constructed under Option 2 is accounted for under Future Fulfillment Center (OY2) within the Trip Generation table.

Regardless of which Opening Year Option is constructed, Specific Plan Buildout represents the maximum potential buildout of the Specific Plan Area based on the maximum floor area ratios for each planning area. This way the full potential impact of the Specific Plan can be analyzed no matter which option ends up being chosen for the initial development. . The TIA and the recommendations for intersection improvements needed to address a LOS deficiency were provided for informational purposes only. . The

comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment A4.18: This comment states that the total presented at the end of Table 12 shows autos and trucks combined, but Figure 14 presents the distribution of autos and trucks separate, and the totals at the bottom of Table 12 should be separated so the reader can understand how much of the total is auto or truck.

Response A4.18: As stated on page 63, the assignment that shows the number of auto trips and truck trips separated is located in Appendix E to the TIA. The trip generation shows the values that are important in the analysis and provides all of the information the reader would need to see how that number was calculated. If the reader would like to see the actual volume of auto and truck trips throughout the study area, the figures are available in Appendix E to the TIA. . The TIA and the recommendations for intersection improvements needed to address a LOS deficiency were provided for informational purposes only. . The comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment A4.19: This comment states that in Table 20, the intersection of Locust Avenue and Jurupa Avenue has an intersection improvement that would result in LOS D in the PM peak hour, but according to the criteria and the City of Fontana Traffic Impact Analysis Guidelines, the improvements should result in LOS C.

Response A4.19: The mitigation measure proposed for the Opening Year Plus Project scenario for Intersection 7 (Locust Avenue/Jurupa Avenue) within the TIA was an interim mitigation measure for analysis purposes only. The full mitigation measure proposed by the Project is to signalize the intersection and add a southbound and westbound left turn lane. The Project proposes to develop Intersection 7 with the full mitigation measure by the Project opening. Therefore, an updated analysis was done to demonstrate effects of the full mitigation measure. The updated analysis demonstrates that with implementation of the full mitigation measure, the mitigated LOS would be 15.9 seconds of delay (LOS B). The updated analysis within the Mitigation Vistro sheet can be found in Appendix B to this Final EIR.

As this analysis is a LOS analysis, it is no longer considered an environmental impact under CEQA, per CEQA Guidelines Section 15064.3. As a result, effect of LOS can be handled separately from the EIR through the Conditions of Approval. The TIA and the recommendations for intersection improvements needed to address a LOS deficiency were provided for informational purposes only. . The comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment A4.20: This comment states that in Table 21, the intersections of Sierra Avenue and I-10 ramps, Sierra Avenue and Slover Avenue, Sierra Avenue and Santa Ana Avenue, and Locust Avenue and Jurupa Avenue have a proposed improvement which would result in LOS E or F in the PM peak hour. According to the criteria set forth in the TIA and the City of Fontana Traffic Impact Analysis Guidelines, the improvements are required to result in LOS C.

Response A4.20: As stated in Section 2.4, Significance Criteria, Sierra Avenue/I-10 ramps and Sierra Avenue/Slover Avenue are listed as Congestion Management Program (CMP) intersections in the San Bernardino County CMP, which imposes a threshold of LOS E. The County CMP supersedes the LOS threshold provided by the City of Fontana and applies to the intersections of Sierra Avenue/I-10 ramps and Sierra Avenue/Slover Avenue. For the intersections of Sierra Avenue/Santa Ana Avenue and Locust Avenue/Jurupa Avenue the LOS threshold of LOS C set by the City of Fontana would apply. The threshold for a significant deficiency for an already deficient intersection is above baseline. Therefore, since the proposed improvements suggested for the impacted intersections reduce the delay to either an acceptable

LOS E (Sierra Avenue/I-10 Ramps) or below the baseline without Project delay (Sierra Avenue/Slover Avenue, Sierra Avenue/Santa Ana Avenue, and Locust Avenue/Jurupa Avenue), the suggested improvements would result in a less than significant deficiency.

As this analysis is a LOS analysis, it is no longer considered an environmental impact under CEQA, per CEQA Guidelines Section 15064.3. As a result, effect of LOS can be handled separately from the EIR through the entitlement process and Conditions of Approval. The TIA and the recommendations for intersection improvements needed to address a LOS deficiency were provided for informational purposes only. The comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment A4.21: The comment requests that the TIA document how the cost estimates for the improvements in Table 29 were developed.

Response A4.21: The cost estimates were derived from the mitigation cost estimates used by other approved studies in the Project area. An escalation factor was added to the previously approved cost estimates. These estimates are preliminary and are subject to change when the civil engineers and Public Works Department finalize the proposed improvements, and a contractor is selected. The TIA and the recommendations for intersection improvements needed to address a LOS deficiency were provided for informational purposes only. . The comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment A4.22: This comment requests that the commenter and the City of Fontana be added in the distribution list for the Final EIR and the response to comments.

Response A4.22: The City of Fontana and the commenter shall be included in the distribution list for the Final EIR and the response to comments. No further response is required.

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LETTER A5: Caltrans (2 pages)

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, Governor

DEPARTMENT OF TRANSPORTATION
OFFICE OF LOCAL DEVELOPMENT-INTERGOVERNMENTAL REVIEW
DISTRICT 8, PLANNING
464 W. 4TH STREET, 6TH FLOOR MS-725
SAN BERNARDINO, CA 92401
PHONE (909) 806-3923
TTY 711
www.dot.ca.gov/dist8

Making Conservation a California Way of Life.

February 23, 2022

File: 08-SBd-10-PM 17.827
C/S: Santa Ana Avenue

Mr. Aron Liang
County of San Bernardino
Dept. of Public Works
825 E. 3rd Street
San Bernardino, CA 92415-0835

Traffic Impact Analysis & VMT Analysis,
Bloomington Busines Specific Plan

Dear Mr. Liang:

Thank you for providing the California Department of Transportation (Caltrans) the opportunity to review and comment on the Traffic Impact Analysis along with VMT Analysis for the proposed industrial project, located south of Santa Ana Avenue, west of Linden Avenue, north of Jurupa Avenue, and east of Alder Avenue in the unincorporated area of Bloomington in the County of San Bernardino to develop up to 3,235,836 square feet of industrial uses over three phases. **A5.1**

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

1) Provide traffic safety analysis/review for the proposed land use projects and plans affecting the State Highway System. **A5.2**

2) Prepare queuing analysis for intersections affecting the state facilities. **A5.3**

3) Provide electrical plans for review. Also, Synchro analysis is required for traffic coordination impacted on all the State traffic signal locations. **A5.4**

4) Verify the speed at intersections with on and off-ramps. Analysis speed for on and off-ramps are not the same as the speed limit of the freeway at the intersection. **A5.5**

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

5) Verify length for storage lengths at on and off-ramps locations. **A5.6**

6) Include proposed or ongoing development projects in the vicinity of the proposed project site in the analysis. Consult with the County for status and information on these projects and incorporate potential traffic impacts from these developments in your trip generation, trip projection, trip distribution, impact analysis, and mitigations or alternatives, as needed. **A5.7**

7) Include information regarding truck traffic that generated by the project affect the existing pedestrian facilities such as existing bike lane and future bike lane proposal in the analysis. **A5.8**

At such time that encroachment into SR-62 Right-of-Way (R/W) is undertaken, issuance of a Caltrans Encroachment Permit will be required. Implementation of Caltrans' Encroachment Permits Office Process (EPOP) or the Project Delivery Quality Management Assessment Process (QMAP) will be determined with submittal of a permit application. When the project is conceptually approved, address all the comments itemized in this letter and proceed to Permit Office with requested documents along with conditions of approval.

For information regarding Encroachment Permit application and submittal requirements, including information regarding EPOP or QMAP encroachment project process enhancements, contact: **A5.9**

Caltrans Office of Encroachment Permits
464 West 4th Street, 6th Floor
San Bernardino, CA 92401-1400
(909) 383-4526
http://dot.ca.gov/programs/traffic-operations/ep

These comments result from a review of the provided document for our evaluation and no further review by our office necessary at this time. If you have any questions regarding this letter, please contact Jacob Mathew at (909) 963-9255 or email at Jacob.Mathew@dot.ca.gov.

Rosa F. Clark

ROSA F. CLARK
Office Chief
Local Development Review (LDR)

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Response to Letter A5: Caltrans, dated February 23, 2022

Comment A5.1: This comment provides a summary of the Project description and location. The comment states that it is Caltrans' responsibility to coordinate and consult with local jurisdictions when a proposed project may impact Caltrans facilities and to make recommendations to offset associated impacts from the proposed project. As such, the comment letter provides multiple comments related to the Project.

Response A5.1: The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required or provided.

Comment A5.2: This comment requests a traffic safety analysis/review for the proposed Project and plans affecting the State Highway System.

Response A5.2: Reviewing the Interim Local Development Intergovernmental Review Safety Review Practitioners Guidelines (December 18, 2020), the following factors are considered to determine the safety impact of a development project:

- Degradation of the walking and bicycling environment and experience.
- New pedestrian and bicyclist desire lines.
- Multimodal conflict points, especially at intersections and project access locations.
- Increased vehicular speeds
- Transition between free flow and metered flow.

The Project study area includes five Caltrans intersections, which include (AM and PM peak hour pedestrian and bicycle counts):

1. Sierra Avenue/I-10 Ramps (AM: 13 ped, 4 bike/PM: 17 ped, 10 bike)
11. Cedar Avenue/I-10 WB Ramps (AM: 2 ped, 8 bike/PM: 16 ped, 5 bike)
12. Cedar Avenue/I-10 EB Ramps (AM: 4 ped, 4 bike/PM: 13 ped, 6 bike)
24. Market Street/SR-60 WB Ramps (AM: 2 ped, 3 bike/PM: 8 ped, 10 bike)
25. Market Street/SR-60 EB Ramps (AM: 1 ped, 5 bike/PM: 20 ped, 6 bike)

As can be seen by the counts, the five intersections do not have heavy amounts of pedestrian or bicycle traffic. The proposed project does not propose any changes to the roadway speeds (or change the flow of traffic to encourage an increase in driving speed), nor does the project change existing metered flow of traffic. In addition, the proposed project does not propose new pedestrian or bicyclist desire lines.

To see the effect of the project on the current truck percentages at the five freeway ramp intersections, a comparison of the vehicle splits before the project trips and after the project trips are added. Table 1 below shows the change in vehicle splits. As can be seen in Table 1, no intersection has a change in vehicle type of more than 1%; therefore, the existing condition of the intersections would remain relatively unchanged. Safety risks would not be increased due to an increase in trucks at any Caltrans intersection.

Using the criteria from the Local Development Intergovernmental Review Safety Review Practitioners Guidelines, the project does not propose any changes that would impact the safety of Caltrans intersections; therefore, no further safety analysis is required.

Table 1: Vehicle Splits for Freeway Intersections

Vehicle Composistion

	Sierra Avenue/I-10 Ramps Baseline				Sierra Avenue/I-10 Ramps + Project			
Vehicle Type	AM Volume	AM %	PM Volume	PM %	AM Volume	AM %	PM Volume	PM %
Passenger Vehicle	11,761	91.78%	17,473	95.02%	11,899	91.87%	17,639	95.06%
2-axle Truck	525	4.10%	500	2.72%	525	4.05%	500	2.69%
3-axle Truck	246	1.92%	165	0.90%	246	1.90%	165	0.89%
4+-axle Truck	282	2.20%	251	1.36%	282	2.18%	251	1.35%
Total	12,814	100%	18,389	100%	12,952	100%	18,555	100%
	Cedar Avenue/I-10 WB Ramps Baseline				Cedar Avenue/I-10 WB Ramps + Project			
Vehicle Type	AM Volume	AM %	PM Volume	PM %	AM Volume	AM %	PM Volume	PM %
Passenger Vehicle	7,443	85.97%	9,615	89.93%	7,522	85.59%	9,710	89.55%
2-axle Truck	626	7.23%	555	5.19%	639	7.27%	570	5.26%
3-axle Truck	203	2.34%	178	1.66%	212	2.41%	189	1.74%
4+-axle Truck	386	4.46%	344	3.22%	415	4.72%	374	3.45%
Total	8,658	100%	10,692	100%	8,788	100%	10,843	100%
	Cedar Avenue/I-10 EB Ramps Baseline				Cedar Avenue/I-10 EB Ramps + Project			
Vehicle Type	AM Volume	AM %	PM Volume	PM %	AM Volume	AM %	PM Volume	PM %
Passenger Vehicle	5,955	83.79%	8,128	88.79%	6,034	83.27%	8,223	88.18%
2-axle Truck	526	7.40%	515	5.63%	544	7.51%	535	5.74%
3-axle Truck	220	3.10%	169	1.85%	233	3.22%	184	1.97%
4+-axle Truck	406	5.71%	342	3.74%	435	6.00%	383	4.11%
Total	7,107	100%	9,154	100%	7,246	100%	9,325	100%
	Market Street/SR-60 WB Ramps Baseline				Market Street/SR-60 WB Ramps + Project			
Vehicle Type	AM Volume	AM %	PM Volume	PM %	AM Volume	AM %	PM Volume	PM %
Passenger Vehicle	3,292	78.14%	5,015	86.02%	3,331	78.01%	5,110	85.95%
2-axle Truck	385	9.14%	400	6.86%	390	9.13%	405	6.81%
3-axle Truck	194	4.60%	144	2.47%	197	4.61%	148	2.49%
4+-axle Truck	342	8.12%	271	4.65%	352	8.24%	282	4.74%
Total	4,213	100%	5,830	100%	4,270	100%	5,945	100%
	Market Street/SR-60 EB Ramps Baseline				Market Street/SR-60 EB Ramps + Project			
Vehicle Type	AM Volume	AM %	PM Volume	PM %	.	AM %	PM Volume	PM %
Passenger Vehicle	2,642	80.87%	5,083	91.47%	2,681	80.66%	5,083	91.14%
2-axle Truck	320	9.79%	293	5.27%	325	9.78%	298	5.34%
3-axle Truck	116	3.55%	80	1.44%	119	3.58%	84	1.51%
4+-axle Truck	189	5.79%	101	1.82%	199	5.99%	112	2.01%
Total	3,267	100%	5,557	100%	3,324	100%	5,577	100%

Comment A5.3: This comment requests a queuing analysis for intersections affecting state facilities.

Response A5.3: Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to queuing. However, effects of the proposed Project related to queuing are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR, and are provided here solely for informational purposes. Table 2 to Table 8 shows the queueing analysis using the Vistro sheets from Appendix C of the TIA (except for Sierra Avenue/I-10 Ramps, which were updated to reflect the

appropriate WB and EB ramps vehicle speed, are included in the updated Vistro sheets in Appendix B to this Final EIR). As can be seen in Tables 3 and Tables 6-8, the project causes a queue deficiency. For Cedar Avenue/I-10 WB Ramps with existing lane geometry, the project adds to the already deficient queue lengths for the Northbound left turn onto the I-10 freeway and the Westbound off ramp queue length. For the Market Street/SR-60 EB Ramps with existing lane geometry, the project adds to the already deficient queue length for the Southbound left turn onto the SR-60 freeway. The TIA proposed fair share contributions to potential improvements to both Cedar Avenue/I-10 WB Ramps and Market Street/SR-60 EB Ramps. The recommended improvement for Cedar Avenue/I-10 WB Ramps is to convert a 3rd southbound thru to southbound thru-right and northbound thru lane, and the recommended improvement for Market Street/SR-60 EB Ramps is to Add a 2nd southbound lane. With implementation of those improvements, the queue at Market Street/SR-60 EB Ramps is reduced to below without project levels, and the queue at the Westbound ramp at Cedar Avenue/I-10 WB Ramps would be reduced to below without project levels; however, the queue for the Northbound left and Southbound right remain significantly deficient. However, it is clear from the without project scenarios and the fact that the northbound left turn lane already extends past the eastbound ramp intersection, the queue lengths for both the northbound left and southbound right are already deficient. While the Project would add trips to the northbound left, the change in safety caused by the queue length would be nominal.

Table 2: Queueing Analysis for Sierra Avenue/I-10 Ramps

Sierra Avenue/I-10 Ramps								
	Northbound		Southbound		Eastbound Ramp		Westbound Ramp	
	LT	RT	LT	RT	LT	RT	LT	RT
Storage Length	565	1,285	325	305	1,205	1500**	1200**	560
Existing (Plus Project)								
Queue Lengh	338/256 (347/291)	0/0 (0/0)	317/310 (317/310)	0/0 (0/0)	513/447 (513/447)	0/0 (0/0)	172/211 (172/211)	0/0 (0/0)
Opening Year (Plus Project)								
Queue Lengh	358/306 (367/342)	0/0 (0/0)	322/325 (322/325)	0/0 (0/0)	521/477 (521/477)	0/0 (0/0)	196/231 (196/231)	0/0 (0/0)
2040 (Plus Project)								
Queue Lengh	373/492 (381/543)	0/0 (0/0)	556/593 (556/593)	0/0 (0/0)	581/582 (581/582)	0/0 (0/0)	208/291 (208/291)	0/0 (0/0)
Project Caused Queue Deficiency?	No	No	No	No	No	No	No	No

Note: LT = Left-turn Lane, RT = Right-turn Lane

Queue length reported in feet for the AM/PM peak periods

** Full Ramp Lenth

Table 3: Queueing Analysis for Cedar Avenue/I-10 WB Ramps

Cedar Avenue/I-10 WB Ramps								
	Northbound		Southbound		Eastbound Ramp		Westbound Ramp	
	LT	RT	LT	RT	LT	RT	LT	RT
Storage Length	905*	N/A	N/A	450	N/A	N/A	1265**	485
Existing (Plus Project)								
Queue Lengh	544/301 (633/653)	N/A	N/A	1069/455 (1069/455)	N/A	N/A	469/305 (723/346)	467/337 (575/411)
Opening Year (Plus Project)								
Queue Lengh	1003/1019 (1104/1431)	N/A	N/A	1567/654 (1567/654)	N/A	N/A	773/486 (1132/580)	479/593 (479/647)
2040 (Plus Project)								
Queue Lengh	536/954 (629/1340)	N/A	N/A	1016/635 (1016/635)	N/A	N/A	440/1286 (745/1367)	452/1506 (514/1601)
Project Caused Queue Deficiency?	Yes	N/A	N/A	No	N/A	N/A	Yes	Yes

Note: LT = Left-turn Lane, RT = Right-turn Lane

Queue length reported in feet for the AM/PM peak periods

* Includes lane south of Cedar Avenue/I10 EB Ramps, but does not include space in intersection

** Full Ramp Lenth

Table 4: Queueing Analysis for Cedar Avenue/I-10 EB Ramps

Cedar Avenue/I-10 EB Ramps								
	Northbound		Southbound		Eastbound Ramp		Westbound Ramp	
	LT	RT	LT	RT	LT	RT	LT	RT
Storage Length	N/A	600	565*	N/A	380	1890**	N/A	N/A
Existing (Plus Project)								
Queue Lengh	N/A	274/191 (303/257)	423/274 (423/274)	N/A	344/262 (414/282)	411/274 (560/305)	N/A	N/A
Opening Year (Plus Project)								
Queue Lengh	N/A	434/339 (475/495)	599/366 (599/366)	N/A	585/355 (686/387)	748/407 (890/460)	N/A	N/A
2040 (Plus Project)								
Queue Lengh	N/A	258/350 (274/423)	593/828 (593/828)	N/A	492/618 (591/672)	620/655 (769/721)	N/A	N/A
Project Caused Queue Deficiency?	Yes	N/A	No	N/A	No	N/A	N/A	N/A

Note: LT = Left-turn Lane, RT = Right-turn Lane

Queue length reported in feet for the AM/PM peak periods

* Includes lane south of Cedar Avenue/I10 EB Ramps, but does not include space in intersection

** Full Ramp Lenth

Table 5: Queueing Analysis for Market Street/SR-60 WB Ramps

Market Street/SR-60 WB Ramps								
	Northbound		Southbound		Eastbound Ramp		Westbound Ramp	
	LT	RT	LT	RT	LT	RT	LT	RT
Storage Length	185	N/A	N/A	285	N/A	N/A	1450**	325
Existing (Plus Project)								
Queue Lengh	117/141 (117/141)	N/A	N/A	0/0 (0/0)	N/A	N/A	80/53 (80/53)	0/0 (0/0)
Opening Year (Plus Project)								
Queue Lengh	119/143 (119/143)	N/A	N/A	0/0 (0/0)	N/A	N/A	81/54 (81/54)	0/0 (0/0)
2040 (Plus Project)								
Queue Lengh	114/214 (114/214)	N/A	N/A	0/0 (0/0)	N/A	N/A	85/76 (85/76)	0/0 (0/0)
Project Caused Queue Deficiency?	No	N/A	N/A	No	N/A	N/A	No	No

Note: LT = Left-turn Lane, RT = Right-turn Lane
Queue length reported in feet for the AM/PM peak periods
** Full Ramp Lenth

Table 6: Queueing Analysis for Market Street/SR-60 EB Ramps

Market Street/SR-60 EB Ramps								
	Northbound		Southbound		Eastbound Ramp		Westbound Ramp	
	LT	RT	LT	RT	LT	RT	LT	RT
Storage Length	N/A	60	155	N/A	180	1,640**	N/A	N/A
Existing (Plus Project)								
Queue Lengh	N/A	0/0 (0/0)	386/314 (396/373)	N/A	74/63 (74/63)	87/185 (87/185)	N/A	N/A
Opening Year (Plus Project)								
Queue Lengh	N/A	0/0 (0/0)	441/941 (453/1240)	N/A	79/98 (79/98)	89/253 (89/253)	N/A	N/A
2040 (Plus Project)								
Queue Lengh	N/A	0/0 (0/0)	396/608 (409/896)	N/A	101/91 (101/91)	178/510 (178/510)	N/A	N/A
Project Caused Queue Deficiency?	N/A	No	Yes	N/A	No	No	N/A	N/A

Note: LT = Left-turn Lane, RT = Right-turn Lane
Queue length reported in feet for the AM/PM peak periods
** Full Ramp Lenth, second right turn lane has 410 feet of queue

Table 7: Queueing Analysis for Cedar Avenue/I-10 WB Ramps MIT

Cedar Avenue/I-10 WB Ramps MIT								
	Northbound		Southbound		Eastbound Ramp		Westbound Ramp	
	LT	RT	LT	RT	LT	RT	LT	RT
Storage Length	905*	N/A	N/A	450	N/A	N/A	1265**	485
Existing (Plus Project)								
Queue Lengh	544/301 (633/653)	N/A	N/A	1069/455 (387/319)	N/A	N/A	469/305 (723/346)	467/337 (575/411)
Opening Year (Plus Project)								
Queue Lengh	1003/1019 (1104/1431)	N/A	N/A	1567/654 (628/469)	N/A	N/A	773/486 (1132/580)	479/593 (479/647)
2040 (Plus Project)								
Queue Lengh	536/954 (423/1106)	N/A	N/A	1016/635 (547/871)	N/A	N/A	440/1286 (445/1084)	452/1506 (312/1326)
Project Caused Queue Deficiency?	Yes	N/A	N/A	Yes	N/A	N/A	No	No

Note: LT = Left-turn Lane, RT = Right-turn Lane
Queue length reported in feet for the AM/PM peak periods
* Includes lane south of Cedar Avenue/I10 EB Ramps, but does not include space in intersection
** Full Ramp Lenth

Table 8: Queueing Analysis for Market Street/SR-60 EB Ramps MIT

Market Street/SR-60 EB Ramps MIT								
	Northbound		Southbound		Eastbound Ramp		Westbound Ramp	
	LT	RT	LT	RT	LT	RT	LT	RT
Storage Length	N/A	60	155	N/A	180	1,640**	N/A	N/A
Existing								
Queue Lengh	N/A	0/0 (0/0)	386/314 (60/114)	N/A	74/63 (74/63)	87/185 (87/185)	N/A	N/A
Opening Year								
Queue Lengh	N/A	0/0 (0/0)	441/941 (81/189)	N/A	79/98 (79/98)	89/253 (89/253)	N/A	N/A
2040								
Queue Lengh	N/A	0/0 (0/0)	396/608 (72/388)	N/A	101/91 (96/91)	178/510 (161/510)	N/A	N/A
Project Caused Queue Deficiency?	N/A	No	No	N/A	No	No	N/A	N/A

Note: LT = Left-turn Lane, RT = Right-turn Lane
Queue length reported in feet for the AM/PM peak periods
** Full Ramp Lenth, second right turn lane has 410 feet of queue

Comment A5.4: This comment requests electrical plans for review and states that Synchro analysis is required for traffic coordination impacted on all of the State traffic signal locations.

Response A5.4: Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic

congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to state intersections. However, effects of the proposed Project related to state intersections are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR, and are provided here solely for informational purposes. The proposed project plans to pay fair share contributions to any required improvements to State intersections, as outlined in the proposed improvements discussed in the TIA. Electrical plans and Synchro analysis for any state traffic signal improvements would be provided as part of the design process at the time physical improvements are proposed for those locations.

Comment A5.5: The comment states that the speed at intersections with on and off-ramps should be verified and analysis speed for on and off-ramps are not the same as the speed limit of the freeway at the intersection.

Response A5.5: Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to speed at on- and off-ramps. However, effects of the proposed Project related to on- and off-ramps are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR, and are provided here solely for informational purposes. The on and off ramp for Intersection 1 (Sierra Avenue/I-10) was updated to match the on and off-ramps of the other intersections. The level of service (LOS) results for all scenarios (Existing, Opening Year, 2040, and plus project for all three) at Intersection 1 did not substantially change from the LOS disclosed in the original TIA, therefore, no new information would be disclosed from the updated analysis. The updated LOS sheets can be found in Appendix A to the Final EIR.

Comment A5.6: The comment states that the length for storage lengths should be verified at on and off-ramps.

Response A5.6: Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to on- and off-ramp deficiencies. However, effects of the proposed Project related to on- and off-ramp deficiencies are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR, and are provided here solely for informational purposes. As shown in Tables 1-7 in Comment A5.3, there would be no significant deficiency to storage lengths to on and off ramps. During the conditions of approval and the time of roadway improvements on state facilities, the County will consult with Caltrans with Synchro analysis to confirm the signal timing a queue impact to on and off ramps.

Comment A5.7: The comment states that the TIA should include proposed or ongoing development projects in the vicinity of the proposed Project in the analysis.

Response A5.7: Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As

part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR, and are provided here solely for informational purposes. The Project TIA, as discussed in Section 3.3 Opening Year Traffic Volumes and Intersection Operations, states that cumulative projects (proposed or ongoing development projects) were included in the Opening Year scenario, with a map of the cumulative projects shown in Figure 8 and the trip generation for all cumulative projects shown in Table 9. In addition, the project also analyzed the full general plan buildout scenario for year 2040, which includes all potential development within the San Bernardino Transportation Analysis Model (SBTAM). Therefore, the project appropriately analyzed the potential impacts from proposed or ongoing development projects within the vicinity of the project.

Comment A5.8: The comment states that the County should include information regarding truck traffic generated by the Project and how the truck traffic would affect existing pedestrian facilities and bike lanes.

Response A5.8: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to truck traffic. However, effects of the proposed Project related to truck traffic are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR, and are provided here solely for informational purposes. See Response A5.2.

As shown on Figure 3-4, Project trucks would utilize established County truck routes, which are directed away from schools in Bloomington. Furthermore, the Project would implement PDF AQ-22, which would require the Project Applicant/Developer/Owner to post signs at every truck exit driveway providing directional information to the truck route. As such, Project trucks would be directed away from schools and would not result in a safety hazard for school children. Furthermore, sidewalks currently exist on Cedar Avenue intermittently on both side of the roadway, on Santa Ana Avenue intermittently on the north side of the roadway, on Jurupa Avenue on the north side east of Linden Avenue. Implementation of the Specific Plan would include roadway improvements within the Specific Plan area that would provide for new sidewalks where none exist currently, thereby improving pedestrian facilities and the sidewalk network. As such, the Project would provide safer sidewalk connectivity for pedestrians, such as school children to utilize. Sierra Avenue has a bike lane on the east side between Santa Ana Avenue and Technology Street. The Countywide Plan Transportation & Mobility Element identifies Cedar Avenue, Jurupa Avenue, Santa Ana Avenue, and Locust Avenue for planned Class II bike lanes. Class II bike lanes are striped lanes that provide bike travel and can be next to a curb or parking lane. Implementation of the Specific Plan would not alter or conflict with existing or planned bike lanes or bicycle transportation.

Comment A5.9: This comment states that when encroachment into the State Route 62 right-of-way is undertaken, issuance of a Caltrans Encroachment Permit will be required and implementation of Caltrans' Encroachment Permits Office Process or the Project Delivery Quality Management Assessment Process will be determined with submittal of a permit application. The comment states that comment in this comment

letter should be addressed and the Applicant would proceed to the Permit Office with requested documents along with conditions of approval and provides a contact for questions regarding the Encroachment Permit application and submittal requirements. The comment concludes with stating that no further review of the Project is needed by Caltrans at this time.

Response A5.9: The County appreciates Caltrans' comments on the proposed Project. At this time, it does not appear that any Caltrans Encroachment Permits would be required. Furthermore, the comment mentions that the Project would include encroachment into the State Route 62 right-of-way; however, State Route 62 is not located within Bloomington or in the vicinity of the Project. No encroachment into State Route 62 or any other Caltrans facilities will be needed for the Project. No further response is warranted.

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LETTER A6: City of Riverside (3 pages)

MEMORANDUM

Engineering

DATE: 03/09/2022

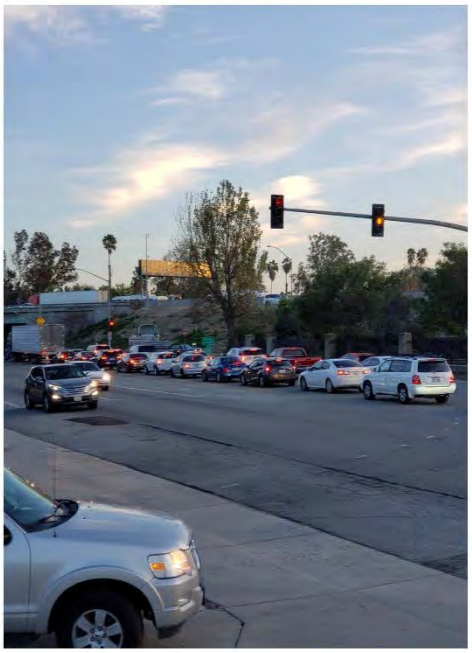
TO: Liang, Aron
FROM: Vital Patel
CC: Philip Nitollama
RE: Bloomington Business Park Specific Plan Traffic Analysis

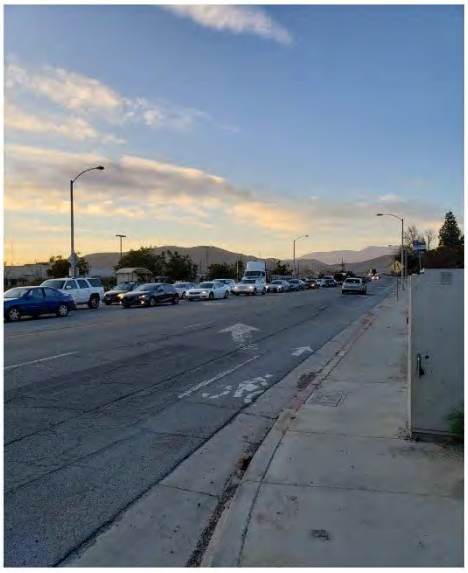
We have reviewed the Traffic Study included in the Bloomington Business Park Specific Plan and Traffic Engineering Comments are as follows:

1. Intersection of Market Street and Rivera Street:

   The Traffic Analysis indicates that the intersection of Market Street and Rivera Street operates under an acceptable Level of Service. However, the field verification indicates that the intersection experiences heavy congestion and operates under unacceptable Level of Service. The City of Riverside requests that the following improvements to be made by project to improve the LOS at the intersection Market Street and Rivera Street in the study: **A6.1**

   a) Installation of CCTV monitoring systems at the intersection of Market & Rivera to allow for observation of traffic operations and potential cut-through traffic.





A6.1 cont.

2. The traffic analysis report indicates that the intersection of Market Street and SR-60 EB Ramps will operate under deficient Level of Service. The study shows that installing 2nd southbound left-turn lane will improve the Level of service. However, it appears that there are existing overpass pillars located in the median at the north leg of the intersection of Market Street and SR-60 EB Ramps. Hence, there may not be sufficient space to accommodate additional lane. Please provide an exhibit to demonstrate the feasibility of this improvement. **A6.2**

3. The traffic analysis report indicates that the intersection of Market Street and SR-60 EB Ramps will operate under deficient Level of Service. The study shows that installing 2nd southbound left-turn lane will improve the Level of service. Table-29 specific Plan Fair Share and Cost Table indicates that the total improvement cost is $85,248.00. Please verify that the project will be constructing this improvement in full. **A6.3**

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Response to Letter A6: City of Riverside, March 3, 2022

Comment A6.1: This comment states that the City of Riverside reviewed the Traffic Impact Analysis (TIA) for the Bloomington Business Park Specific Plan, and the Riverside Traffic Engineering has comments. The first comment states that the TIA indicates that the Market Street and Rivera Street intersection operates under an acceptable Level of Service (LOS). Due to this LOS, the City requests that the Project install CCTV monitoring systems at the intersection to allow for observation of traffic operations and potential cut-through traffic.

Response A6.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. However, as requested by the City of Riverside, the Project will be conditioned to implement the following:

> "Installation of CCTV monitoring systems at the intersection of Market & Rivera to allow for observation of traffic operations and potential cut through traffic."

Comment A6.2: This comment states that the TIA indicates that the intersection of Market Street and State Route 60 East Bound Ramps will operate under deficient LOS, as such, the TIA shows that installing a second southbound left turn lane will improve LOS. However, the comment states that there are overpass pillars and there might not be sufficient space to accommodate an additional lane and requests an exhibit to show the feasibility of this improvement.

Response A6.2: The commenter is referred to Response A6.1 for a discussion of why traffic congestion is no longer a CEQA impact. As shown in Table 15 of the Bloomington Business Park Specific Plan TIA, the LOS deficiency at Market St/SR-60 EB Ramp occurs in the general plan buildout condition; therefore, is considered a cumulative effect of the Project. Additionally, the recommended mitigation has been proposed by other approved traffic studies in the area (West Valley Logistics Center). Therefore, fair share payments from this Project and other area projects would apply toward future Caltrans improvements at the interchange. The comment does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

Comment A6.3: This comment reiterates that the TIA indicates that the intersection of Market Street and State Route 60 East Bound Ramps will operate under deficient LOS, as such, the TIA shows that installing a second southbound left turn lane will improve LOS. The comment provides the Fair Share improvement cost and asks if the Project will be constructing the improvement in full.

Response A6.3: The commenter is referred to Response A6.1 for a discussion of why traffic congestion is no longer a CEQA impact. As stated in Response A6.2, the LOS deficiency at Market St/SR-60 EB Ramp occurs in the general plan buildout condition; therefore, is a cumulative effect of the Project. Therefore, the Project would not be responsible for the construction of the improvement and would only be responsible for a fair share contribution to the improvement. The comment does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

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LETTER O1: Concerned Neighbors of Bloomington (1 page)

October 20, 2021

Dear Supervisor Joe Baca Jr.,

Thank you for your interest in hearing from all Bloomington residents. Concerned Neighbors of Bloomington (CNB) is requesting additional time for all residents to review the Draft Environmental Impact Report ("EIR") for the Bloomington Business Park Specific Plan.

We are asking for an extension of 30 days to contact Non-English speaking residents since the DEIR is only available in English. It will require additional efforts to translate materials. We also would like to point out that the reading level of this document well exceeds the recommended 8th grade reading level for general documents. It will be important to have additional time to ensure that all residents have enough time with the documents, specifically if almost half of Bloomington residents have not obtained a high school diploma. **O1.1**

We have attached our letter requesting an extension to the San Bernardino, Land Use Services Department, Planning Division, Senior Planner, Aaron Lian. We are asking for your support that will allow for the inclusion of all residents. This is an important decision for all Bloomington residents to take part in the democratic process.

Can Concerned Neighbors of Bloomington count on you to request an extension from Land Use Services Department, Planning Division, Senior Planner, Aaron Lian to grant an extension?

Sincerely,

Concerned Neighbors of Bloomington

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Response to Comment Letter O1: Concerned Neighbors of Bloomington, dated October 20, 2021

Comment O1.1: This comment requests that the County of San Bernardino extends the Notice of Availability and Draft EIR public comment period by 30 days in order to allow the Concerned Neighbors of Bloomington to translate materials for non-English speaking Bloomington residences. Additionally, the comment states that the Draft EIR exceeds an 8th grade reading level, and the group would like to ensure that residents have enough time with the documents.

Response to O1.1: As requested by the Concerned Neighbors of Bloomington, the public review and comment period was extended by 30 days, for a 75-day public review period to allow for additional review and public disclosure. Subsequent to receipt of this comment, the end of the public comment period was extended from November 15, 2021 to December 15, 2021. Furthermore, an additional notice regarding the extension was mailed to residents and business owners within a 1,300-foot radius of the Specific Plan Area and 700-foot radius of the Upzone Site in English and Spanish on October 25, 2021. The notice of extension was also posted to the County's website. The comment does not raise any further environmental concerns or questions related to the Draft EIR; therefore, no further response is warranted.

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LETTER O2: Peoples Collective for Environmental Justice (7 pages)

December 15, 2021

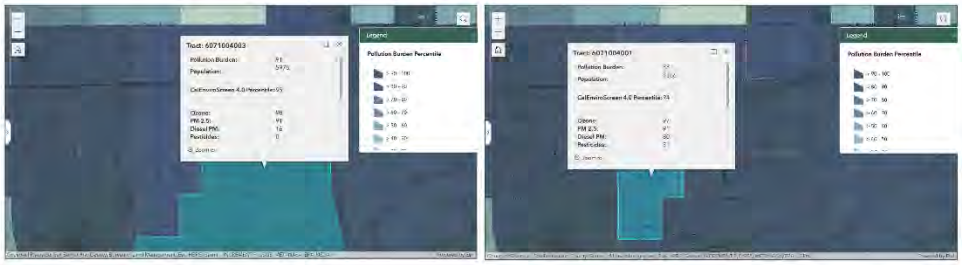
Aron Liang, Senior Planner
County of San Bernardino
Land Use Services Department – Planning Division
385 North Arrowhead Avenue, First Floor
San Bernardino, CA 92415-0187

Dear County of San Bernardino,

On behalf of the Peoples Collective for Environmental Justice, a community based organization dedicated to fighting environmental racism and air pollution, **we write this letter concerned that that the County of San Bernardino has not done an adequate analysis on multiple sections of the Draft Environmental Impact Review (DEIR) for the 'Bloomington Business Park Specific Plan Project' (BBPSP). We believe that the County of San Bernardino is underestimating the potential impacts this project will have. This is disappointing to realize as there have been numerous accounts of undemocratic and non-transparent processes thus far in regards to the outreach and engagement on this project. As the DEIR stands currently, we believe that the proposed project's significant and unavoidable impacts cannot be mitigated nor justified with an overriding consideration**. We request that the County of San Bernardino Supervisors not approve the project and that the Planning Commissioners and Municipal Advisory Council Members not recommend the Bloomington Business Park Specific Plan continue. O2.1

Background

Bloomington is an unincorporated community in the County of San Bernardino. Of the almost 25,000 residents that live in Bloomington, over 80% of them identify as Hispanic/Latino - with over 65% of the community speaking a language other than English. These communities are also living in areas ranked in the 90th percentile and higher of pollution burden including but not limited to diesel pm, ozone, particulate pollution, drinking water contamination, hazardous waste, groundwater threats, and more.

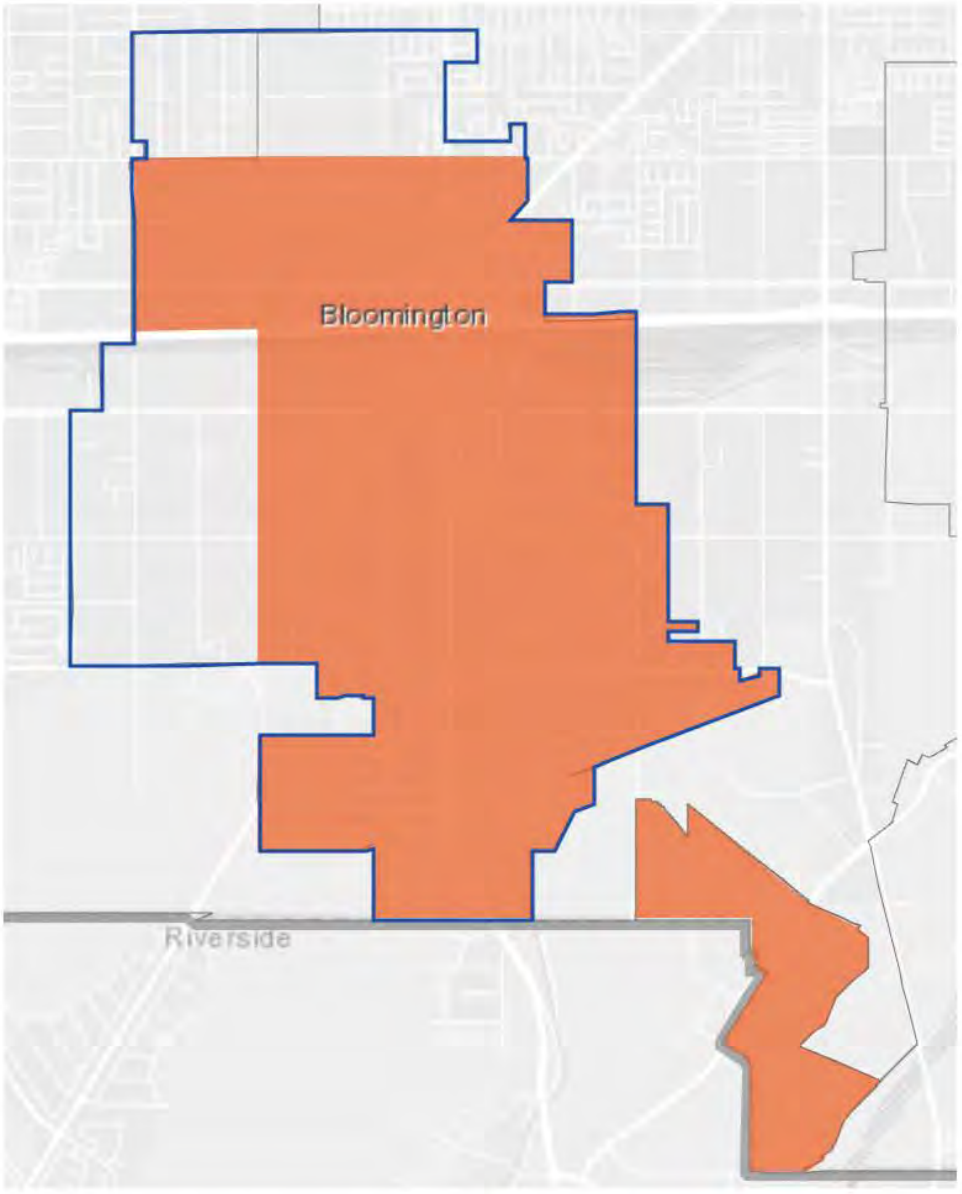


O2.2

According to the definition by Dr. Bullard, a recognized academic on this issue, "environmental racism refers to how minority group neighborhoods—populated primarily by people of color and members of low-socioeconomic backgrounds—are burdened with disproportionate numbers of hazards including toxic waste facilitates, garbage dumps, and other sources of environmental pollutions and foul odors that lower the quality of life". Decisions to approve and permit industrial developments by the County Board of Supervisors whilst having documented evidence of the negative and unavoidable impacts those decisions would have onto nearby residents in Bloomington is textbook environmental racism, and have seen this executed over the past decade.

San Bernardino County themselves in their most updated General Plan has classified the community of Bloomington as an Environmental Justice Community, as the definition given for environmental justice: State planning law defines "environmental justice" as the "fair treatment of people of all races, cultures, and incomes with respect to the

development, adoption, implementation, and enforcement of environmental laws, regulations, and policies" (Government Code Section 65040.12(e))



https://www.arcgis.com/apps/webappviewer/index.html?id=7e14816d164b46fc83d4fee6d523a458

O2.2 cont.

It is clear to us that the County of San Bernardino has not taken into consideration how environemental racism is explicit in this proposal nor have they analyzed how historic discriminatory land use decisions have had and could have generational impacts to communities' health, social mobility and the environment. We believe the County must explore how environmental racism shows up in this project proposal and how it can be eliminated under CEQA. Moreso, because this community, according to SB 535, is in an area considered a "disadvantaged community," which is defined by suffering from a combination of economic, health, and environmental burdens. Currently, 20% of the Bloomington residents experience poverty despite the so-called "economic opportunities" that the County of San Bernardino has brought to Bloomington. We believe that the DEIR needs to provide this analysis. **O2.3**

Lack of Transparency and Democracy

Over the past couple of months, the engagement process for the BBPSP has been inappropriate. Although we appreciate that the comment period was extended due to the language access issues present in Bloomington. We believe that the County of San Bernardino needed to do their due diligence in translating materials so that residents could have full access to the information. In a community where over 60% of the residents speak a language other than English and over 80% of the community identifies as Hispanic/Latino it should be expected that notifications, meetings and the document be translated into Spanish. At the very least, the executive summary of the DEIR should have been translated for the residents to be able to read and engage with. By not providing translated material, we believe that the County limited public comment and thus should redistribute translated material so that the community can properly engage with the proposal. **O2.4**

Yet another example of limiting public comment and participation was that translation was not provided for the residents of Bloomington during public meetings. At MAC meetings, residents were promised translation and were disappointed to find that neither the MAC or the developer followed through with equipment, a translator or translated material. Instead, our organization hired a translator to assist at these meetings. This is the responsibility of the government agency and surely limited comments from members of the community, especially those meetings where our organization did not have translation covered. We believe there would have been adequate community engagement if these basic and minimal details were covered.

We also feel that the County did not create sufficient opportunities for engagement. Only one meeting was provided for the community to give their feedback and learn about the BBPSP DEIR. Any opportunity created by the developer to engage in the project was not an official public comment opportunity, nor did they follow the proper protocols for engagement. Instead, we heard concerns from residents that their voices were silenced, not chosen or talked over. Having only one meeting is unacceptable and goes against the requirements of CEQA.

By only creating one meeting, it significantly limited the opportunity for residents to comment and for the MAC to hear concerns from the community. This is especially important as the MAC member Gary Grossich who was not in attendance of the meeting, has reportedly told residents that parts of the project are a mere "paper exercise." This is also the same MAC member that attempted to schedule a meeting between the developer and certain community members, undermining community members that were commenting at the meeting that they should not meet behind closed doors and instead be transparent with the community. How can residents know what exactly is being done behind their back about the project? By allowing for the scheduling of these private meetings, the MAC is failing to disclose all information on the project, thus not giving the public or the decision-makers all the information needed to make an informed decision. We question that the engagement process during the DEIR by the County of San Bernardino is allowing for bias for the decision-makers who will be making a recommendation on the project and believe it is the County of San Bernardino's responsibility to create sufficient opportunities for engagement with the DEIR for both the community and MAC members who will be making a decision. **O2.5**

Concerns

We believe that in multiple sections of the DEIR, the County of San Bernardino does not adequately analyze all of the potential impacts of the project, fails to address significant harms that come from the project and does not fully explore possible mitigation opportunities. **O2.6**

Environmental Justice

The DEIR and project fail to stay true to updated environmental justice and land use elements. If the county and developer had the Bloomington Business Specific Park in Plan since 2020, when these elements were going under review and being updated, why was there no comment submitted or specific plan proposed then? Since it was not presented then, it is of importance that the DEIR re-analyze how these updated policies that are meant to protect the well being of the Bloomington community will not be violated. According to San Bernardino County, Land use Policy[1] ***LU-4.5:Community identity "We require that new development be consistent with and reinforce the physical and historical character and identity of our unincorporated communities, as described in Table LU-3 and in the values section of Community Action Guides. In addition, we consider the aspirations section of Community Action Guides in our review of new development"*** The project under analysis would be violating this land use policy, the historical character and identity of Bloomington has been residential with emphasis on agricultural land use, it has been a place for families to buy residential spaces that allow for grazing of different animals and plants. This project is completely threatening the well-being of these communities' identity as rural and presents no mitigation for this. The DEIR has also not mentioned how to mitigate for the following Environmental Justice Element Policy: ***Policy HZ-3.14 Community-desired improvements: We assist unincorporated environmental justice focus areas to identify ways in which they might establish special funding and financing mechanisms to provide community-desired public facilities and services, recreational facilities, sidewalks and bike trails, and access to fresh and healthy food.*** Communities in Bloomington, since the notice of preparation of this project, have been echoing how they do not want to be displaced or have a logistics park in the middle of 3-4 different schools, again there has been no mitigation mentioned of the violation of the community's desired public facilities. As mapped in this figure[2] The proposed project will be surrounding 3 different schools, and will be less than 200 meters from them, again the DEIR fails to fully analyze mitigation around these concerns and broken land use and environmental justice policies. **O2.7**

Bloomington Warehouses and Impacted Schools



[1] https://countywideplan.com/policy-plan/beta/lu/
[2] https://earthjustice.org/sites/default/files/files/warehouse_research_report_4.15.2021.pdf

Air Quality and Traffic

According to the DEIR, the proposed project finds that there are multiple air quality impacts that have significant and unavoidable impacts. In a region that already suffers from some of the highest levels of ozone pollution in the country, how does the County of San Bernardino analyze this will worsen with the projected continued port congestion, extreme weather, and cumulative impact from other nearby warehouse operations? The DEIR does not properly study these compounding effects but should so that the public and decision-makers clearly understand the project's near-term and long-term impacts. **O2.8**

We also notice that the trucks coming to and from the facilities are severely undercounted, thus underestimating the environmental and health impacts it will have. We need to understand the impacts at the facility and the impacts for any of the residents, students, parents, or workers who will be walking next to the trucks driving on routes that are inside residential uses. We believe that not only the roads to the freeways should be studied but any route that is coming close to sensitive uses. This is especially important as the DEIR stated that it did not find it feasible to perform a health risk assessment. This is extremely disappointing given that our communities are already at risk of contracting illnesses from the existing poor air quality. We are in the middle of a pandemic that attacks our respiratory system and that this area has seen a large influx of industrialization already. We also believe that the mobile health risk assessment does not account for the cumulative impact of emissions in the area and thus does not account for the possible cancer risk. **O2.9**

It is also concerning to see that the DEIR will need to redesignate roads to accommodate for the project's projected truck and vehicle traffic. In the past, the County of San Bernardino has sued the City of Fontana over a warehouse project, quite similar to the BBPSP and they focused on how the project would exceed the capacity of Locust Ave. However, this project will also use roads such as Locust Ave, so we believe that the County of San Bernardino is going against its very position on this project. Furthermore, if they are to explore using Locust Ave, a traffic, congestion, and infrastructure depletion analysis should be conducted that accounts for all the upcoming projects this area is already slated for. There is also not enough information on how these truck routes will cost the nearby residents and county through wear and tear and the risk they impose primarily on pedestrians and students walking to and from the nearby schools. **O2.10**

We are disturbed to see that the County of San Bernardino is not following any of the Attorney General Guidelines on Warehouses/Distribution Centers, specifically when it comes to buffer zones and setbacks. How will the County of San Bernardino respond when an inevitable accident occurs with pedestrians or families walking to and from schools. Although this DEIR does underestimate the health risks in the surrounding areas, it should be noted that the population that will be most impacted by this will be the outdoor workers and school children who will have to be outside whilst these 24/7 operations continue. We believe that there are significant mitigation measures that can be taken to reduce the impact of this project but they are not explored here, such as limiting the project size, only requiring zero-emissions vehicles and technology, limiting hours of the project, etc. What is critical for the DEIR process is to examine who the exact tenant will be. For example, if the tenant is Amazon, then they have largely different truck operations than a different tenant, thus we do not have a clear picture of the actual impact. The County of San Bernardino should require information on the tenant and analyze them in the DEIR. **O2.11**

Housing Insecurity

Due to San Bernardino County failing to meet compliance requirements for their housing element, this DEIR fails to fully analyze the impacts the project site and upzone site will have on the current and future housing policies. The project has been proposing SB 330 as a need for an upzone site, yet it fails to use SB 330 or current county housing policies correctly. For example, "***Policy V/H-1.1 Housing compatibility: We encourage housing types and designs that are compatible with established land use patterns and the environment of the region, including single-family dwellings, mobile home parks/manufactured home land-lease communities, and apartments.***" As the project is proposed, it fails to be compatible with established land use patterns and environment of the region. This policy is extremely important as it serves to protect residential and landowners. It protects parcels that are zoned as residential or agriculture to remain as land use, and the compatible land-use, being zoned as industrial or special, will not protect the established land use. Instead the proposed change of land-use will cause displacement of tenants as homeowners will feel pressured to sell, and parcel owners who were intentional of buying property in agriculture mixed residential zones risked being fined for no longer complying with the use of the new proposed zone. This is a **O2.12**

strong example of how these housing and land use policies are not being followed. This is an example of housing injustice. For this reason, we request a full halt of this DEIR process until an analysis of the current and proposed housing element is looked at. We urge this as we have seen neighboring counties and communities adopt housing elements that protect environmental justice communities rather than displace them, for example this policy from Riverside County's updated housing element "**HC 18.12 Prioritize the development of safe and affordable housing in environmental justice communities while preventing the displacement of existing residents consistent with the Housing Element, Goal 2, Action 2.1h. Affordable housing projects should include various housing types that respond to community priorities and input. "** **O2.12 cont.**

Conservation

We are concerned that the EIR doesn't examine how the Upper Santa Ana River Conservation Plan will be impacted by this development. We need a clear understanding of how each of these projects will affect one another, which is difficult given that they are both undergoing environmental reviews. **We request for potential interactions to be fully looked at by the county, completing a full analysis of how this new EIR would impact the conversation project's EIR**. Given that the proposed project falls under wetland and non-wetland habitat, which protects rare species like the Santa Ana Sucker. We already see potential impacts of one DEIR to the other, for example in the Upper Santa Ana River Conservation Plan it lists land use policy that is essential to Bloomington's current lifestyle like ***Policy 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 San Bernardino Valley Municipal Water District Appendix B Regional and Local Regulations Upper Santa Ana River Habitat Conservation Plan Environmental Impact Report B-14 May 2021 ICF 455.13 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,*** yet the Bloomington DEIR does not address this important issue or any others mentioned in the Upper Santa Ana River Conservation Plan. **O2.13**

We notice that major investments will be made to the sewage and water infrastructure for this project. However, what is not covered is who will be paying for this cost and if rates will go up because of these improvements. All of this should be analyzed so that decision makers and residents understand the impact it will have on their environment and their income. We also know that there is major flooding in this area, how will disrupting the natural environment continue to exacerbate the impacts of flooding in the area? We are also concerned with the impacts this project will have geologically in relation to seismic activity? We request environmental studies, analytical reports, supporting studies, geological evaluations or geographic assessments the DEIR is based on. We are also requesting reports that the DEIR is based such as any and all: physical structures and geologic features of the zone, soil: make up, characteristics, depth, bedrock, chemistry, and lab-based soil testing results and methodology and lab information, hydrogeologic evaluation, seismic considerations, and construction materials survey. **O2.14**

In closing, we think it is extremely important for the County of San Bernardino to consider our comments and ensure that this DEIR accurately analyzes the full impacts of this project, does not underestimate the impacts, and does its due diligence on engagement and outreach about the project. Ultimately, we believe that this project should not continue forward and that the County of San Bernardino should go with the "No Project Alternative" given that this project will be unable to mitigate significant and harmful impacts. **O2.15**

Sincerely,

Andrea Vidaurre
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Peoples Collective for Environmental Justice

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Response to Letter O2: Peoples Collective for Environmental Justice (dated December 15, 2021)

Comment O2.1: This comment provides an introduction to the comment letter and states that the organization is concerned that the County of San Bernardino has not done an adequate analysis in multiple section of the Draft EIR and believes that the County is underestimating Project impacts. The comment further states that outreach and engagement from the Project was non-transparent. It concludes by requesting that the County does not approve the Project as the Project would result in significant and unavoidable impacts that cannot be mitigated or justified with an overriding consideration.

Response O2.1: This comment does not provide any substantial evidence concerning an environmental impact. The comment is correct by stating that the proposed Project's significant and unavoidable impacts cannot be mitigated to a less than significant level. State CEQA Guidelines Section 15126.2(c) requires an EIR to describe "any significant impacts, including those which can be mitigated but not reduced to a level of insignificance." As discussed in Section 7.2 of the Draft EIR, *Significant and Unavoidable Environmental Impact,* the following significant and unavoidable impacts were identified.

Impact AQ-1, Conflict with AQMP. Land use change of the Project would not result in an exceedance of SCAG's growth projections, but the Project would result in an increase of criteria pollutants that would exceed regional thresholds after implementation of mitigation measures. Therefore, the Project would result in a conflict with, or obstruct, implementation of the applicable Air Quality Management Plan.

Impact AQ-2, Operational Emissions (Project-level and Cumulative). Emissions from operation of the Project would exceed SCAQMD's thresholds for VOC and NOx after implementation of regulatory requirements and mitigation measures. Because a majority of operational-source NOx emissions (by weight) would be generated by Project vehicles, and the VOC emissions would be generated by consumer products that neither the Project applicant nor the County have the ability to reduce emissions of. Therefore, operational-source VOC and NOx emissions would be significant on a Project-level and a cumulative basis.

In accordance with CEQA Section 21081(b) and CEQA Guideline Section 15093, in order to approve the Project, the County is required to determine that the unavoidable adverse environmental impacts identified above may be considered acceptable due to specific considerations which outweigh the unavoidable, adverse environmental impacts of the Project. If the County approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the County shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations (SOC) shall be supported by substantial evidence in the record. If the County decides to approve the project and makes a SOC, the statement will be included in the record of the project approval and will be mentioned in the notice of determination.

Per Public Resources Code § 21002.1 (a),"… the purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." Therefore, the Draft EIR is not intended to serve as the justification for adopting a SOC. basis for the approval or denial of the project, but to disclose the environmental consequences of approving the Project and a SOC. Through the public hearing process, the decision-makers within the County will take into consideration the environmental impacts caused by the project in if it decides to approve the project, a SOC will be required.

The comment does not raise a specific issue with the adequacy of the Draft EIR as a disclosure document for environmental impacts. Therefore, no further response is required or provided.

Comment O2.2: This comment provides demographic information showing that Bloomington is over 80% Hispanic/Latino with over 65% of the community speaking another language other than English. The comment also states that they are living in areas ranked in the 90th percentile and higher of pollution burden including, but not limited to, diesel pm, ozone, particulate pollution, drinking water contamination hazardous waste, groundwater threats, and more. The comment defines environmental racism and states that the County in approving past industrial projects has practiced environmental racism. The comment also states that the community of Bloomington is an environmental justice community.

Response O2.2: This comment does not provide any substantial evidence concerning an environmental impact. It only provides demographic information, defines "environmental racism" and "environmental; justice" and accuses the County of practicing environmental racism in approving past industrial development in Bloomington. The comment does not raise a specific issue with the adequacy of the Draft EIR. Therefore, no further response is provided.

Comment O2.3: This comment states that the County has not taken environmental racism into consideration. The comment also suggests that the analysis should consider how historic discriminatory land use decisions have had and could have generational impacts to communities' health, social mobility and the environment. Finally, the comment suggests that the Draft EIR must explore how environmental racism shows up in the project and how it can be eliminated under CEQA. Finally, the comment cites SB 535 as the basis for identifying Bloomington as a "disadvantaged community."

Response O2.3: This comment does not provide any substantial evidence concerning an environmental impact. CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The issue of whether or not environmental racism has occurred is not required to be analyzed in an EIR.

Section *5 Environmental Impact Analysis,* includes a summary of the existing statutes, ordinances and regulations that apply to the environmental impact area being discussed; the analysis of the Project's direct and indirect environmental impacts on the environment, including potential cumulative impacts that could result from the Project; any applicable Project design features; standard conditions and plans, policies, and programs that could reduce potential impacts; and the feasible mitigation measures that would reduce or eliminate the significant adverse impacts identified. Impacts that cannot be mitigated to less than significant are identified as significant and unavoidable. This section also summarizes the significant and unavoidable impacts that would occur from implementation of the Project and provides a summary of the environmental effects of the implementation of the Project that were found not to be significant. Additionally, this section provides a discussion of various CEQA-mandated considerations including growth-inducing impacts and the identification of significant irreversible changes that would occur from implementation of the Project.

SB 535 is intended to direct 25% of the investment of proceeds from the state's Cap-and-Trade Program for greenhouse gas emissions to disadvantaged communities. These investments are aimed at improving public health, quality of life and economic opportunity in California's most burdened communities, and at the same time, reducing pollution that causes climate change. The investments are authorized by the California Global Warming Solutions Act of 2006 (Assembly Bill 32, Nunez, 2016). According to the SB 535 mapping tool, most of the Proejct site is within a disadvantaged community earmarked for Cap-and-Trade funds investment (https://oehha.ca.gov/calenviroscreen/sb535, accessed May 4, 2022). However, this has no direct bearing on the environmental analysis contained in the Draft EIR.

Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to environmental racism is not provided. This comment does not provide any substantial evidence concerning the adequacy of the Draft EIR. As such, no further response is required.

Comment O2.4: This comment states that the engagement process for the Specific Plan has been inappropriate because materials were not translated to Spanish so that residents could have full access to information. The comment states that the notices, meetings and documents should be translated into Spanish and that the County should redistribute translated material so that the community can properly engage with the proposed Project.

Response O2.4: This comment does not provide any substantial evidence concerning an environmental impact. Rather, it asserts that the County's review process lacked transparency and democracy because documents should have been prepared in Spanish and translators provided at all community meetings.

CEQA does not require translation of CEQA documents and associated technical documents into additional languages as requested by commenters. CEQA addresses public participation in CEQA Guidelines Section 15201 which states that "[e]ach public agency should include provisions in its CEQA procedures for wide public involvement, formal and informal, consistent with its existing activities and procedures, in order to receive and evaluate public reactions to environmental issues related to the agency's activities. Such procedures should include, whenever possible, making environmental information available in electronic format on the Internet, on a web site maintained or utilized by the public agency." Translation of CEQA documents is not part of the County's standard CEQA procedures and is not consistent with the County's existing activities or procedures. In order to provide additional access to the notification process, the County provided the Notice of Preparation and Notice of Availability in Spanish and English and made the Draft EIR and technical studies available to a wide audience by following the public review procedures prescribed by CEQA, including by posting the Draft EIR and associated Appendices on the County's website and to the State Clearinghouse.

With respect to public engagement during the processing of the specific plan application, the Countywide Plan contains the following polices with respect to community engagement for the processing of an application for approval of a specific plan within an environmental justice community:

Policy HZ-3.16 Notification. We notify the public through the County website, mail, and other means when applications are accepted for conditional use permits, changes in zoning, and Policy Plan amendments in or adjacent to environmental justice focus areas. We prepare public notices in the predominant language(s) spoken in the communities containing environmental justice focus areas.

Policy HZ-3.17 Community stakeholders. We identify and coordinate with key community stakeholders through advisory committees or other methods to increase public awareness and obtain timely community input concerning potential funding opportunities, conditional use permits, changes in zoning, and amendments to the Policy Plan in or adjacent to environmental justice focus areas.

Community outreach occurred, in conjunction with CEQA public review and notification processes, for the Project, which included resident meetings, a scoping meeting, direct mailers, and community meetings. Resident meetings were held on December 12, 2018; November 19, 2019; April 10, 2021; and July 28, 2021. A scoping meeting was held on January 14, 2021, and a notice was mailed in English and Spanish two weeks prior to 954 residents within the 1300-foot radius of the Specific Plan along with a 700-foot radius from the Upzone Site. A direct mailer was sent to 3,754 approved mailboxes in Bloomington on

August 1, 2021. Two community meetings were held on August 5, 2021 and October 6, 2021, which included notices mailed two weeks prior in English and Spanish.

Comment O2.5: This comment states that the County did not create sufficient opportunities for engagement and only one meeting was provided for the Community to give their feedback. The comment states that the developer did not follow proper protocols for engagement and the residents were silenced. The comment states that the MAC is failing to disclose all information on the Project and allowing for bias for the decision-makers who will be making a recommendation on the Project.

Response O2.5: The comment erroneously states that only one outreach meeting was held. As discussed in Response O2.4, multiple outreach meetings were held with residents and community members. This comment does not provide any substantial evidence concerning an environmental impact. Refer to response O2.4. CEQA does not require community meetings beyond the scoping meeting. Further, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, no further response is required.

Comment O2.6: This comment states that multiple sections of the Draft EIR do not adequately analyze all of the potential impacts of the Project or explore possible mitigation opportunities. Following this introductory statement, comments are made by various environmental topic areas and responses are provided in Responses O2.7 through O2.15 that follow.

Response O2.6: This comment does not raise a specific environmental claim about the adequacy of the Draft EIR. Therefore, no response is required.

Comment O2.7: This comment states that the Draft EIR and Project fail to stay true to updated environmental justice and land use elements. The comment also states that Policy LU-4.5 would be violated by the Project. The comment states that the DEIR does not mention how to mitigate for Policy HZ-3.14. The comment includes a figure indicating the proximity to schools.

Response O2.7: This comment does not provide any substantial evidence concerning an environmental impact. As discussed in Section Table 5.1-1 of the Draft EIR, the Project would be consistent with Policy LU-4.5. Policy HZ-3.1 is not directly applicable to the Project as it includes Community-desired improvements that would be established by special funding and financing mechanisms rather than development impact fees that would be funded by the development of the Project.

After implementation of Mitigation Measure AQ-2 (use of Tier 4 Final construction equipment), emissions during construction activities would not exceed the SCAQMD's localized significance thresholds for schools or residences. Additionally, a construction-source HRA was prepared (included as Appendix A to this Final EIR), as detailed in Master Response 2, which shows that cancer impacts at all receptors would be well below the 10 in one million significance threshold. The results of the construction-source HRA indicate that cancer risk at Zimmerman Elementary would be 0.06 in one million which is less than the 10 in one million significance threshold. The results of the operational-source HRA indicate the cancer risk at Zimmerman Elementary would be 0.60 in one million, which is less than the 10 in one million significance threshold. Thus, impacts from construction-source and operational TAC emissions were determined to be less than significant. Additionally, although the Project would result in significant and unavoidable regional operational emissions of VOCs and NOX (Draft EIR page 5.3-34), impacts related to DPM and localized significance levels from trucks traveling to and from the Project site would be less than significant. Furthermore, the Project would implement PDF NOI-2, which requires the construction of 12-foot-high concrete walls on the northern property line adjacent to Zimmerman Elementary School, which would reduce noise from Project operations at Zimmerman. As such, the Project Draft EIR considered all applicable potential impacts to adjacent schools and included applicable mitigation, where necessary.

Comment O2.8: This comment states that there are multiple air quality impacts that have significant and unavoidable impacts. In a region that already suffers from some of the highest levels of ozone pollution in the country, how does the County of San Bernardino analyze this will worsen with the projected continued port congestion, extreme weather, and cumulative impact from other nearby warehouse operations? The Draft EIR does not properly study these compounding effects but should so that the public and decision-makers clearly understand the project's near-term and long-term impacts.

Response O2.8: This comment does not provide any substantial evidence concerning an environmental impact. The comment is incorrect that the Draft EIR did not analyze the compounding effects of port congestion, extreme weather, and cumulative impacts from other warehouses. The *Air Quality Impact Analysis* (Draft EIR Appendix C1) addressed climate and meteorology and its effect on air quality, regional air quality impacts which includes the ports in Los Angeles, and cumulative air emissions within the South Coast Air Basin. In addition, Table 4-8 of the Draft EIR identifies four warehouse projects in San Bernardino County, three in Fontana, and five in Jurupa Valley that were specifically considered as part of the cumulative analysis. As described on page 5.3-55 of the Draft EIR, per SCAQMD's methodology, if an individual project would result in air emissions of criteria pollutants that exceed the SCAQMD's thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants. As described in Impact AQ-2 (Draft EIR page 5.3-32), emissions from operation of the proposed Project would exceed SCAQMD's threshold for VOC and NOx after implementation of existing regulations and mitigation measures. As such, operational-source VOC and NOx emissions from implementation of the proposed Project would also be cumulatively considerable, and cumulative air quality impacts would be significant and unavoidable. The County will be required to adopt a Statement of Overriding Considerations for these impacts.

Comment O2.9: This comment states that trucks coming to and from the facilities are undercounted, thus underestimating the environmental and health impacts it will have. The comment states that not only the roads to the freeways should be studied but any route that is coming close to sensitive uses. The comment also states that the mobile health risk assessment does not account for the cumulative impact of emissions in the area and thus does not account for the possible cancer risk.

Response O2.9: This comment does not provide any substantial evidence concerning an environmental impact. The Traffic Impact Analysis (TIA) Trip Generation used the trip rates and truck splits provided in the *TUMF High-Cube Warehouse Trip Generation Study* (WSP, January 29, 2019) for building 2; the High-Cube Warehouse and the Fontana *Truck Trip Generation Study* (City of Fontana, August 2003) for buildings 1 and 3 and future development in Planning Areas A and B. The County of San Bernardino *Traffic Impact Study Guidelines* (July 9, 2019) states that trip generation for high truck generating uses should be handled on a case-by-case basis, and the City of Fontana (the closest jurisdiction) *Traffic Impact Analysis (TIA) Guidelines for Vehicle Miles Traveled (VMT) and Level Of Service Assessment* (October 21, 2020) states that vehicle splits from the *Truck Trip Generation Study* prepared by the City of Fontana shall be used for industrial uses. The County of San Bernardino Public Works Department also reviewed and approved the trip generation and vehicle splits. In addition, studies in the Bloomington area have previously used the vehicle splits that are used in the Bloomington Business Park Specific Plan TIA. Thus, the TIA analysis is consistent with previously used truck rate methodology. Therefore, the Draft EIR appropriately analyzed the volume of trucks that would be generated by the proposed Project.

This comment is incorrect that the Draft EIR found it infeasible to prepare a health risk assessment. The Mobile Health Risk Assessment was prepared for the Project, and it evaluated the sensitive receptor locations that would be affected most from the proposed Project. As impacts to the most affected sensitive receptors would be less than significant, other receptors that are farther from truck routes or along truck routes that are utilized less, would also not be significantly impacted.

Consistent with Response O2.8, per SCAQMD's methodology, projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. As detailed on page 5 of the Mobile Source Health Risk Assessment (Draft EIR Appendix C2), both the SCAQMD maximum individual cancer risk (MICR) and the cancer burden use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts. As detailed on Draft EIR page 5.3-44, the Project would not exceed the thresholds and, therefore, would not result in a cumulatively considerable impact.

Comment O2.10: This comment states that the Project would need to redesignate roads to accommodate for the Project's projected truck and vehicle traffic. The comment states if the Project is going to use Locust Ave, a traffic, congestion, and infrastructure depletion analysis should be conducted that accounts for all the upcoming projects this area is already slated for. There is also not enough information on how these truck routes will cost the nearby residents and county through wear and tear and the risk they impose primarily on pedestrians and students walking to and from the nearby schools.

Response O2.10: This comment does not provide any substantial evidence concerning an environmental impact. The Draft EIR as well as the Traffic Impact Analysis (Appendix K1 to the Draft EIR incorporated cumulative projects in the surrounding area that were proposed at the time the Notice of Preparation was posted. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections, including intersections along Locust Avenue, Santa Ana Avenue, and other local streets, would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The TIA was prepared despite the fact that a traffic congestion analysis is no longer required, as traffic congestion is no longer considered an environmental impact under CEQA, per CEQA Guidelines Section 15064.3. As a result, effects on LOS are handled separately from the EIR through the Conditions of Approval. Monetary cost associated with road maintenance is not an environmental issue, and therefore is not subject to CEQA (*San Franciscans for Reasonable Growth v City & County of San Francisco* (1989) 209 Cal.App.3d 1502).

All vehicles would be subject to follow all roadway signals and signs, and the Project would also improve the intersections and the roadway segments of Locust Avenue and Jurupa Avenue, improving the safety of increased traffic in the area. As shown on Figure 3-4, Project trucks would utilize County-established truck routes and would be directed away from existing residential neighborhoods. Furthermore, the proposed Project would implement PDF AQ-22, which would require the Project Applicant/Developer/Owner to post signs at every truck exit driveway providing directional information to the truck route. The Project would install signs in residential areas noting that truck and employee parking is prohibited. The Bloomington Business Park Specific Plan prohibits commercial truck parking on local streets. Furthermore, should trucks utilize residential streets for driving or parking, they would be subject to citation from law enforcement. Additionally, as detailed in the Draft EIR for Impact TR-1, starting on page 5.15-6, sidewalks currently exist on Cedar Avenue intermittently on both side of the roadway, on Santa Ana Avenue intermittently on the north side of the roadway, on Jurupa Avenue on the north side east of Linden Avenue. Implementation of the Specific Plan would include roadway improvements within the Specific Plan area that would provide for new sidewalks where none exist currently, thereby improving pedestrian safety by improving facilities and the sidewalk network.

Comment O2.11: This comment states that the County of San Bernardino is not following any of the Attorney General Guidelines on Warehouses/Distribution Centers, specifically when it comes to buffer zones and setbacks. The comment states that the Draft EIR underestimates the health risks in the surrounding areas, and the population that will be most impacted will be the outdoor workers and school children. The comment asserts that there are significant mitigation measures that can be taken to reduce the impact of

this Project that are not explored. The comment also states that the County should require information on the tenant and analyze them in the Draft EIR.

Response O2.11: This comment does not provide any substantial evidence concerning an environmental impact. The comment is incorrect that the County is not following any of the Attorney General Guidelines on Warehouse/Distribution Centers. Draft EIR page 5.3-57 describes that the Project Applicant has voluntarily agreed to incorporate various measures from the California Attorney General's Warehouse Projects: Best Practices and Mitigation Measures by incorporation of 27 PDFs. Regarding buffer zones, the Project incorporates walls, setbacks, and landscape buffers as detailed in the proposed Specific Plan. As detailed in Response O2.8, impacts related to health risks were conservatively evaluated in the Draft EIR pursuant to SCAQMD methodology and were not underestimated.

Regarding information on tenants, the proposed Project is a Specific Plan for development of the Project area through 2040. There are no identified tenants. However, future tenants would be required to go through the County's permitting process for occupation of the proposed buildings, which would ensure that future operations conform to the Specific Plan, the environmental conclusions of this EIR, the County's Development Code, and other regulations and standards to ensure that no impacts beyond those disclosed in this EIR occur. Further, CEQA does not require the EIR to identify the expected tenant or end user of the Project. (*Maintain Our Desert Env't v. Town of Apply Valley* (2004) 124 Cal.App.4th 430.)

Comment O2.12: This comment states that the DEIR fails to analyze the impacts that the Project would have on current and future housing policies. The comment also states that the Project would not comply with Policy V/H-1.1 and states that the policy is important in protecting residents and landowners. The comment also states that the Project will displace residents, pressure homeowners to sell, and agriculture mixed residential zones are at risk for not complying with the proposed new zone. The comment states that the housing and land use policies are not being followed which is an example of housing injustice. The comment also states that the County should protect environmental justice communities and include policies that protect them.

Response O2.12: This comment does not provide any substantial evidence concerning an environmental impact. As discussed in Section 5.13, *Population and Housing*, the Project would include a 24-acre Upzone Site that would be redesignated and rezoned from Low Density Residential (LDR) and Residential Single with 20,000 SF Lot Minimums (RS-20M) to Medium Density Residential (MDR) and Residential Multiple (RM), respectively, to allow for the development of up to 480 dwelling units (20 dwelling units per acre) to offset the loss of residential land use designations and zoning at the Specific Plan area. Policy V/H-1.1 states, "We encourage housing types and designs that are compatible with established land use patterns and the environment of the region, including single-family dwellings, mobile home parks/manufactured home land-lease communities, and apartments." This policy is not applicable to the Project as the Project does not include the development of housing. The comment regarding environmental justice does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is provided.

Comment O2.13: This comment states that the Draft EIR does not examine how the Upper Santa Ana River Conservation Plan ("Upper Santa Ana HCP") and the Plan's EIR would be impacted by the Project as they are both undergoing CEQA review. Additionally, the comment states that the Project site is comprised of wetland and non-wetland habitat which protects rare species like the Santa Ana Sucker. The comment provides an overview of certain policies within the Upper Santa Ana River Conservation Plan and states that the Project would conflict with them.

Response O2.13: This comment does not provide any substantial evidence concerning an environmental impact. As discussed on pages 5.4-2 through 5.4-3 of the Draft EIR, *Biological Resources,* the Upper Santa

Ana HCP was made available for public review in May 2021 but has not been adopted yet. It spans the majority of the Valley Region—including the Project sites—and the eastern part of San Bernardino National Forest. The Plan was prepared to provide an Incidental Take Permit for water infrastructure projects undertaken by 11 different water agencies in the Santa Ana River Watershed. Although the Project is not responsible for construction of any of these type improvements (or are any water agencies proposing water infrastructure projects covered by the Plan), it is identified for informational purposes. Additionally, the Project's potential impacts related to the provisions of the Upper Santa Ana HCP are analyzed under Impact BIO-6 starting on page 5.4-23 of the Draft EIR. As discussed, none of the water agency facilities/projects covered by the HCP encompass the Specific Plan Area, offsite infrastructure areas, or the Upzone Site. Therefore, the Draft EIR rightfully concludes that the Project would not conflict with the Upper Santa Ana HCP.

The comment is incorrect in stating the project "falls under wetland habitat". According to the USFWS National Wetland Inventory, no wetland features have been documented within or adjacent to the Specific Plan area. Planning Area A does not support jurisdictional resources, including wetlands, marsh, vernal pool, etc., pursuant to Section 1602 of the California Fish and Game Code as regulated by the California Department of Fish and Wildlife (CDFW), pursuant to the Porter-Cologne Act, as regulated by the Santa Ana Regional Water Quality Control Board (RWQCB) and pursuant to Sections 404/401 of the Clean Water Act as regulated by the U.S. Army Corps of Engineers (USACE) and RWQCB, respectively.

Comment O2.14: This comment states that the Draft EIR does not discuss who will be paying for the costs of the sewage and water infrastructure improvement and that this should be discussed so that residents and decisionmakers can understand the impact improvements would have on the environment and income.

The comment additionally questions how the Project would exacerbate the impacts of flooding in the area and questions impacts the Project would have in relation to geology and seismic activity. The organization requests environmental studies, analytical reports, supporting studies, or geological evaluations the Draft EIR is based on.

Response O2.14: This comment does not provide any substantial evidence concerning an environmental impact. As described in Section 3.0, *Project Description,* and Section 5.17, *Utilities and Service Systems,* infrastructure improvements would be installed based on and concurrent with developments within the Specific Plan. The Developer will construct water, sewer, and stormwater drainage plans at the time development occurs within the Specific Plan in order to serve the Specific Plan. As discussed in Impact UT-1 starting on page 5.17-8 of the Draft EIR, physical environmental effects related to the construction of infrastructure is included throughout the Draft EIR. However, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project's social and economic merits are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of increased utility costs. Further, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, no further response regarding utility costs is required.

Impacts related to the Project's effects on flooding within the area are described in Section 5.10, *Hydrology and Water Quality,* under Impact WQ-4 starting on page 5.10-19. The only defined surface drainage adjacent the Specific Plan Area is an existing surface drainage course from Jurupa Avenue through the park area on the south side of Jurupa Avenue that flows to the privately maintained basin to the south at Locust Avenue and 11th Street, which would not be impacted by the Project. While the proposed development within the Specific Plan Area would result in an increase in impervious surface, it

will include the construction of new stormwater drainage facilities, including biofiltration basins, subsurface infiltration basins, previous landscaped areas, and new storm drains. The proposed drainage infrastructure would have capacity to retain well over 100 percent of the WQMP Design Capture Volume flow for the development. Thus, implementation of the proposed development would not increase the rate or amount of surface runoff in manner that would result in further flooding and would actually improve surrounding flooding conditions.

Impacts related to geology and seismicity are analyzed within Section *5.7, Geology and Soils*. As described starting on page *5.7-7*, the nearest active fault zone is the San Bernardino section of the San Jacinto Fault Zone, which is 3.7 miles northeast of the Specific Plan Area and 3 miles northeast of the Upzone Site. Both of these faults, as well as other faults in the southern California region could cause moderate to intense ground shaking during the lifetime of the Project. Based on the Geotechnical Reports prepared for the Specific Plan Area, included as Appendices G1 through G5, and as described starting on page 5.7-10 of the Draft EIR, the Specific Plan area is at low risk for liquefaction and lateral spreading, but soils in Development Sites 1, 2, and 3 have the potential to collapse when inundated with water. Additionally, based on the San Bernardino Countywide Plan Policy Map HZ-2, *Liquefaction & Landslides*, a small portion of the southernmost portion of the Specific Plan Area, extending into Development Site 2, and into the Planning Area B south of Development Site 3, is mapped as moderate to high landslide susceptibility. However, Development Site 2 slopes gently to the south at an estimated gradient of around 1 percent (SGC, 2021b). The remaining areas of the proposed development areas have relatively flat topography and are not susceptible to landslides (SGC, 2021b). However, with implementation of Mitigation Measure GEO-1, which requires a landslide susceptibility report for future development within the area mapped as moderate to high landslide susceptibility in Planning Area B, Mitigation Measures GEO-2, which requires geotechnical investigations for development outside of Opening Year-Option 1 when they are proposed, and compliance with California Building Code requirements, impacts related to seismicity and geological hazards would be less than significant.

In response to the organization requesting environmental studies, analytical reports, supporting studies, or geological evaluations the Draft EIR is based on, the commenter is referred to Appendices G1 through G5, which were included for public review as part of the Draft EIR. The comment does not raise a specific issue with the adequacy of the Draft EIR. Therefore, no further response is required.

Comment O2.15: This comment provides a conclusion to the comment letter and states that the organization thinks it is extremely important for the County to consider the previous comments and ensure the Draft EIR analyzes the impacts of the Project, does not underestimate impacts, and that the County and Project Applicant does its due diligence on engagement and outreach about the Project. The comment states that the organization believes that the Project should not continue forward, and the County should choose the "No Project Alternative" given that the Project would be unable to mitigate significant and harmful impacts.

Response O2.15: This comment does not provide any substantial evidence concerning an environmental impact and merely summarizes the commenter's unsubstantiated opinions. As such, no further response is required.

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LETTER O3: Blum Collins & Ho, LLP (299 pages)

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December 3, 2021

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VIA EMAIL TO:
Aron.Liang@lus.sbcounty.gov

SUBJECT: Comments on Bloomington Business Park Specific Plan EIR (SCH NO. 2020120545)

Dear Mr. Liang,

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed Bloomington Business Park Specific Plan. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance (GSEJA). Also, GSEJA 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. **O3.1**

1.0 Summary

The project proposes the construction and operation of an industrial Specific Plan area and the upzoning of a replacement residential site in accordance with requirements of SB 330. Buildout of the Specific Plan would result in 3,235,836 square feet of industrial business park uses(with a maximum development capacity of 3,079,910 square feet in Planning Area A and 155,926 square feet in Planning Area B) on 213 acres. The upzone site proposes to change the existing density to the RM zone to permit future development of up to 480 dwelling units. **O3.2**

3.0 Project Description

The EIR does not include the proposed Bloomington Business Park Specific Plan (BBP SP) document as an attachment for public review. The BBP SP would include permitted uses and development standards such as maximum height, floor area ratio, parking requirements, and other items that contribute directly to the analysis of environmental impacts. The EIR must be revised and recirculated to include the Bloomington Business Park Specific Plan document for public review in order to comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). **O3.3**

The Project Description states that "the Specific Plan would apply the I/BP zoning designation to the entire Specific Plan. The I/BP designation permits logistics warehouse uses, e-commerce centers, warehousing and distribution, and cross-dock facilities." However, the San Bernardino County Development Code[1] does not include an I/BP designation. The Industrial zoning designations include IC, IR, or IN. I/BP does not exist as a zoning designation. The EIR is inadequate as an informational document and provides erroneous information to the public and decision makers. The EIR must be revised to include a proposed zoning designation which exists in the County of San Bernardino. **O3.4**

Figure 3-3: Specific Plan Planning Areas is not useful to the public and decision makers as only Planning Area A is identified on the Figure. The same is true for Figure 3-25: Buildout Construction Phasing, which only identifies Planning Area A on the Figure and does not provide any useful information regarding construction phasing. The EIR must be revised to provide Figures which visually display and label the information they seek to communicate. **O3.5**

The EIR does not include floor plans, detailed site plans, elevations, or conceptual grading plans. The basic components of a Planning Application include a site plan, floor plan, conceptual grading plan, and elevations. The site plans provided in Figures 3-10 through 3-13 do not provide any meaningful information or code requirement analysis such as site coverage, floor area ratio, and parking requirements. Figure 3-9: Conceptual Building Elevation Color and Materials only provides partial elevations for one building and does not state which proposed building is depicted. The EIR has excluded the proposed floor plans, conceptual grading plan, and a detailed site plan/elevations from public review, which does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). The EIR must be revised to include these items that contribute directly to the analysis of environmental impacts. **O3.6**

5.3 Air Quality, 5.6 Energy, and 5.8 Greenhouse Gas Emissions

[1] San Bernardino County Development Code
https://codelibrary.amlegal.com/codes/sanbernardino/latest/sanberncty_ca/0-0-0-70465

Please refer to attachments from SWAPE for a complete technical commentary and analysis. **O3.7**

The EIR does not include for analysis relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed project. This is especially significant as the surrounding community is highly burdened by pollution. According to CalEnviroScreen 4.0[2], CalEPA's screening tool that ranks each census tract in the state for pollution and socioeconomic vulnerability, the industrial specific plan project spans two census tracts (6071004001 and 6071002601). Census tract 6071002601 ranks in the 97th percentile for pollution burden, meaning that the impacts from pollution are among the highest in the state. The census tract community, (including sensitive receptors such as Bloomington High School, Ruth Harris Middle School, Sycamore Hills Elementary School, Jurupa Hills High School, Citrus High School, and Kaiser High School), bears the impact of multiple sources of pollution and is more polluted than average on every pollution indicator measured by CalEnviroScreen. For example, the project census tract ranks in the 95th percentile for ozone burden and the 94th percentile for PM 2.5 burden, which are both attributed to heavy truck traffic. Further, the census tract 6071002601 is a diverse community including 66% Hispanic, 9% Asian-American, and 8% African-American residents, which are especially vulnerable to the impacts of pollution. The community has a high rate of low educational attainment, meaning 73% of the census tract over age 25 has not attained a high school diploma, which is an indication that they may lack health insurance or access to medical care. Medical care is vital for this census tract as it ranks in the 55th percentile for incidence of cardiovascular disease and 44th percentile for asthma. **O3.8**

The industrial specific plan project census tract 6071004001 ranks in the 94th percentile for pollution burden, also indicating that the impacts from pollution are among the highest in the state. Census tract 6071004001 is also designated as a Disadvantaged Community pursuant to SB 535[3]. The San Bernardino County Policy Plan also designates census tract 6071004001 as an environmental justice focus area. The census tract community, (including sensitive receptors such as Zimmerman Elementary School and residences), bears the impact of multiple sources of pollution and is more polluted than average on every pollution indicator measured by CalEnviroScreen. For example, census tract 6071004001 ranks in the 97th percentile for ozone burden, the 91st percentile for PM 2.5 burden, and 80th percentile for diesel PM burden, which are attributed to heavy truck traffic. Additionally, census tract 6071004001 is a diverse community including 80% Hispanic and 4% African-American residents, which are especially vulnerable to the impacts of pollution. The community has a high rate of low educational attainment, meaning 90% of the census tract over age 25 has not attained a high school diploma, which is an indication

[2] CalEnviroScreen 4.0 https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40
[3] OEHHA SB 535 Disadvantaged Communities Map https://oehha.ca.gov/calenviroscreen/sb535

that they may lack health insurance or access to medical care. Medical care is vital for this census tract as it ranks in the 90th percentile for incidence of cardiovascular disease and 83rd percentile for asthma.

The upzone site census tract (6071003403) ranks in the 77th percentile for overall environmental burdens. The census tract community, (including sensitive receptors such as Mary Lewis Elementary School, Gerald Smith Elementary School, and residences), bears the impact of multiple sources of pollution and is more polluted than average on every pollution indicator measured by CalEnviroScreen. For example, the census tract ranks in the 98th percentile for ozone burden and the 89th percentile for PM 2.5 burden, which are attributed to heavy truck traffic. Additionally, the upzone site census tract is a diverse community including 79% Hispanic residents, which are especially vulnerable to the impacts of pollution. The community has a high rate of low educational attainment, meaning 89% of the census tract over age 25 has not attained a high school diploma, which is an indication that they may lack health insurance or access to medical care. Medical care is vital for this census tract as it ranks in the 64th percentile for incidence of cardiovascular disease, 56th percentile for asthma, and 93rd percentile for low birth weight babies. **O3.8 cont.**

3.9 Land Use and Planning

Table 5.11-1: SCAG RTP/SCS Consistency Analysis finds that the project is consistent with all goals of Connect SoCal, resulting in less than significant impacts. However, the EIR does not provide any meaningful supporting evidence within SCAG's 2020-2045 Connect SoCal RTP/SCS to support this conclusion, in violation of CEQA's requirements for meaningful disclosure (CEQA § 21003(b)). Due to errors in modeling and modeling without supporting evidence, as noted throughout this comment letter, and the EIR's determination that the project will have significant and unavoidable impacts to Air Quality, the proposed project is directly inconsistent with Goal 5 to reduce greenhouse gas emissions and improve air quality, Goal 6 to support healthy and equitable communities, and Goal 7 to adapt to a changing climate. The EIR must be revised to include finding of significance due to inconsistency with the 2020-2045 RTP/SCS Connect SoCal document. **O3.9**

Table 5.11-2: Project Consistency with Applicable San Bernardino Countywide Plan Policies by Environmental Topic Area does not provide a consistency analysis for all applicable Countywide Plan goals and policies. The EIR must be revised to include a consistency analysis with all Countywide Plan goals and policies, including the following: **O3.10**

Policy TM-1.1 Roadway level of service (LOS). We require our roadways to be built to achieve the following minimum level of service standards during peak commute periods (typically 7:00-9:00 AM and 4:00-6:00 PM on a weekday): LOS D in the Valley Region.

Policy HZ-3.18 Application requirements. In order for a Planning Project Application (excluding Minor Use Permits) to be deemed complete, we require applicants to indicate whether the project is within, adjacent to, or nearby an unincorporated environmental justice focus area and, if so, to: document to the County's satisfaction how an applicant will address environmental justice concerns potentially created by the project; and present a plan to conduct at least two public meetings for nearby residents, businesses, and property owners to obtain public input for applications involving a change in zoning or the Policy Plan. The County will require additional public outreach if the proposed project changes substantively in use, scale, or intensity from the proposed project presented at previous public outreach meeting(s). **O3.10 cont.**

There is also no meaningful discussion or analysis regarding the proposed General Plan Amendment and Zone change which are required for the project to proceed. The EIR relies upon the approval of the proposed land use changes for the project to be consistent with the applicable plans and conclude it will have less than significant impacts. The EIR must be revised to include analysis of the project in accordance with the existing General Plan and Zoning designations in order to accurately and adequately analyze potentially significant impacts. The EIR must be revised to state in the analysis that the project is inconsistent with the existing land use and zoning maps and include a finding of significance with all related goals and policies. **O3.11**

5.13 Population and Housing

The EIR states that Planning Area A "construction could require up to 1,294 construction workers during this 12-month period. Development of Planning Area B would require *fewer* construction workers than that for Planning Area A as less overall building square footage would be allowed in Planning Area B. Workers are *anticipated* to come from the surrounding jurisdictions and commute daily to the jobsite. Although it is possible that the demand for workers could induce some people to move to the region, this consideration would be de minimis, relative to the total number of construction workers in the region." The EIR utilizes uncertain and misleading language in stating that workers are *anticipated* to come from the surrounding jurisdictions. Additionally, the EIR states that the project will require 1,294 construction workers for Planning Area A and an unspecified, "fewer" number of workers for Area B. There is no methodology provided to support the calculation of construction workers required for Planning Area A, which does not comply with CEQA's requirements for meaningful disclosure. The EIR must be revised to provide an accurate estimate of construction employees generated by the proposed project with **O3.12**

a methodology source. It must also provide demographic and geographic information on the location of qualified workers to fill these positions. An estimate of the number of construction workers relocating to the County as a result of the project must be provided.

The EIR utilizes information and projections from the County Policy Plan EIR regarding households, employment, and population. However, the County Policy Plan EIR utilizes SCAG's 2016 RTP/SCS document as the data source[4], which is out of date (SCAG 2020-2045 RTP/SCS was adopted on September 3, 2020) and does not provide accurate estimates. Additionally, the proposed project requires General Plan Land Use and Zoning amendments to proceed, which by nature indicates that the growth proposed by the project was not contemplated by the County Policy Plan EIR.

SCAG's Employment Density Study[5] provides the following applicable average employment generation rates for San Bernardino County: **O3.12 cont.**

1 employee per 1,195 sf of warehouse area

Application of the ratio results in the following calculation:

3,235,836 sf warehouse / 1,195 = 2,708 employees

SCAG's 2020-2045 RTP/SCS Connect SoCal Demographics and Growth Forecast[6] notes that the unincorporated areas of San Bernardino County will add 14,100 jobs between 2016 - 2045. Utilizing the methodology from SCAG's Employment Density Study calculation of 2,708 employees, the project represents 19% of unincorporated San Bernardino County's employment growth from 2016 - 2045. SCAG's Growth Forecast notes that unincorporated San Bernardino County's population will increase by 45,000 residents between 2016 - 2045. Utilizing the methodology from the SCAG Employment Density calculation of 2,708 employees, the project represents 6.0% of unincorporated San Bernardino County's population growth from 2016 - 2045. A single project accounting for nearly 20.0% of the projected employment and 6% of population within unincorporated San Bernardino County over 29 years represents a significant amount of growth. The EIR must be revised to include this analysis, and also provide a cumulative analysis discussion of projects approved since 2016 and projects "in the pipeline" to determine if the project

[4] San Bernardino County Policy Plan EIR Population and Housing http://countywideplan.com/wp-content/uploads/2019/06/Ch_05-13-PH.pdf
[5] SCAG Employment Density Study
http://www.mwcog.org/file.aspx?A=QTTITR24POOOUIw5mPNzK8F4d8djdJe4LF9Exj6lXOU%3D
[6] SCAG Connect SoCal Demographics and Growth Forecast adopted September 3, 2020
https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579

will exceed SCAG's employment and/or population growth forecast. Additionally, the EIR must provide demographic and geographic information on the location of qualified workers to fill these positions in order to provide an accurate environmental analysis. The EIR relies on the existing unemployed population, but has not determined whether this group is interested in or qualified for work in the industrial sector. This is vital as the proposed project requires Land Use and Zoning amendments to proceed and by nature the project's growth exceeds any established projections and represents unplanned growth. **O3.12 cont.**

5.15 Transportation

The EIR does not discuss any LOS analysis even though Appendix K1 - Traffic Impact Assessment included a complete LOS analysis. The EIR must be revised to include discussion and analysis of the LOS information provided in Appendix K1 in order to comply with the County Policy Plan: **O3.13**

Policy TM-1.1 Roadway level of service (LOS). We require our roadways to be built to achieve the following minimum level of service standards during peak commute periods (typically 7:00-9:00 AM and 4:00-6:00 PM on a weekday): LOS D in the Valley Region.

Additionally, Appendix K1 finds that 20 intersections of the study area will be LOS deficient/inconsistent with County Policy Plan LOS requirements (operating at LOS D or F) as a result of the proposed project. Appendix K1 recommends mitigation requiring "fair share" payments to mitigate impacts to less than significant levels. An assessment of fees is appropriate when linked to a specific mitigation program. (*Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, *Save our Peninsula Comm. v. Monterey County Bd. Of Supers.* (2001) 87 Cal.App.4th 99, 141.) Payment of fees is not sufficient where there is no evidence mitigation will actually result. (*Gray v. County of Madera* (2008) 167 Cal.App.4th 1099,1122.) The assessment of fees here is not adequate as there is no evidence mitigation will actually result. The improvements required are not part of an existing DIF/TUMF program and therefore are not planned to occur at all or by any certain date. Additionally, intersections #1, 2, 4, 7, 11, 12, 20, 22, and 25 are located outside of the County of San Bernardino. They are under the control of Fontana, Jurupa Valley, Riverside, and Caltrans. Any roadway improvements recommended or fees paid to mitigate impacts for these locations are beyond the control of the lead agency and evidence that these improvements will be completed or approved by the other jurisdictions has not been provided. The EIR must be revised and recirculated for public review to include enforceable mitigation that will result in quantifiably reduced LOS impacts in accordance with the County Policy Plan goals and policies. **O3.14**

The study area for the EIR is also arbitrary and capricious in that it does not include for analysis all potentially significant impacts on the transportation facilities providing access to the site. The **O3.15**

EIR must be revised to include analysis of the following transportation facilities providing direct access to the project site:

Intersections
Santa Ana Ave. at Tamarind Ave.
Santa Ana Ave. at Alder Ave.

Freeway Merge/Diverge
I-215 at SR-60
I-215 at SR-91
I-215 at I-10
I-215 at SR-210
I-215 at I-15
I-15 at SR-60
I-15 at I-10
I-15 at SR-210

O3.15 cont.

Freeway On/Off Ramps
SR-60 at Rubidoux Blvd.

This is especially vital for analysis since Figure 14 – Project Distribution within Appendix K1 depicts 5% of truck trips accessing Caltrans facilities by utilizing the SR-60 at Rubidoux Blvd. ramp. Additionally, 75% of truck trips and 20% of passenger car trips are depicted to travel on Cedar Ave. towards I-10. The figure depicts trucks and passenger cars continuing to travel on Cedar Ave. north of I-10, but does not include a percentage of trips, which does not comply with CEQA's requirements for meaningful disclosure. Additionally, the I-10 and SR-60 connect to I-215, which provides direct access to the project site from the Southern California Logistics Airport. The EIR must be revised to include analysis of all transportation facilities providing direct access to the project site.

The project's VMT impacts are misrepresented by the SBTAM model. The industrial Specific Plan area spans two TAZ IDs: 53742202 and 53733302. The TAZs are mostly comprised of vacant land with a few underdeveloped properties and low-density single family residences. The proposed Specific Plan area is unique in that TAZ 53733302 contains no warehouse buildings and 53742202 only contains one existing warehouse building at the corner of Jurupa Ave. and Cedar Ave. The VMT analysis does not adequately or accurately represent the VMT impacts of the proposed project and the EIR must be revised to reflect this. The operational nature of industrial/warehouse uses involves high rates of truck/trailer VMT due to traveling from large regional distribution centers to smaller industrial parks and then to their final delivery destinations.

O3.16

Appendix C4 - Energy Analysis calculates that Opening Year Development Option 1 will generate 19,206,556 VMT annually (6,599,740 VMT from passenger cars and 12,606,816 VMT from trucks/trailers); Opening Year Development Option 2 will generate 25,557,878 VMT annually (8,868,745 VMT from passenger cars and 16,689,133 VMT from trucks/trailers); and Specific Plan area buildout will generate 35,193,301 VMT annually (11,887,216 VMT from passenger cars and 23,306,085 VMT from trucks/trailers). The average daily VMT for OYD1 is 52,621; average daily VMT for OYD2 is 70,022; and average daily VMT for the Specific Plan area buildout is 96,420. This is exponentially higher than the VMTs reported in each TAZ. The project's truck/trailer activity is unable to utilize public transit or active transportation and it is misleading to the public and decision makers to exclude the truck/trailer activity from VMT analysis. The EIR must be revised to reflect a quantified VMT analysis that includes truck/trailer activity to adequately and accurately analyze the potentially significant project transportation impacts.

O3.16 cont.

Appendix K2- VMT Analysis states that "the number of residents for calculating VMT/Person was obtained from SBTAM socioeconomic data" for the SB 330 Upzone Site and "SBTAM socioeconomic data for the unincorporated San Bernardino County area" for the industrial Specific Plan area. However, the SBTAM socioeconomic data is not included for public review. CEQA § 15150 (f) states that incorporation by reference is most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of the problem at hand. The SBTAM data contributes directly to the analysis of the problem at hand. Not including the SBTAM data as attachments for public review is in violation of CEQA § 15150 (f). The EIR must be revised and recirculated for public review including the SBTAM data.

O3.17

Additionally, Appendix K2 states that "For the purpose of this analysis, the number of employees were calculated using the building square footage factors provided in Table 7, UrbanFootprint Building square Footage Factors for Residential Units and Employees by Type, in the Southern California Regional Transportation Plan Sustainable Communities Strategy (SCS) Background Documentation." Table 7 is from SCAG's 2016 RTP/SCS, which is out of date as the 2020-2045 RTP/SCS was adopted on September 3, 2020. The EIR must be revised to utilize and include as an attachment Table 6: Building Square Footage Factors for Residential Units and Employment by Type from SCAG's 2020-2045 Sustainable Communities Strategy Technical Report[7]. Further, Appendix K2 utilizes the suburban factor of 1,700 square feet of building per employee rather than the urban factor of 1,200 square feet of building per employee, which serves to skew employee generation and VMT downwards. Appendix K2 does not give any reasoning or justification for utilizing the suburban factor instead of the urban factor. Also, the EIR is not internally consistent as the Population and Housing analysis calculates OYD1 will generate 1,769 employees and

O3.18

[7] SCAG 2020-2045 Sustainable Communities Strategy Technical Report
https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_sustainable-communities-strategy.pdf?1606002097

OYD2 will generate 2,270 employees while the VMT analysis only utilizes 1,575 employees for its analysis. The EIR must be revised to utilize the urban factor of 1,200 square feet of building per employee. **O3.18 cont.**

7.0 Alternatives

The EIR is required to evaluate a reasonable range of alternatives to the proposed project which will avoid or substantially lessen any of the significant effects of the project (CEQA § 15126.6.) The three alternatives chosen for analysis include the CEQA required "No Project" alternative and only two other alternatives - Existing Zoning Project and Reduced Intensity Project. The EIR does not evaluate a reasonable range of alternatives as only two alternatives beyond the required No Project alternative are analyzed. The EIR does not include an alternative that meets the project objectives and also eliminates all of the project's significant and unavoidable impacts. The EIR must be revised to include analysis of a reasonable range of alternatives and foster informed decision making (CEQA § 15126.6). This could include alternatives such as development of the project site with a project that has reduced the intensity to a degree that will result in avoidance of the proposed project's significant and unavoidable Air Quality impacts while meeting the project objectives. **O3.19**

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. **O3.20**

Sincerely,



Gary Ho
Blum Collins & Ho, LLP

Attachments:
1. SWAPE Comment Letter

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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November 9, 2021

Gary Ho
Blum Collins LLP
707 Wilshire Blvd, Ste. 4880
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Subject: **Comments on the Bloomington Business Park Specific Plan Project (SCH No. 2020120545)**

Dear Mr. Ho,

We have reviewed the September 2021 Draft Environmental Impact Report ("DEIR") for the Bloomington Business Park Specific Plan Project ("Project") located in the City of San Bernardino ("City"). The Project includes four separate components: 1) Bloomington Business Park Specific Plan ("Specific Plan"), which is a land-use guiding document for the development of industrial and business park uses and infrastructure; 2) Opening Year Development of Planning Area A within the Specific Plan (Opening Year – Option 1 or Opening Year – Option 2); 3) Future Development Area – Specific Plan Buildout; and 4) Rezoning a residential site ("Upzone Site") to a higher density in compliance with Senate Bill 330. Opening Year – Option 1 proposes to construct 2,113,640-SF of warehouse space, 993 truck trailer stalls, and 830 non-trailer parking stalls on the 213-acre site. Opening Year – Option 2 proposes to construct 2,712,040-SF of warehouse space and 1,147 non-trailer parking stalls on the 213-acre site. Furthermore, Future Development Area – Specific Plan Buildout would occur in addition to either the Opening Year – Option 1 or Opening Year – Option 2 scenarios, in which all 213 acres would be developed with 3,235,836 SF of light industrial and business park uses. **O3.21**

Our review concludes that the DEIR fails to adequately evaluate the Project's air quality, health risk, and greenhouse gas impacts. As a result, emissions and health risk impacts associated with construction of the proposed Project are underestimated and inadequately addressed. An updated EIR should be prepared to adequately assess and mitigate the potential air quality, health risk, and greenhouse gas impacts that the project may have on the surrounding environment. **O3.22**

Air Quality

Unsubstantiated Input Parameters Used to Estimate Project Emissions

The DEIR's air quality analysis relies on emissions calculated with CalEEMod.2016.3.2 (p. 5.3-28).[1] CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but the California Environmental Quality Act ("CEQA") requires that such changes be justified by substantial evidence. Once all of the values are inputted into the model, the Project's construction and operational emissions are calculated, and "output files" are generated. These output files disclose to the reader what parameters are utilized in calculating the Project's air pollutant emissions and make known which default values are changed as well as provide justification for the values selected. **O3.23**

When reviewing the Project's CalEEMod output files, provided in the Air Quality Impact Analysis ("AQIA") and the Greenhouse Gas Analysis ("GHG Analysis") as Appendix C1 and C3 to the DEIR, respectively, we found that several model inputs were not consistent with information disclosed in the DEIR. As a result, the Project's construction and operational emissions are underestimated. We recommend an updated EIR should be prepared to include an updated air quality analysis that adequately evaluates the impacts that construction of the Project will have on local and regional air quality.

Incorrect Application of Tier 4 Final Mitigation

Review of the CalEEMod output files demonstrates that the "Bloomington Business Park Specific Plan (Construction - Mitigated)" models for the Opening Year – Option 1, Opening Year – Option 2, and Future Development Area – Specific Plan Buildout scenarios assume that the Project's off-road construction equipment fleet would meet Tier 4 Final emissions standards (see excerpt below) (Appendix C1, pp. 337-338, 415-416, 899-900, 975-976, 1453-1454, 1528-1529; Appendix C3, pp. 110-111, 336-337, 557-558). **O3.24**

[1] CAPCOA (May 2021) CalEEMod User's Guide, Version 2016.3.2, http://www.caleemod.com/

Table Name	Column Name	Default Value	New Value
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
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tblConstEquipMitigation	Tier	No Change	Tier 4 Final

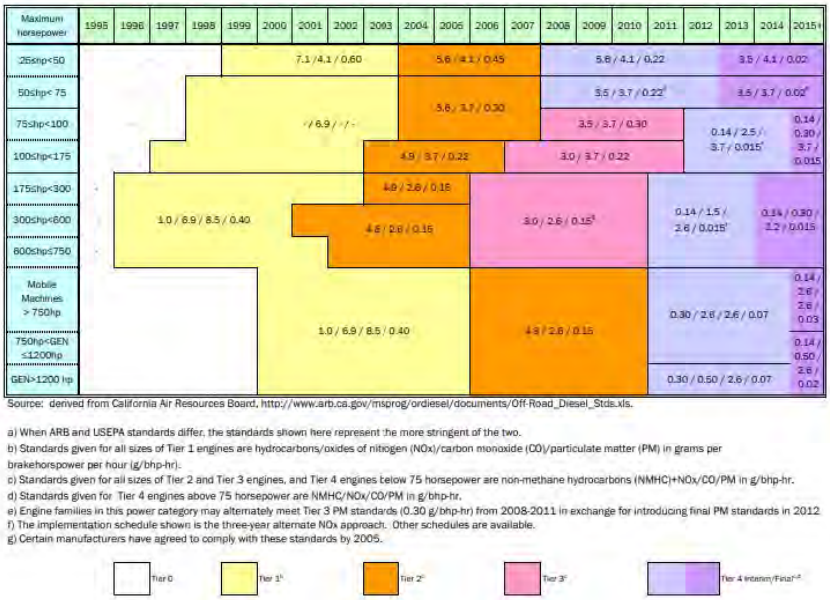
O3.24 cont.

As previously mentioned, the CalEEMod User's Guide requires any changes to model defaults be justified.[2] According to the "User Entered Comments and Non-Default Data" table, the justification provided for the inclusion of Tier 4 Final mitigation is: "MM AQ-2: Tier 4 engines for all equipment" (Appendix C1, pp. 336, 414, 898, 974, 1452, 1527; Appendix C3, pp. 109, 335, 556). Furthermore, the DEIR incorporates Mitigation Measure ("MM") AQ-2, which states:

> "**MM AQ-2: Tier 4** The construction plans and specifications shall state that off-road diesel construction equipment rated at 50 horsepower (hp) or greater, complies with Environmental Protection Agency (EPA)/California Air Resources Board (CARB) Tier 4 off-road emissions standards or equivalent and shall ensure that all construction equipment is tuned and maintained in accordance with the manufacturer's specifications. The Lead Agency shall conduct an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts" (p. 5.3-59).

However, the inclusion of Tier 4 Final emissions standards remain unsupported. As demonstrated above, MM AQ-2 fails to require the more efficient Tier 4 *Final* emission standards. The United States Environmental Protection Agency ("U.S. EPA") has slowly adopted more stringent standards to lower the emissions from off-road construction equipment. Since 1994, Tier 1, Tier 2, Tier 3, Tier 4 Interim, and Tier 4 Final construction equipment have been phased in over time. Tier 4 Final represents the cleanest burning equipment and therefore has the lowest emissions compared to other tiers, including Tier 4 Interim equipment (see excerpt below):[3]

[2] CalEEMod User's Guide, *available at: :* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 2, 9.
[3] "San Francisco Clean Construction Ordinance Implementation Guide for San Francisco Public Projects." August 2015, *available at:*



Source: derived from California Air Resources Board, http://www.arb.ca.gov/msprog/ordiesel/documents/Off-Road_Diesel_Stds.xls.

a) When ARB and USEPA standards differ, the standards shown here represent the more stringent of the two.
b) Standards given for all sizes of Tier 1 engines are hydrocarbons/oxides of nitrogen (NOx)/carbon monoxide (CO)/particulate matter (PM) in grams per brakehorsepower per hour (g/bhp-hr).
c) Standards given for all sizes of Tier 2 and Tier 3 engines, and Tier 4 engines below 75 horsepower are non-methane hydrocarbons (NMHC)+NOx/CO/PM in g/bhp-hr.
d) Standards given for Tier 4 engines above 75 horsepower are NMHC/NOx/CO/PM in g/bhp-hr.
e) Engine families in this power category may alternately meet Tier 3 PM standards (0.30 g/bhp-hr) from 2008-2011 in exchange for introducing final PM standards in 2012.
f) The implementation schedule shown is the three-year alternate NOx approach. Other schedules are available.
g) Certain manufacturers have agreed to comply with these standards by 2005.

O3.24 cont.

As demonstrated in the figure above, Tier 4 Interim equipment has higher emission levels than Tier 4 Final equipment. Therefore, by modeling construction emissions assuming a full Tier 4 Final equipment fleet, the DEIR fails to account for higher emissions that may occur as a result of the use of Tier 4 Interim equipment. Since MM AQ-2 fails to specify whether the Project would use Tier 4 Interim or Tier 4 Final equipment, it is incorrect to model emissions assuming that the more efficient Tier 4 Final equipment would be implemented. Until an updated EIR is prepared requiring Tier 4 Final engines during all phases of construction, and not Tier 4 Interim equipment, the DEIR's modeling should not be relied upon to determine Project significance.

Updated Analysis Indicates Significant Air Quality Impact

In an effort to more accurately estimate Project's construction-related emissions associated with Opening Year – Option 2, we prepared an updated CalEEMod model, using the Project-specific information provided by the DEIR. In our updated model, we excluded the incorrect use of Tier 4 Final mitigation and rather incorporated Tier 4 Interim mitigation.

https://www.sfdph.org/dph/files/EHSdocs/AirQuality/San_Francisco_Clean_Construction_Ordinance_2015.pdf, p. 6

Our updated analysis estimates that the Project's construction-related NO_x emissions associated with Opening Year - Option 2 would exceed the applicable SCAQMD thresholds of 100-pounds per day ("lbs/day") (see table below).[4]

Model	NO_x
DEIR	83.1
SWAPE	116.9
% Increase	41%
SCAQMD Regional Threshold (lbs/day)	**100**
Threshold Exceeded?	**Yes**

O3.24 cont.

As you can see in the excerpt above, the Project's construction-related NO_x emissions associated with Opening Year - Option 2, as estimated by SWAPE, increase by approximately 41% and exceed the applicable SCAQMD significance thresholds. Thus, our model demonstrates that the Project would result in a potentially significant air quality impact that was not previously identified or addressed in the DEIR. As a result, an updated EIR should be prepared to adequately assess and mitigate the potential air quality impacts that the Project may have on the surrounding environment.

Diesel Particulate Matter Health Risk Emissions Inadequately Evaluated

The DEIR concludes that the proposed Project would result in a less-than-significant health risk impact based on quantified mobile-source health risk analyses ("HRAs"), provided in the Mobile Source Health Risk Analysis ("HRA Report") as Appendix C2 to the DEIR. Specifically, the DEIR estimates that the maximum incremental cancer risks posed to nearby, existing sensitive receptors as a result of Project operation associated with Opening Year – Option 1, Opening Year – Option 2, and the Future Development Area – Specific Plan Buildout would be 4.58, 5.78, and 3.11 in one million, respectively, none of which would exceed the SCAQMD significance threshold of 10 in one million (p. 5.3-53). However, the DEIR fails to discuss the health risk impacts associated with Project construction. The DEIR's evaluation of the Project's potential health risk impacts, as well as the subsequent less-than-significant impact conclusion, is incorrect for four reasons.

O3.25

First, the DEIR's mobile-source HRAs utilize incorrect Fraction of Time At Home ("FAH") values. Specifically, the DEIR's HRAs utilize the following FAH values for the various age groups (Appendix C2, p. 26, Table 2-4):

[4] "South Coast AQMD Air Quality Significance Thresholds." SCAQMD, April 2019, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf.

TABLE 2-4: EXPOSURE ASSUMPTIONS FOR INDIVIDUAL CANCER RISK (30 YEAR RESIDENTIAL)

Age	Daily Breathing Rate (L/kg-day)	Age Specific Factor	Exposure Duration (years)	Fraction of Time at Home	Exposure Frequency (days/year)	Exposure Time (hours/day)
-0.25 to 0	361	10	0.25	0.85	350	24
0 to 2	1090	10	2	0.85	350	24
2 to 16	572	3	14	0.72	350	24
16 to 30	261	1	14	0.73	350	24

However, these are incorrect, as SCAQMD guidance states:

O3.25 cont.

> "For Tiers 1, 2, and 3 screening purposes, the FAH is assumed to be 1 for ages third trimester to 16. As a default, children are assumed to attend a daycare or school in close proximity to their home and no discount should be taken for time spent outside of the area affected by the facility's emissions. People older than age 16 are assumed to spend only 73 percent of their time at home."[5]

As such, per SCAQMD guidance, the mobile-source HRAs should have used an FAH of 1 for the third trimester, infant, and child receptors. Thus, by utilizing incorrect FAH values, the DEIR's mobile-source HRAs underestimate the cancer risk posed to nearby, existing sensitive receptors as a result of Project construction.

Second, the DEIR fails to quantitatively evaluate the Project's construction-related toxic air contaminant ("TAC") emissions or make a reasonable effort to connect these emissions to potential health risk impacts posed to nearby existing sensitive receptors. This is incorrect, as construction of the proposed Project will produce emissions of DPM through the exhaust stacks of construction equipment over a potential construction duration of 14 months (p. 3-16). However, the DEIR fails to discuss the potential DPM associated with Project construction or indicate the concentrations at which such pollutants would trigger adverse health effects. Thus, without making a reasonable effort to connect the Project's construction-related TAC emissions to the potential health risks posed to nearby receptors, the DEIR is inconsistent with CEQA's requirement to correlate the increase in emissions generated by the Project with the potential adverse impacts on human health.

O3.26

Third, the State of California Department of Justice recommends the preparation of a quantitative HRA pursuant to the Office of Environmental Health Hazard Assessment ("OEHHA"), the organization responsible for providing guidance on conducting HRAs in California, as well as local air district

O3.27

[5] "Risk Assessment Procedures." SCAQMD, August 2017, available at: http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1401/riskassessmentprocedures_2017_080717.pdf, p. 7.

6

guidelines.[6] OEHHA released its most recent *Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments* in February 2015.[7] This guidance document describes the types of projects that warrant the preparation of an HRA. The OEHHA document recommends that all short-term projects lasting at least two months be evaluated for cancer risks to nearby sensitive receptors. As the Project's proposed construction duration vastly exceeds the 2-month requirement set forth by OEHHA, it is clear that the Project meets the threshold warranting a quantified construction-related HRA under OEHHA guidance. These recommendations reflect the most recent state health risk policies, and as such, we recommend that an analysis of health risk impacts posed to nearby sensitive receptors from Project-generated construction DPM emissions be included in an updated EIR for the Project.

O3.27 cont.

Fourth, while the DEIR includes an HRA evaluating the Project's operational health risk impacts to nearby, existing receptors as a result of Project-generated mobile emissions, the HRA fails to evaluate the cumulative lifetime cancer risk to nearby, existing receptors as a result of Project construction and operation together. According to OEHHA guidance, as referenced by the HRA Report, "the excess cancer risk is calculated separately for each age grouping and then summed to yield cancer risk at the receptor location" (p. 25).[8] However, the DEIR's HRA fails to sum each age bin to evaluate the total cancer risk over the course of the Project's total construction and operation. This is incorrect and thus, an updated analysis should quantify the entirety of the Project's construction and operational health risks together and sum them to compare to the SCAQMD threshold of 10 in one million, as referenced by the DEIR (p. 5.3-45).[9]

O3.28

Screening-Level Analysis Indicates a Potentially Significant Health Risk Impact

In order to conduct our screening-level risk analysis we relied upon AERSCREEN, which is a screening level air quality dispersion model.[10] The model replaced SCREEN3, and AERSCREEN is included in the OEHHA[11] and the California Air Pollution Control Officers Associated ("CAPCOA")[12] guidance as the appropriate air dispersion model for Level 2 health risk screening analyses ("HRSAs"). A Level 2 HRSA utilizes a limited amount of site-specific information to generate maximum reasonable downwind concentrations of air contaminants to which nearby sensitive receptors may be exposed. If an

O3.29

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[6] "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice, *available at:* https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf, p. 6.
[7] "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, *available at:* http://oehha.ca.gov/air/hot_spots/hotspots2015.html.
[8] "Guidance Manual for preparation of Health Risk Assessments." OEHHA, February 2015, *available at:* https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf p. 8-4
[9] "South Coast AQMD Air Quality Significance Thresholds." SCAQMD, April 2019, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf.
[10] U.S. EPA (April 2011) AERSCREEN Released as the EPA Recommended Screening Model, http://www.epa.gov/ttn/scram/guidance/clarification/20110411_AERSCREEN_Release_Memo.pdf
[11] "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, *available at:* http://oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf
[12] CAPCOA (July 2009) Health Risk Assessments for Proposed Land Use Projects, http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA_HRA_LU_Guidelines_8-6-09.pdf.

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unacceptable air quality hazard is determined to be possible using AERSCREEN, a more refined modeling approach is required prior to approval of the Project.

We prepared a preliminary HRA of the Project's health risk impact associated with construction of Opening Year – Option 2 and the Future Development Area – Specific Plan Buildout to residential sensitive receptors using the annual PM_{10} exhaust estimates from the DEIR's CalEEMod output files. Consistent with recommendations set forth by OEHHA, we assumed residential exposure begins during the third trimester stage of life. The DEIR's CalEEMod model indicates that construction activities will generate approximately 122 pounds of DPM over the 633-day construction period.[13] The AERSCREEN model relies on a continuous average emission rate to simulate maximum downward concentrations from point, area, and volume emission sources. To account for the variability in equipment usage and truck trips over Project construction, we calculated an average DPM emission rate by the following equation:

$$Emission\ Rate\ \left(\frac{grams}{second}\right) = \frac{121.7\ lbs}{633\ days} \times \frac{453.6\ grams}{lbs} \times \frac{1\ day}{24\ hours} \times \frac{1\ hour}{3{,}600\ seconds} = 0.00101\ g/s$$

O3.29 cont.

Using this equation, we estimated a construction emission rate of 0.00101 grams per second ("g/s"). Construction activities were simulated as a 213-acre rectangular area source in AERSCREEN with dimensions of 1,313 by 656.5 meters. A release height of three meters was selected to represent the height of exhaust stacks on operational equipment and other heavy-duty vehicles, and an initial vertical dimension of one and a half meters was used to simulate instantaneous plume dispersion upon release. An urban meteorological setting was selected with model-default inputs for wind speed and direction distribution.

The AERSCREEN model generates maximum reasonable estimates of single-hour DPM concentrations from the Project site. EPA guidance suggests that in screening procedures, the annualized average concentration of an air pollutant be estimated by multiplying the single-hour concentration by 10%.[14] According to the DEIR, the nearest sensitive receptor is located approximately 42 feet, or 13 meters, from the Project site (p. 5.3-16). However, review of the AERSCREEN output files demonstrates that the maximally exposed individual resident ("MEIR") is located approximately 650 meters downwind of the Project site. Thus, the single-hour concentration estimated by AERSCREEN for Project construction is approximately 0.08673 $\mu g/m^3$ DPM at approximately 650 meters downwind. Multiplying this single-hour concentration by 10%, we get an annualized average concentration of 0.008673 $\mu g/m^3$ for Project construction at the MEIR.

We calculated the excess cancer risk to the MEIR using applicable HRA methodologies prescribed by OEHHA. Consistent with the 633-day construction schedule included in the Project's CalEEMod output

[13] See Attachment B for calculations.
[14] "Screening Procedures for Estimating the Air Quality Impact of Stationary Sources Revised." EPA, 1992, *available at*: http://www.epa.gov/ttn/scram/guidance/guide/EPA-454R-92-019_OCR.pdf; *see also* "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, *available at*: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf p. 4-36.

files, the annualized average concentration for Project construction was used for the entire third trimester of pregnancy (0.25 years) and 1.48 years of the infantile stage of life (0 – 2 years).

Consistent with the DEIR's mobile-source HRAs, we used Age Sensitivity Factors ("ASFs") to account for the heightened susceptibility of young children to the carcinogenic toxicity of air pollution (Appendix C2, p. 26, Table 2-4). When applying ASFs, the quantified cancer risk should be multiplied by a factor of ten during the third trimester of pregnancy and during the first two years of life (infant). Furthermore, in accordance with the guidance set forth by OEHHA, we used the 95th percentile breathing rates for infants.[15] Finally, according to SCAQMD guidance, we used a Fraction of Time At Home ("FAH") Value of 1 for the 3rd trimester and infant receptors.[16] We used a cancer potency factor of 1.1 (mg/kg-day)$^{-1}$ and an averaging time of 25,550 days. The results of our calculations are shown below.

The Maximally Exposed Individual at an Existing Residential Receptor

Age Group	Emissions Source	Duration (years)	Concentration (ug/m3)	Breathing Rate (L/kg-day)	ASF	Cancer Risk (with ASFs*)
3rd Trimester	Construction	0.25	0.008673	361	10	**1.18E-07**
	Construction	*1.48*	*0.008673*	*1090*		
	Operation	*0.52*	*	*1090*		
Infant (Age 0 - 2)	Total	2			10	**2.11E-06**
Child (Age 2 - 16)	Operation	14	*	572	3	*
Adult (Age 16 - 30)	Operation	14	*	261	1	*
Lifetime		**30**				**2.23E-06**

* Operational cancer risks calculated separately in the DEIR.

O3.29 cont.

As demonstrated in the table above, the excess cancer risks during the 3rd trimester of pregnancy and the infant stage of life at the MEIR located approximately 650 meters away, over the course of Project construction, are approximately 0.118 and 2.11 in one million, respectively. The excess cancer risk associated with construction of Opening Year – Option 1 and the Future Development Area – Specific Plan Buildout over the course of a residential lifetime is approximately 2.23 in one million. When summing Project's construction-related cancer risk, as estimated by SWAPE, with the DEIR's maximum

[15] "Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics 'Hot Spots' Information and Assessment Act," July 2018, *available at:* http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab2588supplementalguidelines.pdf, p. 16.
"Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, *available at:* https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf
[16] "Risk Assessment Procedures for Rules 1401, 1401.1, and 212." SCAQMD, August 2017, *available at:* http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1401/riskassessmentprocedures_2017_080717.pdf, p. 7.

incremental operational cancer risks estimates of 5.78 and 3.11 in one million associated with Opening Year – Option 2 and the Future Development Area – Specific Plan Buildout, we estimate an excess cancer risk of approximately 11.12 in one million over the course of a residential lifetime (p. 26).[17] Thus, the lifetime cancer risk exceed the SCAQMD threshold of 10 in one million, thus resulting in a potentially significant impact not previously addressed or identified by the DEIR.

O3.29 cont.

An agency must include an analysis of health risks that connects the Project's air emissions with the health risk posed by those emissions. Our analysis represents a screening-level HRA, which is known to be conservative and tends to err on the side of health protection.[18] The purpose of the screening-level construction and operational HRA shown above is to demonstrate the link between the proposed Project's emissions and the potential health risk. Our screening-level HRA demonstrates that construction and operation of the Project could result in a potentially significant health risk impact, when correct exposure assumptions and up-to-date, applicable guidance are used. Therefore, since our screening-level HRA indicates a potentially significant impact, the City should prepare an updated EIR with an HRA which makes a reasonable effort to connect the Project's air quality emissions and the potential health risks posed to nearby receptors. Thus, the City should prepare an updated, quantified air pollution model as well as an updated, quantified refined health risk analysis which adequately and accurately evaluates health risk impacts associated with both Project construction and operation.

O3.30

Greenhouse Gas

Failure to Adequately Evaluate Greenhouse Gas Impacts

The DEIR relies upon the Project's consistency with the County of San Bernardino's GHG Emissions Reduction Plan Update in order to conclude that the Project would result in a less-than-significant greenhouse gas ("GHG") impact. Specifically, the DEIR estimates that the Opening Year – Option 1, Opening Year – Option 2, and Future Development Area – Specific Plan Buildout scenarios would generate net annual GHG emissions of 17,347.57, 22,420.02, and 30,515.40 metric tons of carbon dioxide equivalents per year ("MT CO_2e/year"), respectively, which would exceed the County's screening threshold of 3,000 MT CO_2e/year threshold (see excerpts below) (p. 5.8-12 – 5.8-13, Table 5.8-2, Table 5.8-3, Table 5.8-4).

O3.31

[17] Calculated: 2.23 in one million + 5.78 in one million + 3.11 in one million = 11.12 in one million.
[18] "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, *available at:* https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf, p. 1-5

Table 5.8-2: Opening Year – Option 1 Generated Greenhouse Emissions

Emission Source	Emissions (MT/yr)			
	CO_2	CH_4	N_2O	Total CO_2e
Amortized construction emissions	169.32	0.02	0.00	169.85
Area Source	0.18	4.70E-04	0.00	0.19
Energy Source	1,242.91	0.05	0.01	1,247.82
Mobile Source	14,168.50	0.90	0.00	14,190.88
On-Site Equipment	406.34	0.13	0.00	409.62
Waste	517.72	30.60	0.00	1,282.63
Water Usage	45.99	0.01	7.10E-04	46.57
Total CO_2e	**17,347.57**			

Source: Urban Crossroads, 2021 (Appendix C3).

Table 5.8-3: Opening Year – Option 2 Generated Greenhouse Emissions

Emission Source	Emissions (MT/yr)			
	CO_2	CH_4	N_2O	Total CO_2e
Amortized construction emissions	189.12	0.02	0.00	189.67
Area Source	0.22	5.90E-04	0.00	0.24
Energy Source	1,578.07	0.06	0.02	1,584.31
Mobile Source	18,819.38	1.20	0.00	18,849.43
On-Site Equipment	507.92	0.16	0.00	512.03
Waste	517.49	30.58	0.00	1,282.06
Water Usage	1.77	0.02	3.90E-04	2.28
Total CO_2e	**22,420.02**			

Source: Urban Crossroads, 2021 (Appendix C3).

O3.31 cont.

Table 5.8-4: Future Development Area - Specific Plan Buildout Generated Greenhouse Emissions

Emission Source	Emissions (MT/yr)			
	CO_2	CH_4	N_2O	Total CO_2e
Amortized construction emissions	209.25	0.03	0.00	209.95
Area Source	0.24	6.20E-04	0.00	0.25
Energy Source	2,629.20	0.10	0.03	2,639.54
Mobile Source	25,073.35	1.53	0.00	25,111.53
On-Site Equipment	609.35	0.20	0.00	614.27
Waste	763.75	45.14	0.00	1,892.15
Water Usage	46.88	0.02	9.00E-04	47.72
Total CO_2e	**30,515.40**			

Source: Urban Crossroads, 2021 (Appendix C3).

Thus, as the Project's GHG emissions exceed the 3,000 MT CO_2e/year threshold, the DEIR claims the Project may demonstrate less-than-significant impacts by achieving at least 100 points in the Screening Tables (p. 5.8-13). Specifically, the DEIR claims:

> "According to the County's proposed 2021 GHG Emissions Reduction Plan Update, any project that adopts at least 100 points of GHG performance standards listed in the proposed 2021 Screening Tables, would be consistent with the County's proposed GHG Emissions Reduction Plan to reduce emissions to 40 percent below 2007 levels [...]
>
> As shown in Tables 5.8-6 and 5.8-7, the proposed Specific Plan Project (including all three development scenarios) would earn 171 points and the Upzone Site would earn 104 points on

O3.32

the County's proposed 2021 GHG Screening Tables, which would both exceed 100 points" (p. 5.8-13).

As demonstrated above, the DEIR then claims that the Project will achieve 171 points and, thus, be consistent with the County's GHG Emissions Reduction Plan. Specifically, review of Table 5.8-6, *Screening Table for GHG Reduction Measures for Specific Plan Industrial Development*, demonstrates that the DEIR claims to be consistent with the following reduction features (see excerpt below) (p. 5.8-14 – 5.8-19, Table 5.8-6):

Table 5.8-6: Screening Table for GHG Reduction Measures for Specific Plan Industrial Development

Feature	Description	Assigned Point Values	Project Points
Reduction Measure Energy: Exceed Energy Efficiency Standards in New Commercial Units			
Building Envelope			
Insulation	• 2019 Title 24 Requirements (walls R-16; roof/attic R-32) • Modestly Enhanced Insulation (walls R-15, roof/attic R-38) • Enhanced Insulation (rigid wall insulation R-13, roof/attic R-38) • Greatly Enhanced Insulation (spray foam insulated walls R-18 or higher, roof/attic R-38 or higher)	0 points 9 points 11 points 12 points	11
Windows	• 2019 Title 24 Windows (0.57 U-factor, 0.4 SHGC) • Modestly Enhanced Window Insulation (0.4 U-factor, 0.32 SHGC) • Enhanced Window Insulation (0.32 U-factor, 0.25 SHGC) • Greatly Enhanced Window Insulation (0.28 or less U-factor, 0.22 or less SHGC)	0 points 4 points 5 points 7 points	7
Cool Roof	• Enhanced Cool Roof (CRRC Rated 0.2 aged solar reflectance, 0.75 thermal emittance) • Greatly Enhanced Cool Roof (CRRC Rated 0.35 aged solar reflectance, 0.75 thermal emittance)	8 points 10 points	10
Air Filtration	Minimizing leaks in the building envelope is as important as the insulation properties of the building. Insulation does not work effectively if there is excess air leakage. • Air barrier applied to exterior walls, caulking, and visual inspection such as the HERS Verified Quality Insulation Installation (QII or equivalent) • Blower Door HERS Verified Envelope Leakage or equivalent	7 points 6 points	7

Note: this is only a partial screenshot of Table 5.8-6.

Furthermore, the DEIR incorporates Mitigation Measure ("MM") GHG-1, which states:

> "Prior to issuance of building permits for each building, the Project Applicant shall provide documentation to the County of San Bernardino Building Department demonstrating that the improvements and/or buildings subject to the building permit application include measures from the 2021 County of San Bernardino Greenhouse Gas Reduction Plan Screening Tables (June 2021), as needed to achieve the required 100 points. Specific measures may be substituted for other measures that achieve an equivalent amount of GHG reduction, subject to the County of San Bernardino Building Department approval" (p. 5.8-39).

However, while we acknowledge that the Project includes implementing a minimum of 100 points per the 2021 Screening Tables as a formal mitigation measure, we recommend that the individual reduction

O3.32 cont.

features be included as formal mitigation measures. According to the Association of Environmental Professionals' ("AEP") *CEQA Portal Topic Paper* on Mitigation Measures:

> "While not 'mitigation', a good practice is to include those project design feature(s) that address environmental impacts in the mitigation monitoring and reporting program (MMRP). Often the MMRP is all that accompanies building and construction plans through the permit process. If the design features are not listed as important to addressing an environmental impact, it is easy for someone not involved in the original environmental process to approve a change to the project that could eliminate one or more of the design features without understanding the resulting environmental impact."[19]

O3.32 cont.

As demonstrated above, design features that are not formally included as mitigation measures may be eliminated from the Project's design altogether. Thus, as the specific reduction features are not formally included as mitigation measures in the DEIR, we cannot guarantee that they would be implemented, monitored, and enforced on the Project site. As such, until the specific reduction measures are included as mitigation measures, the Project's GHG analysis should not be relied upon to determine Project significance.

Feasible Mitigation Measures Available to Reduce Emissions

Our analysis demonstrates that the Project would result in potentially significant air quality and health risk impacts that should be mitigated further. In an effort to reduce the Project's emissions, we identified several mitigation measures that are applicable to the proposed Project. Feasible mitigation measures can be found in the Department of Justice Warehouse Project Best Practices document.[20] Therefore, to reduce the Project's emissions, consideration of the following measures should be made:

- Requiring off-road construction equipment to be zero-emission, where available, and all diesel-fueled off-road construction equipment, to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
- Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.
- Requiring on-road heavy-duty haul trucks to be model year 2010 or newer if diesel-fueled.
- Providing electrical hook ups to the power grid, rather than use of diesel-fueled generators, for electric construction tools, such as saws, drills and compressors, and using electric tools whenever feasible.
- Limiting the amount of daily grading disturbance area.

O3.33

[19] "CEQA Portal Topic Paper Mitigation Measures." AEP, February 2020, *available at:* https://ceqaportal.org/tp/CEQA%20Mitigation%202020.pdf, p. 6.
[20] "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice.

- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Forbidding idling of heavy equipment for more than two minutes.
- Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.
- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.
- Providing information on transit and ridesharing programs and services to construction employees.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.
- Requiring that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2010 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring all heavy-duty vehicles entering or operated on the project site to be zero-emission beginning in 2030.
- Requiring on-site equipment, such as forklifts and yard trucks, to be electric with the necessary electrical charging stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Forbidding trucks from idling for more than two minutes and requiring operators to turn off engines when not in use.
- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the air district, and the building manager.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.

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- Constructing electric truck charging stations proportional to the number of dock doors at the project.
- Constructing electric plugs for electric transport refrigeration units at every dock door, if the warehouse use could include refrigeration.
- Constructing electric light-duty vehicle charging stations proportional to the number of parking spaces at the project.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity, such as equal to the building's projected energy needs.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Achieving certification of compliance with LEED green building standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Posting signs at every truck exit driveway providing directional information to the truck route.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants to use carriers that are SmartWay carriers.
- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

O3.33 cont.

These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently, reduce emissions released during Project construction and operation. An updated EIR should be prepared to include all feasible mitigation measures, as well as include updated air quality and health risk analyses to ensure that the necessary mitigation measures are implemented to reduce emissions to below thresholds. The updated EIR should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure that the Project's significant emissions are reduced to the maximum extent possible.

Disclaimer

SWAPE has received limited discovery regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of

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care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

O3.34 cont.

Sincerely,

Matt Hagemann, P.G., C.Hg.

Paul E. Rosenfeld, Ph.D.

Attachment A: CalEEMod Output Files
Attachment B: Health Risk Calculations
Attachment C: AERSCREEN Output Files
Attachment D: Matt Hagemann CV
Attachment E: Paul E. Rosenfeld CV

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Bloomington Business Park Specific Plan (Construction - Mitigated)

San Bernardino-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unrefrigerated Warehouse-No Rail	2,712.04	1000sqft	62.26	2,712,040.00	0
Other Asphalt Surfaces	2,700.10	1000sqft	61.99	2,700,104.00	0
Parking Lot	1,436.00	Space	17.16	747,687.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	32
Climate Zone	10			**Operational Year**	2022
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	564.66	**CH4 Intensity (lb/MWhr)**	0.023	**N2O Intensity (lb/MWhr)**	0.005

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Consistent with the DEIR's model

Land Use - Consistent in the DIER's model

Construction Phase - Consistent in the DIER's model

Off-road Equipment - Consistent in the DIER's model

Off-road Equipment - Consistent in the DIER's model

Off-road Equipment - Consistent in the DIER's model

Off-road Equipment - Consistent in the DIER's model

Off-road Equipment - Consistent in the DIER's model

Off-road Equipment - Consistent in the DIER's model

Trips and VMT - Consistent in the DIER's model.

Grading - Consistent in the DIER's model

Architectural Coating - Consistent in the DIER's model.

Vehicle Trips - Consistent in the DIER's model

Vehicle Emission Factors - Consistent in the DIER's model.

Vehicle Emission Factors - Consistent in the DIER's model.

Vehicle Emission Factors - Consistent in the DIER's model.

Energy Use - Consistent in the DIER's model.

Water And Wastewater - Consistent in the DIER's model.

Solid Waste - Consistent in the DIER's model.

Construction Off-road Equipment Mitigation - See SWAPE comment "Incorrect Application of Tier 4 Final Mitigation."

Fleet Mix -

Demolition - Consistent with the DEIR's model

Table Name	Column Name	Default Value	New Value
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tblArchitecturalCoating	EF_Nonresidential_Interior	100.00	10.00
tblArchitecturalCoating	EF_Parking	100.00	50.00
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tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00

tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	17.00
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tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
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tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
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tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
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Bloomington Business Park Specific Plan (Construction - Mitigated) - San Bernardino-South Coast County, Annual

tblConstructionPhase	NumDays	3,100.00	150.00
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tblEnergyUse	NT24NG	0.03	0.00
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tblGrading	MaterialImported	0.00	202,200.00
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tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
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tblProjectCharacteristics	CO2IntensityFactor	702.44	564.66
tblProjectCharacteristics	N2OIntensityFactor	0.006	0.005
tblSolidWaste	SolidWasteGenerationRate	2,549.32	0.00
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tblTripsAndVMT	VendorTripNumber	0.00	155.00
tblTripsAndVMT	VendorTripNumber	0.00	218.00
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tblVehicleEF	HHD	0.01	0.01
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tblVehicleEF	HHD	8.5000e-005	5.0000e-006

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tblVehicleEF	HHD	0.01	0.01
tblVehicleEF	HHD	8.4000e-005	0.00
tblVehicleEF	HHD	1.6800e-004	1.0000e-005
tblVehicleEF	HHD	3.5970e-003	1.8200e-004
tblVehicleEF	HHD	0.91	0.52
tblVehicleEF	HHD	1.1700e-004	7.0000e-006
tblVehicleEF	HHD	0.13	0.23
tblVehicleEF	HHD	2.2100e-004	8.1200e-004
tblVehicleEF	HHD	0.05	1.0000e-006
tblVehicleEF	HHD	1.31	0.02
tblVehicleEF	HHD	0.04	3.3680e-003
tblVehicleEF	HHD	0.10	0.00
tblVehicleEF	HHD	4.53	5.98
tblVehicleEF	HHD	0.57	0.33
tblVehicleEF	HHD	1.79	3.7590e-003
tblVehicleEF	HHD	6,364.76	1,097.48
tblVehicleEF	HHD	1,475.79	1,393.36
tblVehicleEF	HHD	5.54	0.03
tblVehicleEF	HHD	25.32	6.13

tblVehicleEF	HHD	2.46	3.28
tblVehicleEF	HHD	0.01	3.8650e-003
tblVehicleEF	HHD	0.06	0.06
tblVehicleEF	HHD	0.04	0.03
tblVehicleEF	HHD	0.01	0.03
tblVehicleEF	HHD	5.1000e-005	1.0000e-006
tblVehicleEF	HHD	0.01	3.6980e-003
tblVehicleEF	HHD	0.03	0.03
tblVehicleEF	HHD	8.8810e-003	8.6000e-003
tblVehicleEF	HHD	0.01	0.03
tblVehicleEF	HHD	4.7000e-005	1.0000e-006
tblVehicleEF	HHD	8.5000e-005	5.0000e-006
tblVehicleEF	HHD	3.4760e-003	1.8700e-004
tblVehicleEF	HHD	0.91	0.40
tblVehicleEF	HHD	5.2000e-005	3.0000e-006
tblVehicleEF	HHD	0.08	0.07
tblVehicleEF	HHD	2.3300e-004	8.2900e-004
tblVehicleEF	HHD	0.05	1.0000e-006
tblVehicleEF	HHD	0.06	0.01
tblVehicleEF	HHD	0.01	0.01
tblVehicleEF	HHD	8.5000e-005	0.00
tblVehicleEF	HHD	8.5000e-005	5.0000e-006
tblVehicleEF	HHD	3.4760e-003	1.8700e-004
tblVehicleEF	HHD	1.05	0.46
tblVehicleEF	HHD	5.2000e-005	3.0000e-006
tblVehicleEF	HHD	0.13	0.08
tblVehicleEF	HHD	2.3300e-004	8.2900e-004

tblVehicleEF	HHD	0.06	1.0000e-006
tblVehicleEF	LDA	4.2030e-003	2.5110e-003
tblVehicleEF	LDA	5.6230e-003	0.05
tblVehicleEF	LDA	0.57	0.67
tblVehicleEF	LDA	1.19	2.11
tblVehicleEF	LDA	251.29	265.15
tblVehicleEF	LDA	57.15	54.12
tblVehicleEF	LDA	0.05	0.04
tblVehicleEF	LDA	1.6780e-003	1.5210e-003
tblVehicleEF	LDA	2.2790e-003	1.8570e-003
tblVehicleEF	LDA	1.5460e-003	1.4000e-003
tblVehicleEF	LDA	2.0960e-003	1.7080e-003
tblVehicleEF	LDA	0.04	0.06
tblVehicleEF	LDA	0.10	0.10
tblVehicleEF	LDA	0.03	0.05
tblVehicleEF	LDA	0.01	9.5370e-003
tblVehicleEF	LDA	0.03	0.21
tblVehicleEF	LDA	0.08	0.22
tblVehicleEF	LDA	2.5170e-003	2.6060e-003
tblVehicleEF	LDA	5.9200e-004	5.3200e-004
tblVehicleEF	LDA	0.04	0.06
tblVehicleEF	LDA	0.10	0.10
tblVehicleEF	LDA	0.03	0.05
tblVehicleEF	LDA	0.02	0.01
tblVehicleEF	LDA	0.03	0.21
tblVehicleEF	LDA	0.08	0.24
tblVehicleEF	LDA	4.7900e-003	2.8350e-003

tblVehicleEF	LDA	4.6890e-003	0.04
tblVehicleEF	LDA	0.71	0.81
tblVehicleEF	LDA	0.99	1.78
tblVehicleEF	LDA	274.94	287.11
tblVehicleEF	LDA	57.15	53.48
tblVehicleEF	LDA	0.05	0.03
tblVehicleEF	LDA	1.6780e-003	1.5210e-003
tblVehicleEF	LDA	2.2790e-003	1.8570e-003
tblVehicleEF	LDA	1.5460e-003	1.4000e-003
tblVehicleEF	LDA	2.0960e-003	1.7080e-003
tblVehicleEF	LDA	0.09	0.11
tblVehicleEF	LDA	0.12	0.11
tblVehicleEF	LDA	0.07	0.09
tblVehicleEF	LDA	0.01	0.01
tblVehicleEF	LDA	0.03	0.21
tblVehicleEF	LDA	0.06	0.19
tblVehicleEF	LDA	2.7550e-003	2.8220e-003
tblVehicleEF	LDA	5.8800e-004	5.2600e-004
tblVehicleEF	LDA	0.09	0.11
tblVehicleEF	LDA	0.12	0.11
tblVehicleEF	LDA	0.07	0.09
tblVehicleEF	LDA	0.02	0.02
tblVehicleEF	LDA	0.03	0.21
tblVehicleEF	LDA	0.07	0.21
tblVehicleEF	LDA	4.0960e-003	2.4600e-003
tblVehicleEF	LDA	5.5670e-003	0.05
tblVehicleEF	LDA	0.54	0.64

tblVehicleEF	LDA	1.18	2.12
tblVehicleEF	LDA	245.70	261.06
tblVehicleEF	LDA	57.15	54.13
tblVehicleEF	LDA	0.05	0.04
tblVehicleEF	LDA	1.6780e-003	1.5210e-003
tblVehicleEF	LDA	2.2790e-003	1.8570e-003
tblVehicleEF	LDA	1.5460e-003	1.4000e-003
tblVehicleEF	LDA	2.0960e-003	1.7080e-003
tblVehicleEF	LDA	0.05	0.06
tblVehicleEF	LDA	0.11	0.11
tblVehicleEF	LDA	0.03	0.05
tblVehicleEF	LDA	0.01	9.3400e-003
tblVehicleEF	LDA	0.04	0.24
tblVehicleEF	LDA	0.08	0.22
tblVehicleEF	LDA	2.4600e-003	2.5660e-003
tblVehicleEF	LDA	5.9100e-004	5.3200e-004
tblVehicleEF	LDA	0.05	0.06
tblVehicleEF	LDA	0.11	0.11
tblVehicleEF	LDA	0.03	0.05
tblVehicleEF	LDA	0.01	0.01
tblVehicleEF	LDA	0.04	0.24
tblVehicleEF	LDA	0.08	0.24
tblVehicleEF	LDT1	0.01	7.5760e-003
tblVehicleEF	LDT1	0.02	0.08
tblVehicleEF	LDT1	1.54	1.52
tblVehicleEF	LDT1	3.61	2.39
tblVehicleEF	LDT1	313.68	314.63

tblVehicleEF	LDT1	70.93	65.70
tblVehicleEF	LDT1	0.16	0.13
tblVehicleEF	LDT1	2.7050e-003	2.3430e-003
tblVehicleEF	LDT1	3.6920e-003	2.8390e-003
tblVehicleEF	LDT1	2.4910e-003	2.1560e-003
tblVehicleEF	LDT1	3.3960e-003	2.6100e-003
tblVehicleEF	LDT1	0.18	0.19
tblVehicleEF	LDT1	0.33	0.26
tblVehicleEF	LDT1	0.13	0.14
tblVehicleEF	LDT1	0.03	0.03
tblVehicleEF	LDT1	0.20	0.86
tblVehicleEF	LDT1	0.26	0.42
tblVehicleEF	LDT1	3.1570e-003	3.0930e-003
tblVehicleEF	LDT1	7.7300e-004	6.4600e-004
tblVehicleEF	LDT1	0.18	0.19
tblVehicleEF	LDT1	0.33	0.26
tblVehicleEF	LDT1	0.13	0.14
tblVehicleEF	LDT1	0.05	0.05
tblVehicleEF	LDT1	0.20	0.86
tblVehicleEF	LDT1	0.28	0.47
tblVehicleEF	LDT1	0.02	8.4650e-003
tblVehicleEF	LDT1	0.02	0.07
tblVehicleEF	LDT1	1.85	1.81
tblVehicleEF	LDT1	2.97	2.00
tblVehicleEF	LDT1	341.75	337.48
tblVehicleEF	LDT1	70.93	64.87
tblVehicleEF	LDT1	0.14	0.11

tblVehicleEF	LDT1	2.7050e-003	2.3430e-003
tblVehicleEF	LDT1	3.6920e-003	2.8390e-003
tblVehicleEF	LDT1	2.4910e-003	2.1560e-003
tblVehicleEF	LDT1	3.3960e-003	2.6100e-003
tblVehicleEF	LDT1	0.37	0.36
tblVehicleEF	LDT1	0.41	0.31
tblVehicleEF	LDT1	0.27	0.26
tblVehicleEF	LDT1	0.04	0.04
tblVehicleEF	LDT1	0.20	0.65
tblVehicleEF	LDT1	0.21	0.35
tblVehicleEF	LDT1	3.4420e-003	3.3180e-003
tblVehicleEF	LDT1	7.6200e-004	6.3800e-004
tblVehicleEF	LDT1	0.37	0.36
tblVehicleEF	LDT1	0.41	0.31
tblVehicleEF	LDT1	0.27	0.26
tblVehicleEF	LDT1	0.06	0.05
tblVehicleEF	LDT1	0.20	0.65
tblVehicleEF	LDT1	0.23	0.40
tblVehicleEF	LDT1	0.01	7.4310e-003
tblVehicleEF	LDT1	0.02	0.08
tblVehicleEF	LDT1	1.47	1.47
tblVehicleEF	LDT1	3.55	2.39
tblVehicleEF	LDT1	307.06	310.38
tblVehicleEF	LDT1	70.93	65.71
tblVehicleEF	LDT1	0.15	0.12
tblVehicleEF	LDT1	2.7050e-003	2.3430e-003
tblVehicleEF	LDT1	3.6920e-003	2.8390e-003

tblVehicleEF	LDT1	2.4910e-003	2.1560e-003
tblVehicleEF	LDT1	3.3960e-003	2.6100e-003
tblVehicleEF	LDT1	0.19	0.19
tblVehicleEF	LDT1	0.39	0.30
tblVehicleEF	LDT1	0.12	0.13
tblVehicleEF	LDT1	0.03	0.03
tblVehicleEF	LDT1	0.23	1.00
tblVehicleEF	LDT1	0.25	0.43
tblVehicleEF	LDT1	3.0890e-003	3.0520e-003
tblVehicleEF	LDT1	7.7200e-004	6.4600e-004
tblVehicleEF	LDT1	0.19	0.19
tblVehicleEF	LDT1	0.39	0.30
tblVehicleEF	LDT1	0.12	0.13
tblVehicleEF	LDT1	0.05	0.05
tblVehicleEF	LDT1	0.23	1.00
tblVehicleEF	LDT1	0.28	0.47
tblVehicleEF	LDT2	6.3270e-003	4.4090e-003
tblVehicleEF	LDT2	8.1990e-003	0.07
tblVehicleEF	LDT2	0.80	1.00
tblVehicleEF	LDT2	1.67	2.71
tblVehicleEF	LDT2	351.15	335.59
tblVehicleEF	LDT2	79.39	70.25
tblVehicleEF	LDT2	0.09	0.09
tblVehicleEF	LDT2	1.7270e-003	1.6020e-003
tblVehicleEF	LDT2	2.4170e-003	1.9240e-003
tblVehicleEF	LDT2	1.5880e-003	1.4740e-003
tblVehicleEF	LDT2	2.2220e-003	1.7690e-003

tblVehicleEF	LDT2	0.06	0.10
tblVehicleEF	LDT2	0.13	0.14
tblVehicleEF	LDT2	0.05	0.08
tblVehicleEF	LDT2	0.02	0.02
tblVehicleEF	LDT2	0.07	0.45
tblVehicleEF	LDT2	0.11	0.33
tblVehicleEF	LDT2	3.5180e-003	3.2990e-003
tblVehicleEF	LDT2	8.2200e-004	6.9100e-004
tblVehicleEF	LDT2	0.06	0.10
tblVehicleEF	LDT2	0.13	0.14
tblVehicleEF	LDT2	0.05	0.08
tblVehicleEF	LDT2	0.02	0.03
tblVehicleEF	LDT2	0.07	0.45
tblVehicleEF	LDT2	0.12	0.36
tblVehicleEF	LDT2	7.1840e-003	4.9540e-003
tblVehicleEF	LDT2	6.8290e-003	0.06
tblVehicleEF	LDT2	0.97	1.20
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tblVehicleEF	LDT2	79.39	69.39
tblVehicleEF	LDT2	0.08	0.08
tblVehicleEF	LDT2	1.7270e-003	1.6020e-003
tblVehicleEF	LDT2	2.4170e-003	1.9240e-003
tblVehicleEF	LDT2	1.5880e-003	1.4740e-003
tblVehicleEF	LDT2	2.2220e-003	1.7690e-003
tblVehicleEF	LDT2	0.13	0.18
tblVehicleEF	LDT2	0.15	0.16

tblVehicleEF	LDT2	0.11	0.15
tblVehicleEF	LDT2	0.02	0.02
tblVehicleEF	LDT2	0.07	0.45
tblVehicleEF	LDT2	0.09	0.29
tblVehicleEF	LDT2	3.8420e-003	3.5160e-003
tblVehicleEF	LDT2	8.1700e-004	6.8200e-004
tblVehicleEF	LDT2	0.13	0.18
tblVehicleEF	LDT2	0.15	0.16
tblVehicleEF	LDT2	0.11	0.15
tblVehicleEF	LDT2	0.03	0.03
tblVehicleEF	LDT2	0.07	0.45
tblVehicleEF	LDT2	0.10	0.31
tblVehicleEF	LDT2	6.1560e-003	4.3220e-003
tblVehicleEF	LDT2	8.1410e-003	0.07
tblVehicleEF	LDT2	0.75	0.96
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tblVehicleEF	LDT2	79.39	70.27
tblVehicleEF	LDT2	0.08	0.08
tblVehicleEF	LDT2	1.7270e-003	1.6020e-003
tblVehicleEF	LDT2	2.4170e-003	1.9240e-003
tblVehicleEF	LDT2	1.5880e-003	1.4740e-003
tblVehicleEF	LDT2	2.2220e-003	1.7690e-003
tblVehicleEF	LDT2	0.06	0.09
tblVehicleEF	LDT2	0.14	0.16
tblVehicleEF	LDT2	0.05	0.08
tblVehicleEF	LDT2	0.02	0.02

tblVehicleEF	LDT2	0.08	0.52
tblVehicleEF	LDT2	0.11	0.33
tblVehicleEF	LDT2	3.4410e-003	3.2580e-003
tblVehicleEF	LDT2	8.2200e-004	6.9100e-004
tblVehicleEF	LDT2	0.06	0.09
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tblVehicleEF	LDT2	0.05	0.08
tblVehicleEF	LDT2	0.02	0.03
tblVehicleEF	LDT2	0.08	0.52
tblVehicleEF	LDT2	0.12	0.37
tblVehicleEF	LHD1	5.2170e-003	5.0850e-003
tblVehicleEF	LHD1	0.01	6.1020e-003
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	0.14	0.18
tblVehicleEF	LHD1	1.07	0.75
tblVehicleEF	LHD1	2.60	1.03
tblVehicleEF	LHD1	9.23	9.25
tblVehicleEF	LHD1	809.20	652.45
tblVehicleEF	LHD1	30.40	11.21
tblVehicleEF	LHD1	0.09	0.07
tblVehicleEF	LHD1	2.12	1.25
tblVehicleEF	LHD1	9.6500e-004	8.9000e-004
tblVehicleEF	LHD1	0.01	9.8770e-003
tblVehicleEF	LHD1	0.01	9.8260e-003
tblVehicleEF	LHD1	9.5800e-004	2.6000e-004
tblVehicleEF	LHD1	9.2400e-004	8.5100e-004
tblVehicleEF	LHD1	2.5390e-003	2.4690e-003

tblVehicleEF	LHD1	0.01	9.3760e-003
tblVehicleEF	LHD1	8.8100e-004	2.3900e-004
tblVehicleEF	LHD1	3.7070e-003	3.0390e-003
tblVehicleEF	LHD1	0.11	0.08
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	1.8240e-003	1.5810e-003
tblVehicleEF	LHD1	0.08	0.06
tblVehicleEF	LHD1	0.35	0.55
tblVehicleEF	LHD1	0.27	0.08
tblVehicleEF	LHD1	9.2000e-005	9.0000e-005
tblVehicleEF	LHD1	5.9750e-003	6.3570e-003
tblVehicleEF	LHD1	3.5300e-004	1.1100e-004
tblVehicleEF	LHD1	3.7070e-003	3.0390e-003
tblVehicleEF	LHD1	0.11	0.08
tblVehicleEF	LHD1	0.02	0.03
tblVehicleEF	LHD1	1.8240e-003	1.5810e-003
tblVehicleEF	LHD1	0.10	0.08
tblVehicleEF	LHD1	0.35	0.55
tblVehicleEF	LHD1	0.29	0.09
tblVehicleEF	LHD1	5.2170e-003	5.0990e-003
tblVehicleEF	LHD1	0.01	6.2280e-003
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	0.14	0.18
tblVehicleEF	LHD1	1.09	0.76
tblVehicleEF	LHD1	2.43	0.98
tblVehicleEF	LHD1	9.23	9.25
tblVehicleEF	LHD1	609.20	652.47

tblVehicleEF	LHD1	30.40	11.12
tblVehicleEF	LHD1	0.09	0.07
tblVehicleEF	LHD1	1.98	1.17
tblVehicleEF	LHD1	9.6500e-004	8.9000e-004
tblVehicleEF	LHD1	0.01	9.8770e-003
tblVehicleEF	LHD1	0.01	9.8260e-003
tblVehicleEF	LHD1	9.5800e-004	2.6000e-004
tblVehicleEF	LHD1	9.2400e-004	8.5100e-004
tblVehicleEF	LHD1	2.5390e-003	2.4690e-003
tblVehicleEF	LHD1	0.01	9.3760e-003
tblVehicleEF	LHD1	8.6100e-004	2.3900e-004
tblVehicleEF	LHD1	7.3080e-003	5.4780e-003
tblVehicleEF	LHD1	0.13	0.10
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	4.1220e-003	3.0450e-003
tblVehicleEF	LHD1	0.09	0.06
tblVehicleEF	LHD1	0.36	0.56
tblVehicleEF	LHD1	0.25	0.08
tblVehicleEF	LHD1	9.2000e-005	9.0000e-005
tblVehicleEF	LHD1	5.9770e-003	6.3570e-003
tblVehicleEF	LHD1	3.5000e-004	1.1000e-004
tblVehicleEF	LHD1	7.3080e-003	5.4780e-003
tblVehicleEF	LHD1	0.13	0.10
tblVehicleEF	LHD1	0.02	0.03
tblVehicleEF	LHD1	4.1220e-003	3.0450e-003
tblVehicleEF	LHD1	0.11	0.08
tblVehicleEF	LHD1	0.36	0.56

tblVehicleEF	LHD1	0.28	0.08
tblVehicleEF	LHD1	5.2170e-003	5.0870e-003
tblVehicleEF	LHD1	0.01	6.1100e-003
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	0.14	0.18
tblVehicleEF	LHD1	1.07	0.75
tblVehicleEF	LHD1	2.55	1.02
tblVehicleEF	LHD1	9.23	9.25
tblVehicleEF	LHD1	609.20	652.45
tblVehicleEF	LHD1	30.40	11.20
tblVehicleEF	LHD1	0.09	0.07
tblVehicleEF	LHD1	2.08	1.23
tblVehicleEF	LHD1	9.6500e-004	8.9000e-004
tblVehicleEF	LHD1	0.01	9.8770e-003
tblVehicleEF	LHD1	0.01	9.8260e-003
tblVehicleEF	LHD1	9.5800e-004	2.6000e-004
tblVehicleEF	LHD1	9.2400e-004	8.5100e-004
tblVehicleEF	LHD1	2.5390e-003	2.4690e-003
tblVehicleEF	LHD1	0.01	9.3760e-003
tblVehicleEF	LHD1	8.8100e-004	2.3900e-004
tblVehicleEF	LHD1	4.0430e-003	3.1520e-003
tblVehicleEF	LHD1	0.13	0.10
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	1.7940e-003	1.6100e-003
tblVehicleEF	LHD1	0.08	0.06
tblVehicleEF	LHD1	0.38	0.60
tblVehicleEF	LHD1	0.26	0.09

tblVehicleEF	LHD1	9.2000e-005	9.0000e-005
tblVehicleEF	LHD1	5.9760e-003	6.3570e-003
tblVehicleEF	LHD1	3.5200e-004	1.1100e-004
tblVehicleEF	LHD1	4.0430e-003	3.1520e-003
tblVehicleEF	LHD1	0.13	0.10
tblVehicleEF	LHD1	0.02	0.03
tblVehicleEF	LHD1	1.7940e-003	1.6100e-003
tblVehicleEF	LHD1	0.10	0.08
tblVehicleEF	LHD1	0.38	0.60
tblVehicleEF	LHD1	0.29	0.09
tblVehicleEF	LHD2	3.5950e-003	3.6950e-003
tblVehicleEF	LHD2	4.6110e-003	4.1040e-003
tblVehicleEF	LHD2	8.1370e-003	0.01
tblVehicleEF	LHD2	0.12	0.15
tblVehicleEF	LHD2	0.50	0.50
tblVehicleEF	LHD2	1.20	0.67
tblVehicleEF	LHD2	14.27	14.14
tblVehicleEF	LHD2	608.52	665.25
tblVehicleEF	LHD2	24.46	8.76
tblVehicleEF	LHD2	0.11	0.10
tblVehicleEF	LHD2	1.49	1.36
tblVehicleEF	LHD2	1.2830e-003	1.3100e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	4.0000e-004	1.3700e-004
tblVehicleEF	LHD2	1.2280e-003	1.2540e-003
tblVehicleEF	LHD2	2.6860e-003	2.6560e-003

tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	3.6800e-004	1.2600e-004
tblVehicleEF	LHD2	1.3070e-003	1.7040e-003
tblVehicleEF	LHD2	0.04	0.05
tblVehicleEF	LHD2	0.01	0.02
tblVehicleEF	LHD2	7.0300e-004	9.2000e-004
tblVehicleEF	LHD2	0.06	0.06
tblVehicleEF	LHD2	0.09	0.32
tblVehicleEF	LHD2	0.11	0.05
tblVehicleEF	LHD2	1.3900e-004	1.3500e-004
tblVehicleEF	LHD2	5.9200e-003	6.4300e-003
tblVehicleEF	LHD2	2.6700e-004	8.7000e-005
tblVehicleEF	LHD2	1.3070e-003	1.7040e-003
tblVehicleEF	LHD2	0.04	0.05
tblVehicleEF	LHD2	0.02	0.02
tblVehicleEF	LHD2	7.0300e-004	9.2000e-004
tblVehicleEF	LHD2	0.07	0.07
tblVehicleEF	LHD2	0.09	0.32
tblVehicleEF	LHD2	0.12	0.06
tblVehicleEF	LHD2	3.5950e-003	3.7050e-003
tblVehicleEF	LHD2	4.6760e-003	4.1460e-003
tblVehicleEF	LHD2	7.7630e-003	0.01
tblVehicleEF	LHD2	0.12	0.15
tblVehicleEF	LHD2	0.50	0.50
tblVehicleEF	LHD2	1.13	0.64
tblVehicleEF	LHD2	14.27	14.14
tblVehicleEF	LHD2	608.52	665.25

tblVehicleEF	LHD2	24.46	8.70
tblVehicleEF	LHD2	0.11	0.10
tblVehicleEF	LHD2	1.40	1.28
tblVehicleEF	LHD2	1.2830e-003	1.3100e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	4.0000e-004	1.3700e-004
tblVehicleEF	LHD2	1.2280e-003	1.2540e-003
tblVehicleEF	LHD2	2.6860e-003	2.6560e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	3.6800e-004	1.2600e-004
tblVehicleEF	LHD2	2.5220e-003	3.0730e-003
tblVehicleEF	LHD2	0.04	0.06
tblVehicleEF	LHD2	0.01	0.02
tblVehicleEF	LHD2	1.5220e-003	1.7630e-003
tblVehicleEF	LHD2	0.06	0.06
tblVehicleEF	LHD2	0.09	0.32
tblVehicleEF	LHD2	0.10	0.05
tblVehicleEF	LHD2	1.3900e-004	1.3500e-004
tblVehicleEF	LHD2	5.9200e-003	6.4300e-003
tblVehicleEF	LHD2	2.6500e-004	8.6000e-005
tblVehicleEF	LHD2	2.5220e-003	3.0730e-003
tblVehicleEF	LHD2	0.04	0.06
tblVehicleEF	LHD2	0.02	0.02
tblVehicleEF	LHD2	1.5220e-003	1.7630e-003
tblVehicleEF	LHD2	0.07	0.07
tblVehicleEF	LHD2	0.09	0.32

tblVehicleEF	LHD2	0.11	0.05
tblVehicleEF	LHD2	3.5950e-003	3.6960e-003
tblVehicleEF	LHD2	4.6180e-003	4.1080e-003
tblVehicleEF	LHD2	8.0640e-003	0.01
tblVehicleEF	LHD2	0.12	0.15
tblVehicleEF	LHD2	0.50	0.50
tblVehicleEF	LHD2	1.19	0.67
tblVehicleEF	LHD2	14.27	14.14
tblVehicleEF	LHD2	608.52	665.25
tblVehicleEF	LHD2	24.46	8.75
tblVehicleEF	LHD2	0.11	0.10
tblVehicleEF	LHD2	1.46	1.33
tblVehicleEF	LHD2	1.2830e-003	1.3100e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	4.0000e-004	1.3700e-004
tblVehicleEF	LHD2	1.2280e-003	1.2540e-003
tblVehicleEF	LHD2	2.6360e-003	2.6580e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	3.6800e-004	1.2600e-004
tblVehicleEF	LHD2	1.3460e-003	1.7140e-003
tblVehicleEF	LHD2	0.04	0.06
tblVehicleEF	LHD2	0.01	0.02
tblVehicleEF	LHD2	6.8700e-004	9.2200e-004
tblVehicleEF	LHD2	0.05	0.06
tblVehicleEF	LHD2	0.10	0.34
tblVehicleEF	LHD2	0.11	0.05

tblVehicleEF	LHD2	1.3900e-004	1.3500e-004
tblVehicleEF	LHD2	5.9200e-003	6.4300e-003
tblVehicleEF	LHD2	2.6600e-004	8.7000e-005
tblVehicleEF	LHD2	1.3460e-003	1.7140e-003
tblVehicleEF	LHD2	0.04	0.06
tblVehicleEF	LHD2	0.02	0.02
tblVehicleEF	LHD2	6.8700e-004	9.2200e-004
tblVehicleEF	LHD2	0.07	0.07
tblVehicleEF	LHD2	0.10	0.34
tblVehicleEF	LHD2	0.12	0.06
tblVehicleEF	MCY	0.43	0.34
tblVehicleEF	MCY	0.16	0.24
tblVehicleEF	MCY	20.55	19.26
tblVehicleEF	MCY	9.93	8.60
tblVehicleEF	MCY	167.73	212.03
tblVehicleEF	MCY	46.45	60.73
tblVehicleEF	MCY	1.16	1.13
tblVehicleEF	MCY	1.8610e-003	1.9650e-003
tblVehicleEF	MCY	3.6730e-003	2.9600e-003
tblVehicleEF	MCY	1.7420e-003	1.8380e-003
tblVehicleEF	MCY	3.4650e-003	2.7870e-003
tblVehicleEF	MCY	1.45	1.42
tblVehicleEF	MCY	0.84	0.80
tblVehicleEF	MCY	0.80	0.78
tblVehicleEF	MCY	2.23	2.33
tblVehicleEF	MCY	0.49	1.91
tblVehicleEF	MCY	2.16	1.84

tblVehicleEF	MCY	2.0770e-003	2.0980e-003
tblVehicleEF	MCY	6.9000e-004	6.0100e-004
tblVehicleEF	MCY	1.45	1.42
tblVehicleEF	MCY	0.84	0.80
tblVehicleEF	MCY	0.80	0.78
tblVehicleEF	MCY	2.74	2.67
tblVehicleEF	MCY	0.49	1.91
tblVehicleEF	MCY	2.35	2.01
tblVehicleEF	MCY	0.42	0.34
tblVehicleEF	MCY	0.14	0.21
tblVehicleEF	MCY	20.68	19.28
tblVehicleEF	MCY	9.05	7.90
tblVehicleEF	MCY	167.73	211.90
tblVehicleEF	MCY	46.45	58.88
tblVehicleEF	MCY	0.99	0.97
tblVehicleEF	MCY	1.8610e-003	1.9650e-003
tblVehicleEF	MCY	3.6730e-003	2.9600e-003
tblVehicleEF	MCY	1.7420e-003	1.8380e-003
tblVehicleEF	MCY	3.4650e-003	2.7870e-003
tblVehicleEF	MCY	3.14	2.77
tblVehicleEF	MCY	1.27	1.11
tblVehicleEF	MCY	2.13	1.77
tblVehicleEF	MCY	2.17	2.28
tblVehicleEF	MCY	0.49	1.88
tblVehicleEF	MCY	1.86	1.62
tblVehicleEF	MCY	2.0770e-003	2.0970e-003
tblVehicleEF	MCY	6.6700e-004	5.8300e-004

tblVehicleEF	MCY	3.14	2.77
tblVehicleEF	MCY	1.27	1.11
tblVehicleEF	MCY	2.13	1.77
tblVehicleEF	MCY	2.67	2.81
tblVehicleEF	MCY	0.49	1.88
tblVehicleEF	MCY	2.02	1.76
tblVehicleEF	MCY	0.42	0.34
tblVehicleEF	MCY	0.15	0.24
tblVehicleEF	MCY	19.63	18.76
tblVehicleEF	MCY	9.55	8.44
tblVehicleEF	MCY	167.73	211.17
tblVehicleEF	MCY	45.45	60.38
tblVehicleEF	MCY	1.12	1.09
tblVehicleEF	MCY	1.8610e-003	1.9650e-003
tblVehicleEF	MCY	3.6730e-003	2.9600e-003
tblVehicleEF	MCY	1.7420e-003	1.8380e-003
tblVehicleEF	MCY	3.4650e-003	2.7870e-003
tblVehicleEF	MCY	1.71	1.57
tblVehicleEF	MCY	1.13	1.06
tblVehicleEF	MCY	0.72	0.74
tblVehicleEF	MCY	2.19	2.31
tblVehicleEF	MCY	0.56	2.18
tblVehicleEF	MCY	2.08	1.81
tblVehicleEF	MCY	2.0610e-003	2.0900e-003
tblVehicleEF	MCY	6.8200e-004	5.9600e-004
tblVehicleEF	MCY	1.71	1.57
tblVehicleEF	MCY	1.13	1.06

tblVehicleEF	MCY	0.72	0.74
tblVehicleEF	MCY	2.69	2.84
tblVehicleEF	MCY	0.56	2.18
tblVehicleEF	MCY	2.27	1.98
tblVehicleEF	MDV	0.01	5.5200e-003
tblVehicleEF	MDV	0.02	0.09
tblVehicleEF	MDV	1.35	1.14
tblVehicleEF	MDV	3.25	3.25
tblVehicleEF	MDV	483.94	415.10
tblVehicleEF	MDV	107.92	87.32
tblVehicleEF	MDV	0.17	0.11
tblVehicleEF	MDV	1.8290e-003	1.6850e-003
tblVehicleEF	MDV	2.5170e-003	2.0310e-003
tblVehicleEF	MDV	1.6830e-003	1.5540e-003
tblVehicleEF	MDV	2.3150e-003	1.8680e-003
tblVehicleEF	MDV	0.10	0.11
tblVehicleEF	MDV	0.20	0.17
tblVehicleEF	MDV	0.08	0.10
tblVehicleEF	MDV	0.03	0.02
tblVehicleEF	MDV	0.11	0.50
tblVehicleEF	MDV	0.25	0.44
tblVehicleEF	MDV	4.8500e-003	4.0780e-003
tblVehicleEF	MDV	1.1370e-003	6.5900e-004
tblVehicleEF	MDV	0.10	0.11
tblVehicleEF	MDV	0.20	0.17
tblVehicleEF	MDV	0.08	0.10
tblVehicleEF	MDV	0.05	0.03

tblVehicleEF	MDV	0.11	0.50
tblVehicleEF	MDV	0.28	0.48
tblVehicleEF	MDV	0.01	6.2110e-003
tblVehicleEF	MDV	0.02	0.08
tblVehicleEF	MDV	1.64	1.35
tblVehicleEF	MDV	2.69	2.72
tblVehicleEF	MDV	526.85	438.45
tblVehicleEF	MDV	107.92	86.27
tblVehicleEF	MDV	0.16	0.10
tblVehicleEF	MDV	1.8260e-003	1.6850e-003
tblVehicleEF	MDV	2.5170e-003	2.0310e-003
tblVehicleEF	MDV	1.6830e-003	1.5540e-003
tblVehicleEF	MDV	2.3150e-003	1.8680e-003
tblVehicleEF	MDV	0.20	0.21
tblVehicleEF	MDV	0.23	0.19
tblVehicleEF	MDV	0.17	0.19
tblVehicleEF	MDV	0.04	0.03
tblVehicleEF	MDV	0.11	0.49
tblVehicleEF	MDV	0.21	0.38
tblVehicleEF	MDV	5.2830e-003	4.3080e-003
tblVehicleEF	MDV	1.1260e-003	8.4800e-004
tblVehicleEF	MDV	0.20	0.21
tblVehicleEF	MDV	0.23	0.19
tblVehicleEF	MDV	0.17	0.19
tblVehicleEF	MDV	0.05	0.04
tblVehicleEF	MDV	0.11	0.49
tblVehicleEF	MDV	0.23	0.41

tblVehicleEF	MDV	0.01	5.4050e-003
tblVehicleEF	MDV	0.02	0.09
tblVehicleEF	MDV	1.28	1.09
tblVehicleEF	MDV	3.20	3.26
tblVehicleEF	MDV	473.93	410.75
tblVehicleEF	MDV	107.92	87.35
tblVehicleEF	MDV	0.16	0.10
tblVehicleEF	MDV	1.8260e-003	1.6850e-003
tblVehicleEF	MDV	2.5170e-003	2.0310e-003
tblVehicleEF	MDV	1.6830e-003	1.5540e-003
tblVehicleEF	MDV	2.3150e-003	1.8680e-003
tblVehicleEF	MDV	0.10	0.11
tblVehicleEF	MDV	0.22	0.18
tblVehicleEF	MDV	0.08	0.10
tblVehicleEF	MDV	0.03	0.02
tblVehicleEF	MDV	0.13	0.57
tblVehicleEF	MDV	0.25	0.44
tblVehicleEF	MDV	4.7490e-003	4.0360e-003
tblVehicleEF	MDV	1.1360e-003	8.5900e-004
tblVehicleEF	MDV	0.10	0.11
tblVehicleEF	MDV	0.22	0.18
tblVehicleEF	MDV	0.08	0.10
tblVehicleEF	MDV	0.04	0.03
tblVehicleEF	MDV	0.13	0.57
tblVehicleEF	MDV	0.27	0.48
tblVehicleEF	MH	0.04	3.6550e-003
tblVehicleEF	MH	0.03	0.00

tblVehicleEF	MH	3.07	0.35
tblVehicleEF	MH	6.43	0.00
tblVehicleEF	MH	1,045.05	970.21
tblVehicleEF	MH	59.49	0.00
tblVehicleEF	MH	1.54	4.24
tblVehicleEF	MH	0.01	0.02
tblVehicleEF	MH	0.04	0.11
tblVehicleEF	MH	1.1740e-003	0.00
tblVehicleEF	MH	3.2230e-003	4.0000e-003
tblVehicleEF	MH	0.04	0.11
tblVehicleEF	MH	1.0790e-003	0.00
tblVehicleEF	MH	1.47	0.00
tblVehicleEF	MH	0.09	0.00
tblVehicleEF	MH	0.51	0.00
tblVehicleEF	MH	0.10	0.09
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	0.37	0.00
tblVehicleEF	MH	0.01	9.1720e-003
tblVehicleEF	MH	7.0700e-004	0.00
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tblVehicleEF	MH	0.14	0.09
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	0.40	0.00
tblVehicleEF	MH	0.04	3.6550e-003
tblVehicleEF	MH	0.03	0.00

tblVehicleEF	MH	3.19	0.35
tblVehicleEF	MH	5.84	0.00
tblVehicleEF	MH	1,045.05	970.21
tblVehicleEF	MH	59.49	0.00
tblVehicleEF	MH	1.41	4.00
tblVehicleEF	MH	0.01	0.02
tblVehicleEF	MH	0.04	0.11
tblVehicleEF	MH	1.1740e-003	0.00
tblVehicleEF	MH	3.2230e-003	4.0000e-003
tblVehicleEF	MH	0.04	0.11
tblVehicleEF	MH	1.0790e-003	0.00
tblVehicleEF	MH	2.91	0.00
tblVehicleEF	MH	0.11	0.00
tblVehicleEF	MH	1.21	0.00
tblVehicleEF	MH	0.11	0.09
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	0.34	0.00
tblVehicleEF	MH	0.01	9.1720e-003
tblVehicleEF	MH	6.9700e-004	0.00
tblVehicleEF	MH	2.91	0.00
tblVehicleEF	MH	0.11	0.00
tblVehicleEF	MH	1.21	0.00
tblVehicleEF	MH	0.15	0.09
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	0.38	0.00
tblVehicleEF	MH	0.04	3.6550e-003
tblVehicleEF	MH	0.03	0.00

tblVehicleEF	MH	3.08	0.35
tblVehicleEF	MH	6.36	0.00
tblVehicleEF	MH	1,045.05	970.21
tblVehicleEF	MH	59.49	0.00
tblVehicleEF	MH	1.51	4.17
tblVehicleEF	MH	0.01	0.02
tblVehicleEF	MH	0.04	0.11
tblVehicleEF	MH	1.1740e-003	0.00
tblVehicleEF	MH	3.2230e-003	4.0000e-003
tblVehicleEF	MH	0.04	0.11
tblVehicleEF	MH	1.0790e-003	0.00
tblVehicleEF	MH	1.75	0.00
tblVehicleEF	MH	0.11	0.00
tblVehicleEF	MH	0.53	0.00
tblVehicleEF	MH	0.10	0.09
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	0.37	0.00
tblVehicleEF	MH	0.01	9.1720e-003
tblVehicleEF	MH	7.0600e-004	0.00
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tblVehicleEF	MH	0.11	0.00
tblVehicleEF	MH	0.53	0.00
tblVehicleEF	MH	0.15	0.09
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	0.40	0.00
tblVehicleEF	MHD	0.02	2.5070e-003
tblVehicleEF	MHD	3.5160e-003	3.3210e-003

tblVehicleEF	MHD	0.05	6.4670e-003
tblVehicleEF	MHD	0.32	0.31
tblVehicleEF	MHD	0.27	0.32
tblVehicleEF	MHD	5.32	0.74
tblVehicleEF	MHD	156.91	68.92
tblVehicleEF	MHD	1,101.52	974.57
tblVehicleEF	MHD	52.43	6.35
tblVehicleEF	MHD	0.60	0.52
tblVehicleEF	MHD	0.99	1.61
tblVehicleEF	MHD	3.8600e-004	1.2310e-003
tblVehicleEF	MHD	5.0030e-003	0.04
tblVehicleEF	MHD	7.6400e-004	7.5000e-005
tblVehicleEF	MHD	3.6900e-004	1.1780e-003
tblVehicleEF	MHD	4.7830e-003	0.03
tblVehicleEF	MHD	7.0300e-004	6.9000e-005
tblVehicleEF	MHD	1.2800e-003	4.5300e-004
tblVehicleEF	MHD	0.04	0.01
tblVehicleEF	MHD	0.02	0.02
tblVehicleEF	MHD	6.5100e-004	2.4000e-004
tblVehicleEF	MHD	0.04	0.06
tblVehicleEF	MHD	0.02	0.08
tblVehicleEF	MHD	0.32	0.03
tblVehicleEF	MHD	1.5080e-003	6.5300e-004
tblVehicleEF	MHD	0.01	9.2620e-003
tblVehicleEF	MHD	6.1700e-004	6.3000e-005
tblVehicleEF	MHD	1.2800e-003	4.5300e-004
tblVehicleEF	MHD	0.04	0.01

tblVehicleEF	MHD	0.03	0.02
tblVehicleEF	MHD	6.5100e-004	2.4000e-004
tblVehicleEF	MHD	0.04	0.07
tblVehicleEF	MHD	0.02	0.06
tblVehicleEF	MHD	0.35	0.04
tblVehicleEF	MHD	0.02	2.3860e-003
tblVehicleEF	MHD	3.5800e-003	3.3450e-003
tblVehicleEF	MHD	0.05	6.2100e-003
tblVehicleEF	MHD	0.24	0.26
tblVehicleEF	MHD	0.28	0.33
tblVehicleEF	MHD	4.97	0.70
tblVehicleEF	MHD	166.20	69.59
tblVehicleEF	MHD	1,101.52	974.58
tblVehicleEF	MHD	52.43	6.28
tblVehicleEF	MHD	0.62	0.52
tblVehicleEF	MHD	0.92	1.52
tblVehicleEF	MHD	3.2500e-004	1.0410e-003
tblVehicleEF	MHD	5.0030e-003	0.04
tblVehicleEF	MHD	7.6400e-004	7.5000e-005
tblVehicleEF	MHD	3.1100e-004	9.9600e-004
tblVehicleEF	MHD	4.7830e-003	0.03
tblVehicleEF	MHD	7.0300e-004	6.9000e-005
tblVehicleEF	MHD	2.5300e-003	8.2800e-004
tblVehicleEF	MHD	0.05	0.02
tblVehicleEF	MHD	0.02	0.02
tblVehicleEF	MHD	1.5010e-003	4.7800e-004
tblVehicleEF	MHD	0.04	0.06

tblVehicleEF	MHD	0.02	0.08
tblVehicleEF	MHD	0.30	0.03
tblVehicleEF	MHD	1.5950e-003	6.5900e-004
tblVehicleEF	MHD	0.01	9.2620e-003
tblVehicleEF	MHD	6.1100e-004	6.2000e-005
tblVehicleEF	MHD	2.5300e-003	8.2800e-004
tblVehicleEF	MHD	0.05	0.02
tblVehicleEF	MHD	0.03	0.02
tblVehicleEF	MHD	1.5010e-003	4.7800e-004
tblVehicleEF	MHD	0.04	0.07
tblVehicleEF	MHD	0.02	0.08
tblVehicleEF	MHD	0.33	0.04
tblVehicleEF	MHD	0.02	2.6830e-003
tblVehicleEF	MHD	3.5220e-003	3.3210e-003
tblVehicleEF	MHD	0.05	6.4200e-003
tblVehicleEF	MHD	0.45	0.37
tblVehicleEF	MHD	0.27	0.32
tblVehicleEF	MHD	5.23	0.74
tblVehicleEF	MHD	144.06	58.00
tblVehicleEF	MHD	1,101.52	974.57
tblVehicleEF	MHD	52.43	6.34
tblVehicleEF	MHD	0.57	0.52
tblVehicleEF	MHD	0.97	1.59
tblVehicleEF	MHD	4.7000e-004	1.4940e-003
tblVehicleEF	MHD	5.0030e-003	0.04
tblVehicleEF	MHD	7.6400e-004	7.5000e-005
tblVehicleEF	MHD	4.4900e-004	1.4300e-003

tblVehicleEF	MHD	4.7830e-003	0.03
tblVehicleEF	MHD	7.0300e-004	6.9000e-005
tblVehicleEF	MHD	1.3890e-003	4.7100e-004
tblVehicleEF	MHD	0.05	0.02
tblVehicleEF	MHD	0.03	0.02
tblVehicleEF	MHD	6.4000e-004	2.4400e-004
tblVehicleEF	MHD	0.04	0.05
tblVehicleEF	MHD	0.02	0.09
tblVehicleEF	MHD	0.32	0.03
tblVehicleEF	MHD	1.3860e-003	6.4400e-004
tblVehicleEF	MHD	0.01	9.2620e-003
tblVehicleEF	MHD	6.1600e-004	6.3000e-005
tblVehicleEF	MHD	1.3890e-003	4.7100e-004
tblVehicleEF	MHD	0.05	0.02
tblVehicleEF	MHD	0.04	0.02
tblVehicleEF	MHD	6.4000e-004	2.4400e-004
tblVehicleEF	MHD	0.04	0.07
tblVehicleEF	MHD	0.02	0.09
tblVehicleEF	MHD	0.35	0.04
tblVehicleEF	OBUS	0.01	8.8200e-003
tblVehicleEF	OBUS	9.9110e-003	6.5960e-003
tblVehicleEF	OBUS	0.03	0.02
tblVehicleEF	OBUS	0.26	0.52
tblVehicleEF	OBUS	0.63	0.77
tblVehicleEF	OBUS	6.27	2.45
tblVehicleEF	OBUS	70.35	76.06
tblVehicleEF	OBUS	1,121.50	1,406.90

tblVehicleEF	OBUS	70.70	20.49
tblVehicleEF	OBUS	0.28	0.34
tblVehicleEF	OBUS	0.97	1.24
tblVehicleEF	OBUS	6.4000e-005	5.8900e-004
tblVehicleEF	OBUS	4.6440e-003	0.01
tblVehicleEF	OBUS	9.2900e-004	2.1800e-004
tblVehicleEF	OBUS	5.1000e-005	5.6400e-004
tblVehicleEF	OBUS	4.4220e-003	0.01
tblVehicleEF	OBUS	8.5400e-004	2.0100e-004
tblVehicleEF	OBUS	2.1800e-003	2.6020e-003
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.04	0.05
tblVehicleEF	OBUS	9.3100e-004	1.1160e-003
tblVehicleEF	OBUS	0.04	0.05
tblVehicleEF	OBUS	0.05	0.29
tblVehicleEF	OBUS	0.38	0.12
tblVehicleEF	OBUS	6.8400e-004	7.2500e-004
tblVehicleEF	OBUS	0.01	0.01
tblVehicleEF	OBUS	8.1700e-004	2.0300e-004
tblVehicleEF	OBUS	2.1800e-003	2.6020e-003
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.05	0.07
tblVehicleEF	OBUS	9.3100e-004	1.1160e-003
tblVehicleEF	OBUS	0.06	0.07
tblVehicleEF	OBUS	0.05	0.29
tblVehicleEF	OBUS	0.42	0.13
tblVehicleEF	OBUS	0.01	8.6750e-003

tblVehicleEF	OBUS	0.01	6.7350e-003
tblVehicleEF	OBUS	0.03	0.02
tblVehicleEF	OBUS	0.26	0.51
tblVehicleEF	OBUS	0.65	0.79
tblVehicleEF	OBUS	5.74	2.28
tblVehicleEF	OBUS	73.50	75.90
tblVehicleEF	OBUS	1,121.50	1,406.93
tblVehicleEF	OBUS	70.70	20.20
tblVehicleEF	OBUS	0.29	0.34
tblVehicleEF	OBUS	0.90	1.16
tblVehicleEF	OBUS	5.4000e-005	5.0100e-004
tblVehicleEF	OBUS	4.6440e-003	0.01
tblVehicleEF	OBUS	9.2900e-004	2.1800e-004
tblVehicleEF	OBUS	5.1000e-005	4.7900e-004
tblVehicleEF	OBUS	4.4220e-003	0.01
tblVehicleEF	OBUS	8.5400e-004	2.0100e-004
tblVehicleEF	OBUS	4.2350e-003	4.6860e-003
tblVehicleEF	OBUS	0.02	0.03
tblVehicleEF	OBUS	0.03	0.05
tblVehicleEF	OBUS	2.1330e-003	2.2090e-003
tblVehicleEF	OBUS	0.05	0.05
tblVehicleEF	OBUS	0.05	0.29
tblVehicleEF	OBUS	0.36	0.11
tblVehicleEF	OBUS	7.1400e-004	7.2400e-004
tblVehicleEF	OBUS	0.01	0.01
tblVehicleEF	OBUS	8.0800e-004	2.0000e-004
tblVehicleEF	OBUS	4.2350e-003	4.6860e-003

tblVehicleEF	OBUS	0.02	0.03
tblVehicleEF	OBUS	0.05	0.07
tblVehicleEF	OBUS	2.1330e-003	2.2090e-003
tblVehicleEF	OBUS	0.06	0.07
tblVehicleEF	OBUS	0.05	0.29
tblVehicleEF	OBUS	0.40	0.12
tblVehicleEF	OBUS	0.01	8.7750e-003
tblVehicleEF	OBUS	9.9380e-003	6.6000e-003
tblVehicleEF	OBUS	0.03	0.02
tblVehicleEF	OBUS	0.28	0.53
tblVehicleEF	OBUS	0.63	0.77
tblVehicleEF	OBUS	6.22	2.45
tblVehicleEF	OBUS	66.00	76.30
tblVehicleEF	OBUS	1,121.50	1,405.90
tblVehicleEF	OBUS	70.70	20.50
tblVehicleEF	OBUS	0.27	0.35
tblVehicleEF	OBUS	0.96	1.22
tblVehicleEF	OBUS	7.7000e-005	7.1200e-004
tblVehicleEF	OBUS	4.6440e-003	0.01
tblVehicleEF	OBUS	9.2900e-004	2.1800e-004
tblVehicleEF	OBUS	7.4000e-005	6.8100e-004
tblVehicleEF	OBUS	4.4220e-003	0.01
tblVehicleEF	OBUS	8.5400e-004	2.0100e-004
tblVehicleEF	OBUS	2.3200e-003	2.7390e-003
tblVehicleEF	OBUS	0.02	0.03
tblVehicleEF	OBUS	0.04	0.05
tblVehicleEF	OBUS	9.4100e-004	1.1660e-003

tblVehicleEF	OBUS	0.04	0.05
tblVehicleEF	OBUS	0.05	0.30
tblVehicleEF	OBUS	0.38	0.12
tblVehicleEF	OBUS	6.4200e-004	7.2800e-004
tblVehicleEF	OBUS	0.01	0.01
tblVehicleEF	OBUS	8.1600e-004	2.0300e-004
tblVehicleEF	OBUS	2.3200e-003	2.7390e-003
tblVehicleEF	OBUS	0.02	0.03
tblVehicleEF	OBUS	0.05	0.07
tblVehicleEF	OBUS	9.4100e-004	1.1660e-003
tblVehicleEF	OBUS	0.06	0.07
tblVehicleEF	OBUS	0.05	0.30
tblVehicleEF	OBUS	0.42	0.13
tblVehicleEF	SBUS	0.84	0.06
tblVehicleEF	SBUS	0.01	8.5840e-003
tblVehicleEF	SBUS	0.07	6.1570e-003
tblVehicleEF	SBUS	5.71	2.50
tblVehicleEF	SBUS	0.65	0.78
tblVehicleEF	SBUS	5.33	0.82
tblVehicleEF	SBUS	1,258.13	345.06
tblVehicleEF	SBUS	1,136.31	1,112.17
tblVehicleEF	SBUS	37.11	4.79
tblVehicleEF	SBUS	11.70	3.29
tblVehicleEF	SBUS	4.77	5.20
tblVehicleEF	SBUS	0.01	4.3580e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	0.03	0.03

tblVehicleEF	SBUS	5.1700e-004	4.0000e-005
tblVehicleEF	SBUS	0.01	4.1690e-003
tblVehicleEF	SBUS	2.7560e-003	2.7010e-003
tblVehicleEF	SBUS	0.03	0.03
tblVehicleEF	SBUS	4.7500e-004	3.6000e-005
tblVehicleEF	SBUS	2.9260e-003	1.2420e-003
tblVehicleEF	SBUS	0.02	9.5120e-003
tblVehicleEF	SBUS	0.68	0.28
tblVehicleEF	SBUS	1.3050e-003	5.9000e-004
tblVehicleEF	SBUS	0.11	0.11
tblVehicleEF	SBUS	9.3510e-003	0.06
tblVehicleEF	SBUS	0.27	0.04
tblVehicleEF	SBUS	0.01	3.2890e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	4.6300e-004	4.7000e-005
tblVehicleEF	SBUS	2.9260e-003	1.2420e-003
tblVehicleEF	SBUS	0.02	9.5120e-003
tblVehicleEF	SBUS	0.97	0.40
tblVehicleEF	SBUS	1.3050e-003	5.9000e-004
tblVehicleEF	SBUS	0.13	0.13
tblVehicleEF	SBUS	9.3510e-003	0.06
tblVehicleEF	SBUS	0.30	0.04
tblVehicleEF	SBUS	0.84	0.06
tblVehicleEF	SBUS	0.01	8.7140e-003
tblVehicleEF	SBUS	0.06	5.1550e-003
tblVehicleEF	SBUS	5.56	2.47
tblVehicleEF	SBUS	0.66	0.80

tblVehicleEF	SBUS	3.65	0.60
tblVehicleEF	SBUS	1,322.00	352.98
tblVehicleEF	SBUS	1,136.31	1,112.20
tblVehicleEF	SBUS	37.11	4.41
tblVehicleEF	SBUS	12.08	3.36
tblVehicleEF	SBUS	4.47	4.88
tblVehicleEF	SBUS	0.01	3.6810e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	0.03	0.03
tblVehicleEF	SBUS	5.1700e-004	4.0000e-005
tblVehicleEF	SBUS	9.6490e-003	3.5220e-003
tblVehicleEF	SBUS	2.7560e-003	2.7010e-003
tblVehicleEF	SBUS	0.03	0.03
tblVehicleEF	SBUS	4.7500e-004	3.6000e-005
tblVehicleEF	SBUS	5.6170e-003	2.2080e-003
tblVehicleEF	SBUS	0.02	9.9850e-003
tblVehicleEF	SBUS	0.67	0.28
tblVehicleEF	SBUS	2.8800e-003	1.1130e-003
tblVehicleEF	SBUS	0.11	0.11
tblVehicleEF	SBUS	8.5310e-003	0.06
tblVehicleEF	SBUS	0.22	0.03
tblVehicleEF	SBUS	0.01	3.3640e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	4.3500e-004	4.4000e-005
tblVehicleEF	SBUS	5.6170e-003	2.2080e-003
tblVehicleEF	SBUS	0.02	9.9850e-003
tblVehicleEF	SBUS	0.97	0.40

tblVehicleEF	SBUS	2.8800e-003	1.1130e-003
tblVehicleEF	SBUS	0.13	0.13
tblVehicleEF	SBUS	8.5310e-003	0.06
tblVehicleEF	SBUS	0.24	0.03
tblVehicleEF	SBUS	0.84	0.06
tblVehicleEF	SBUS	0.01	8.5770e-003
tblVehicleEF	SBUS	0.07	6.3440e-003
tblVehicleEF	SBUS	5.91	2.56
tblVehicleEF	SBUS	0.65	0.78
tblVehicleEF	SBUS	5.37	0.86
tblVehicleEF	SBUS	1,169.92	334.13
tblVehicleEF	SBUS	1,136.31	1,112.17
tblVehicleEF	SBUS	37.11	4.85
tblVehicleEF	SBUS	11.19	3.19
tblVehicleEF	SBUS	4.69	5.12
tblVehicleEF	SBUS	0.01	5.2920e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	0.03	0.03
tblVehicleEF	SBUS	5.1700e-004	4.0000e-005
tblVehicleEF	SBUS	0.01	5.0630e-003
tblVehicleEF	SBUS	2.7560e-003	2.7010e-003
tblVehicleEF	SBUS	0.03	0.03
tblVehicleEF	SBUS	4.7500e-004	3.6000e-005
tblVehicleEF	SBUS	2.9580e-003	1.2070e-003
tblVehicleEF	SBUS	0.02	0.01
tblVehicleEF	SBUS	0.68	0.28
tblVehicleEF	SBUS	1.2820e-003	6.0100e-004

tblVehicleEF	SBUS	0.11	0.11
tblVehicleEF	SBUS	0.01	0.08
tblVehicleEF	SBUS	0.28	0.04
tblVehicleEF	SBUS	0.01	3.1850e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	4.6400e-004	4.8000e-005
tblVehicleEF	SBUS	2.9580e-003	1.2070e-003
tblVehicleEF	SBUS	0.02	0.01
tblVehicleEF	SBUS	0.98	0.40
tblVehicleEF	SBUS	1.2820e-003	6.0100e-004
tblVehicleEF	SBUS	0.13	0.13
tblVehicleEF	SBUS	0.01	0.08
tblVehicleEF	SBUS	0.31	0.04
tblVehicleEF	UBUS	1.83	4.45
tblVehicleEF	UBUS	0.08	0.01
tblVehicleEF	UBUS	9.26	34.75
tblVehicleEF	UBUS	14.34	0.89
tblVehicleEF	UBUS	1,846.39	1,592.13
tblVehicleEF	UBUS	136.37	11.77
tblVehicleEF	UBUS	5.87	0.38
tblVehicleEF	UBUS	0.52	0.07
tblVehicleEF	UBUS	0.01	0.03
tblVehicleEF	UBUS	0.07	2.6550e-003
tblVehicleEF	UBUS	1.4030e-003	1.4100e-004
tblVehicleEF	UBUS	0.22	0.03
tblVehicleEF	UBUS	3.0000e-003	6.6220e-003
tblVehicleEF	UBUS	0.06	2.5280e-003

tblVehicleEF	UBUS	1.2900e-003	1.3000e-004
tblVehicleEF	UBUS	8.0860e-003	1.6780e-003
tblVehicleEF	UBUS	0.11	9.5390e-003
tblVehicleEF	UBUS	3.9450e-003	7.3700e-004
tblVehicleEF	UBUS	0.61	0.07
tblVehicleEF	UBUS	0.02	0.04
tblVehicleEF	UBUS	1.15	0.04
tblVehicleEF	UBUS	0.01	3.0250e-003
tblVehicleEF	UBUS	1.6240e-003	1.1700e-004
tblVehicleEF	UBUS	8.0860e-003	1.6780e-003
tblVehicleEF	UBUS	0.11	9.5390e-003
tblVehicleEF	UBUS	3.9450e-003	7.3700e-004
tblVehicleEF	UBUS	2.50	4.54
tblVehicleEF	UBUS	0.02	0.04
tblVehicleEF	UBUS	1.25	0.04
tblVehicleEF	UBUS	1.83	4.45
tblVehicleEF	UBUS	0.08	9.2350e-003
tblVehicleEF	UBUS	9.36	34.75
tblVehicleEF	UBUS	11.74	0.76
tblVehicleEF	UBUS	1,846.39	1,692.13
tblVehicleEF	UBUS	136.37	11.55
tblVehicleEF	UBUS	5.45	0.38
tblVehicleEF	UBUS	0.52	0.07
tblVehicleEF	UBUS	0.01	0.03
tblVehicleEF	UBUS	0.07	2.6550e-003
tblVehicleEF	UBUS	1.4030e-003	1.4100e-004
tblVehicleEF	UBUS	0.22	0.03

tblVehicleEF	UBUS	3.0000e-003	6.6220e-003
tblVehicleEF	UBUS	0.06	2.5280e-003
tblVehicleEF	UBUS	1.2900e-003	1.3000e-004
tblVehicleEF	UBUS	0.02	3.0610e-003
tblVehicleEF	UBUS	0.14	0.01
tblVehicleEF	UBUS	9.3320e-003	1.4840e-003
tblVehicleEF	UBUS	0.62	0.07
tblVehicleEF	UBUS	0.02	0.04
tblVehicleEF	UBUS	1.02	0.03
tblVehicleEF	UBUS	0.01	3.0250e-003
tblVehicleEF	UBUS	1.5790e-003	1.1400e-004
tblVehicleEF	UBUS	0.02	3.0610e-003
tblVehicleEF	UBUS	0.14	0.01
tblVehicleEF	UBUS	9.3320e-003	1.4840e-003
tblVehicleEF	UBUS	2.52	4.54
tblVehicleEF	UBUS	0.02	0.04
tblVehicleEF	UBUS	1.12	0.04
tblVehicleEF	UBUS	1.83	4.45
tblVehicleEF	UBUS	0.08	0.01
tblVehicleEF	UBUS	9.27	34.75
tblVehicleEF	UBUS	13.86	0.90
tblVehicleEF	UBUS	1,846.39	1,692.13
tblVehicleEF	UBUS	136.37	11.80
tblVehicleEF	UBUS	5.76	0.38
tblVehicleEF	UBUS	0.52	0.07
tblVehicleEF	UBUS	0.01	0.03
tblVehicleEF	UBUS	0.07	2.6550e-003

tblVehicleEF	UBUS	1.4030e-003	1.4100e-004
tblVehicleEF	UBUS	0.22	0.03
tblVehicleEF	UBUS	3.0000e-003	6.6220e-003
tblVehicleEF	UBUS	0.06	2.5280e-003
tblVehicleEF	UBUS	1.2900e-003	1.3000e-004
tblVehicleEF	UBUS	9.2250e-003	1.6870e-003
tblVehicleEF	UBUS	0.14	0.01
tblVehicleEF	UBUS	4.1190e-003	7.4500e-004
tblVehicleEF	UBUS	0.61	0.07
tblVehicleEF	UBUS	0.03	0.05
tblVehicleEF	UBUS	1.13	0.04
tblVehicleEF	UBUS	0.01	3.0250e-003
tblVehicleEF	UBUS	1.6160e-003	1.1700e-004
tblVehicleEF	UBUS	9.2250e-003	1.6870e-003
tblVehicleEF	UBUS	0.14	0.01
tblVehicleEF	UBUS	4.1190e-003	7.4500e-004
tblVehicleEF	UBUS	2.50	4.54
tblVehicleEF	UBUS	0.03	0.05
tblVehicleEF	UBUS	1.24	0.04
tblVehicleTrips	CC_TL	8.40	0.00
tblVehicleTrips	CC_TL	8.40	0.00
tblVehicleTrips	CC_TL	8.40	0.00
tblVehicleTrips	CNW_TL	6.90	0.00
tblVehicleTrips	CNW_TL	6.90	0.00
tblVehicleTrips	CNW_TL	6.90	0.00
tblVehicleTrips	CNW_TTP	41.00	0.00
tblVehicleTrips	CW_TL	16.60	0.00

tblVehicleTrips	CW_TL	16.60	0.00
tblVehicleTrips	CW_TL	16.60	0.00
tblVehicleTrips	CW_TTP	59.00	0.00
tblVehicleTrips	DV_TP	5.00	0.00
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PR_TP	92.00	0.00
tblVehicleTrips	ST_TR	1.68	0.00
tblVehicleTrips	SU_TR	1.68	0.00
tblVehicleTrips	WD_TR	1.68	0.00
tblWater	IndoorWaterUseRate	527,159,250.00	0.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.2516	3.1502	1.5869	5.2900e-003	1.0580	0.1119	1.1699	0.2120	0.1030	0.3150	0.0000	484.4936	484.4936	0.0883	0.0000	486.5760
2022	3.7329	17.6559	15.5316	0.0568	5.1916	0.4910	5.6825	1.4713	0.4555	1.9268	0.0000	5,189.178 8	5,189.178 8	0.5793	0.0000	5,203.660 4
Maximum	3.7329	17.6559	15.5316	0.0568	5.1916	0.4910	5.6825	1.4713	0.4555	1.9268	0.0000	5,189.178 8	5,189.178 8	0.5793	0.0000	5,203.660 4

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.0681	1.7473	1.0386	5.2900e-003	1.0580	6.1500e-003	1.0641	0.2120	0.0600e-003	0.2181	0.0000	484.4936	484.4936	0.0883	0.0000	486.5760
2022	2.9907	12.0506	17.9841	0.0568	5.1916	0.0592	5.2507	1.4713	0.0574	1.5288	0.0000	5,189.177 1	5,189.177 1	0.5793	0.0000	5,203.658 8
Maximum	2.9907	12.0506	17.9841	0.0568	5.1916	0.0592	5.2507	1.4713	0.0574	1.5288	0.0000	5,189.177 1	5,189.177 1	0.5793	0.0000	5,203.658 8

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	20.22	33.71	-15.80	0.00	0.00	89.17	7.85	0.00	88.65	22.11	0.00	0.00	0.00	0.00	0.00	0.00

Bloomington Business Park Specific Plan (Construction - Mitigated) - San Bernardino-South Coast County, Annual

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	10-22-2021	1-21-2022	3.4553	1.8922
2	1-22-2022	4-21-2022	3.9427	2.3808
3	4-22-2022	7-21-2022	4.9689	3.3190
4	7-22-2022	9-30-2022	4.4160	3.4110
		Highest	4.9689	3.3190

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	11.3359	8.0000e-004	0.0875	1.0000e-005		3.1000e-004	3.1000e-004		3.1000e-004	3.1000e-004	0.0000	0.1700	0.1700	4.5000e-004	0.0000	0.1812
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**11.3359**	**8.0000e-004**	**0.0875**	**1.0000e-005**	**0.0000**	**3.1000e-004**	**3.1000e-004**	**0.0000**	**3.1000e-004**	**3.1000e-004**	**0.0000**	**0.1700**	**0.1700**	**4.5000e-004**	**0.0000**	**0.1812**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	11.3359	8.0000e-004	0.0875	1.0000e-005		3.1000e-004	3.1000e-004		3.1000e-004	3.1000e-004	0.0000	0.1700	0.1700	4.5000e-004	0.0000	0.1812
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**11.3359**	**8.0000e-004**	**0.0875**	**1.0000e-005**	**0.0000**	**3.1000e-004**	**3.1000e-004**	**0.0000**	**3.1000e-004**	**3.1000e-004**	**0.0000**	**0.1700**	**0.1700**	**4.5000e-004**	**0.0000**	**0.1812**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Bloomington Business Park Specific Plan (Construction - Mitigated) - San Bernardino-South Coast County, Annual

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	10/1/2021	12/15/2021	5	55	
2	Site Preparation	Site Preparation	12/17/2021	2/24/2022	5	50	
3	Grading	Grading	2/25/2022	6/2/2022	5	70	
4	Building Construction	Building Construction	6/3/2022	12/29/2022	5	150	
5	Paving	Paving	8/12/2022	12/29/2022	5	100	
6	Architectural Coating	Architectural Coating	8/12/2022	12/29/2022	5	100	

Acres of Grading (Site Preparation Phase): 1000

Acres of Grading (Grading Phase): 1400

Acres of Paving: 79.15

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 4,068,060; Non-Residential Outdoor: 1,356,020; Striped Parking Area: 206,867 (Architectural Coating – sqft)

OffRoad Equipment

Bloomington Business Park Specific Plan (Construction - Mitigated) - San Bernardino-South Coast County, Annual

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	2	8.00	81	0.73
Demolition	Excavators	6	8.00	158	0.38
Demolition	Rubber Tired Dozers	4	8.00	247	0.40
Site Preparation	Crawler Tractors	7	8.00	212	0.43
Site Preparation	Rubber Tired Dozers	5	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	0	8.00	97	0.37
Grading	Crawler Tractors	4	8.00	212	0.43
Grading	Excavators	4	8.00	158	0.38
Grading	Graders	2	8.00	187	0.41
Grading	Rubber Tired Dozers	2	8.00	247	0.40
Grading	Scrapers	4	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	0	8.00	97	0.37
Building Construction	Cranes	2	8.00	231	0.29
Building Construction	Crawler Tractors	6	8.00	212	0.43
Building Construction	Forklifts	6	8.00	89	0.20
Building Construction	Generator Sets	2	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	0	8.00	97	0.37
Building Construction	Welders	2	8.00	46	0.45
Paving	Pavers	4	8.00	130	0.42
Paving	Paving Equipment	4	8.00	132	0.36
Paving	Rollers	4	8.00	80	0.38
Architectural Coating	Air Compressors	2	8.00	78	0.48

Trips and VMT

Bloomington Business Park Specific Plan (Construction - Mitigated) - San Bernardino-South Coast County, Annual

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	12	30.00	171.00	2,707.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	12	30.00	155.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	16	40.00	218.00	18,696.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	18	2,587.00	466.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	12	30.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	2	517.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

Water Exposed Area

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.2930	0.0000	0.2930	0.0444	0.0000	0.0444	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1741	1.7292	1.1861	2.1400e-003		0.0953	0.0953		0.0793	0.0793	0.0000	187.0043	187.0043	0.0526	0.0000	188.3202
Total	**0.1741**	**1.7292**	**1.1861**	**2.1400e-003**	**0.2930**	**0.0953**	**0.3883**	**0.0444**	**0.0793**	**0.1236**	**0.0000**	**187.0043**	**187.0043**	**0.0526**	**0.0000**	**188.3202**

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	9.2000e-003	0.3161	0.0500	1.0400e-003	0.0253	8.6000e-004	0.0262	6.4000e-003	8.4000e-004	7.2400e-003	0.0000	100.2077	100.2077	5.6300e-003	0.0000	100.3486
Vendor	0.0125	0.4575	0.0931	1.2500e-003	0.0297	7.9000e-004	0.0304	8.3600e-003	7.5000e-004	9.3100e-003	0.0000	119.4262	119.4262	6.0500e-003	0.0000	119.5774
Worker	3.8000e-003	2.8700e-003	0.0294	8.0000e-005	9.0500e-003	6.0000e-005	9.1000e-003	2.4000e-003	5.0000e-005	2.4500e-003	0.0000	7.5067	7.5067	2.1000e-004	0.0000	7.5118
Total	**0.0249**	**0.7765**	**0.1733**	**2.3700e-003**	**0.0620**	**1.7300e-003**	**0.0657**	**0.0174**	**1.6400e-003**	**0.0190**	**0.0000**	**227.1406**	**227.1406**	**0.0139**	**0.0000**	**227.4879**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.2930	0.0000	0.2930	0.0444	0.0000	0.0444	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0321	0.7457	1.3571	2.1400e-003		3.3900e-003	3.3900e-003		3.3900e-003	3.3900e-003	0.0000	187.0041	187.0041	0.0520	0.0000	188.3200
Total	**0.0321**	**0.7457**	**1.3571**	**2.1400e-003**	**0.2930**	**3.3900e-003**	**0.2963**	**0.0444**	**3.3900e-003**	**0.0478**	**0.0000**	**187.0041**	**187.0041**	**0.0520**	**0.0000**	**188.3200**

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	9.2000e-003	0.3161	0.0500	1.0400e-003	0.0253	8.6000e-004	0.0262	6.4000e-003	8.4000e-004	7.2400e-003	0.0000	100.2077	100.2077	5.6300e-003	0.0000	100.3486
Vendor	0.0125	0.4575	0.0931	1.2500e-003	0.0297	7.9000e-004	0.0304	8.3600e-003	7.5000e-004	9.3100e-003	0.0000	119.4262	119.4262	6.0500e-003	0.0000	119.5774
Worker	3.8000e-003	2.8700e-003	0.0291	8.0000e-005	9.0500e-003	6.0000e-005	9.1000e-003	2.4000e-003	5.0000e-005	2.4000e-003	0.0000	7.5067	7.5067	2.1000e-004	0.0000	7.5119
Total	0.0249	0.7765	0.1723	2.3700e-003	0.0620	1.7300e-003	0.0637	0.0174	1.6400e-003	0.0190	0.0000	227.1406	227.1406	0.0139	0.0000	227.4879

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.6959	0.0000	0.6959	0.1483	0.0000	0.1483	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0500	0.5700	0.2048	5.4000e-004		0.0247	0.0247		0.0228	0.0228	0.0000	47.1973	47.1973	0.0153	0.0000	47.5789
Total	0.0500	0.5700	0.2048	5.4000e-004	0.6959	0.0247	0.7206	0.1483	0.0228	0.1711	0.0000	47.1973	47.1973	0.0153	0.0000	47.5789

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	2.2600e-003	0.0829	0.0169	2.3000e-004	5.3700e-003	1.4000e-004	5.5200e-003	1.5500e-003	1.4000e-004	1.6900e-003	0.0000	21.6504	21.6504	1.4600e-003	0.0000	21.6868
Worker	7.6000e-004	5.7000e-004	5.8800e-003	2.0000e-005	1.8100e-003	1.0000e-005	1.8200e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.5018	1.5018	4.0000e-005	0.0000	1.5024
Total	**2.0200e-003**	**0.0835**	**0.0228**	**2.5000e-004**	**7.1800e-003**	**1.5000e-004**	**7.3400e-003**	**2.0300e-003**	**1.5000e-004**	**2.1800e-003**	**0.0000**	**23.1517**	**23.1517**	**1.5000e-003**	**0.0000**	**23.1892**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.6959	0.0000	0.6959	0.1483	0.0000	0.1483	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	8.7900e-003	0.1417	0.2855	5.4000e-004		8.8000e-004	8.8000e-004		8.8000e-004	8.8000e-004	0.0000	47.1973	47.1973	0.0153	0.0000	47.5789
Total	**8.7900e-003**	**0.1417**	**0.2855**	**5.4000e-004**	**0.6959**	**8.8000e-004**	**0.6967**	**0.1483**	**8.8000e-004**	**0.1492**	**0.0000**	**47.1973**	**47.1973**	**0.0153**	**0.0000**	**47.5789**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	2.2600e-003	0.0829	0.0169	2.3000e-004	5.3700e-003	1.4000e-004	5.5200e-003	1.5500e-003	1.4000e-004	1.6900e-003	0.0000	21.6504	21.6504	1.4600e-003	0.0000	21.6868
Worker	7.8000e-004	5.7000e-004	5.8800e-003	2.0000e-005	1.8100e-003	1.0000e-005	1.8200e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.5018	1.5018	4.0000e-005	0.0000	1.5024
Total	2.0200e-003	0.0835	0.0228	2.5000e-004	7.1800e-003	1.5000e-004	7.3400e-003	2.0300e-003	1.5000e-004	2.1800e-003	0.0000	23.1517	23.1517	1.5000e-003	0.0000	23.1892

3.3 Site Preparation - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					1.1174	0.0000	1.1174	0.3800	0.0000	0.3800	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1488	1.6775	0.6652	1.9000e-003		0.0716	0.0716		0.0659	0.0659	0.0000	167.1432	167.1432	0.0541	0.0000	168.4947
Total	0.1488	1.6775	0.6652	1.9000e-003	1.1174	0.0716	1.1890	0.3800	0.0659	0.4459	0.0000	167.1432	167.1432	0.0541	0.0000	168.4947

3.3 Site Preparation - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	7.4700e-003	0.2785	0.0553	8.0000e-004	0.0191	4.2000e-004	0.0195	5.5000e-003	4.1000e-004	5.9100e-003	0.0000	76.1351	76.1351	4.9000e-003	0.0000	76.2600
Worker	2.5200e-003	1.8300e-003	0.0191	0.0000e-005	6.4100e-003	4.0000e-005	6.4500e-003	1.7000e-003	4.0000e-005	1.7400e-003	0.0000	5.1311	5.1311	1.3000e-004	0.0000	5.1345
Total	9.9900e-003	0.2803	0.0745	8.0000e-004	0.0255	4.6000e-004	0.0259	7.2000e-003	4.5000e-004	7.6500e-003	0.0000	81.2662	81.2662	5.1300e-003	0.0000	81.3944

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					1.1174	0.0000	1.1174	0.3800	0.0000	0.3800	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0312	0.5023	1.0123	1.9000e-003		3.1100e-003	3.1100e-003		3.1100e-003	3.1100e-003	0.0000	167.1430	167.1430	0.0541	0.0000	168.4945
Total	0.0312	0.5023	1.0123	1.9000e-003	1.1174	3.1100e-003	1.1205	0.3800	3.1100e-003	0.3831	0.0000	167.1430	167.1430	0.0541	0.0000	168.4945

3.3 Site Preparation - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	7.4700e-003	0.2785	0.0554	8.0000e-004	0.0191	4.2000e-004	0.0195	5.5000e-003	4.1000e-004	5.9100e-003	0.0000	76.1351	76.1351	4.9000e-003	0.0000	76.2600
Worker	2.5200e-003	1.8300e-003	0.0191	0.0000e-005	6.4100e-003	4.0000e-005	6.4500e-003	1.7000e-003	4.0000e-005	1.7300e-003	0.0000	5.1311	5.1311	1.3000e-004	0.0000	5.1345
Total	9.9900e-003	0.2803	0.0745	8.0000e-004	0.0255	4.6000e-004	0.0259	7.2000e-003	4.5000e-004	7.5500e-003	0.0000	81.2662	81.2662	5.1300e-003	0.0000	81.3944

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					1.1776	0.0000	1.1776	0.3139	0.0000	0.3139	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.2996	3.3256	2.0437	5.0100e-003		0.1336	0.1336		0.1229	0.1229	0.0000	439.8846	439.8846	0.1423	0.0000	443.4413
Total	0.2996	3.3256	2.0437	5.0100e-003	1.1776	0.1336	1.3111	0.3139	0.1229	0.4368	0.0000	439.8846	439.8846	0.1423	0.0000	443.4413

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0335	1.9877	0.3381	7.0600e-003	0.1600	5.0000e-004	0.1650	0.0440	4.7000e-003	0.0487	0.0000	680.0567	680.0567	0.0376	0.0000	681.0017
Vendor	0.0159	0.7030	0.1398	2.0100e-003	0.0481	1.0700e-003	0.0492	0.0139	1.0300e-003	0.0149	0.0000	192.1955	192.1955	0.0126	0.0000	192.5107
Worker	6.0000e-003	4.2800e-003	0.0458	1.4000e-004	0.0154	1.0000e-004	0.0155	4.0900e-003	9.0000e-005	4.1700e-003	0.0000	12.2796	12.2796	3.2000e-004	0.0000	12.2876
Total	0.0781	2.6951	0.5237	9.2100e-003	0.2235	6.1700e-003	0.2297	0.0619	5.9100e-003	0.0679	0.0000	885.1317	885.1317	0.0507	0.0000	886.4000

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					1.1776	0.0000	1.1776	0.3139	0.0000	0.3139	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0790	1.4497	2.8279	5.0100e-003		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004	0.0000	439.8841	439.8841	0.1423	0.0000	443.4408
Total	0.0790	1.4497	2.8279	5.0100e-003	1.1776	8.2000e-004	1.1858	0.3139	8.2000e-004	0.3221	0.0000	439.8841	439.8841	0.1423	0.0000	443.4408

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0335	1.9877	0.3381	7.0600e-003	0.1600	5.0000e-004	0.1650	0.0440	4.7000e-003	0.0487	0.0000	680.0567	680.0567	0.0376	0.0000	681.0017
Vendor	0.0159	0.7030	0.1398	2.0100e-003	0.0481	1.0700e-003	0.0492	0.0139	1.0300e-003	0.0149	0.0000	192.1955	192.1955	0.0126	0.0000	192.5107
Worker	6.0000e-003	4.2800e-003	0.0458	1.4000e-004	0.0154	1.0000e-003	0.0155	4.0900e-003	9.0000e-005	4.1700e-003	0.0000	12.2796	12.2796	3.2000e-004	0.0000	12.2876
Total	0.0781	2.6951	0.5237	9.2100e-003	0.2235	6.1700e-003	0.2297	0.0619	5.9100e-003	0.0679	0.0000	885.1317	885.1317	0.0507	0.0000	886.4000

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.4194	4.4646	2.6505	6.4500e-003		0.1912	0.1912		0.1784	0.1784	0.0000	559.3518	559.3518	0.1518	0.0000	563.1458
Total	0.4194	4.4646	2.6505	6.4500e-003		0.1912	0.1912		0.1784	0.1784	0.0000	559.3518	559.3518	0.1518	0.0000	563.1458

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0864	3.2203	0.6488	9.2000e-003	0.2204	4.0100e-003	0.2253	0.0636	4.7000e-003	0.0683	0.0000	880.3711	880.3711	0.0578	0.0000	881.8160
Worker	0.8350	0.6068	6.3399	0.0186	2.1274	0.0155	2.1429	0.5650	0.0124	0.5774	0.0000	1,701.829 5	1,701.829 5	0.0443	0.0000	1,702.928 6
Total	0.9214	3.8271	6.9805	0.0280	2.3478	0.0194	2.3661	0.6286	0.0171	0.6457	0.0000	2,582.191 5	2,582.191 5	0.1021	0.0000	2,584.743 6

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1123	2.0654	3.6976	6.4500e-003		0.0167	0.0167		0.0167	0.0167	0.0000	559.3512	559.3512	0.1519	0.0000	563.1452
Total	0.1123	2.0654	3.6976	6.4500e-003		0.0167	0.0167		0.0167	0.0167	0.0000	559.3512	559.3512	0.1519	0.0000	563.1452

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0864	3.2203	0.6488	9.2000e-003	0.2204	4.9100e-003	0.2253	0.0636	4.7000e-003	0.0683	0.0000	880.3711	880.3711	0.0578	0.0000	881.8160
Worker	0.8350	0.0668	0.8399	0.0186	2.1274	0.0135	2.1409	0.5650	0.0124	0.5774	0.0000	1,701.829 5	1,701.829 5	0.0443	0.0000	1,702.928 6
Total	0.9214	3.2871	6.9805	0.0280	2.3478	0.0184	2.3661	0.6286	0.0171	0.6457	0.0000	2,582.191 5	2,582.191 5	0.1021	0.0000	2,584.743 6

3.6 Paving - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1103	1.1125	1.4581	2.2800e-003		0.0568	0.0568		0.0523	0.0523	0.0000	200.2756	200.2756	0.0648	0.0000	201.8949
Paving	0.1037					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.2140	1.1125	1.4581	2.2800e-003		0.0568	0.0568		0.0523	0.0523	0.0000	200.2756	200.2756	0.0648	0.0000	201.8949

3.6 Paving - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.4600e-003	4.6900e-003	0.0490	1.5000e-004	0.0165	1.0000e-004	0.0166	4.3700e-003	1.0000e-004	4.4600e-003	0.0000	12.1567	12.1567	3.4000e-004	0.0000	12.1653
Total	**6.4600e-003**	**4.6900e-003**	**0.0490**	**1.5000e-004**	**0.0165**	**1.0000e-004**	**0.0166**	**4.3700e-003**	**1.0000e-004**	**4.4600e-003**	**0.0000**	**12.1567**	**12.1567**	**3.4000e-004**	**0.0000**	**12.1653**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0334	1.0040	1.7296	2.2800e-003		3.7400e-003	3.7400e-003		3.7400e-003	3.7400e-003	0.0000	200.2753	200.2753	0.0648	0.0000	201.8947
Paving	0.1037					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.1371**	**1.0040**	**1.7296**	**2.2800e-003**		**3.7400e-003**	**3.7400e-003**		**3.7400e-003**	**3.7400e-003**	**0.0000**	**200.2753**	**200.2753**	**0.0648**	**0.0000**	**201.8947**

3.6 Paving - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.4600e-003	4.6900e-003	0.0490	1.5000e-004	0.0165	1.0000e-004	0.0166	4.3700e-003	1.0000e-004	4.4600e-003	0.0000	13.1567	13.1567	3.4000e-004	0.0000	13.1653
Total	6.4600e-003	4.6900e-003	0.0490	1.5000e-004	0.0165	1.0000e-004	0.0166	4.3700e-003	1.0000e-004	4.4600e-003	0.0000	13.1567	13.1567	3.4000e-004	0.0000	13.1653

3.7 Architectural Coating - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	1.4967					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0273	0.1878	0.2418	4.0000e-004		0.0109	0.0109		0.0109	0.0109	0.0000	34.0434	34.0434	2.2200e-003	0.0000	34.0988
Total	1.5240	0.1878	0.2418	4.0000e-004		0.0109	0.0109		0.0109	0.0109	0.0000	34.0434	34.0434	2.2200e-003	0.0000	34.0988

3.7 Architectural Coating - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1113	0.0808	0.8447	2.5100e-003	0.2834	1.7900e-003	0.2852	0.0753	1.6500e-003	0.0769	0.0000	226.7340	226.7340	5.9100e-003	0.0000	226.8816
Total	**0.1113**	**0.0808**	**0.8447**	**2.5100e-003**	**0.2834**	**1.7900e-003**	**0.2852**	**0.0753**	**1.6500e-003**	**0.0769**	**0.0000**	**226.7340**	**226.7340**	**5.9100e-003**	**0.0000**	**226.8816**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	1.4967					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	7.2000e-005	0.1413	0.2443	4.0000e-004		5.3000e-004	5.3000e-004		5.3000e-004	5.3000e-004	0.0000	34.0433	34.0433	2.2200e-003	0.0000	34.0988
Total	**1.5040**	**0.1413**	**0.2443**	**4.0000e-004**		**5.3000e-004**	**5.3000e-004**		**5.3000e-004**	**5.3000e-004**	**0.0000**	**34.0433**	**34.0433**	**2.2200e-003**	**0.0000**	**34.0988**

3.7 Architectural Coating - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1113	0.0809	0.8447	2.5100e-003	0.2834	1.7900e-003	0.2852	0.0753	1.6500e-003	0.0769	0.0000	226.7340	226.7340	5.9100e-003	0.0000	226.8816
Total	**0.1113**	**0.0809**	**0.8447**	**2.5100e-003**	**0.2834**	**1.7900e-003**	**0.2852**	**0.0753**	**1.6500e-003**	**0.0769**	**0.0000**	**226.7340**	**226.7340**	**5.9100e-003**	**0.0000**	**226.8816**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Asphalt Surfaces	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0	0	0
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-No	0.00	0.00	0.00	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Bloomington Business Park Specific Plan (Construction - Mitigated) - San Bernardino-South Coast County, Annual

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Asphalt Surfaces	0.553113	0.036408	0.180286	0.116335	0.016165	0.005101	0.018218	0.063797	0.001357	0.001565	0.005903	0.000808	0.000944
Parking Lot	0.553113	0.036408	0.180286	0.116335	0.016165	0.005101	0.018218	0.063797	0.001357	0.001565	0.005903	0.000808	0.000944
Unrefrigerated Warehouse-No Rail	0.553113	0.036408	0.180286	0.116335	0.016165	0.005101	0.018218	0.063797	0.001357	0.001565	0.005903	0.000808	0.000944

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lbs/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	11.3359	8.0000e-004	0.0875	1.0000e-005		3.1000e-004	3.1000e-004		3.1000e-004	3.1000e-004	0.0000	0.1700	0.1700	4.5000e-004	0.0000	0.1812
Unmitigated	11.3359	8.0000e-004	0.0875	1.0000e-005		3.1000e-004	3.1000e-004		3.1000e-004	3.1000e-004	0.0000	0.1700	0.1700	4.5000e-004	0.0000	0.1812

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	1.3050					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	10.0228					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.1480e-001	8.0000e-004	0.0875	1.0000e-005		3.1000e-004	3.1000e-004		3.1000e-004	3.1000e-004	0.0000	0.1700	0.1700	4.5000e-004	0.0000	0.1812
Total	**11.3359**	**8.0000e-004**	**0.0875**	**1.0000e-005**		**3.1000e-004**	**3.1000e-004**		**3.1000e-004**	**3.1000e-004**	**0.0000**	**0.1700**	**0.1700**	**4.5000e-004**	**0.0000**	**0.1812**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	1.3050					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	10.0228					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.1480e-001	8.0000e-004	0.0875	1.0000e-005		3.1000e-004	3.1000e-004		3.1000e-004	3.1000e-004	0.0000	0.1700	0.1700	4.5000e-004	0.0000	0.1812
Total	**11.3359**	**8.0000e-004**	**0.0875**	**1.0000e-005**		**3.1000e-004**	**3.1000e-004**		**3.1000e-004**	**3.1000e-004**	**0.0000**	**0.1700**	**0.1700**	**4.5000e-004**	**0.0000**	**0.1812**

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

7.2 Water by Land Use

Unmitigated

	Indoor/Out door Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Bloomington Business Park Specific Plan (Construction - Mitigated)

San Bernardino-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unrefrigerated Warehouse-No Rail	2,712.04	1000sqft	62.26	2,712,040.00	0
Other Asphalt Surfaces	2,700.10	1000sqft	61.99	2,700,104.00	0
Parking Lot	1,436.00	Space	17.16	747,687.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	32
Climate Zone	10			**Operational Year**	2022
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	564.66	**CH4 Intensity (lb/MWhr)**	0.023	**N2O Intensity (lb/MWhr)**	0.005

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Consistent with the DEIR's model

Land Use - Consistent in the DIER's model

Construction Phase - Consistent in the DIER's model

Off-road Equipment - Consistent in the DIER's model

Off-road Equipment - Consistent in the DIER's model

Off-road Equipment - Consistent in the DIER's model

Bloomington Business Park Specific Plan (Construction - Mitigated) - San Bernardino-South Coast County, Summer

Off-road Equipment - Consistent in the DIER's model.

Off-road Equipment - Consistent in the DIER's model.

Off-road Equipment - Consistent in the DIER's model.

Trips and VMT - Consistent in the DIER's model.

Grading - Consistent in the DIER's model.

Architectural Coating - Consistent in the DIER's model.

Vehicle Trips - Consistent in the DIER's model.

Vehicle Emission Factors - Consistent in the DIER's model.

Vehicle Emission Factors - Consistent in the DIER's model.

Vehicle Emission Factors - Consistent in the DIER's model.

Energy Use - Consistent in the DIER's model.

Water And Wastewater - Consistent in the DIER's model.

Solid Waste - Consistent in the DIER's model.

Construction Off-road Equipment Mitigation - See SWAPE comment "Incorrect Application of Tier 4 Final Mitigation."

Fleet Mix -

Demolition - Consistent with the DEIR's model.

Table Name	Column Name	Default Value	New Value
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tblArchitecturalCoating	EF_Nonresidential_Interior	100.00	10.00
tblArchitecturalCoating	EF_Parking	100.00	50.00
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tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00

Bloomington Business Park Specific Plan (Construction - Mitigated) - San Bernardino-South Coast County, Summer

tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
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Bloomington Business Park Specific Plan (Construction - Mitigated) - San Bernardino-South Coast County, Summer

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tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
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tblOffRoadEquipment	UsageHours	7.00	8.00
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tblProjectCharacteristics	CO2IntensityFactor	702.44	564.66
tblProjectCharacteristics	N2OIntensityFactor	0.006	0.005
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tblVehicleEF	LDA	5.5670e-003	0.05
tblVehicleEF	LDA	0.54	0.64

tblVehicleEF	LDA	1.18	2.12
tblVehicleEF	LDA	245.70	261.06
tblVehicleEF	LDA	57.15	54.13
tblVehicleEF	LDA	0.05	0.04
tblVehicleEF	LDA	1.6780e-003	1.5210e-003
tblVehicleEF	LDA	2.2790e-003	1.8570e-003
tblVehicleEF	LDA	1.5460e-003	1.4000e-003
tblVehicleEF	LDA	2.0960e-003	1.7080e-003
tblVehicleEF	LDA	0.05	0.06
tblVehicleEF	LDA	0.11	0.11
tblVehicleEF	LDA	0.03	0.05
tblVehicleEF	LDA	0.01	9.3400e-003
tblVehicleEF	LDA	0.04	0.24
tblVehicleEF	LDA	0.08	0.22
tblVehicleEF	LDA	2.4600e-003	2.5660e-003
tblVehicleEF	LDA	5.9100e-004	5.3200e-004
tblVehicleEF	LDA	0.05	0.06
tblVehicleEF	LDA	0.11	0.11
tblVehicleEF	LDA	0.03	0.05
tblVehicleEF	LDA	0.01	0.01
tblVehicleEF	LDA	0.04	0.24
tblVehicleEF	LDA	0.08	0.24
tblVehicleEF	LDT1	0.01	7.5760e-003
tblVehicleEF	LDT1	0.02	0.08
tblVehicleEF	LDT1	1.54	1.52
tblVehicleEF	LDT1	3.61	2.39
tblVehicleEF	LDT1	313.68	314.63

tblVehicleEF	LDT1	70.93	65.70
tblVehicleEF	LDT1	0.16	0.13
tblVehicleEF	LDT1	2.7050e-003	2.3430e-003
tblVehicleEF	LDT1	3.6920e-003	2.8390e-003
tblVehicleEF	LDT1	2.4910e-003	2.1560e-003
tblVehicleEF	LDT1	3.3960e-003	2.6100e-003
tblVehicleEF	LDT1	0.18	0.19
tblVehicleEF	LDT1	0.33	0.26
tblVehicleEF	LDT1	0.13	0.14
tblVehicleEF	LDT1	0.03	0.03
tblVehicleEF	LDT1	0.20	0.86
tblVehicleEF	LDT1	0.26	0.42
tblVehicleEF	LDT1	3.1570e-003	3.0930e-003
tblVehicleEF	LDT1	7.7300e-004	6.4600e-004
tblVehicleEF	LDT1	0.18	0.19
tblVehicleEF	LDT1	0.33	0.26
tblVehicleEF	LDT1	0.13	0.14
tblVehicleEF	LDT1	0.05	0.05
tblVehicleEF	LDT1	0.20	0.86
tblVehicleEF	LDT1	0.28	0.47
tblVehicleEF	LDT1	0.02	8.4650e-003
tblVehicleEF	LDT1	0.02	0.07
tblVehicleEF	LDT1	1.85	1.81
tblVehicleEF	LDT1	2.97	2.00
tblVehicleEF	LDT1	341.75	337.48
tblVehicleEF	LDT1	70.93	64.87
tblVehicleEF	LDT1	0.14	0.11

tblVehicleEF	LDT1	2.7050e-003	2.3430e-003
tblVehicleEF	LDT1	3.6920e-003	2.8390e-003
tblVehicleEF	LDT1	2.4910e-003	2.1560e-003
tblVehicleEF	LDT1	3.3960e-003	2.6100e-003
tblVehicleEF	LDT1	0.37	0.36
tblVehicleEF	LDT1	0.41	0.31
tblVehicleEF	LDT1	0.27	0.26
tblVehicleEF	LDT1	0.04	0.04
tblVehicleEF	LDT1	0.20	0.65
tblVehicleEF	LDT1	0.21	0.36
tblVehicleEF	LDT1	3.4420e-003	3.3180e-003
tblVehicleEF	LDT1	7.6200e-004	6.3800e-004
tblVehicleEF	LDT1	0.37	0.36
tblVehicleEF	LDT1	0.41	0.31
tblVehicleEF	LDT1	0.27	0.26
tblVehicleEF	LDT1	0.06	0.05
tblVehicleEF	LDT1	0.20	0.65
tblVehicleEF	LDT1	0.23	0.40
tblVehicleEF	LDT1	0.01	7.4310e-003
tblVehicleEF	LDT1	0.02	0.08
tblVehicleEF	LDT1	1.47	1.47
tblVehicleEF	LDT1	3.55	2.39
tblVehicleEF	LDT1	307.06	310.38
tblVehicleEF	LDT1	70.93	65.71
tblVehicleEF	LDT1	0.15	0.12
tblVehicleEF	LDT1	2.7050e-003	2.3430e-003
tblVehicleEF	LDT1	3.6920e-003	2.8390e-003

tblVehicleEF	LDT1	2.4910e-003	2.1560e-003
tblVehicleEF	LDT1	3.3960e-003	2.6100e-003
tblVehicleEF	LDT1	0.19	0.19
tblVehicleEF	LDT1	0.39	0.30
tblVehicleEF	LDT1	0.12	0.13
tblVehicleEF	LDT1	0.03	0.03
tblVehicleEF	LDT1	0.23	1.00
tblVehicleEF	LDT1	0.25	0.43
tblVehicleEF	LDT1	3.0890e-003	3.0520e-003
tblVehicleEF	LDT1	7.7200e-004	6.4600e-004
tblVehicleEF	LDT1	0.19	0.19
tblVehicleEF	LDT1	0.39	0.30
tblVehicleEF	LDT1	0.12	0.13
tblVehicleEF	LDT1	0.05	0.05
tblVehicleEF	LDT1	0.23	1.00
tblVehicleEF	LDT1	0.28	0.47
tblVehicleEF	LDT2	6.3270e-003	4.4090e-003
tblVehicleEF	LDT2	8.1990e-003	0.07
tblVehicleEF	LDT2	0.80	1.00
tblVehicleEF	LDT2	1.67	2.71
tblVehicleEF	LDT2	351.15	335.59
tblVehicleEF	LDT2	79.39	70.25
tblVehicleEF	LDT2	0.09	0.09
tblVehicleEF	LDT2	1.7270e-003	1.6020e-003
tblVehicleEF	LDT2	2.4170e-003	1.9240e-003
tblVehicleEF	LDT2	1.5880e-003	1.4740e-003
tblVehicleEF	LDT2	2.2220e-003	1.7690e-003

tblVehicleEF	LDT2	0.06	0.10
tblVehicleEF	LDT2	0.13	0.14
tblVehicleEF	LDT2	0.05	0.08
tblVehicleEF	LDT2	0.02	0.02
tblVehicleEF	LDT2	0.07	0.45
tblVehicleEF	LDT2	0.11	0.33
tblVehicleEF	LDT2	3.5180e-003	3.2990e-003
tblVehicleEF	LDT2	8.2200e-004	6.9100e-004
tblVehicleEF	LDT2	0.06	0.10
tblVehicleEF	LDT2	0.13	0.14
tblVehicleEF	LDT2	0.05	0.08
tblVehicleEF	LDT2	0.02	0.03
tblVehicleEF	LDT2	0.07	0.45
tblVehicleEF	LDT2	0.12	0.36
tblVehicleEF	LDT2	7.1840e-003	4.9540e-003
tblVehicleEF	LDT2	6.8290e-003	0.06
tblVehicleEF	LDT2	0.97	1.20
tblVehicleEF	LDT2	1.38	2.28
tblVehicleEF	LDT2	383.36	357.71
tblVehicleEF	LDT2	79.39	69.39
tblVehicleEF	LDT2	0.08	0.08
tblVehicleEF	LDT2	1.7270e-003	1.6020e-003
tblVehicleEF	LDT2	2.4170e-003	1.9240e-003
tblVehicleEF	LDT2	1.5880e-003	1.4740e-003
tblVehicleEF	LDT2	2.2220e-003	1.7690e-003
tblVehicleEF	LDT2	0.13	0.18
tblVehicleEF	LDT2	0.15	0.16

tblVehicleEF	LDT2	0.11	0.15
tblVehicleEF	LDT2	0.02	0.02
tblVehicleEF	LDT2	0.07	0.45
tblVehicleEF	LDT2	0.09	0.29
tblVehicleEF	LDT2	3.8420e-003	3.5160e-003
tblVehicleEF	LDT2	8.1700e-004	6.8200e-004
tblVehicleEF	LDT2	0.13	0.18
tblVehicleEF	LDT2	0.15	0.16
tblVehicleEF	LDT2	0.11	0.15
tblVehicleEF	LDT2	0.03	0.03
tblVehicleEF	LDT2	0.07	0.45
tblVehicleEF	LDT2	0.10	0.31
tblVehicleEF	LDT2	6.1560e-003	4.3220e-003
tblVehicleEF	LDT2	8.1410e-003	0.07
tblVehicleEF	LDT2	0.75	0.96
tblVehicleEF	LDT2	1.64	2.72
tblVehicleEF	LDT2	343.55	331.47
tblVehicleEF	LDT2	79.39	70.27
tblVehicleEF	LDT2	0.08	0.08
tblVehicleEF	LDT2	1.7270e-003	1.6020e-003
tblVehicleEF	LDT2	2.4170e-003	1.9240e-003
tblVehicleEF	LDT2	1.5880e-003	1.4740e-003
tblVehicleEF	LDT2	2.2220e-003	1.7690e-003
tblVehicleEF	LDT2	0.06	0.09
tblVehicleEF	LDT2	0.14	0.16
tblVehicleEF	LDT2	0.05	0.08
tblVehicleEF	LDT2	0.02	0.02

tblVehicleEF	LDT2	0.08	0.52
tblVehicleEF	LDT2	0.11	0.33
tblVehicleEF	LDT2	3.4410e-003	3.2580e-003
tblVehicleEF	LDT2	8.2200e-004	6.9100e-004
tblVehicleEF	LDT2	0.06	0.09
tblVehicleEF	LDT2	0.14	0.16
tblVehicleEF	LDT2	0.05	0.08
tblVehicleEF	LDT2	0.02	0.03
tblVehicleEF	LDT2	0.08	0.52
tblVehicleEF	LDT2	0.12	0.37
tblVehicleEF	LHD1	5.2170e-003	5.0850e-003
tblVehicleEF	LHD1	0.01	6.1020e-003
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	0.14	0.18
tblVehicleEF	LHD1	1.07	0.75
tblVehicleEF	LHD1	2.60	1.03
tblVehicleEF	LHD1	9.23	9.25
tblVehicleEF	LHD1	809.20	652.45
tblVehicleEF	LHD1	30.40	11.21
tblVehicleEF	LHD1	0.09	0.07
tblVehicleEF	LHD1	2.12	1.25
tblVehicleEF	LHD1	9.6500e-004	8.9000e-004
tblVehicleEF	LHD1	0.01	9.8770e-003
tblVehicleEF	LHD1	0.01	9.8260e-003
tblVehicleEF	LHD1	9.5800e-004	2.6000e-004
tblVehicleEF	LHD1	9.2400e-004	8.5100e-004
tblVehicleEF	LHD1	2.5390e-003	2.4690e-003

tblVehicleEF	LHD1	0.01	9.3760e-003
tblVehicleEF	LHD1	8.8100e-004	2.3900e-004
tblVehicleEF	LHD1	3.7070e-003	3.0390e-003
tblVehicleEF	LHD1	0.11	0.08
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	1.8240e-003	1.5810e-003
tblVehicleEF	LHD1	0.08	0.06
tblVehicleEF	LHD1	0.35	0.55
tblVehicleEF	LHD1	0.27	0.08
tblVehicleEF	LHD1	9.2000e-005	9.0000e-005
tblVehicleEF	LHD1	5.9750e-003	6.3570e-003
tblVehicleEF	LHD1	3.5300e-004	1.1100e-004
tblVehicleEF	LHD1	3.7070e-003	3.0390e-003
tblVehicleEF	LHD1	0.11	0.08
tblVehicleEF	LHD1	0.02	0.03
tblVehicleEF	LHD1	1.8240e-003	1.5810e-003
tblVehicleEF	LHD1	0.10	0.08
tblVehicleEF	LHD1	0.35	0.55
tblVehicleEF	LHD1	0.29	0.09
tblVehicleEF	LHD1	5.2170e-003	5.0990e-003
tblVehicleEF	LHD1	0.01	6.2280e-003
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	0.14	0.18
tblVehicleEF	LHD1	1.09	0.76
tblVehicleEF	LHD1	2.43	0.98
tblVehicleEF	LHD1	9.23	9.25
tblVehicleEF	LHD1	609.20	652.47

tblVehicleEF	LHD1	30.40	11.12
tblVehicleEF	LHD1	0.09	0.07
tblVehicleEF	LHD1	1.98	1.17
tblVehicleEF	LHD1	9.6500e-004	8.9000e-004
tblVehicleEF	LHD1	0.01	9.8770e-003
tblVehicleEF	LHD1	0.01	9.8260e-003
tblVehicleEF	LHD1	9.5800e-004	2.6000e-004
tblVehicleEF	LHD1	9.2400e-004	8.5100e-004
tblVehicleEF	LHD1	2.5390e-003	2.4690e-003
tblVehicleEF	LHD1	0.01	9.3760e-003
tblVehicleEF	LHD1	8.6100e-004	2.3900e-004
tblVehicleEF	LHD1	7.3080e-003	5.4780e-003
tblVehicleEF	LHD1	0.13	0.10
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	4.1220e-003	3.0450e-003
tblVehicleEF	LHD1	0.09	0.06
tblVehicleEF	LHD1	0.36	0.56
tblVehicleEF	LHD1	0.25	0.08
tblVehicleEF	LHD1	9.2000e-005	9.0000e-005
tblVehicleEF	LHD1	5.9770e-003	6.3570e-003
tblVehicleEF	LHD1	3.5000e-004	1.1000e-004
tblVehicleEF	LHD1	7.3080e-003	5.4780e-003
tblVehicleEF	LHD1	0.13	0.10
tblVehicleEF	LHD1	0.02	0.03
tblVehicleEF	LHD1	4.1220e-003	3.0450e-003
tblVehicleEF	LHD1	0.11	0.08
tblVehicleEF	LHD1	0.36	0.56

tblVehicleEF	LHD1	0.28	0.08
tblVehicleEF	LHD1	5.2170e-003	5.0870e-003
tblVehicleEF	LHD1	0.01	6.1100e-003
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	0.14	0.18
tblVehicleEF	LHD1	1.07	0.75
tblVehicleEF	LHD1	2.55	1.02
tblVehicleEF	LHD1	9.23	9.25
tblVehicleEF	LHD1	609.20	652.45
tblVehicleEF	LHD1	30.40	11.20
tblVehicleEF	LHD1	0.09	0.07
tblVehicleEF	LHD1	2.08	1.23
tblVehicleEF	LHD1	9.6500e-004	8.9000e-004
tblVehicleEF	LHD1	0.01	9.8770e-003
tblVehicleEF	LHD1	0.01	9.8260e-003
tblVehicleEF	LHD1	9.5800e-004	2.6000e-004
tblVehicleEF	LHD1	9.2400e-004	8.5100e-004
tblVehicleEF	LHD1	2.5390e-003	2.4690e-003
tblVehicleEF	LHD1	0.01	9.3760e-003
tblVehicleEF	LHD1	8.8100e-004	2.3900e-004
tblVehicleEF	LHD1	4.0430e-003	3.1520e-003
tblVehicleEF	LHD1	0.13	0.10
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	1.7940e-003	1.6100e-003
tblVehicleEF	LHD1	0.08	0.06
tblVehicleEF	LHD1	0.38	0.60
tblVehicleEF	LHD1	0.26	0.09

tblVehicleEF	LHD1	9.2000e-005	9.0000e-005
tblVehicleEF	LHD1	5.9760e-003	6.3570e-003
tblVehicleEF	LHD1	3.5200e-004	1.1100e-004
tblVehicleEF	LHD1	4.0430e-003	3.1520e-003
tblVehicleEF	LHD1	0.13	0.10
tblVehicleEF	LHD1	0.02	0.03
tblVehicleEF	LHD1	1.7940e-003	1.6100e-003
tblVehicleEF	LHD1	0.10	0.08
tblVehicleEF	LHD1	0.38	0.60
tblVehicleEF	LHD1	0.29	0.09
tblVehicleEF	LHD2	3.5950e-003	3.6950e-003
tblVehicleEF	LHD2	4.6110e-003	4.1040e-003
tblVehicleEF	LHD2	8.1370e-003	0.01
tblVehicleEF	LHD2	0.12	0.15
tblVehicleEF	LHD2	0.50	0.50
tblVehicleEF	LHD2	1.20	0.67
tblVehicleEF	LHD2	14.27	14.14
tblVehicleEF	LHD2	608.52	665.25
tblVehicleEF	LHD2	24.46	8.76
tblVehicleEF	LHD2	0.11	0.10
tblVehicleEF	LHD2	1.49	1.36
tblVehicleEF	LHD2	1.2830e-003	1.3100e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	4.0000e-004	1.3700e-004
tblVehicleEF	LHD2	1.2280e-003	1.2540e-003
tblVehicleEF	LHD2	2.6860e-003	2.6560e-003

tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	3.6800e-004	1.2600e-004
tblVehicleEF	LHD2	1.3070e-003	1.7040e-003
tblVehicleEF	LHD2	0.04	0.05
tblVehicleEF	LHD2	0.01	0.02
tblVehicleEF	LHD2	7.0300e-004	9.2000e-004
tblVehicleEF	LHD2	0.06	0.06
tblVehicleEF	LHD2	0.09	0.32
tblVehicleEF	LHD2	0.11	0.05
tblVehicleEF	LHD2	1.3900e-004	1.3500e-004
tblVehicleEF	LHD2	5.9200e-003	6.4300e-003
tblVehicleEF	LHD2	2.6700e-004	8.7000e-005
tblVehicleEF	LHD2	1.3070e-003	1.7040e-003
tblVehicleEF	LHD2	0.04	0.05
tblVehicleEF	LHD2	0.02	0.02
tblVehicleEF	LHD2	7.0300e-004	9.2000e-004
tblVehicleEF	LHD2	0.07	0.07
tblVehicleEF	LHD2	0.09	0.32
tblVehicleEF	LHD2	0.12	0.06
tblVehicleEF	LHD2	3.5950e-003	3.7050e-003
tblVehicleEF	LHD2	4.6760e-003	4.1460e-003
tblVehicleEF	LHD2	7.7630e-003	0.01
tblVehicleEF	LHD2	0.12	0.15
tblVehicleEF	LHD2	0.50	0.50
tblVehicleEF	LHD2	1.13	0.64
tblVehicleEF	LHD2	14.27	14.14
tblVehicleEF	LHD2	608.52	665.25

tblVehicleEF	LHD2	24.46	8.70
tblVehicleEF	LHD2	0.11	0.10
tblVehicleEF	LHD2	1.40	1.28
tblVehicleEF	LHD2	1.2830e-003	1.3100e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	4.0000e-004	1.3700e-004
tblVehicleEF	LHD2	1.2280e-003	1.2540e-003
tblVehicleEF	LHD2	2.6860e-003	2.6560e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	3.6800e-004	1.2600e-004
tblVehicleEF	LHD2	2.5220e-003	3.0730e-003
tblVehicleEF	LHD2	0.04	0.06
tblVehicleEF	LHD2	0.01	0.02
tblVehicleEF	LHD2	1.5220e-003	1.7630e-003
tblVehicleEF	LHD2	0.06	0.06
tblVehicleEF	LHD2	0.09	0.32
tblVehicleEF	LHD2	0.10	0.05
tblVehicleEF	LHD2	1.3900e-004	1.3500e-004
tblVehicleEF	LHD2	5.9200e-003	6.4300e-003
tblVehicleEF	LHD2	2.6500e-004	8.6000e-005
tblVehicleEF	LHD2	2.5220e-003	3.0730e-003
tblVehicleEF	LHD2	0.04	0.06
tblVehicleEF	LHD2	0.02	0.02
tblVehicleEF	LHD2	1.5220e-003	1.7630e-003
tblVehicleEF	LHD2	0.07	0.07
tblVehicleEF	LHD2	0.09	0.32

tblVehicleEF	LHD2	0.11	0.05
tblVehicleEF	LHD2	3.5950e-003	3.6960e-003
tblVehicleEF	LHD2	4.6180e-003	4.1080e-003
tblVehicleEF	LHD2	8.0640e-003	0.01
tblVehicleEF	LHD2	0.12	0.15
tblVehicleEF	LHD2	0.50	0.50
tblVehicleEF	LHD2	1.19	0.67
tblVehicleEF	LHD2	14.27	14.14
tblVehicleEF	LHD2	608.52	665.25
tblVehicleEF	LHD2	24.46	8.75
tblVehicleEF	LHD2	0.11	0.10
tblVehicleEF	LHD2	1.46	1.33
tblVehicleEF	LHD2	1.2830e-003	1.3100e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	4.0000e-004	1.3700e-004
tblVehicleEF	LHD2	1.2280e-003	1.2540e-003
tblVehicleEF	LHD2	2.6360e-003	2.6580e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	3.6800e-004	1.2600e-004
tblVehicleEF	LHD2	1.3460e-003	1.7140e-003
tblVehicleEF	LHD2	0.04	0.06
tblVehicleEF	LHD2	0.01	0.02
tblVehicleEF	LHD2	6.8700e-004	9.2200e-004
tblVehicleEF	LHD2	0.05	0.06
tblVehicleEF	LHD2	0.10	0.34
tblVehicleEF	LHD2	0.11	0.05

tblVehicleEF	LHD2	1.3900e-004	1.3500e-004
tblVehicleEF	LHD2	5.9200e-003	6.4300e-003
tblVehicleEF	LHD2	2.6600e-004	8.7000e-005
tblVehicleEF	LHD2	1.3460e-003	1.7140e-003
tblVehicleEF	LHD2	0.04	0.06
tblVehicleEF	LHD2	0.02	0.02
tblVehicleEF	LHD2	6.8700e-004	9.2200e-004
tblVehicleEF	LHD2	0.07	0.07
tblVehicleEF	LHD2	0.10	0.34
tblVehicleEF	LHD2	0.12	0.06
tblVehicleEF	MCY	0.43	0.34
tblVehicleEF	MCY	0.16	0.24
tblVehicleEF	MCY	20.55	19.26
tblVehicleEF	MCY	9.93	8.60
tblVehicleEF	MCY	167.73	212.03
tblVehicleEF	MCY	46.45	60.73
tblVehicleEF	MCY	1.16	1.13
tblVehicleEF	MCY	1.8610e-003	1.9650e-003
tblVehicleEF	MCY	3.6730e-003	2.9600e-003
tblVehicleEF	MCY	1.7420e-003	1.8380e-003
tblVehicleEF	MCY	3.4650e-003	2.7870e-003
tblVehicleEF	MCY	1.45	1.42
tblVehicleEF	MCY	0.84	0.80
tblVehicleEF	MCY	0.80	0.78
tblVehicleEF	MCY	2.23	2.33
tblVehicleEF	MCY	0.49	1.91
tblVehicleEF	MCY	2.16	1.84

tblVehicleEF	MCY	2.0770e-003	2.0980e-003
tblVehicleEF	MCY	6.9000e-004	6.0100e-004
tblVehicleEF	MCY	1.45	1.42
tblVehicleEF	MCY	0.84	0.80
tblVehicleEF	MCY	0.80	0.78
tblVehicleEF	MCY	2.74	2.67
tblVehicleEF	MCY	0.49	1.91
tblVehicleEF	MCY	2.35	2.01
tblVehicleEF	MCY	0.42	0.34
tblVehicleEF	MCY	0.14	0.21
tblVehicleEF	MCY	20.68	19.28
tblVehicleEF	MCY	9.05	7.90
tblVehicleEF	MCY	167.73	211.90
tblVehicleEF	MCY	46.45	58.88
tblVehicleEF	MCY	0.99	0.97
tblVehicleEF	MCY	1.8610e-003	1.9650e-003
tblVehicleEF	MCY	3.6730e-003	2.9600e-003
tblVehicleEF	MCY	1.7420e-003	1.8380e-003
tblVehicleEF	MCY	3.4650e-003	2.7870e-003
tblVehicleEF	MCY	3.14	2.77
tblVehicleEF	MCY	1.27	1.11
tblVehicleEF	MCY	2.13	1.77
tblVehicleEF	MCY	2.17	2.28
tblVehicleEF	MCY	0.49	1.88
tblVehicleEF	MCY	1.86	1.62
tblVehicleEF	MCY	2.0770e-003	2.0970e-003
tblVehicleEF	MCY	6.6700e-004	5.8300e-004

tblVehicleEF	MCY	3.14	2.77
tblVehicleEF	MCY	1.27	1.11
tblVehicleEF	MCY	2.13	1.77
tblVehicleEF	MCY	2.67	2.81
tblVehicleEF	MCY	0.49	1.88
tblVehicleEF	MCY	2.02	1.76
tblVehicleEF	MCY	0.42	0.34
tblVehicleEF	MCY	0.15	0.24
tblVehicleEF	MCY	19.63	18.76
tblVehicleEF	MCY	9.55	8.44
tblVehicleEF	MCY	167.73	211.17
tblVehicleEF	MCY	45.45	60.38
tblVehicleEF	MCY	1.12	1.09
tblVehicleEF	MCY	1.8610e-003	1.9650e-003
tblVehicleEF	MCY	3.6730e-003	2.9600e-003
tblVehicleEF	MCY	1.7420e-003	1.8380e-003
tblVehicleEF	MCY	3.4650e-003	2.7870e-003
tblVehicleEF	MCY	1.71	1.57
tblVehicleEF	MCY	1.13	1.06
tblVehicleEF	MCY	0.72	0.74
tblVehicleEF	MCY	2.19	2.31
tblVehicleEF	MCY	0.56	2.18
tblVehicleEF	MCY	2.08	1.81
tblVehicleEF	MCY	2.0610e-003	2.0900e-003
tblVehicleEF	MCY	6.8200e-004	5.9600e-004
tblVehicleEF	MCY	1.71	1.57
tblVehicleEF	MCY	1.13	1.06

tblVehicleEF	MCY	0.72	0.74
tblVehicleEF	MCY	2.69	2.84
tblVehicleEF	MCY	0.56	2.18
tblVehicleEF	MCY	2.27	1.98
tblVehicleEF	MDV	0.01	5.5200e-003
tblVehicleEF	MDV	0.02	0.09
tblVehicleEF	MDV	1.35	1.14
tblVehicleEF	MDV	3.25	3.25
tblVehicleEF	MDV	483.94	415.10
tblVehicleEF	MDV	107.92	87.32
tblVehicleEF	MDV	0.17	0.11
tblVehicleEF	MDV	1.8290e-003	1.6850e-003
tblVehicleEF	MDV	2.5170e-003	2.0310e-003
tblVehicleEF	MDV	1.6830e-003	1.5540e-003
tblVehicleEF	MDV	2.3150e-003	1.8680e-003
tblVehicleEF	MDV	0.10	0.11
tblVehicleEF	MDV	0.20	0.17
tblVehicleEF	MDV	0.08	0.10
tblVehicleEF	MDV	0.03	0.02
tblVehicleEF	MDV	0.11	0.50
tblVehicleEF	MDV	0.25	0.44
tblVehicleEF	MDV	4.8500e-003	4.0780e-003
tblVehicleEF	MDV	1.1370e-003	8.5900e-004
tblVehicleEF	MDV	0.10	0.11
tblVehicleEF	MDV	0.20	0.17
tblVehicleEF	MDV	0.08	0.10
tblVehicleEF	MDV	0.05	0.03

tblVehicleEF	MDV	0.11	0.50
tblVehicleEF	MDV	0.28	0.48
tblVehicleEF	MDV	0.01	6.2110e-003
tblVehicleEF	MDV	0.02	0.08
tblVehicleEF	MDV	1.64	1.35
tblVehicleEF	MDV	2.69	2.72
tblVehicleEF	MDV	526.85	438.45
tblVehicleEF	MDV	107.92	86.27
tblVehicleEF	MDV	0.16	0.10
tblVehicleEF	MDV	1.8260e-003	1.6850e-003
tblVehicleEF	MDV	2.5170e-003	2.0310e-003
tblVehicleEF	MDV	1.6830e-003	1.5540e-003
tblVehicleEF	MDV	2.3150e-003	1.8680e-003
tblVehicleEF	MDV	0.20	0.21
tblVehicleEF	MDV	0.23	0.19
tblVehicleEF	MDV	0.17	0.19
tblVehicleEF	MDV	0.04	0.03
tblVehicleEF	MDV	0.11	0.49
tblVehicleEF	MDV	0.21	0.38
tblVehicleEF	MDV	5.2830e-003	4.3080e-003
tblVehicleEF	MDV	1.1260e-003	8.4800e-004
tblVehicleEF	MDV	0.20	0.21
tblVehicleEF	MDV	0.23	0.19
tblVehicleEF	MDV	0.17	0.19
tblVehicleEF	MDV	0.05	0.04
tblVehicleEF	MDV	0.11	0.49
tblVehicleEF	MDV	0.23	0.41

tblVehicleEF	MDV	0.01	5.4050e-003
tblVehicleEF	MDV	0.02	0.09
tblVehicleEF	MDV	1.28	1.09
tblVehicleEF	MDV	3.20	3.26
tblVehicleEF	MDV	473.93	410.75
tblVehicleEF	MDV	107.92	87.35
tblVehicleEF	MDV	0.16	0.10
tblVehicleEF	MDV	1.8260e-003	1.6850e-003
tblVehicleEF	MDV	2.5170e-003	2.0310e-003
tblVehicleEF	MDV	1.6830e-003	1.5540e-003
tblVehicleEF	MDV	2.3150e-003	1.8680e-003
tblVehicleEF	MDV	0.10	0.11
tblVehicleEF	MDV	0.22	0.18
tblVehicleEF	MDV	0.08	0.10
tblVehicleEF	MDV	0.03	0.02
tblVehicleEF	MDV	0.13	0.57
tblVehicleEF	MDV	0.25	0.44
tblVehicleEF	MDV	4.7490e-003	4.0360e-003
tblVehicleEF	MDV	1.1360e-003	8.5900e-004
tblVehicleEF	MDV	0.10	0.11
tblVehicleEF	MDV	0.22	0.18
tblVehicleEF	MDV	0.08	0.10
tblVehicleEF	MDV	0.04	0.03
tblVehicleEF	MDV	0.13	0.57
tblVehicleEF	MDV	0.27	0.48
tblVehicleEF	MH	0.04	3.6550e-003
tblVehicleEF	MH	0.03	0.00

tblVehicleEF	MH	3.07	0.35
tblVehicleEF	MH	6.43	0.00
tblVehicleEF	MH	1,045.05	970.21
tblVehicleEF	MH	59.49	0.00
tblVehicleEF	MH	1.54	4.24
tblVehicleEF	MH	0.01	0.02
tblVehicleEF	MH	0.04	0.11
tblVehicleEF	MH	1.1740e-003	0.00
tblVehicleEF	MH	3.2230e-003	4.0000e-003
tblVehicleEF	MH	0.04	0.11
tblVehicleEF	MH	1.0790e-003	0.00
tblVehicleEF	MH	1.47	0.00
tblVehicleEF	MH	0.09	0.00
tblVehicleEF	MH	0.51	0.00
tblVehicleEF	MH	0.10	0.09
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	0.37	0.00
tblVehicleEF	MH	0.01	9.1720e-003
tblVehicleEF	MH	7.0700e-004	0.00
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tblVehicleEF	MH	0.09	0.00
tblVehicleEF	MH	0.51	0.00
tblVehicleEF	MH	0.14	0.09
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	0.40	0.00
tblVehicleEF	MH	0.04	3.6550e-003
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tblVehicleEF	MH	3.19	0.35
tblVehicleEF	MH	5.84	0.00
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tblVehicleEF	MH	59.49	0.00
tblVehicleEF	MH	1.41	4.00
tblVehicleEF	MH	0.01	0.02
tblVehicleEF	MH	0.04	0.11
tblVehicleEF	MH	1.1740e-003	0.00
tblVehicleEF	MH	3.2230e-003	4.0000e-003
tblVehicleEF	MH	0.04	0.11
tblVehicleEF	MH	1.0790e-003	0.00
tblVehicleEF	MH	2.91	0.00
tblVehicleEF	MH	0.11	0.00
tblVehicleEF	MH	1.21	0.00
tblVehicleEF	MH	0.11	0.09
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	0.34	0.00
tblVehicleEF	MH	0.01	9.1720e-003
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tblVehicleEF	MH	0.15	0.09
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	0.38	0.00
tblVehicleEF	MH	0.04	3.6550e-003
tblVehicleEF	MH	0.03	0.00

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tblVehicleEF	MH	3.2230e-003	4.0000e-003
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tblVehicleEF	MH	0.53	0.00
tblVehicleEF	MH	0.10	0.08
tblVehicleEF	MH	0.03	0.00
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tblVehicleEF	MHD	0.05	6.4670e-003
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tblVehicleEF	MHD	0.60	0.52
tblVehicleEF	MHD	0.99	1.61
tblVehicleEF	MHD	3.8600e-004	1.2310e-003
tblVehicleEF	MHD	5.0030e-003	0.04
tblVehicleEF	MHD	7.6400e-004	7.5000e-005
tblVehicleEF	MHD	3.6900e-004	1.1780e-003
tblVehicleEF	MHD	4.7830e-003	0.03
tblVehicleEF	MHD	7.0300e-004	6.9000e-005
tblVehicleEF	MHD	1.2800e-003	4.5300e-004
tblVehicleEF	MHD	0.04	0.01
tblVehicleEF	MHD	0.02	0.02
tblVehicleEF	MHD	6.5100e-004	2.4000e-004
tblVehicleEF	MHD	0.04	0.06
tblVehicleEF	MHD	0.02	0.08
tblVehicleEF	MHD	0.32	0.03
tblVehicleEF	MHD	1.5080e-003	6.5300e-004
tblVehicleEF	MHD	0.01	9.2620e-003
tblVehicleEF	MHD	6.1700e-004	6.3000e-005
tblVehicleEF	MHD	1.2800e-003	4.5300e-004
tblVehicleEF	MHD	0.04	0.01

tblVehicleEF	MHD	0.03	0.02
tblVehicleEF	MHD	6.5100e-004	2.4000e-004
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tblVehicleEF	MHD	0.02	0.06
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tblVehicleEF	MHD	0.05	6.2100e-003
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tblVehicleEF	MHD	1,101.52	974.58
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tblVehicleEF	MHD	0.92	1.52
tblVehicleEF	MHD	3.2500e-004	1.0410e-003
tblVehicleEF	MHD	5.0030e-003	0.04
tblVehicleEF	MHD	7.6400e-004	7.5000e-005
tblVehicleEF	MHD	3.1100e-004	9.9600e-004
tblVehicleEF	MHD	4.7830e-003	0.03
tblVehicleEF	MHD	7.0300e-004	6.9000e-005
tblVehicleEF	MHD	2.5300e-003	8.2800e-004
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tblVehicleEF	MHD	0.02	0.02
tblVehicleEF	MHD	1.5010e-003	4.7800e-004
tblVehicleEF	MHD	0.04	0.06

tblVehicleEF	MHD	0.02	0.08
tblVehicleEF	MHD	0.30	0.03
tblVehicleEF	MHD	1.5950e-003	6.5900e-004
tblVehicleEF	MHD	0.01	9.2620e-003
tblVehicleEF	MHD	6.1100e-004	6.2000e-005
tblVehicleEF	MHD	2.5300e-003	8.2800e-004
tblVehicleEF	MHD	0.05	0.02
tblVehicleEF	MHD	0.03	0.02
tblVehicleEF	MHD	1.5010e-003	4.7800e-004
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tblVehicleEF	MHD	0.02	0.08
tblVehicleEF	MHD	0.33	0.04
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tblVehicleEF	MHD	0.97	1.59
tblVehicleEF	MHD	4.7000e-004	1.4940e-003
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tblVehicleEF	MHD	7.6400e-004	7.5000e-005
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tblVehicleEF	MHD	1.3890e-003	4.7100e-004
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tblVehicleEF	MHD	0.03	0.02
tblVehicleEF	MHD	6.4000e-004	2.4400e-004
tblVehicleEF	MHD	0.04	0.05
tblVehicleEF	MHD	0.02	0.09
tblVehicleEF	MHD	0.32	0.03
tblVehicleEF	MHD	1.3860e-003	6.4400e-004
tblVehicleEF	MHD	0.01	9.2620e-003
tblVehicleEF	MHD	6.1600e-004	6.3000e-005
tblVehicleEF	MHD	1.3890e-003	4.7100e-004
tblVehicleEF	MHD	0.05	0.02
tblVehicleEF	MHD	0.04	0.02
tblVehicleEF	MHD	6.4000e-004	2.4400e-004
tblVehicleEF	MHD	0.04	0.07
tblVehicleEF	MHD	0.02	0.09
tblVehicleEF	MHD	0.35	0.04
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tblVehicleEF	OBUS	0.03	0.02
tblVehicleEF	OBUS	0.26	0.52
tblVehicleEF	OBUS	0.63	0.77
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tblVehicleEF	OBUS	70.35	76.06
tblVehicleEF	OBUS	1,121.50	1,406.90

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tblVehicleEF	OBUS	0.97	1.24
tblVehicleEF	OBUS	6.4000e-005	5.8900e-004
tblVehicleEF	OBUS	4.6440e-003	0.01
tblVehicleEF	OBUS	9.2900e-004	2.1800e-004
tblVehicleEF	OBUS	5.1000e-005	5.6400e-004
tblVehicleEF	OBUS	4.4220e-003	0.01
tblVehicleEF	OBUS	8.5400e-004	2.0100e-004
tblVehicleEF	OBUS	2.1800e-003	2.6020e-003
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.04	0.05
tblVehicleEF	OBUS	9.3100e-004	1.1160e-003
tblVehicleEF	OBUS	0.04	0.05
tblVehicleEF	OBUS	0.05	0.29
tblVehicleEF	OBUS	0.38	0.12
tblVehicleEF	OBUS	6.8400e-004	7.2500e-004
tblVehicleEF	OBUS	0.01	0.01
tblVehicleEF	OBUS	8.1700e-004	2.0300e-004
tblVehicleEF	OBUS	2.1800e-003	2.6020e-003
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.05	0.07
tblVehicleEF	OBUS	9.3100e-004	1.1160e-003
tblVehicleEF	OBUS	0.06	0.07
tblVehicleEF	OBUS	0.05	0.29
tblVehicleEF	OBUS	0.42	0.13
tblVehicleEF	OBUS	0.01	8.6750e-003

tblVehicleEF	OBUS	0.01	6.7350e-003
tblVehicleEF	OBUS	0.03	0.02
tblVehicleEF	OBUS	0.26	0.51
tblVehicleEF	OBUS	0.65	0.79
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tblVehicleEF	OBUS	4.6440e-003	0.01
tblVehicleEF	OBUS	9.2900e-004	2.1800e-004
tblVehicleEF	OBUS	5.1000e-005	4.7900e-004
tblVehicleEF	OBUS	4.4220e-003	0.01
tblVehicleEF	OBUS	8.5400e-004	2.0100e-004
tblVehicleEF	OBUS	4.2350e-003	4.6860e-003
tblVehicleEF	OBUS	0.02	0.03
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tblVehicleEF	OBUS	2.1330e-003	2.2090e-003
tblVehicleEF	OBUS	0.05	0.05
tblVehicleEF	OBUS	0.05	0.29
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tblVehicleEF	OBUS	7.1400e-004	7.2400e-004
tblVehicleEF	OBUS	0.01	0.01
tblVehicleEF	OBUS	8.0800e-004	2.0000e-004
tblVehicleEF	OBUS	4.2350e-003	4.6860e-003

tblVehicleEF	OBUS	0.02	0.03
tblVehicleEF	OBUS	0.05	0.07
tblVehicleEF	OBUS	2.1330e-003	2.2090e-003
tblVehicleEF	OBUS	0.06	0.07
tblVehicleEF	OBUS	0.05	0.29
tblVehicleEF	OBUS	0.40	0.12
tblVehicleEF	OBUS	0.01	8.7750e-003
tblVehicleEF	OBUS	9.9380e-003	6.6000e-003
tblVehicleEF	OBUS	0.03	0.02
tblVehicleEF	OBUS	0.28	0.53
tblVehicleEF	OBUS	0.63	0.77
tblVehicleEF	OBUS	6.22	2.45
tblVehicleEF	OBUS	66.00	76.30
tblVehicleEF	OBUS	1,121.50	1,405.90
tblVehicleEF	OBUS	70.70	20.50
tblVehicleEF	OBUS	0.27	0.35
tblVehicleEF	OBUS	0.96	1.22
tblVehicleEF	OBUS	7.7000e-005	7.1200e-004
tblVehicleEF	OBUS	4.6440e-003	0.01
tblVehicleEF	OBUS	9.2900e-004	2.1800e-004
tblVehicleEF	OBUS	7.4000e-005	6.8100e-004
tblVehicleEF	OBUS	4.4220e-003	0.01
tblVehicleEF	OBUS	8.5400e-004	2.0100e-004
tblVehicleEF	OBUS	2.3200e-003	2.7390e-003
tblVehicleEF	OBUS	0.02	0.03
tblVehicleEF	OBUS	0.04	0.05
tblVehicleEF	OBUS	9.4100e-004	1.1660e-003

tblVehicleEF	OBUS	0.04	0.05
tblVehicleEF	OBUS	0.05	0.30
tblVehicleEF	OBUS	0.38	0.12
tblVehicleEF	OBUS	6.4200e-004	7.2800e-004
tblVehicleEF	OBUS	0.01	0.01
tblVehicleEF	OBUS	8.1600e-004	2.0300e-004
tblVehicleEF	OBUS	2.3200e-003	2.7390e-003
tblVehicleEF	OBUS	0.02	0.03
tblVehicleEF	OBUS	0.05	0.07
tblVehicleEF	OBUS	9.4100e-004	1.1660e-003
tblVehicleEF	OBUS	0.06	0.07
tblVehicleEF	OBUS	0.05	0.30
tblVehicleEF	OBUS	0.42	0.13
tblVehicleEF	SBUS	0.84	0.06
tblVehicleEF	SBUS	0.01	8.5840e-003
tblVehicleEF	SBUS	0.07	6.1570e-003
tblVehicleEF	SBUS	5.71	2.50
tblVehicleEF	SBUS	0.65	0.78
tblVehicleEF	SBUS	5.33	0.82
tblVehicleEF	SBUS	1,258.13	345.06
tblVehicleEF	SBUS	1,136.31	1,112.17
tblVehicleEF	SBUS	37.11	4.79
tblVehicleEF	SBUS	11.70	3.29
tblVehicleEF	SBUS	4.77	5.20
tblVehicleEF	SBUS	0.01	4.3580e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	0.03	0.03

tblVehicleEF	SBUS	5.1700e-004	4.0000e-005
tblVehicleEF	SBUS	0.01	4.1690e-003
tblVehicleEF	SBUS	2.7560e-003	2.7010e-003
tblVehicleEF	SBUS	0.03	0.03
tblVehicleEF	SBUS	4.7500e-004	3.6000e-005
tblVehicleEF	SBUS	2.9260e-003	1.2420e-003
tblVehicleEF	SBUS	0.02	9.5120e-003
tblVehicleEF	SBUS	0.68	0.28
tblVehicleEF	SBUS	1.3050e-003	5.9000e-004
tblVehicleEF	SBUS	0.11	0.11
tblVehicleEF	SBUS	9.3510e-003	0.06
tblVehicleEF	SBUS	0.27	0.04
tblVehicleEF	SBUS	0.01	3.2890e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	4.6300e-004	4.7000e-005
tblVehicleEF	SBUS	2.9260e-003	1.2420e-003
tblVehicleEF	SBUS	0.02	9.5120e-003
tblVehicleEF	SBUS	0.97	0.40
tblVehicleEF	SBUS	1.3050e-003	5.9000e-004
tblVehicleEF	SBUS	0.13	0.13
tblVehicleEF	SBUS	9.3510e-003	0.06
tblVehicleEF	SBUS	0.30	0.04
tblVehicleEF	SBUS	0.84	0.06
tblVehicleEF	SBUS	0.01	8.7140e-003
tblVehicleEF	SBUS	0.06	5.1550e-003
tblVehicleEF	SBUS	5.56	2.47
tblVehicleEF	SBUS	0.66	0.80

tblVehicleEF	SBUS	3.65	0.60
tblVehicleEF	SBUS	1,322.00	352.98
tblVehicleEF	SBUS	1,136.31	1,112.20
tblVehicleEF	SBUS	37.11	4.41
tblVehicleEF	SBUS	12.08	3.36
tblVehicleEF	SBUS	4.47	4.88
tblVehicleEF	SBUS	0.01	3.6810e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	0.03	0.03
tblVehicleEF	SBUS	5.1700e-004	4.0000e-005
tblVehicleEF	SBUS	9.6490e-003	3.5220e-003
tblVehicleEF	SBUS	2.7560e-003	2.7010e-003
tblVehicleEF	SBUS	0.03	0.03
tblVehicleEF	SBUS	4.7500e-004	3.6000e-005
tblVehicleEF	SBUS	5.6170e-003	2.2080e-003
tblVehicleEF	SBUS	0.02	9.9850e-003
tblVehicleEF	SBUS	0.67	0.28
tblVehicleEF	SBUS	2.8800e-003	1.1130e-003
tblVehicleEF	SBUS	0.11	0.11
tblVehicleEF	SBUS	8.5310e-003	0.06
tblVehicleEF	SBUS	0.22	0.03
tblVehicleEF	SBUS	0.01	3.3640e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	4.3500e-004	4.4000e-005
tblVehicleEF	SBUS	5.6170e-003	2.2080e-003
tblVehicleEF	SBUS	0.02	9.9850e-003
tblVehicleEF	SBUS	0.97	0.40

tblVehicleEF	SBUS	2.8800e-003	1.1130e-003
tblVehicleEF	SBUS	0.13	0.13
tblVehicleEF	SBUS	8.5310e-003	0.06
tblVehicleEF	SBUS	0.24	0.03
tblVehicleEF	SBUS	0.84	0.06
tblVehicleEF	SBUS	0.01	8.5770e-003
tblVehicleEF	SBUS	0.07	6.3440e-003
tblVehicleEF	SBUS	5.91	2.56
tblVehicleEF	SBUS	0.65	0.78
tblVehicleEF	SBUS	5.37	0.86
tblVehicleEF	SBUS	1,169.92	334.13
tblVehicleEF	SBUS	1,136.31	1,112.17
tblVehicleEF	SBUS	37.11	4.85
tblVehicleEF	SBUS	11.19	3.19
tblVehicleEF	SBUS	4.69	5.12
tblVehicleEF	SBUS	0.01	5.2920e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	0.03	0.03
tblVehicleEF	SBUS	5.1700e-004	4.0000e-005
tblVehicleEF	SBUS	0.01	5.0630e-003
tblVehicleEF	SBUS	2.7560e-003	2.7010e-003
tblVehicleEF	SBUS	0.03	0.03
tblVehicleEF	SBUS	4.7500e-004	3.6000e-005
tblVehicleEF	SBUS	2.9580e-003	1.2070e-003
tblVehicleEF	SBUS	0.02	0.01
tblVehicleEF	SBUS	0.68	0.28
tblVehicleEF	SBUS	1.2820e-003	6.0100e-004

tblVehicleEF	SBUS	0.11	0.11
tblVehicleEF	SBUS	0.01	0.08
tblVehicleEF	SBUS	0.28	0.04
tblVehicleEF	SBUS	0.01	3.1850e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	4.6400e-004	4.8000e-005
tblVehicleEF	SBUS	2.9580e-003	1.2070e-003
tblVehicleEF	SBUS	0.02	0.01
tblVehicleEF	SBUS	0.98	0.40
tblVehicleEF	SBUS	1.2820e-003	6.0100e-004
tblVehicleEF	SBUS	0.13	0.13
tblVehicleEF	SBUS	0.01	0.08
tblVehicleEF	SBUS	0.31	0.04
tblVehicleEF	UBUS	1.83	4.45
tblVehicleEF	UBUS	0.08	0.01
tblVehicleEF	UBUS	9.26	34.75
tblVehicleEF	UBUS	14.34	0.89
tblVehicleEF	UBUS	1,846.39	1,592.13
tblVehicleEF	UBUS	136.37	11.77
tblVehicleEF	UBUS	5.87	0.38
tblVehicleEF	UBUS	0.52	0.07
tblVehicleEF	UBUS	0.01	0.03
tblVehicleEF	UBUS	0.07	2.6550e-003
tblVehicleEF	UBUS	1.4030e-003	1.4100e-004
tblVehicleEF	UBUS	0.22	0.03
tblVehicleEF	UBUS	3.0000e-003	6.6220e-003
tblVehicleEF	UBUS	0.06	2.5280e-003

tblVehicleEF	UBUS	1.2900e-003	1.3000e-004
tblVehicleEF	UBUS	8.0860e-003	1.6780e-003
tblVehicleEF	UBUS	0.11	9.5390e-003
tblVehicleEF	UBUS	3.9450e-003	7.3700e-004
tblVehicleEF	UBUS	0.61	0.07
tblVehicleEF	UBUS	0.02	0.04
tblVehicleEF	UBUS	1.15	0.04
tblVehicleEF	UBUS	0.01	3.0250e-003
tblVehicleEF	UBUS	1.6240e-003	1.1700e-004
tblVehicleEF	UBUS	8.0860e-003	1.6780e-003
tblVehicleEF	UBUS	0.11	9.5390e-003
tblVehicleEF	UBUS	3.9450e-003	7.3700e-004
tblVehicleEF	UBUS	2.50	4.54
tblVehicleEF	UBUS	0.02	0.04
tblVehicleEF	UBUS	1.25	0.04
tblVehicleEF	UBUS	1.83	4.45
tblVehicleEF	UBUS	0.08	9.2350e-003
tblVehicleEF	UBUS	9.36	34.75
tblVehicleEF	UBUS	11.74	0.76
tblVehicleEF	UBUS	1,846.39	1,692.13
tblVehicleEF	UBUS	136.37	11.55
tblVehicleEF	UBUS	5.45	0.38
tblVehicleEF	UBUS	0.52	0.07
tblVehicleEF	UBUS	0.01	0.03
tblVehicleEF	UBUS	0.07	2.6550e-003
tblVehicleEF	UBUS	1.4030e-003	1.4100e-004
tblVehicleEF	UBUS	0.22	0.03

tblVehicleEF	UBUS	3.0000e-003	6.6220e-003
tblVehicleEF	UBUS	0.06	2.5280e-003
tblVehicleEF	UBUS	1.2900e-003	1.3000e-004
tblVehicleEF	UBUS	0.02	3.0610e-003
tblVehicleEF	UBUS	0.14	0.01
tblVehicleEF	UBUS	9.3320e-003	1.4840e-003
tblVehicleEF	UBUS	0.62	0.07
tblVehicleEF	UBUS	0.02	0.04
tblVehicleEF	UBUS	1.02	0.03
tblVehicleEF	UBUS	0.01	3.0250e-003
tblVehicleEF	UBUS	1.5790e-003	1.1400e-004
tblVehicleEF	UBUS	0.02	3.0610e-003
tblVehicleEF	UBUS	0.14	0.01
tblVehicleEF	UBUS	9.3320e-003	1.4840e-003
tblVehicleEF	UBUS	2.52	4.54
tblVehicleEF	UBUS	0.02	0.04
tblVehicleEF	UBUS	1.12	0.04
tblVehicleEF	UBUS	1.83	4.45
tblVehicleEF	UBUS	0.08	0.01
tblVehicleEF	UBUS	9.27	34.75
tblVehicleEF	UBUS	13.86	0.90
tblVehicleEF	UBUS	1,846.39	1,692.13
tblVehicleEF	UBUS	136.37	11.80
tblVehicleEF	UBUS	5.76	0.38
tblVehicleEF	UBUS	0.52	0.07
tblVehicleEF	UBUS	0.01	0.03
tblVehicleEF	UBUS	0.07	2.6550e-003

tblVehicleEF	UBUS	1.4030e-003	1.4100e-004
tblVehicleEF	UBUS	0.22	0.03
tblVehicleEF	UBUS	3.0000e-003	6.6220e-003
tblVehicleEF	UBUS	0.06	2.5280e-003
tblVehicleEF	UBUS	1.2900e-003	1.3000e-004
tblVehicleEF	UBUS	9.2250e-003	1.6870e-003
tblVehicleEF	UBUS	0.14	0.01
tblVehicleEF	UBUS	4.1190e-003	7.4500e-004
tblVehicleEF	UBUS	0.61	0.07
tblVehicleEF	UBUS	0.03	0.05
tblVehicleEF	UBUS	1.13	0.04
tblVehicleEF	UBUS	0.01	3.0250e-003
tblVehicleEF	UBUS	1.6160e-003	1.1700e-004
tblVehicleEF	UBUS	9.2250e-003	1.6870e-003
tblVehicleEF	UBUS	0.14	0.01
tblVehicleEF	UBUS	4.1190e-003	7.4500e-004
tblVehicleEF	UBUS	2.50	4.54
tblVehicleEF	UBUS	0.03	0.05
tblVehicleEF	UBUS	1.24	0.04
tblVehicleTrips	CC_TL	8.40	0.00
tblVehicleTrips	CC_TL	8.40	0.00
tblVehicleTrips	CC_TL	8.40	0.00
tblVehicleTrips	CNW_TL	6.90	0.00
tblVehicleTrips	CNW_TL	6.90	0.00
tblVehicleTrips	CNW_TL	6.90	0.00
tblVehicleTrips	CNW_TTP	41.00	0.00
tblVehicleTrips	CW_TL	16.60	0.00

tblVehicleTrips	CW_TL	16.60	0.00
tblVehicleTrips	CW_TL	16.60	0.00
tblVehicleTrips	CW_TTP	59.00	0.00
tblVehicleTrips	DV_TP	5.00	0.00
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PR_TP	92.00	0.00
tblVehicleTrips	ST_TR	1.68	0.00
tblVehicleTrips	SU_TR	1.68	0.00
tblVehicleTrips	WD_TR	1.68	0.00
tblWater	IndoorWaterUseRate	527,159,250.00	0.00

2.0 Emissions Summary

Bloomington Business Park Specific Plan (Construction - Mitigated) - San Bernardino-South Coast County, Summer

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	9.6418	116.0749	49.2430	0.1655	52.6485	3.5252	57.1737	19.2161	4.1641	23.3802	0.0000	16,752.02 48	16,752.02 48	3.3474	0.0000	16,818.15 44
2022	56.3460	170.6425	196.3426	0.5960	52.6485	4.1846	56.8459	19.2161	3.9035	23.0185	0.0000	59,593.68 63	59,593.68 63	6.0174	0.0000	59,728.48 12
Maximum	**56.3460**	**170.6425**	**196.3426**	**0.5960**	**52.6485**	**4.5252**	**57.1737**	**19.2161**	**4.1641**	**23.3802**	**0.0000**	**59,593.68 63**	**59,593.68 63**	**6.0174**	**0.0000**	**59,728.48 12**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	2.1609	54.2261	55.9693	0.1655	52.6485	0.1875	52.8360	19.2161	0.1862	19.4023	0.0000	16,752.02 48	16,752.02 48	3.3474	0.0000	16,818.15 44
2022	50.3127	117.0459	215.7848	0.5960	52.6485	0.5897	52.8918	19.2161	0.5697	19.3983	0.0000	59,593.68 63	59,593.68 63	6.0174	0.0000	59,728.48 12
Maximum	**50.3127**	**117.0459**	**215.7848**	**0.5960**	**52.6485**	**0.5897**	**52.8360**	**19.2161**	**0.5697**	**19.4023**	**0.0000**	**59,593.68 63**	**59,593.68 63**	**6.0174**	**0.0000**	**59,728.48 12**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	20.50	40.56	-10.67	0.00	0.00	91.08	6.92	0.00	90.63	15.65	0.00	0.00	0.00	0.00	0.00	0.00

Bloomington Business Park Specific Plan (Construction - Mitigated) - San Bernardino-South Coast County, Summer

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	62.1353	6.3900e-003	0.7003	5.0000e-005		2.5000e-003	2.5000e-003		2.5000e-003	2.5000e-003		1.4987	1.4987	3.9500e-003		1.5976
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	**62.1353**	**6.3900e-003**	**0.7003**	**5.0000e-005**	**0.0000**	**2.5000e-003**	**2.5000e-003**	**0.0000**	**2.5000e-003**	**2.5000e-003**		**1.4987**	**1.4987**	**3.9500e-003**	**0.0000**	**1.5976**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	62.1353	6.3900e-003	0.7003	5.0000e-005		2.5000e-003	2.5000e-003		2.5000e-003	2.5000e-003		1.4987	1.4987	3.9500e-003		1.5976
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	**62.1353**	**6.3900e-003**	**0.7003**	**5.0000e-005**	**0.0000**	**2.5000e-003**	**2.5000e-003**	**0.0000**	**2.5000e-003**	**2.5000e-003**		**1.4987**	**1.4987**	**3.9500e-003**	**0.0000**	**1.5976**

Bloomington Business Park Specific Plan (Construction - Mitigated) - San Bernardino-South Coast County, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	10/1/2021	12/16/2021	5	55	
2	Site Preparation	Site Preparation	12/17/2021	2/24/2022	5	50	
3	Grading	Grading	2/25/2022	6/2/2022	5	70	
4	Building Construction	Building Construction	6/3/2022	12/29/2022	5	150	
5	Paving	Paving	8/12/2022	12/29/2022	5	100	
6	Architectural Coating	Architectural Coating	8/12/2022	12/29/2022	5	100	

Acres of Grading (Site Preparation Phase): 1000

Acres of Grading (Grading Phase): 1400

Acres of Paving: 79.15

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 4,068,060; Non-Residential Outdoor: 1,356,020; Striped Parking Area: 206,867 (Architectural Coating – sqft)

OffRoad Equipment

Bloomington Business Park Specific Plan (Construction - Mitigated) - San Bernardino-South Coast County, Summer

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	2	8.00	81	0.73
Demolition	Excavators	6	8.00	158	0.38
Demolition	Rubber Tired Dozers	4	8.00	247	0.40
Site Preparation	Crawler Tractors	7	8.00	212	0.43
Site Preparation	Rubber Tired Dozers	5	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	0	8.00	97	0.37
Grading	Crawler Tractors	4	8.00	212	0.43
Grading	Excavators	4	8.00	158	0.38
Grading	Graders	2	8.00	187	0.41
Grading	Rubber Tired Dozers	2	8.00	247	0.40
Grading	Scrapers	4	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	0	8.00	97	0.37
Building Construction	Cranes	2	8.00	231	0.29
Building Construction	Crawler Tractors	6	8.00	212	0.43
Building Construction	Forklifts	6	8.00	89	0.20
Building Construction	Generator Sets	2	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	0	8.00	97	0.37
Building Construction	Welders	2	8.00	46	0.45
Paving	Pavers	4	8.00	130	0.42
Paving	Paving Equipment	4	8.00	132	0.36
Paving	Rollers	4	8.00	80	0.38
Architectural Coating	Air Compressors	2	8.00	78	0.48

Trips and VMT

Bloomington Business Park Specific Plan (Construction - Mitigated) - San Bernardino-South Coast County, Summer

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	12	30.00	171.00	2,707.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	12	30.00	155.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	16	40.00	218.00	18,696.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	18	2,587.00	466.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	12	30.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	2	517.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

Water Exposed Area

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					10.6529	0.0000	10.6529	1.6129	0.0000	1.6129			0.0000			0.0000
Off-Road	6.3302	62.8814	43.1301	0.0776		3.1027	3.1027		2.8822	2.8822		7,495.889 9	7,495.889 9	2.1098		7,548.634 7
Total	6.3302	62.8814	43.1301	0.0776	10.6529	3.1027	13.7555	1.6129	2.8822	4.4951		7,495.889 9	7,495.889 9	2.1098		7,548.634 7

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.2925	11.2260	1.7607	0.0382	0.8613	0.0316	0.8931	0.2362	0.0291	0.2655		4,061.433 6	4,061.433 6	0.2177		4,066.876 4
Vendor	0.4425	16.4808	3.1080	0.0461	1.0952	0.0293	1.1245	0.3154	0.0270	0.3424		4,866.477 2	4,866.477 2	0.3075		4,874.165 8
Worker	0.1524	0.0942	1.2420	3.3000e-003	0.3353	2.1800e-003	0.2375	0.0889	1.9800e-003	0.0908		328.2242	328.2242	9.3400e-003		328.4577
Total	0.8874	27.8110	6.0837	0.0877	2.2919	0.0622	2.3549	0.6404	0.0594	0.6998		9,256.134 9	9,256.134 9	0.5346		9,269.499 7

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					10.6529	0.0000	10.6529	1.6129	0.0000	1.6129			0.0000			0.0000
Off-Road	1.1683	27.1151	49.3477	0.0776		0.1233	0.1233		0.1233	0.1233	0.0000	7,495.889 9	7,495.889 9	2.1098		7,548.634 7
Total	1.1683	27.1151	49.3477	0.0776	10.6529	0.1233	10.7761	1.6129	0.1233	1.7362	0.0000	7,495.889 9	7,495.889 9	2.1098		7,548.634 7

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.2925	11.2260	1.7607	0.0382	0.8613	0.0316	0.8931	0.2262	0.0301	0.2563		4,061.433 6	4,061.433 6	0.2177		4,066.876 4
Vendor	0.4425	16.4808	3.1080	0.0461	1.0952	0.0293	1.1245	0.3154	0.0270	0.3424		4,866.477 2	4,866.477 2	0.3075		4,874.165 8
Worker	0.1524	0.0942	1.2420	3.3000e-003	0.3353	2.1800e-003	0.2375	0.0889	1.9800e-003	0.0908		328.2242	328.2242	9.3400e-003		328.4577
Total	**0.8874**	**27.8110**	**6.0837**	**0.0877**	**2.2919**	**0.0632**	**2.3549**	**0.6404**	**0.0594**	**0.6998**		**9,256.134 9**	**9,256.134 9**	**0.5346**		**9,269.499 7**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					51.3204	0.0000	51.3204	18.8413	0.0000	18.8413			0.0000			0.0000
Off-Road	0.0883	103.6329	37.2345	0.0976		4.4974	4.4974		4.1376	4.1376		9,459.295 2	9,459.295 2	3.0693		9,535.778 4
Total	**0.0883**	**103.6329**	**37.2345**	**0.0976**	**51.3204**	**4.4974**	**55.8178**	**18.8413**	**4.1376**	**22.9789**		**9,459.295 2**	**9,459.295 2**	**3.0693**		**9,535.778 4**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4011	14.9478	2.8127	0.0418	0.9927	0.0256	1.0184	0.2658	0.0245	0.2904		4,411.134 3	4,411.134 3	0.2788		4,418.103 4
Worker	0.1524	0.0942	1.2420	3.3000e-003	0.3353	2.1800e-003	0.2375	0.0889	1.9800e-003	0.0908		328.2242	328.2242	9.3400e-003		328.4577
Total	0.5535	15.0420	4.0546	0.0451	1.3281	0.0278	1.3558	0.3748	0.0265	0.4012		4,739.358 4	4,739.358 4	0.2881		4,746.561 1

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					51.3204	0.0000	51.3204	18.8413	0.0000	18.8413			0.0000			0.0000
Off-Road	1.5974	25.7577	51.9147	0.0976		0.1597	0.1597		0.1597	0.1597	0.0000	9,459.295 2	9,459.295 2	3.0693		9,535.778 4
Total	1.5974	25.7577	51.9147	0.0976	51.3204	0.1597	51.4802	18.8413	0.1597	19.0011	0.0000	9,459.295 2	9,459.295 2	3.0693		9,535.778 4

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4011	14.9478	2.8127	0.0418	0.9927	0.0256	1.0184	0.2658	0.0245	0.2904		4,411.134 3	4,411.134 3	0.2788		4,418.103 4
Worker	0.1524	0.0942	1.2420	3.3000e-003	0.3353	2.1400e-003	0.2375	0.0889	1.9800e-003	0.0908		328.2242	328.2242	9.3400e-003		328.4577
Total	0.5535	15.0420	4.0546	0.0451	1.3281	0.0278	1.3558	0.3748	0.0265	0.4012		4,739.358 4	4,739.358 4	0.2881		4,746.561 1

3.3 Site Preparation - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					51.3204	0.0000	51.3204	18.8413	0.0000	18.8413			0.0000			0.0000
Off-Road	7.6289	86.0232	34.1137	0.0975		3.6738	3.6739		3.3799	3.3790		9,448.403 3	9,448.403 3	3.0558		9,524.798 4
Total	7.6289	86.0232	34.1137	0.0975	51.3204	3.6738	54.9943	18.8413	3.3799	22.2212		9,448.403 3	9,448.403 3	3.0558		9,524.798 4

3.3 Site Preparation - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3757	14.1786	2.6005	0.0415	0.9927	0.0215	1.0142	0.2658	0.0206	0.2864		4,375.767 5	4,375.767 5	0.2691		4,382.499 4
Worker	0.1424	0.0847	1.1409	3.1800e-003	0.3353	2.0800e-003	0.3374	0.0889	1.9200e-003	0.0908		316.3807	316.3807	8.3300e-003		316.5902
Total	**0.5180**	**14.2633**	**3.7414**	**0.0446**	**1.3280**	**0.0236**	**1.3517**	**0.3748**	**0.0225**	**0.3973**		**4,692.148 3**	**4,692.148 3**	**0.2775**		**4,699.089 6**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					51.3204	0.0000	51.3204	18.8413	0.0000	18.8413			0.0000			0.0000
Off-Road	1.5974	25.7577	51.9147	0.0975		0.1597	0.1597		0.1597	0.1597	0.0000	9,448.403 2	9,448.403 2	3.0558		9,524.798 4
Total	**1.5974**	**25.7577**	**51.9147**	**0.0975**	**51.3204**	**0.1597**	**51.4802**	**18.8413**	**0.1597**	**19.0011**	**0.0000**	**9,448.403 2**	**9,448.403 2**	**3.0558**		**9,524.798 4**

3.3 Site Preparation - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3757	14.1786	2.6005	0.0415	0.9927	0.0215	1.0142	0.2658	0.0206	0.2864		4,375.767 5	4,375.767 5	0.2691		4,382.499 4
Worker	0.1424	0.0847	1.1409	3.1800e-003	0.3353	2.0800e-003	0.3374	0.0889	1.9200e-003	0.0908		316.3807	316.3807	8.3300e-003		316.5902
Total	**0.5180**	**14.2633**	**3.7414**	**0.0446**	**1.3280**	**0.0236**	**1.3517**	**0.3748**	**0.0225**	**0.3973**		**4,692.148 3**	**4,692.148 3**	**0.2775**		**4,699.089 6**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					33.6447	0.0000	33.6447	8.9698	0.0000	8.9698			0.0000			0.0000
Off-Road	8.5585	95.0158	58.3905	0.1431		3.8162	3.8162		3.5109	3.5109		13,853.99 47	13,853.99 47	4.3807		13,966.01 13
Total	**8.5585**	**95.0158**	**58.3905**	**0.1431**	**33.6447**	**3.8162**	**37.4609**	**8.9698**	**3.5109**	**12.4806**		**13,853.99 47**	**13,853.99 47**	**4.3807**		**13,966.01 13**

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	1.4020	55.5751	9.0987	0.2040	4.6489	0.1420	4.7909	1.2746	0.1309	1.4161		21,678.16 27	21,678.16 27	1.1471		21,706.89 98
Vendor	0.3255	10.8387	3.6575	0.0583	1.3962	0.0303	1.4265	0.4020	0.0290	0.4310		6,154.805 3	6,154.805 3	0.3785		6,164.267 7
Worker	0.1000	0.1130	1.5212	4.2800e-003	0.4471	2.7800e-003	0.4499	0.1186	2.5600e-003	0.1211		421.8410	421.8410	0.0112		422.1203
Total	2.2076	75.6268	14.2774	0.2666	6.4922	0.1751	6.6673	1.7951	0.1674	1.9625		28,254.32 90	28,254.32 90	1.5368		28,292.74 78

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					33.6447	0.0000	33.6447	8.9698	0.0000	8.9698			0.0000			0.0000
Off-Road	2.2580	41.4192	80.7979	0.1431		0.2343	0.2343		0.2343	0.2343	0.0000	13,853.99 47	13,853.99 47	4.3807		13,966.01 13
Total	2.2580	41.4192	80.7979	0.1431	33.6447	0.2343	33.8790	8.9698	0.2343	9.2041	0.0000	13,853.99 47	13,853.99 47	4.3807		13,966.01 13

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	1.4025	55.5751	9.0987	0.2040	4.0489	0.1420	4.1909	1.2746	0.1309	1.4161		21,678.16 27	21,678.16 27	1.1471		21,706.89 98
Vendor	0.3255	10.8387	3.6575	0.0583	1.3962	0.0303	1.4265	0.4020	0.0290	0.4310		6,154.305 3	6,154.305 3	0.3785		6,163.767 7
Worker	0.1180	0.1130	1.5212	4.2800e-003	0.4471	2.7800e-003	0.4499	0.1186	2.5600e-003	0.1211		421.8410	421.8410	0.0112		422.1203
Total	1.8460	66.5268	14.2774	0.2666	5.8922	0.1751	6.0673	1.7951	0.1674	1.9625		28,254.32 90	28,254.32 90	1.5368		28,292.74 78

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	5.5925	59.5273	35.3396	0.0860		2.5486	2.5486		2.3785	2.3785		8,221.064 3	8,221.064 3	2.2305		8,276.827 0
Total	5.5925	59.5273	35.3396	0.0860		2.5486	2.5486		2.3785	2.3785		8,221.064 4	8,221.064 4	2.2305		8,276.827 0

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	1.1284	42.6213	7.8116	0.1247	2.9846	0.0547	3.0393	0.8594	0.0519	0.9212		13,155.53 33	13,155.53 33	0.8091		13,175.70 00
Worker	12.2751	7.3051	98.3849	0.2739	29.0160	0.1799	29.0001	7.9888	0.1653	7.9541		27,282.96 46	27,282.96 46	0.7220		27,300.62 97
Total	**13.3985**	**49.9264**	**106.2032**	**0.3986**	**31.9011**	**0.2443**	**32.1454**	**8.8282**	**0.2272**	**8.7554**		**40,438.09 80**	**40,438.09 80**	**1.5315**		**40,476.38 91**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4968	27.5080	49.3012	0.0860		0.2222	0.2222		0.2222	0.2222	0.0000	8,221.064 3	8,221.064 3	2.2305		8,276.827 0
Total	**1.4968**	**27.5080**	**49.3012**	**0.0860**		**0.2222**	**0.2222**		**0.2222**	**0.2222**	**0.0000**	**8,221.064 4**	**8,221.064 4**	**2.2305**		**8,276.827 0**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day											lb/day				
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	1.1284	42.6213	7.8116	0.1247	2.9846	0.0547	3.0393	0.8594	0.0519	0.9212		13,155.53 33	13,155.53 33	0.8091		13,175.76 00
Worker	12.2751	7.3051	98.3849	0.2739	29.0166	0.1796	29.0961	7.9888	0.1653	7.9541		27,282.56 46	27,282.56 46	0.7220		27,300.62 97
Total	**13.3985**	**49.9264**	**106.2032**	**0.3986**	**31.9011**	**0.2443**	**32.1454**	**8.8282**	**0.2272**	**8.7554**		**40,438.09 80**	**40,438.09 80**	**1.5315**		**40,476.38 91**

3.6 Paving - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day											lb/day				
Off-Road	2.2056	22.2498	29.1610	0.0456		1.1358	1.1358		1.0449	1.0449		4,415.320 6	4,415.320 6	1.4280		4,451.020 7
Paving	2.0737					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**4.2794**	**22.2498**	**29.1610**	**0.0456**		**1.1358**	**1.1358**		**1.0449**	**1.0449**		**4,415.320 6**	**4,415.320 6**	**1.4280**		**4,451.020 7**

3.6 Paving - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1424	0.0847	1.1409	3.1800e-003	0.3353	2.0800e-003	0.3374	0.0889	1.9200e-003	0.0909		316.3807	316.3807	8.3800e-003		316.5902
Total	0.1424	0.0847	1.1409	3.1800e-003	0.3353	2.0800e-003	0.3374	0.0889	1.9200e-003	0.0909		316.3807	316.3807	8.3800e-003		316.5902

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6682	20.0789	34.5913	0.0456		0.0748	0.0748		0.0748	0.0748	0.0000	4,415.320 6	4,415.320 6	1.4280		4,451.020 7
Paving	2.0737					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	2.7419	20.0789	34.5913	0.0456		0.0748	0.0748		0.0748	0.0748	0.0000	4,415.320 6	4,415.320 6	1.4280		4,451.020 7

3.6 Paving - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1424	0.0847	1.1409	3.1800e-003	0.3353	2.0800e-003	0.3374	0.0889	1.9200e-003	0.0909		316.3807	316.3807	8.3800e-003		316.5902
Total	**0.1424**	**0.0847**	**1.1409**	**3.1800e-003**	**0.3353**	**2.0800e-003**	**0.3374**	**0.0889**	**1.9200e-003**	**0.0909**		**316.3807**	**316.3807**	**8.3800e-003**		**316.5902**

3.7 Architectural Coating - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	29.9548					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.5454	3.7560	4.8363	7.9200e-003		0.2179	0.2179		0.2179	0.2179		750.5281	750.5281	0.0489		751.7497
Total	**30.4802**	**3.7560**	**4.8363**	**7.9200e-003**		**0.2179**	**0.2179**		**0.2179**	**0.2179**		**750.5281**	**750.5281**	**0.0489**		**751.7497**

3.7 Architectural Coating - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	2.4531	1.4599	19.6618	0.0547	5.7788	0.0359	5.8147	1.5326	0.0330	1.5656		5,452.294 5	5,452.294 5	0.1444		5,455.904 5
Total	**2.4531**	**1.4599**	**19.6618**	**0.0547**	**5.7788**	**0.0359**	**5.8147**	**1.5326**	**0.0330**	**1.5656**		**5,452.294 5**	**5,452.294 5**	**0.1444**		**5,455.904 5**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	29.9848					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1453	2.8262	4.8864	7.9200e-003		0.0106	0.0106		0.0106	0.0106	0.0000	750.5281	750.5281	0.0489		751.7497
Total	**30.0800**	**2.8262**	**4.8864**	**7.9200e-003**		**0.0106**	**0.0106**		**0.0106**	**0.0106**	**0.0000**	**750.5281**	**750.5281**	**0.0489**		**751.7497**

3.7 Architectural Coating - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	2.4531	1.4599	19.6618	0.0547	5.7788	0.0359	5.8147	1.5326	0.0330	1.5656		5,452.294 5	5,452.294 5	0.1444		5,455.904 5
Total	**2.4531**	**1.4599**	**19.6618**	**0.0547**	**5.7788**	**0.0359**	**5.8147**	**1.5326**	**0.0330**	**1.5656**		**5,452.294 5**	**5,452.294 5**	**0.1444**		**5,455.904 5**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Asphalt Surfaces	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0	0	0
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-No	0.00	0.00	0.00	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Bloomington Business Park Specific Plan (Construction - Mitigated) - San Bernardino-South Coast County, Summer

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Asphalt Surfaces	0.553113	0.036408	0.180286	0.116335	0.016165	0.005101	0.018218	0.063797	0.001357	0.001565	0.005903	0.000808	0.000944
Parking Lot	0.553113	0.036408	0.180286	0.116335	0.016165	0.005101	0.018218	0.063797	0.001357	0.001565	0.005903	0.000808	0.000944
Unrefrigerated Warehouse-No Rail	0.553113	0.036408	0.180286	0.116335	0.016165	0.005101	0.018218	0.063797	0.001357	0.001565	0.005903	0.000808	0.000944

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	62.1353	6.3900e-003	0.7003	5.0000e-005		2.5000e-003	2.5000e-003		2.5000e-003	2.5000e-003		1.4987	1.4987	3.9500e-003		1.5976
Unmitigated	62.1353	6.3900e-003	0.7003	5.0000e-005		2.5000e-003	2.5000e-003		2.5000e-003	2.5000e-003		1.4987	1.4987	3.9500e-003		1.5976

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	7.1505					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	54.9196					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0651	6.3900e-003	0.7003	5.0000e-005		2.5000e-003	2.5000e-003		2.5000e-003	2.5000e-003		1.4987	1.4987	3.9500e-003		1.5976
Total	**62.1353**	**6.3900e-003**	**0.7003**	**5.0000e-005**		**2.5000e-003**	**2.5000e-003**		**2.5000e-003**	**2.5000e-003**		**1.4987**	**1.4987**	**3.9500e-003**		**1.5976**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	7.1505					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	54.9196					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0651	6.3900e-003	0.7003	5.0000e-005		2.5000e-003	2.5000e-003		2.5000e-003	2.5000e-003		1.4987	1.4987	3.9500e-003		1.5976
Total	**62.1353**	**6.3900e-003**	**0.7003**	**5.0000e-005**		**2.5000e-003**	**2.5000e-003**		**2.5000e-003**	**2.5000e-003**		**1.4987**	**1.4987**	**3.9500e-003**		**1.5976**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Bloomington Business Park Specific Plan (Construction - Mitigated)

San Bernardino-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unrefrigerated Warehouse-No Rail	2,712.04	1000sqft	62.26	2,712,040.00	0
Other Asphalt Surfaces	2,700.10	1000sqft	61.99	2,700,104.00	0
Parking Lot	1,436.00	Space	17.16	747,687.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	32
Climate Zone	10			**Operational Year**	2022
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	564.66	**CH4 Intensity (lb/MWhr)**	0.023	**N2O Intensity (lb/MWhr)**	0.005

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Consistent with the DEIR's model

Land Use - Consistent in the DIER's model

Construction Phase - Consistent in the DIER's model

Off-road Equipment - Consistent in the DIER's model

Off-road Equipment - Consistent in the DIER's model

Off-road Equipment - Consistent in the DIER's model

Bloomington Business Park Specific Plan (Construction - Mitigated) - San Bernardino-South Coast County, Winter

Off-road Equipment - Consistent in the DIER's model

Off-road Equipment - Consistent in the DIER's model

Off-road Equipment - Consistent in the DIER's model

Trips and VMT - Consistent in the DIER's model

Grading - Consistent in the DIER's model

Architectural Coating - Consistent in the DIER's model

Vehicle Trips - Consistent in the DIER's model

Vehicle Emission Factors - Consistent in the DIER's model

Vehicle Emission Factors - Consistent in the DIER's model

Vehicle Emission Factors - Consistent in the DIER's model

Energy Use - Consistent in the DIER's model

Water And Wastewater - Consistent in the DIER's model

Solid Waste - Consistent in the DIER's model

Construction Off-road Equipment Mitigation - See SWAPE comment "Incorrect Application of Tier 4 Final Mitigation."

Fleet Mix -

Demolition - Consistent with the DEIR's model

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Exterior	100.00	10.00
tblArchitecturalCoating	EF_Nonresidential_Interior	100.00	10.00
tblArchitecturalCoating	EF_Parking	100.00	50.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00

tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	17.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	10.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	6.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	11.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
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tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstructionPhase	NumDays	220.00	100.00

tblConstructionPhase	NumDays	3,100.00	150.00
tblConstructionPhase	NumDays	200.00	55.00
tblConstructionPhase	NumDays	310.00	70.00
tblConstructionPhase	NumDays	220.00	100.00
tblConstructionPhase	NumDays	120.00	50.00
tblEnergyUse	LightingElect	0.35	0.00
tblEnergyUse	LightingElect	1.17	0.00
tblEnergyUse	NT24E	0.82	0.00
tblEnergyUse	NT24NG	0.03	0.00
tblEnergyUse	T24E	0.37	0.00
tblEnergyUse	T24NG	2.00	0.00
tblGrading	AcresOfGrading	490.00	1,400.00
tblGrading	AcresOfGrading	175.00	1,000.00
tblGrading	MaterialExported	0.00	39,550.00
tblGrading	MaterialImported	0.00	202,200.00
tblLandUse	LandUseSquareFeet	2,700,100.00	2,700,104.00
tblLandUse	LandUseSquareFeet	574,400.00	747,687.00
tblLandUse	LotAcreage	12.92	17.16
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00

tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
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tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	4.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	UsageHours	6.00	8.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblProjectCharacteristics	CH4IntensityFactor	0.029	0.023
tblProjectCharacteristics	CO2IntensityFactor	702.44	564.66
tblProjectCharacteristics	N2OIntensityFactor	0.006	0.005
tblSolidWaste	SolidWasteGenerationRate	2,549.32	0.00
tblTripsAndVMT	HaulingTripNumber	30,219.00	18,596.00
tblTripsAndVMT	VendorTripNumber	0.00	171.00
tblTripsAndVMT	VendorTripNumber	0.00	155.00
tblTripsAndVMT	VendorTripNumber	0.00	218.00
tblTripsAndVMT	VendorTripNumber	1,010.00	466.00
tblVehicleEF	HHD	1.21	0.03
tblVehicleEF	HHD	0.04	0.14
tblVehicleEF	HHD	0.10	0.00
tblVehicleEF	HHD	3.29	5.95
tblVehicleEF	HHD	0.57	0.67

tblVehicleEF	HHD	1.82	3.7880e-003
tblVehicleEF	HHD	6,933.41	1,124.17
tblVehicleEF	HHD	1,475.79	1,484.27
tblVehicleEF	HHD	5.54	0.03
tblVehicleEF	HHD	26.50	6.08
tblVehicleEF	HHD	2.50	3.42
tblVehicleEF	HHD	9.7780e-003	3.6280e-003
tblVehicleEF	HHD	0.06	0.06
tblVehicleEF	HHD	0.04	0.04
tblVehicleEF	HHD	0.01	0.03
tblVehicleEF	HHD	5.1000e-005	1.0000e-006
tblVehicleEF	HHD	9.3550e-003	3.4710e-003
tblVehicleEF	HHD	0.03	0.03
tblVehicleEF	HHD	8.8810e-003	8.8310e-003
tblVehicleEF	HHD	0.01	0.03
tblVehicleEF	HHD	4.7000e-005	1.0000e-006
tblVehicleEF	HHD	8.5000e-005	5.0000e-006
tblVehicleEF	HHD	3.1910e-003	1.6000e-004
tblVehicleEF	HHD	0.84	0.43
tblVehicleEF	HHD	5.2000e-005	3.0000e-006
tblVehicleEF	HHD	0.08	0.08
tblVehicleEF	HHD	2.1700e-004	7.9100e-004
tblVehicleEF	HHD	0.05	1.0000e-006
tblVehicleEF	HHD	0.07	0.01
tblVehicleEF	HHD	0.01	0.01
tblVehicleEF	HHD	8.6000e-005	0.00
tblVehicleEF	HHD	8.5000e-005	5.0000e-006

tblVehicleEF	HHD	3.1910e-003	1.6000e-004
tblVehicleEF	HHD	0.97	0.50
tblVehicleEF	HHD	5.2000e-005	3.0000e-006
tblVehicleEF	HHD	0.13	0.23
tblVehicleEF	HHD	2.1700e-004	7.9100e-004
tblVehicleEF	HHD	0.06	1.0000e-006
tblVehicleEF	HHD	1.14	0.03
tblVehicleEF	HHD	0.04	0.14
tblVehicleEF	HHD	0.09	0.00
tblVehicleEF	HHD	2.39	5.82
tblVehicleEF	HHD	0.57	0.67
tblVehicleEF	HHD	1.70	3.5770e-003
tblVehicleEF	HHD	7,345.18	1,121.04
tblVehicleEF	HHD	1,475.79	1,484.27
tblVehicleEF	HHD	5.54	0.03
tblVehicleEF	HHD	27.35	5.90
tblVehicleEF	HHD	2.36	3.23
tblVehicleEF	HHD	8.2750e-003	3.1750e-003
tblVehicleEF	HHD	0.06	0.06
tblVehicleEF	HHD	0.04	0.04
tblVehicleEF	HHD	0.01	0.03
tblVehicleEF	HHD	5.1000e-005	1.0000e-006
tblVehicleEF	HHD	7.9170e-003	3.0380e-003
tblVehicleEF	HHD	0.03	0.03
tblVehicleEF	HHD	8.8810e-003	8.8310e-003
tblVehicleEF	HHD	0.01	0.03
tblVehicleEF	HHD	4.7000e-005	1.0000e-006

tblVehicleEF	HHD	1.6800e-004	1.0000e-005
tblVehicleEF	HHD	3.5970e-003	1.8200e-004
tblVehicleEF	HHD	0.79	0.45
tblVehicleEF	HHD	1.1700e-004	7.0000e-006
tblVehicleEF	HHD	0.08	0.08
tblVehicleEF	HHD	2.2100e-004	8.1200e-004
tblVehicleEF	HHD	0.05	1.0000e-006
tblVehicleEF	HHD	0.07	0.01
tblVehicleEF	HHD	0.01	0.01
tblVehicleEF	HHD	8.4000e-005	0.00
tblVehicleEF	HHD	1.6800e-004	1.0000e-005
tblVehicleEF	HHD	3.5970e-003	1.8200e-004
tblVehicleEF	HHD	0.91	0.52
tblVehicleEF	HHD	1.1700e-004	7.0000e-006
tblVehicleEF	HHD	0.13	0.23
tblVehicleEF	HHD	2.2100e-004	8.1200e-004
tblVehicleEF	HHD	0.05	1.0000e-006
tblVehicleEF	HHD	1.31	0.02
tblVehicleEF	HHD	0.04	3.3680e-003
tblVehicleEF	HHD	0.10	0.00
tblVehicleEF	HHD	4.53	5.98
tblVehicleEF	HHD	0.57	0.33
tblVehicleEF	HHD	1.79	3.7590e-003
tblVehicleEF	HHD	6,364.76	1,097.48
tblVehicleEF	HHD	1,475.79	1,393.36
tblVehicleEF	HHD	5.54	0.03
tblVehicleEF	HHD	25.32	6.13

tblVehicleEF	HHD	2.46	3.28
tblVehicleEF	HHD	0.01	3.8650e-003
tblVehicleEF	HHD	0.06	0.06
tblVehicleEF	HHD	0.04	0.03
tblVehicleEF	HHD	0.01	0.03
tblVehicleEF	HHD	5.1000e-005	1.0000e-006
tblVehicleEF	HHD	0.01	3.6980e-003
tblVehicleEF	HHD	0.03	0.03
tblVehicleEF	HHD	8.8810e-003	8.6000e-003
tblVehicleEF	HHD	0.01	0.03
tblVehicleEF	HHD	4.7000e-005	1.0000e-006
tblVehicleEF	HHD	8.5000e-005	5.0000e-006
tblVehicleEF	HHD	3.4760e-003	1.8700e-004
tblVehicleEF	HHD	0.91	0.40
tblVehicleEF	HHD	5.2000e-005	3.0000e-006
tblVehicleEF	HHD	0.08	0.07
tblVehicleEF	HHD	2.3300e-004	8.2900e-004
tblVehicleEF	HHD	0.05	1.0000e-005
tblVehicleEF	HHD	0.06	0.01
tblVehicleEF	HHD	0.01	0.01
tblVehicleEF	HHD	8.5000e-005	0.00
tblVehicleEF	HHD	8.5000e-005	5.0000e-006
tblVehicleEF	HHD	3.4760e-003	1.8700e-004
tblVehicleEF	HHD	1.05	0.46
tblVehicleEF	HHD	5.2000e-005	3.0000e-006
tblVehicleEF	HHD	0.13	0.08
tblVehicleEF	HHD	2.3300e-004	8.2900e-004

tblVehicleEF	HHD	0.06	1.0000e-006
tblVehicleEF	LDA	4.2030e-003	2.5110e-003
tblVehicleEF	LDA	5.6230e-003	0.05
tblVehicleEF	LDA	0.57	0.67
tblVehicleEF	LDA	1.19	2.11
tblVehicleEF	LDA	251.29	265.15
tblVehicleEF	LDA	57.15	54.12
tblVehicleEF	LDA	0.05	0.04
tblVehicleEF	LDA	1.6780e-003	1.5210e-003
tblVehicleEF	LDA	2.2790e-003	1.8570e-003
tblVehicleEF	LDA	1.5460e-003	1.4000e-003
tblVehicleEF	LDA	2.0960e-003	1.7080e-003
tblVehicleEF	LDA	0.04	0.06
tblVehicleEF	LDA	0.10	0.10
tblVehicleEF	LDA	0.03	0.05
tblVehicleEF	LDA	0.01	9.5370e-003
tblVehicleEF	LDA	0.03	0.21
tblVehicleEF	LDA	0.08	0.22
tblVehicleEF	LDA	2.5170e-003	2.6060e-003
tblVehicleEF	LDA	5.9200e-004	5.3200e-004
tblVehicleEF	LDA	0.04	0.06
tblVehicleEF	LDA	0.10	0.10
tblVehicleEF	LDA	0.03	0.05
tblVehicleEF	LDA	0.02	0.01
tblVehicleEF	LDA	0.03	0.21
tblVehicleEF	LDA	0.08	0.24
tblVehicleEF	LDA	4.7900e-003	2.8350e-003

tblVehicleEF	LDA	4.6890e-003	0.04
tblVehicleEF	LDA	0.71	0.81
tblVehicleEF	LDA	0.99	1.78
tblVehicleEF	LDA	274.94	287.11
tblVehicleEF	LDA	57.15	53.48
tblVehicleEF	LDA	0.05	0.03
tblVehicleEF	LDA	1.6780e-003	1.5210e-003
tblVehicleEF	LDA	2.2790e-003	1.8570e-003
tblVehicleEF	LDA	1.5460e-003	1.4000e-003
tblVehicleEF	LDA	2.0960e-003	1.7080e-003
tblVehicleEF	LDA	0.09	0.11
tblVehicleEF	LDA	0.12	0.11
tblVehicleEF	LDA	0.07	0.09
tblVehicleEF	LDA	0.01	0.01
tblVehicleEF	LDA	0.03	0.21
tblVehicleEF	LDA	0.06	0.19
tblVehicleEF	LDA	2.7550e-003	2.8220e-003
tblVehicleEF	LDA	5.8800e-004	5.2600e-004
tblVehicleEF	LDA	0.09	0.11
tblVehicleEF	LDA	0.12	0.11
tblVehicleEF	LDA	0.07	0.09
tblVehicleEF	LDA	0.02	0.02
tblVehicleEF	LDA	0.03	0.21
tblVehicleEF	LDA	0.07	0.21
tblVehicleEF	LDA	4.0960e-003	2.4600e-003
tblVehicleEF	LDA	5.5670e-003	0.05
tblVehicleEF	LDA	0.54	0.64

tblVehicleEF	LDA	1.18	2.12
tblVehicleEF	LDA	245.70	261.06
tblVehicleEF	LDA	57.15	54.13
tblVehicleEF	LDA	0.05	0.04
tblVehicleEF	LDA	1.6780e-003	1.5210e-003
tblVehicleEF	LDA	2.2790e-003	1.8570e-003
tblVehicleEF	LDA	1.5460e-003	1.4000e-003
tblVehicleEF	LDA	2.0960e-003	1.7080e-003
tblVehicleEF	LDA	0.05	0.06
tblVehicleEF	LDA	0.11	0.11
tblVehicleEF	LDA	0.03	0.05
tblVehicleEF	LDA	0.01	9.3400e-003
tblVehicleEF	LDA	0.04	0.24
tblVehicleEF	LDA	0.08	0.22
tblVehicleEF	LDA	2.4600e-003	2.5660e-003
tblVehicleEF	LDA	5.9100e-004	5.3200e-004
tblVehicleEF	LDA	0.05	0.06
tblVehicleEF	LDA	0.11	0.11
tblVehicleEF	LDA	0.03	0.05
tblVehicleEF	LDA	0.01	0.01
tblVehicleEF	LDA	0.04	0.24
tblVehicleEF	LDA	0.08	0.24
tblVehicleEF	LDT1	0.01	7.5760e-003
tblVehicleEF	LDT1	0.02	0.08
tblVehicleEF	LDT1	1.54	1.52
tblVehicleEF	LDT1	3.61	2.39
tblVehicleEF	LDT1	313.68	314.63

tblVehicleEF	LDT1	70.93	65.70
tblVehicleEF	LDT1	0.16	0.13
tblVehicleEF	LDT1	2.7050e-003	2.3430e-003
tblVehicleEF	LDT1	3.6920e-003	2.8390e-003
tblVehicleEF	LDT1	2.4910e-003	2.1560e-003
tblVehicleEF	LDT1	3.3960e-003	2.6100e-003
tblVehicleEF	LDT1	0.18	0.19
tblVehicleEF	LDT1	0.33	0.26
tblVehicleEF	LDT1	0.13	0.14
tblVehicleEF	LDT1	0.03	0.03
tblVehicleEF	LDT1	0.20	0.86
tblVehicleEF	LDT1	0.26	0.42
tblVehicleEF	LDT1	3.1570e-003	3.0930e-003
tblVehicleEF	LDT1	7.7300e-004	6.4600e-004
tblVehicleEF	LDT1	0.18	0.19
tblVehicleEF	LDT1	0.33	0.26
tblVehicleEF	LDT1	0.13	0.14
tblVehicleEF	LDT1	0.05	0.05
tblVehicleEF	LDT1	0.20	0.86
tblVehicleEF	LDT1	0.28	0.47
tblVehicleEF	LDT1	0.02	8.4650e-003
tblVehicleEF	LDT1	0.02	0.07
tblVehicleEF	LDT1	1.85	1.81
tblVehicleEF	LDT1	2.97	2.00
tblVehicleEF	LDT1	341.75	337.48
tblVehicleEF	LDT1	70.93	64.87
tblVehicleEF	LDT1	0.14	0.11

tblVehicleEF	LDT1	2.7050e-003	2.3430e-003
tblVehicleEF	LDT1	3.6920e-003	2.8390e-003
tblVehicleEF	LDT1	2.4910e-003	2.1560e-003
tblVehicleEF	LDT1	3.3960e-003	2.6100e-003
tblVehicleEF	LDT1	0.37	0.36
tblVehicleEF	LDT1	0.41	0.31
tblVehicleEF	LDT1	0.27	0.26
tblVehicleEF	LDT1	0.04	0.04
tblVehicleEF	LDT1	0.20	0.65
tblVehicleEF	LDT1	0.21	0.36
tblVehicleEF	LDT1	3.4420e-003	3.3180e-003
tblVehicleEF	LDT1	7.6200e-004	6.3800e-004
tblVehicleEF	LDT1	0.37	0.36
tblVehicleEF	LDT1	0.41	0.31
tblVehicleEF	LDT1	0.27	0.26
tblVehicleEF	LDT1	0.06	0.05
tblVehicleEF	LDT1	0.20	0.65
tblVehicleEF	LDT1	0.23	0.40
tblVehicleEF	LDT1	0.01	7.4310e-003
tblVehicleEF	LDT1	0.02	0.08
tblVehicleEF	LDT1	1.47	1.47
tblVehicleEF	LDT1	3.55	2.39
tblVehicleEF	LDT1	307.06	310.38
tblVehicleEF	LDT1	70.93	65.71
tblVehicleEF	LDT1	0.15	0.12
tblVehicleEF	LDT1	2.7050e-003	2.3430e-003
tblVehicleEF	LDT1	3.6920e-003	2.8390e-003

tblVehicleEF	LDT1	2.4910e-003	2.1560e-003
tblVehicleEF	LDT1	3.3960e-003	2.6100e-003
tblVehicleEF	LDT1	0.19	0.19
tblVehicleEF	LDT1	0.39	0.30
tblVehicleEF	LDT1	0.12	0.13
tblVehicleEF	LDT1	0.03	0.03
tblVehicleEF	LDT1	0.23	1.00
tblVehicleEF	LDT1	0.25	0.43
tblVehicleEF	LDT1	3.0890e-003	3.0520e-003
tblVehicleEF	LDT1	7.7200e-004	6.4600e-004
tblVehicleEF	LDT1	0.19	0.19
tblVehicleEF	LDT1	0.39	0.30
tblVehicleEF	LDT1	0.12	0.13
tblVehicleEF	LDT1	0.05	0.05
tblVehicleEF	LDT1	0.23	1.00
tblVehicleEF	LDT1	0.28	0.47
tblVehicleEF	LDT2	6.3270e-003	4.4090e-003
tblVehicleEF	LDT2	8.1990e-003	0.07
tblVehicleEF	LDT2	0.80	1.00
tblVehicleEF	LDT2	1.67	2.71
tblVehicleEF	LDT2	351.15	335.59
tblVehicleEF	LDT2	79.39	70.25
tblVehicleEF	LDT2	0.09	0.09
tblVehicleEF	LDT2	1.7270e-003	1.6020e-003
tblVehicleEF	LDT2	2.4170e-003	1.9240e-003
tblVehicleEF	LDT2	1.5880e-003	1.4740e-003
tblVehicleEF	LDT2	2.2220e-003	1.7690e-003

tblVehicleEF	LDT2	0.06	0.10
tblVehicleEF	LDT2	0.13	0.14
tblVehicleEF	LDT2	0.05	0.08
tblVehicleEF	LDT2	0.02	0.02
tblVehicleEF	LDT2	0.07	0.45
tblVehicleEF	LDT2	0.11	0.33
tblVehicleEF	LDT2	3.5180e-003	3.2990e-003
tblVehicleEF	LDT2	8.2200e-004	6.9100e-004
tblVehicleEF	LDT2	0.06	0.10
tblVehicleEF	LDT2	0.13	0.14
tblVehicleEF	LDT2	0.05	0.08
tblVehicleEF	LDT2	0.02	0.03
tblVehicleEF	LDT2	0.07	0.45
tblVehicleEF	LDT2	0.12	0.36
tblVehicleEF	LDT2	7.1840e-003	4.9540e-003
tblVehicleEF	LDT2	6.8290e-003	0.06
tblVehicleEF	LDT2	0.97	1.20
tblVehicleEF	LDT2	1.38	2.28
tblVehicleEF	LDT2	383.36	357.71
tblVehicleEF	LDT2	79.39	69.39
tblVehicleEF	LDT2	0.08	0.08
tblVehicleEF	LDT2	1.7270e-003	1.6020e-003
tblVehicleEF	LDT2	2.4170e-003	1.9240e-003
tblVehicleEF	LDT2	1.5880e-003	1.4740e-003
tblVehicleEF	LDT2	2.2220e-003	1.7690e-003
tblVehicleEF	LDT2	0.13	0.18
tblVehicleEF	LDT2	0.15	0.16

tblVehicleEF	LDT2	0.11	0.15
tblVehicleEF	LDT2	0.02	0.02
tblVehicleEF	LDT2	0.07	0.45
tblVehicleEF	LDT2	0.09	0.29
tblVehicleEF	LDT2	3.8420e-003	3.5160e-003
tblVehicleEF	LDT2	8.1700e-004	6.8200e-004
tblVehicleEF	LDT2	0.13	0.18
tblVehicleEF	LDT2	0.15	0.16
tblVehicleEF	LDT2	0.11	0.15
tblVehicleEF	LDT2	0.03	0.03
tblVehicleEF	LDT2	0.07	0.45
tblVehicleEF	LDT2	0.10	0.31
tblVehicleEF	LDT2	6.1560e-003	4.3220e-003
tblVehicleEF	LDT2	8.1410e-003	0.07
tblVehicleEF	LDT2	0.75	0.96
tblVehicleEF	LDT2	1.64	2.72
tblVehicleEF	LDT2	343.55	331.47
tblVehicleEF	LDT2	79.39	70.27
tblVehicleEF	LDT2	0.08	0.08
tblVehicleEF	LDT2	1.7270e-003	1.6020e-003
tblVehicleEF	LDT2	2.4170e-003	1.9240e-003
tblVehicleEF	LDT2	1.5880e-003	1.4740e-003
tblVehicleEF	LDT2	2.2220e-003	1.7690e-003
tblVehicleEF	LDT2	0.06	0.09
tblVehicleEF	LDT2	0.14	0.16
tblVehicleEF	LDT2	0.05	0.08
tblVehicleEF	LDT2	0.02	0.02

tblVehicleEF	LDT2	0.08	0.52
tblVehicleEF	LDT2	0.11	0.33
tblVehicleEF	LDT2	3.4410e-003	3.2580e-003
tblVehicleEF	LDT2	8.2200e-004	6.9100e-004
tblVehicleEF	LDT2	0.06	0.09
tblVehicleEF	LDT2	0.14	0.16
tblVehicleEF	LDT2	0.05	0.08
tblVehicleEF	LDT2	0.02	0.03
tblVehicleEF	LDT2	0.08	0.52
tblVehicleEF	LDT2	0.12	0.37
tblVehicleEF	LHD1	5.2170e-003	5.0650e-003
tblVehicleEF	LHD1	0.01	6.1020e-003
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	0.14	0.18
tblVehicleEF	LHD1	1.07	0.75
tblVehicleEF	LHD1	2.60	1.03
tblVehicleEF	LHD1	9.23	9.25
tblVehicleEF	LHD1	809.20	652.45
tblVehicleEF	LHD1	30.40	11.21
tblVehicleEF	LHD1	0.09	0.07
tblVehicleEF	LHD1	2.12	1.25
tblVehicleEF	LHD1	9.6500e-004	8.9000e-004
tblVehicleEF	LHD1	0.01	9.8770e-003
tblVehicleEF	LHD1	0.01	9.8260e-003
tblVehicleEF	LHD1	9.5800e-004	2.6000e-004
tblVehicleEF	LHD1	9.2400e-004	8.5100e-004
tblVehicleEF	LHD1	2.5390e-003	2.4690e-003

tblVehicleEF	LHD1	0.01	9.3760e-003
tblVehicleEF	LHD1	8.8100e-004	2.3900e-004
tblVehicleEF	LHD1	3.7070e-003	3.0390e-003
tblVehicleEF	LHD1	0.11	0.08
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	1.8240e-003	1.5810e-003
tblVehicleEF	LHD1	0.08	0.06
tblVehicleEF	LHD1	0.35	0.55
tblVehicleEF	LHD1	0.27	0.08
tblVehicleEF	LHD1	9.2000e-005	9.0000e-005
tblVehicleEF	LHD1	5.9750e-003	6.3570e-003
tblVehicleEF	LHD1	3.5300e-004	1.1100e-004
tblVehicleEF	LHD1	3.7070e-003	3.0390e-003
tblVehicleEF	LHD1	0.11	0.08
tblVehicleEF	LHD1	0.02	0.03
tblVehicleEF	LHD1	1.8240e-003	1.5810e-003
tblVehicleEF	LHD1	0.10	0.08
tblVehicleEF	LHD1	0.35	0.55
tblVehicleEF	LHD1	0.29	0.09
tblVehicleEF	LHD1	5.2170e-003	5.0990e-003
tblVehicleEF	LHD1	0.01	6.2280e-003
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	0.14	0.18
tblVehicleEF	LHD1	1.09	0.76
tblVehicleEF	LHD1	2.43	0.98
tblVehicleEF	LHD1	9.23	9.25
tblVehicleEF	LHD1	609.20	652.47

tblVehicleEF	LHD1	30.40	11.12
tblVehicleEF	LHD1	0.09	0.07
tblVehicleEF	LHD1	1.98	1.17
tblVehicleEF	LHD1	9.6500e-004	8.9000e-004
tblVehicleEF	LHD1	0.01	9.8770e-003
tblVehicleEF	LHD1	0.01	9.8260e-003
tblVehicleEF	LHD1	9.5800e-004	2.6000e-004
tblVehicleEF	LHD1	9.2400e-004	8.5100e-004
tblVehicleEF	LHD1	2.5390e-003	2.4690e-003
tblVehicleEF	LHD1	0.01	9.3760e-003
tblVehicleEF	LHD1	8.6100e-004	2.3900e-004
tblVehicleEF	LHD1	7.3080e-003	5.4780e-003
tblVehicleEF	LHD1	0.13	0.10
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	4.1220e-003	3.0450e-003
tblVehicleEF	LHD1	0.09	0.06
tblVehicleEF	LHD1	0.36	0.56
tblVehicleEF	LHD1	0.25	0.08
tblVehicleEF	LHD1	9.2000e-005	9.0000e-005
tblVehicleEF	LHD1	5.9770e-003	6.3570e-003
tblVehicleEF	LHD1	3.5000e-004	1.1000e-004
tblVehicleEF	LHD1	7.3080e-003	5.4780e-003
tblVehicleEF	LHD1	0.13	0.10
tblVehicleEF	LHD1	0.02	0.03
tblVehicleEF	LHD1	4.1220e-003	3.0450e-003
tblVehicleEF	LHD1	0.11	0.08
tblVehicleEF	LHD1	0.36	0.56

tblVehicleEF	LHD1	0.28	0.08
tblVehicleEF	LHD1	5.2170e-003	5.0870e-003
tblVehicleEF	LHD1	0.01	6.1100e-003
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	0.14	0.18
tblVehicleEF	LHD1	1.07	0.75
tblVehicleEF	LHD1	2.55	1.02
tblVehicleEF	LHD1	9.23	9.25
tblVehicleEF	LHD1	609.20	652.45
tblVehicleEF	LHD1	30.40	11.20
tblVehicleEF	LHD1	0.09	0.07
tblVehicleEF	LHD1	2.08	1.23
tblVehicleEF	LHD1	9.6500e-004	8.9000e-004
tblVehicleEF	LHD1	0.01	9.8770e-003
tblVehicleEF	LHD1	0.01	9.8260e-003
tblVehicleEF	LHD1	9.5800e-004	2.6000e-004
tblVehicleEF	LHD1	9.2400e-004	8.5100e-004
tblVehicleEF	LHD1	2.5390e-003	2.4690e-003
tblVehicleEF	LHD1	0.01	9.3760e-003
tblVehicleEF	LHD1	8.8100e-004	2.3900e-004
tblVehicleEF	LHD1	4.0430e-003	3.1520e-003
tblVehicleEF	LHD1	0.13	0.10
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	1.7940e-003	1.6100e-003
tblVehicleEF	LHD1	0.08	0.06
tblVehicleEF	LHD1	0.38	0.60
tblVehicleEF	LHD1	0.26	0.09

tblVehicleEF	LHD1	9.2000e-005	9.0000e-005
tblVehicleEF	LHD1	5.9760e-003	6.3570e-003
tblVehicleEF	LHD1	3.5200e-004	1.1100e-004
tblVehicleEF	LHD1	4.0430e-003	3.1520e-003
tblVehicleEF	LHD1	0.13	0.10
tblVehicleEF	LHD1	0.02	0.03
tblVehicleEF	LHD1	1.7940e-003	1.6100e-003
tblVehicleEF	LHD1	0.10	0.08
tblVehicleEF	LHD1	0.38	0.60
tblVehicleEF	LHD1	0.29	0.09
tblVehicleEF	LHD2	3.5950e-003	3.6950e-003
tblVehicleEF	LHD2	4.6110e-003	4.1040e-003
tblVehicleEF	LHD2	8.1370e-003	0.01
tblVehicleEF	LHD2	0.12	0.15
tblVehicleEF	LHD2	0.50	0.50
tblVehicleEF	LHD2	1.20	0.67
tblVehicleEF	LHD2	14.27	14.14
tblVehicleEF	LHD2	608.52	665.25
tblVehicleEF	LHD2	24.46	8.76
tblVehicleEF	LHD2	0.11	0.10
tblVehicleEF	LHD2	1.49	1.36
tblVehicleEF	LHD2	1.2830e-003	1.3100e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	4.0000e-004	1.3700e-004
tblVehicleEF	LHD2	1.2280e-003	1.2540e-003
tblVehicleEF	LHD2	2.6860e-003	2.6560e-003

tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	3.6800e-004	1.2600e-004
tblVehicleEF	LHD2	1.3070e-003	1.7040e-003
tblVehicleEF	LHD2	0.04	0.05
tblVehicleEF	LHD2	0.01	0.02
tblVehicleEF	LHD2	7.0300e-004	9.2000e-004
tblVehicleEF	LHD2	0.06	0.06
tblVehicleEF	LHD2	0.09	0.32
tblVehicleEF	LHD2	0.11	0.05
tblVehicleEF	LHD2	1.3900e-004	1.3500e-004
tblVehicleEF	LHD2	5.9200e-003	6.4300e-003
tblVehicleEF	LHD2	2.6700e-004	8.7000e-005
tblVehicleEF	LHD2	1.3070e-003	1.7040e-003
tblVehicleEF	LHD2	0.04	0.05
tblVehicleEF	LHD2	0.02	0.02
tblVehicleEF	LHD2	7.0300e-004	9.2000e-004
tblVehicleEF	LHD2	0.07	0.07
tblVehicleEF	LHD2	0.09	0.32
tblVehicleEF	LHD2	0.12	0.06
tblVehicleEF	LHD2	3.5950e-003	3.7050e-003
tblVehicleEF	LHD2	4.6760e-003	4.1460e-003
tblVehicleEF	LHD2	7.7630e-003	0.01
tblVehicleEF	LHD2	0.12	0.15
tblVehicleEF	LHD2	0.50	0.50
tblVehicleEF	LHD2	1.13	0.64
tblVehicleEF	LHD2	14.27	14.14
tblVehicleEF	LHD2	608.52	665.25

tblVehicleEF	LHD2	24.46	8.70
tblVehicleEF	LHD2	0.11	0.10
tblVehicleEF	LHD2	1.40	1.28
tblVehicleEF	LHD2	1.2830e-003	1.3100e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	4.0000e-004	1.3700e-004
tblVehicleEF	LHD2	1.2280e-003	1.2540e-003
tblVehicleEF	LHD2	2.6860e-003	2.6560e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	3.6800e-004	1.2600e-004
tblVehicleEF	LHD2	2.5220e-003	3.0730e-003
tblVehicleEF	LHD2	0.04	0.06
tblVehicleEF	LHD2	0.01	0.02
tblVehicleEF	LHD2	1.5220e-003	1.7630e-003
tblVehicleEF	LHD2	0.06	0.06
tblVehicleEF	LHD2	0.09	0.32
tblVehicleEF	LHD2	0.10	0.05
tblVehicleEF	LHD2	1.3900e-004	1.3500e-004
tblVehicleEF	LHD2	5.9200e-003	6.4300e-003
tblVehicleEF	LHD2	2.6500e-004	8.6000e-005
tblVehicleEF	LHD2	2.5220e-003	3.0730e-003
tblVehicleEF	LHD2	0.04	0.06
tblVehicleEF	LHD2	0.02	0.02
tblVehicleEF	LHD2	1.5220e-003	1.7630e-003
tblVehicleEF	LHD2	0.07	0.07
tblVehicleEF	LHD2	0.09	0.32

tblVehicleEF	LHD2	0.11	0.05
tblVehicleEF	LHD2	3.5950e-003	3.6960e-003
tblVehicleEF	LHD2	4.6180e-003	4.1080e-003
tblVehicleEF	LHD2	8.0640e-003	0.01
tblVehicleEF	LHD2	0.12	0.15
tblVehicleEF	LHD2	0.50	0.50
tblVehicleEF	LHD2	1.19	0.67
tblVehicleEF	LHD2	14.27	14.14
tblVehicleEF	LHD2	608.52	665.25
tblVehicleEF	LHD2	24.46	8.75
tblVehicleEF	LHD2	0.11	0.10
tblVehicleEF	LHD2	1.46	1.33
tblVehicleEF	LHD2	1.2830e-003	1.3100e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	4.0000e-004	1.3700e-004
tblVehicleEF	LHD2	1.2280e-003	1.2540e-003
tblVehicleEF	LHD2	2.6360e-003	2.6580e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	3.6800e-004	1.2600e-004
tblVehicleEF	LHD2	1.3460e-003	1.7140e-003
tblVehicleEF	LHD2	0.04	0.06
tblVehicleEF	LHD2	0.01	0.02
tblVehicleEF	LHD2	6.8700e-004	9.2200e-004
tblVehicleEF	LHD2	0.05	0.06
tblVehicleEF	LHD2	0.10	0.34
tblVehicleEF	LHD2	0.11	0.05

tblVehicleEF	LHD2	1.3900e-004	1.3500e-004
tblVehicleEF	LHD2	5.9200e-003	6.4300e-003
tblVehicleEF	LHD2	2.6600e-004	8.7000e-005
tblVehicleEF	LHD2	1.3460e-003	1.7140e-003
tblVehicleEF	LHD2	0.04	0.06
tblVehicleEF	LHD2	0.02	0.02
tblVehicleEF	LHD2	6.8700e-004	9.2200e-004
tblVehicleEF	LHD2	0.07	0.07
tblVehicleEF	LHD2	0.10	0.34
tblVehicleEF	LHD2	0.12	0.06
tblVehicleEF	MCY	0.43	0.34
tblVehicleEF	MCY	0.16	0.24
tblVehicleEF	MCY	20.55	19.26
tblVehicleEF	MCY	9.93	8.60
tblVehicleEF	MCY	167.73	212.03
tblVehicleEF	MCY	46.45	60.73
tblVehicleEF	MCY	1.16	1.13
tblVehicleEF	MCY	1.8610e-003	1.9650e-003
tblVehicleEF	MCY	3.6730e-003	2.9600e-003
tblVehicleEF	MCY	1.7420e-003	1.8380e-003
tblVehicleEF	MCY	3.4650e-003	2.7870e-003
tblVehicleEF	MCY	1.45	1.42
tblVehicleEF	MCY	0.84	0.80
tblVehicleEF	MCY	0.80	0.78
tblVehicleEF	MCY	2.23	2.33
tblVehicleEF	MCY	0.49	1.91
tblVehicleEF	MCY	2.16	1.84

tblVehicleEF	MCY	2.0770e-003	2.0980e-003
tblVehicleEF	MCY	6.9000e-004	6.0100e-004
tblVehicleEF	MCY	1.45	1.42
tblVehicleEF	MCY	0.84	0.80
tblVehicleEF	MCY	0.80	0.78
tblVehicleEF	MCY	2.74	2.67
tblVehicleEF	MCY	0.49	1.91
tblVehicleEF	MCY	2.35	2.01
tblVehicleEF	MCY	0.42	0.34
tblVehicleEF	MCY	0.14	0.21
tblVehicleEF	MCY	20.68	19.28
tblVehicleEF	MCY	9.05	7.90
tblVehicleEF	MCY	167.73	211.90
tblVehicleEF	MCY	46.45	58.88
tblVehicleEF	MCY	0.99	0.97
tblVehicleEF	MCY	1.8610e-003	1.9650e-003
tblVehicleEF	MCY	3.6730e-003	2.9600e-003
tblVehicleEF	MCY	1.7420e-003	1.8380e-003
tblVehicleEF	MCY	3.4650e-003	2.7870e-003
tblVehicleEF	MCY	3.14	2.77
tblVehicleEF	MCY	1.27	1.11
tblVehicleEF	MCY	2.13	1.77
tblVehicleEF	MCY	2.17	2.28
tblVehicleEF	MCY	0.49	1.88
tblVehicleEF	MCY	1.86	1.62
tblVehicleEF	MCY	2.0770e-003	2.0970e-003
tblVehicleEF	MCY	6.6700e-004	5.8300e-004

tblVehicleEF	MCY	3.14	2.77
tblVehicleEF	MCY	1.27	1.11
tblVehicleEF	MCY	2.13	1.77
tblVehicleEF	MCY	2.67	2.81
tblVehicleEF	MCY	0.49	1.88
tblVehicleEF	MCY	2.02	1.76
tblVehicleEF	MCY	0.42	0.34
tblVehicleEF	MCY	0.15	0.24
tblVehicleEF	MCY	19.63	18.76
tblVehicleEF	MCY	9.55	8.44
tblVehicleEF	MCY	167.73	211.17
tblVehicleEF	MCY	45.45	60.38
tblVehicleEF	MCY	1.12	1.09
tblVehicleEF	MCY	1.8610e-003	1.9650e-003
tblVehicleEF	MCY	3.6730e-003	2.9600e-003
tblVehicleEF	MCY	1.7420e-003	1.8380e-003
tblVehicleEF	MCY	3.4650e-003	2.7870e-003
tblVehicleEF	MCY	1.71	1.57
tblVehicleEF	MCY	1.13	1.06
tblVehicleEF	MCY	0.72	0.74
tblVehicleEF	MCY	2.19	2.31
tblVehicleEF	MCY	0.56	2.18
tblVehicleEF	MCY	2.08	1.81
tblVehicleEF	MCY	2.0610e-003	2.0900e-003
tblVehicleEF	MCY	6.8200e-004	5.9600e-004
tblVehicleEF	MCY	1.71	1.57
tblVehicleEF	MCY	1.13	1.06

tblVehicleEF	MCY	0.72	0.74
tblVehicleEF	MCY	2.69	2.84
tblVehicleEF	MCY	0.56	2.18
tblVehicleEF	MCY	2.27	1.98
tblVehicleEF	MDV	0.01	5.5200e-003
tblVehicleEF	MDV	0.02	0.09
tblVehicleEF	MDV	1.35	1.14
tblVehicleEF	MDV	3.25	3.25
tblVehicleEF	MDV	483.94	415.10
tblVehicleEF	MDV	107.92	87.32
tblVehicleEF	MDV	0.17	0.11
tblVehicleEF	MDV	1.8290e-003	1.6850e-003
tblVehicleEF	MDV	2.5170e-003	2.0310e-003
tblVehicleEF	MDV	1.6830e-003	1.5540e-003
tblVehicleEF	MDV	2.3150e-003	1.8680e-003
tblVehicleEF	MDV	0.10	0.11
tblVehicleEF	MDV	0.20	0.17
tblVehicleEF	MDV	0.08	0.10
tblVehicleEF	MDV	0.03	0.02
tblVehicleEF	MDV	0.11	0.50
tblVehicleEF	MDV	0.25	0.44
tblVehicleEF	MDV	4.8500e-003	4.0780e-003
tblVehicleEF	MDV	1.1370e-003	8.5900e-004
tblVehicleEF	MDV	0.10	0.11
tblVehicleEF	MDV	0.20	0.17
tblVehicleEF	MDV	0.08	0.10
tblVehicleEF	MDV	0.05	0.03

tblVehicleEF	MDV	0.11	0.50
tblVehicleEF	MDV	0.28	0.48
tblVehicleEF	MDV	0.01	6.2110e-003
tblVehicleEF	MDV	0.02	0.08
tblVehicleEF	MDV	1.64	1.35
tblVehicleEF	MDV	2.69	2.72
tblVehicleEF	MDV	526.85	438.45
tblVehicleEF	MDV	107.92	86.27
tblVehicleEF	MDV	0.16	0.10
tblVehicleEF	MDV	1.8260e-003	1.6850e-003
tblVehicleEF	MDV	2.5170e-003	2.0310e-003
tblVehicleEF	MDV	1.6830e-003	1.5540e-003
tblVehicleEF	MDV	2.3150e-003	1.8680e-003
tblVehicleEF	MDV	0.20	0.21
tblVehicleEF	MDV	0.23	0.19
tblVehicleEF	MDV	0.17	0.19
tblVehicleEF	MDV	0.04	0.03
tblVehicleEF	MDV	0.11	0.49
tblVehicleEF	MDV	0.21	0.38
tblVehicleEF	MDV	5.2830e-003	4.3080e-003
tblVehicleEF	MDV	1.1260e-003	8.4800e-004
tblVehicleEF	MDV	0.20	0.21
tblVehicleEF	MDV	0.23	0.19
tblVehicleEF	MDV	0.17	0.19
tblVehicleEF	MDV	0.05	0.04
tblVehicleEF	MDV	0.11	0.49
tblVehicleEF	MDV	0.23	0.41

tblVehicleEF	MDV	0.01	5.4050e-003
tblVehicleEF	MDV	0.02	0.09
tblVehicleEF	MDV	1.28	1.09
tblVehicleEF	MDV	3.20	3.26
tblVehicleEF	MDV	473.93	410.75
tblVehicleEF	MDV	107.92	87.35
tblVehicleEF	MDV	0.16	0.10
tblVehicleEF	MDV	1.8260e-003	1.6850e-003
tblVehicleEF	MDV	2.5170e-003	2.0310e-003
tblVehicleEF	MDV	1.6830e-003	1.5540e-003
tblVehicleEF	MDV	2.3150e-003	1.8680e-003
tblVehicleEF	MDV	0.10	0.11
tblVehicleEF	MDV	0.22	0.18
tblVehicleEF	MDV	0.08	0.10
tblVehicleEF	MDV	0.03	0.02
tblVehicleEF	MDV	0.13	0.57
tblVehicleEF	MDV	0.25	0.44
tblVehicleEF	MDV	4.7490e-003	4.0360e-003
tblVehicleEF	MDV	1.1360e-003	8.5900e-004
tblVehicleEF	MDV	0.10	0.11
tblVehicleEF	MDV	0.22	0.18
tblVehicleEF	MDV	0.08	0.10
tblVehicleEF	MDV	0.04	0.03
tblVehicleEF	MDV	0.13	0.57
tblVehicleEF	MDV	0.27	0.48
tblVehicleEF	MH	0.04	3.6550e-003
tblVehicleEF	MH	0.03	0.00

tblVehicleEF	MH	3.07	0.35
tblVehicleEF	MH	6.43	0.00
tblVehicleEF	MH	1,045.05	970.21
tblVehicleEF	MH	59.49	0.00
tblVehicleEF	MH	1.54	4.24
tblVehicleEF	MH	0.01	0.02
tblVehicleEF	MH	0.04	0.11
tblVehicleEF	MH	1.1740e-003	0.00
tblVehicleEF	MH	3.2230e-003	4.0000e-003
tblVehicleEF	MH	0.04	0.11
tblVehicleEF	MH	1.0790e-003	0.00
tblVehicleEF	MH	1.47	0.00
tblVehicleEF	MH	0.09	0.00
tblVehicleEF	MH	0.51	0.00
tblVehicleEF	MH	0.10	0.09
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	0.37	0.00
tblVehicleEF	MH	0.01	9.1720e-003
tblVehicleEF	MH	7.0700e-004	0.00
tblVehicleEF	MH	1.47	0.00
tblVehicleEF	MH	0.09	0.00
tblVehicleEF	MH	0.51	0.00
tblVehicleEF	MH	0.14	0.09
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	0.40	0.00
tblVehicleEF	MH	0.04	3.6550e-003
tblVehicleEF	MH	0.03	0.00

tblVehicleEF	MH	3.19	0.35
tblVehicleEF	MH	5.84	0.00
tblVehicleEF	MH	1,045.05	970.21
tblVehicleEF	MH	59.49	0.00
tblVehicleEF	MH	1.41	4.00
tblVehicleEF	MH	0.01	0.02
tblVehicleEF	MH	0.04	0.11
tblVehicleEF	MH	1.1740e-003	0.00
tblVehicleEF	MH	3.2230e-003	4.0000e-003
tblVehicleEF	MH	0.04	0.11
tblVehicleEF	MH	1.0790e-003	0.00
tblVehicleEF	MH	2.91	0.00
tblVehicleEF	MH	0.11	0.00
tblVehicleEF	MH	1.21	0.00
tblVehicleEF	MH	0.11	0.09
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	0.34	0.00
tblVehicleEF	MH	0.01	9.1720e-003
tblVehicleEF	MH	6.9700e-004	0.00
tblVehicleEF	MH	2.91	0.00
tblVehicleEF	MH	0.11	0.00
tblVehicleEF	MH	1.21	0.00
tblVehicleEF	MH	0.15	0.09
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	0.38	0.00
tblVehicleEF	MH	0.04	3.6550e-003
tblVehicleEF	MH	0.03	0.00

tblVehicleEF	MH	3.08	0.35
tblVehicleEF	MH	6.36	0.00
tblVehicleEF	MH	1,045.05	970.21
tblVehicleEF	MH	59.49	0.00
tblVehicleEF	MH	1.51	4.17
tblVehicleEF	MH	0.01	0.02
tblVehicleEF	MH	0.04	0.11
tblVehicleEF	MH	1.1740e-003	0.00
tblVehicleEF	MH	3.2230e-003	4.0000e-003
tblVehicleEF	MH	0.04	0.11
tblVehicleEF	MH	1.0790e-003	0.00
tblVehicleEF	MH	1.75	0.00
tblVehicleEF	MH	0.11	0.00
tblVehicleEF	MH	0.53	0.00
tblVehicleEF	MH	0.10	0.08
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	0.37	0.00
tblVehicleEF	MH	0.01	9.1720e-003
tblVehicleEF	MH	7.0600e-004	0.00
tblVehicleEF	MH	1.75	0.00
tblVehicleEF	MH	0.11	0.00
tblVehicleEF	MH	0.53	0.00
tblVehicleEF	MH	0.15	0.09
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	0.40	0.00
tblVehicleEF	MHD	0.02	2.5070e-003
tblVehicleEF	MHD	3.5160e-003	3.3210e-003

tblVehicleEF	MHD	0.05	6.4670e-003
tblVehicleEF	MHD	0.32	0.31
tblVehicleEF	MHD	0.27	0.32
tblVehicleEF	MHD	5.32	0.74
tblVehicleEF	MHD	156.91	68.92
tblVehicleEF	MHD	1,101.52	974.57
tblVehicleEF	MHD	52.43	6.35
tblVehicleEF	MHD	0.60	0.52
tblVehicleEF	MHD	0.99	1.61
tblVehicleEF	MHD	3.8600e-004	1.2310e-003
tblVehicleEF	MHD	5.0030e-003	0.04
tblVehicleEF	MHD	7.6400e-004	7.5000e-005
tblVehicleEF	MHD	3.6900e-004	1.1780e-003
tblVehicleEF	MHD	4.7830e-003	0.03
tblVehicleEF	MHD	7.0300e-004	6.9000e-005
tblVehicleEF	MHD	1.2800e-003	4.5300e-004
tblVehicleEF	MHD	0.04	0.01
tblVehicleEF	MHD	0.02	0.02
tblVehicleEF	MHD	6.5100e-004	2.4000e-004
tblVehicleEF	MHD	0.04	0.06
tblVehicleEF	MHD	0.02	0.08
tblVehicleEF	MHD	0.32	0.03
tblVehicleEF	MHD	1.5080e-003	6.5300e-004
tblVehicleEF	MHD	0.01	9.2620e-003
tblVehicleEF	MHD	6.1700e-004	6.3000e-005
tblVehicleEF	MHD	1.2800e-003	4.5300e-004
tblVehicleEF	MHD	0.04	0.01

tblVehicleEF	MHD	0.03	0.02
tblVehicleEF	MHD	6.5100e-004	2.4000e-004
tblVehicleEF	MHD	0.04	0.07
tblVehicleEF	MHD	0.02	0.06
tblVehicleEF	MHD	0.35	0.04
tblVehicleEF	MHD	0.02	2.3860e-003
tblVehicleEF	MHD	3.5800e-003	3.3450e-003
tblVehicleEF	MHD	0.05	6.2100e-003
tblVehicleEF	MHD	0.24	0.26
tblVehicleEF	MHD	0.28	0.33
tblVehicleEF	MHD	4.97	0.70
tblVehicleEF	MHD	166.20	69.59
tblVehicleEF	MHD	1,101.52	974.58
tblVehicleEF	MHD	52.43	6.28
tblVehicleEF	MHD	0.62	0.52
tblVehicleEF	MHD	0.92	1.52
tblVehicleEF	MHD	3.2500e-004	1.0410e-003
tblVehicleEF	MHD	5.0030e-003	0.04
tblVehicleEF	MHD	7.6400e-004	7.5000e-005
tblVehicleEF	MHD	3.1100e-004	9.9600e-004
tblVehicleEF	MHD	4.7830e-003	0.03
tblVehicleEF	MHD	7.0300e-004	6.9000e-005
tblVehicleEF	MHD	2.5300e-003	8.2800e-004
tblVehicleEF	MHD	0.05	0.02
tblVehicleEF	MHD	0.02	0.02
tblVehicleEF	MHD	1.5010e-003	4.7800e-004
tblVehicleEF	MHD	0.04	0.06

tblVehicleEF	MHD	0.02	0.08
tblVehicleEF	MHD	0.30	0.03
tblVehicleEF	MHD	1.5950e-003	6.5900e-004
tblVehicleEF	MHD	0.01	9.2620e-003
tblVehicleEF	MHD	6.1100e-004	6.2000e-005
tblVehicleEF	MHD	2.5306e-003	8.2800e-004
tblVehicleEF	MHD	0.05	0.02
tblVehicleEF	MHD	0.03	0.02
tblVehicleEF	MHD	1.5010e-003	4.7800e-004
tblVehicleEF	MHD	0.04	0.07
tblVehicleEF	MHD	0.02	0.08
tblVehicleEF	MHD	0.33	0.04
tblVehicleEF	MHD	0.02	2.6830e-003
tblVehicleEF	MHD	3.5220e-003	3.3210e-003
tblVehicleEF	MHD	0.05	6.4200e-003
tblVehicleEF	MHD	0.45	0.37
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tblVehicleEF	MHD	52.43	6.34
tblVehicleEF	MHD	0.57	0.52
tblVehicleEF	MHD	0.97	1.59
tblVehicleEF	MHD	4.7000e-004	1.4940e-003
tblVehicleEF	MHD	5.0030e-003	0.04
tblVehicleEF	MHD	7.6400e-004	7.5000e-005
tblVehicleEF	MHD	4.4900e-004	1.4300e-003

tblVehicleEF	MHD	4.7830e-003	0.03
tblVehicleEF	MHD	7.0300e-004	6.9000e-005
tblVehicleEF	MHD	1.3890e-003	4.7100e-004
tblVehicleEF	MHD	0.05	0.02
tblVehicleEF	MHD	0.03	0.02
tblVehicleEF	MHD	6.4000e-004	2.4400e-004
tblVehicleEF	MHD	0.04	0.05
tblVehicleEF	MHD	0.02	0.09
tblVehicleEF	MHD	0.32	0.03
tblVehicleEF	MHD	1.3860e-003	6.4400e-004
tblVehicleEF	MHD	0.01	9.2620e-003
tblVehicleEF	MHD	6.1600e-004	6.3000e-005
tblVehicleEF	MHD	1.3890e-003	4.7100e-004
tblVehicleEF	MHD	0.05	0.02
tblVehicleEF	MHD	0.04	0.02
tblVehicleEF	MHD	6.4000e-004	2.4400e-004
tblVehicleEF	MHD	0.04	0.07
tblVehicleEF	MHD	0.02	0.09
tblVehicleEF	MHD	0.35	0.04
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tblVehicleEF	OBUS	9.9110e-003	6.5960e-003
tblVehicleEF	OBUS	0.03	0.02
tblVehicleEF	OBUS	0.26	0.52
tblVehicleEF	OBUS	0.63	0.77
tblVehicleEF	OBUS	6.27	2.45
tblVehicleEF	OBUS	70.35	76.06
tblVehicleEF	OBUS	1,121.50	1,406.90

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tblVehicleEF	OBUS	0.97	1.24
tblVehicleEF	OBUS	6.4000e-005	5.8900e-004
tblVehicleEF	OBUS	4.6440e-003	0.01
tblVehicleEF	OBUS	9.2900e-004	2.1800e-004
tblVehicleEF	OBUS	5.1000e-005	5.6400e-004
tblVehicleEF	OBUS	4.4220e-003	0.01
tblVehicleEF	OBUS	8.5400e-004	2.0100e-004
tblVehicleEF	OBUS	2.1800e-003	2.6020e-003
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.04	0.05
tblVehicleEF	OBUS	9.3100e-004	1.1160e-003
tblVehicleEF	OBUS	0.04	0.05
tblVehicleEF	OBUS	0.05	0.29
tblVehicleEF	OBUS	0.38	0.12
tblVehicleEF	OBUS	6.8400e-004	7.2500e-004
tblVehicleEF	OBUS	0.01	0.01
tblVehicleEF	OBUS	8.1700e-004	2.0300e-004
tblVehicleEF	OBUS	2.1800e-003	2.6020e-003
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.05	0.07
tblVehicleEF	OBUS	9.3100e-004	1.1160e-003
tblVehicleEF	OBUS	0.06	0.07
tblVehicleEF	OBUS	0.05	0.29
tblVehicleEF	OBUS	0.42	0.13
tblVehicleEF	OBUS	0.01	8.6750e-003

tblVehicleEF	OBUS	0.01	6.7350e-003
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tblVehicleEF	OBUS	0.26	0.51
tblVehicleEF	OBUS	0.65	0.79
tblVehicleEF	OBUS	5.74	2.28
tblVehicleEF	OBUS	73.50	75.90
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tblVehicleEF	OBUS	70.70	20.20
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tblVehicleEF	OBUS	0.90	1.16
tblVehicleEF	OBUS	5.4000e-005	5.0100e-004
tblVehicleEF	OBUS	4.6440e-003	0.01
tblVehicleEF	OBUS	9.2900e-004	2.1800e-004
tblVehicleEF	OBUS	5.1000e-005	4.7900e-004
tblVehicleEF	OBUS	4.4220e-003	0.01
tblVehicleEF	OBUS	8.5400e-004	2.0100e-004
tblVehicleEF	OBUS	4.2350e-003	4.6860e-003
tblVehicleEF	OBUS	0.02	0.03
tblVehicleEF	OBUS	0.03	0.05
tblVehicleEF	OBUS	2.1330e-003	2.2090e-003
tblVehicleEF	OBUS	0.05	0.05
tblVehicleEF	OBUS	0.05	0.29
tblVehicleEF	OBUS	0.36	0.11
tblVehicleEF	OBUS	7.1400e-004	7.2400e-004
tblVehicleEF	OBUS	0.01	0.01
tblVehicleEF	OBUS	8.0800e-004	2.0000e-004
tblVehicleEF	OBUS	4.2350e-003	4.6860e-003

tblVehicleEF	OBUS	0.02	0.03
tblVehicleEF	OBUS	0.05	0.07
tblVehicleEF	OBUS	2.1330e-003	2.2090e-003
tblVehicleEF	OBUS	0.06	0.07
tblVehicleEF	OBUS	0.05	0.29
tblVehicleEF	OBUS	0.40	0.12
tblVehicleEF	OBUS	0.01	8.7750e-003
tblVehicleEF	OBUS	9.9380e-003	6.6000e-003
tblVehicleEF	OBUS	0.03	0.02
tblVehicleEF	OBUS	0.28	0.53
tblVehicleEF	OBUS	0.63	0.77
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tblVehicleEF	OBUS	0.96	1.22
tblVehicleEF	OBUS	7.7000e-005	7.1200e-004
tblVehicleEF	OBUS	4.6440e-003	0.01
tblVehicleEF	OBUS	9.2900e-004	2.1800e-004
tblVehicleEF	OBUS	7.4000e-005	6.8100e-004
tblVehicleEF	OBUS	4.4220e-003	0.01
tblVehicleEF	OBUS	8.5400e-004	2.0100e-004
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tblVehicleEF	OBUS	9.4100e-004	1.1660e-003

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tblVehicleEF	OBUS	0.01	0.01
tblVehicleEF	OBUS	8.1600e-004	2.0300e-004
tblVehicleEF	OBUS	2.3200e-003	2.7390e-003
tblVehicleEF	OBUS	0.02	0.03
tblVehicleEF	OBUS	0.05	0.07
tblVehicleEF	OBUS	9.4100e-004	1.1660e-003
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tblVehicleEF	SBUS	1,136.31	1,112.17
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tblVehicleEF	SBUS	11.70	3.29
tblVehicleEF	SBUS	4.77	5.20
tblVehicleEF	SBUS	0.01	4.3580e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	0.03	0.03

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tblVehicleEF	SBUS	0.01	4.1690e-003
tblVehicleEF	SBUS	2.7560e-003	2.7010e-003
tblVehicleEF	SBUS	0.03	0.03
tblVehicleEF	SBUS	4.7500e-004	3.6000e-005
tblVehicleEF	SBUS	2.9260e-003	1.2420e-003
tblVehicleEF	SBUS	0.02	9.5120e-003
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tblVehicleEF	SBUS	1.3050e-003	5.9000e-004
tblVehicleEF	SBUS	0.11	0.11
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tblVehicleEF	SBUS	4.6300e-004	4.7000e-005
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tblVehicleEF	SBUS	8.5310e-003	0.06
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tblVehicleEF	SBUS	0.01	3.3640e-003
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tblVehicleEF	SBUS	4.3500e-004	4.4000e-005
tblVehicleEF	SBUS	5.6170e-003	2.2080e-003
tblVehicleEF	SBUS	0.02	9.9850e-003
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tblVehicleEF	SBUS	2.8800e-003	1.1130e-003
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tblVehicleEF	SBUS	8.5310e-003	0.06
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tblVehicleEF	SBUS	0.01	5.2920e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	0.03	0.03
tblVehicleEF	SBUS	5.1700e-004	4.0000e-005
tblVehicleEF	SBUS	0.01	5.0630e-003
tblVehicleEF	SBUS	2.7560e-003	2.7010e-003
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tblVehicleEF	UBUS	0.08	0.01
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tblVehicleEF	UBUS	14.34	0.89
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tblVehicleEF	UBUS	136.37	11.77
tblVehicleEF	UBUS	5.87	0.38
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tblVehicleEF	UBUS	0.01	0.03
tblVehicleEF	UBUS	0.07	2.6550e-003
tblVehicleEF	UBUS	1.4030e-003	1.4100e-004
tblVehicleEF	UBUS	0.22	0.03
tblVehicleEF	UBUS	3.0000e-003	6.6220e-003
tblVehicleEF	UBUS	0.06	2.5280e-003

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tblVehicleEF	UBUS	0.01	3.0250e-003
tblVehicleEF	UBUS	1.6240e-003	1.1700e-004
tblVehicleEF	UBUS	8.0860e-003	1.6780e-003
tblVehicleEF	UBUS	0.11	9.5390e-003
tblVehicleEF	UBUS	3.9450e-003	7.3700e-004
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tblVehicleEF	UBUS	1.83	4.45
tblVehicleEF	UBUS	0.08	9.2350e-003
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tblVehicleEF	UBUS	1,846.39	1,692.13
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tblVehicleEF	UBUS	0.52	0.07
tblVehicleEF	UBUS	0.01	0.03
tblVehicleEF	UBUS	0.07	2.6550e-003
tblVehicleEF	UBUS	1.4030e-003	1.4100e-004
tblVehicleEF	UBUS	0.22	0.03

tblVehicleEF	UBUS	3.0000e-003	6.6220e-003
tblVehicleEF	UBUS	0.06	2.5280e-003
tblVehicleEF	UBUS	1.2900e-003	1.3000e-004
tblVehicleEF	UBUS	0.02	3.0610e-003
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tblVehicleEF	UBUS	0.02	0.04
tblVehicleEF	UBUS	1.02	0.03
tblVehicleEF	UBUS	0.01	3.0250e-003
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tblVehicleEF	UBUS	0.02	3.0610e-003
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tblVehicleEF	UBUS	3.0000e-003	6.6220e-003
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tblVehicleEF	UBUS	1.2900e-003	1.3000e-004
tblVehicleEF	UBUS	9.2250e-003	1.6870e-003
tblVehicleEF	UBUS	0.14	0.01
tblVehicleEF	UBUS	4.1190e-003	7.4500e-004
tblVehicleEF	UBUS	0.61	0.07
tblVehicleEF	UBUS	0.03	0.05
tblVehicleEF	UBUS	1.13	0.04
tblVehicleEF	UBUS	0.01	3.0250e-003
tblVehicleEF	UBUS	1.6160e-003	1.1700e-004
tblVehicleEF	UBUS	9.2250e-003	1.6870e-003
tblVehicleEF	UBUS	0.14	0.01
tblVehicleEF	UBUS	4.1190e-003	7.4500e-004
tblVehicleEF	UBUS	2.50	4.54
tblVehicleEF	UBUS	0.03	0.05
tblVehicleEF	UBUS	1.24	0.04
tblVehicleTrips	CC_TL	8.40	0.00
tblVehicleTrips	CC_TL	8.40	0.00
tblVehicleTrips	CC_TL	8.40	0.00
tblVehicleTrips	CNW_TL	6.90	0.00
tblVehicleTrips	CNW_TL	6.90	0.00
tblVehicleTrips	CNW_TL	6.90	0.00
tblVehicleTrips	CNW_TTP	41.00	0.00
tblVehicleTrips	CW_TL	16.60	0.00

tblVehicleTrips	CW_TL	16.60	0.00
tblVehicleTrips	CW_TL	16.60	0.00
tblVehicleTrips	CW_TTP	59.00	0.00
tblVehicleTrips	DV_TP	5.00	0.00
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PR_TP	92.00	0.00
tblVehicleTrips	ST_TR	1.68	0.00
tblVehicleTrips	SU_TR	1.68	0.00
tblVehicleTrips	WD_TR	1.68	0.00
tblWater	IndoorWaterUseRate	527,159,250.00	0.00

2.0 Emissions Summary

Bloomington Business Park Specific Plan (Construction - Mitigated) - San Bernardino-South Coast County, Winter

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	9.6665	116.5206	49.7641	0.1022	52.6485	3.5259	57.1744	19.2161	4.1648	23.3809	0.0000	16,422.78 45	16,422.78 45	3.3765	0.0000	16,490.16 69
2022	56.4867	170.5098	176.1181	0.5589	52.6485	4.1865	56.8366	19.2161	3.9033	23.0181	0.0000	55,679.66 97	55,679.66 97	6.1568	0.0000	55,814.01 94
Maximum	**56.4867**	**170.5098**	**176.1181**	**0.5589**	**52.6485**	**4.5259**	**57.1744**	**19.2161**	**4.1648**	**23.3809**	**0.0000**	**55,679.66 97**	**55,679.66 97**	**6.1568**	**0.0000**	**55,814.01 94**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	2.1756	54.7976	58.2234	0.1022	52.6485	0.1882	52.8367	19.2161	0.1889	19.4050	0.0000	16,422.78 45	16,422.78 45	3.3765	0.0000	16,490.16 69
2022	50.4533	116.9132	195.5603	0.5589	52.6485	0.5917	52.8325	19.2161	0.5715	19.3989	0.0000	55,679.66 97	55,679.66 97	6.1568	0.0000	55,814.01 94
Maximum	**50.4533**	**116.9132**	**195.5603**	**0.5589**	**52.6485**	**0.5917**	**52.8367**	**19.2161**	**0.5715**	**19.4030**	**0.0000**	**55,679.66 97**	**55,679.66 97**	**6.1568**	**0.0000**	**55,814.01 94**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	20.44	40.99	-11.47	0.00	0.00	91.05	6.92	0.00	90.60	15.65	0.00	0.00	0.00	0.00	0.00	0.00

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	62.1353	6.3900e-003	0.7003	5.0000e-005		2.5000e-003	2.5000e-003		2.5000e-003	2.5000e-003		1.4987	1.4987	3.9500e-003		1.5976
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	**62.1353**	**6.3900e-003**	**0.7003**	**5.0000e-005**	**0.0000**	**2.5000e-003**	**2.5000e-003**	**0.0000**	**2.5000e-003**	**2.5000e-003**		**1.4987**	**1.4987**	**3.9500e-003**	**0.0000**	**1.5976**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	62.1353	6.3900e-003	0.7003	5.0000e-005		2.5000e-003	2.5000e-003		2.5000e-003	2.5000e-003		1.4987	1.4987	3.9500e-003		1.5976
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	**62.1353**	**6.3900e-003**	**0.7003**	**5.0000e-005**	**0.0000**	**2.5000e-003**	**2.5000e-003**	**0.0000**	**2.5000e-003**	**2.5000e-003**		**1.4987**	**1.4987**	**3.9500e-003**	**0.0000**	**1.5976**

Bloomington Business Park Specific Plan (Construction - Mitigated) - San Bernardino-South Coast County, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	10/1/2021	12/16/2021	5	55	
2	Site Preparation	Site Preparation	12/17/2021	2/24/2022	5	50	
3	Grading	Grading	2/25/2022	6/2/2022	5	70	
4	Building Construction	Building Construction	6/3/2022	12/29/2022	5	150	
5	Paving	Paving	8/12/2022	12/29/2022	5	100	
6	Architectural Coating	Architectural Coating	8/12/2022	12/29/2022	5	100	

Acres of Grading (Site Preparation Phase): 1000

Acres of Grading (Grading Phase): 1400

Acres of Paving: 79.15

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 4,068,060; Non-Residential Outdoor: 1,356,020; Striped Parking Area: 206,867 (Architectural Coating – sqft)

OffRoad Equipment

Bloomington Business Park Specific Plan (Construction - Mitigated) - San Bernardino-South Coast County, Winter

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	2	8.00	81	0.73
Demolition	Excavators	6	8.00	158	0.38
Demolition	Rubber Tired Dozers	4	8.00	247	0.40
Site Preparation	Crawler Tractors	7	8.00	212	0.43
Site Preparation	Rubber Tired Dozers	5	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	0	8.00	97	0.37
Grading	Crawler Tractors	4	8.00	212	0.43
Grading	Excavators	4	8.00	158	0.38
Grading	Graders	2	8.00	187	0.41
Grading	Rubber Tired Dozers	2	8.00	247	0.40
Grading	Scrapers	4	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	0	8.00	97	0.37
Building Construction	Cranes	2	8.00	231	0.29
Building Construction	Crawler Tractors	6	8.00	212	0.43
Building Construction	Forklifts	6	8.00	89	0.20
Building Construction	Generator Sets	2	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	0	8.00	97	0.37
Building Construction	Welders	2	8.00	46	0.45
Paving	Pavers	4	8.00	130	0.42
Paving	Paving Equipment	4	8.00	132	0.36
Paving	Rollers	4	8.00	80	0.38
Architectural Coating	Air Compressors	2	8.00	78	0.48

Trips and VMT

Bloomington Business Park Specific Plan (Construction - Mitigated) - San Bernardino-South Coast County, Winter

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	12	30.00	171.00	2,707.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	12	30.00	155.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	16	40.00	218.00	18,696.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	18	2,587.00	466.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	12	30.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	2	517.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

Water Exposed Area

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					10.6529	0.0000	10.6529	1.6129	0.0000	1.6129			0.0000			0.0000
Off-Road	6.3302	62.8814	43.1301	0.0776		3.1027	3.1027		2.8822	2.8822		7,495.889 9	7,495.889 9	2.1098		7,548.634 7
Total	6.3302	62.8814	43.1301	0.0776	10.6529	3.1027	13.7555	1.6129	2.8822	4.4951		7,495.889 9	7,495.889 9	2.1098		7,548.634 7

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.3057	11.2682	1.0957	0.0372	0.8513	0.0322	0.8835	0.2092	0.0306	0.2670		3,954.994 6	3,954.994 6	0.2064		3,960.906 4
Vendor	0.4694	16.3152	3.6297	0.0444	1.0952	0.0291	1.1243	0.3154	0.0278	0.3431		4,677.450 7	4,677.450 7	0.3400		4,685.972 8
Worker	0.1528	0.0991	1.0187	2.9600e-003	0.3353	2.1800e-003	0.2375	0.0889	1.9800e-003	0.0908		294.4496	294.4496	8.2000e-003		294.6542
Total	0.9279	27.6825	6.6341	0.0846	2.2919	0.0634	2.3453	0.6404	0.0606	0.7010		8,926.894 7	8,926.894 7	0.5855		8,941.532 2

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					10.6529	0.0000	10.6529	1.6129	0.0000	1.6129			0.0000			0.0000
Off-Road	1.1683	27.1151	49.3477	0.0776		0.1233	0.1233		0.1233	0.1233	0.0000	7,495.889 9	7,495.889 9	2.1098		7,548.634 7
Total	1.1683	27.1151	49.3477	0.0776	10.6529	0.1233	10.7761	1.6129	0.1233	1.7362	0.0000	7,495.889 9	7,495.889 9	2.1098		7,548.634 7

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.3057	11.2682	1.0957	0.0372	0.8513	0.0322	0.8835	0.2262	0.0296	0.2670		3,954.094 6	3,954.094 6	0.2564		3,960.505 4
Vendor	0.4694	16.3152	3.6297	0.0444	1.0952	0.0291	1.1243	0.3154	0.0278	0.3431		4,677.450 7	4,677.450 7	0.3499		4,685.972 8
Worker	0.1529	0.0991	1.0187	2.9600e-003	0.3353	2.1800e-003	0.3375	0.0889	1.9800e-003	0.0909		294.4496	294.4496	8.2000e-003		294.6542
Total	**0.9279**	**27.6825**	**6.6341**	**0.0846**	**2.2919**	**0.0634**	**2.3453**	**0.6404**	**0.0606**	**0.7010**		**8,926.894 7**	**8,926.894 7**	**0.5855**		**8,941.532 2**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					51.3204	0.0000	51.3204	18.8413	0.0000	18.8413			0.0000			0.0000
Off-Road	9.0883	103.6329	37.2345	0.0976		4.4974	4.4974		4.1376	4.1376		9,459.295 2	9,459.295 2	3.0693		9,535.778 4
Total	**9.0883**	**103.6329**	**37.2345**	**0.0976**	**51.3204**	**4.4974**	**55.8178**	**18.8413**	**4.1376**	**22.9789**		**9,459.295 2**	**9,459.295 2**	**3.0693**		**9,535.778 4**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4255	14.7887	3.2901	0.0402	0.9927	0.0263	1.0191	0.2658	0.0252	0.2910		4,239.794 5	4,239.794 5	0.3080		4,247.510 0
Worker	0.1523	0.0991	1.0187	2.9600e-003	0.3353	2.1800e-003	0.2375	0.0889	1.9800e-003	0.0908		294.4493	294.4493	8.2000e-003		294.6542
Total	**0.5782**	**14.8878**	**4.3087**	**0.0432**	**1.3281**	**0.0285**	**1.3565**	**0.3748**	**0.0272**	**0.4020**		**4,534.243 8**	**4,534.243 8**	**0.3172**		**4,542.173 2**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					51.3204	0.0000	51.3204	18.8313	0.0000	18.8313			0.0000			0.0000
Off-Road	1.5974	25.7577	51.9147	0.0976		0.1597	0.1597		0.1597	0.1597	0.0000	9,459.295 2	9,459.295 2	3.0693		9,535.778 4
Total	**1.5974**	**25.7577**	**51.9147**	**0.0976**	**51.3204**	**0.1597**	**51.4802**	**18.8313**	**0.1597**	**19.0011**	**0.0000**	**9,459.295 2**	**9,459.295 2**	**3.0693**		**9,535.778 4**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day											lb/day				
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4255	14.7887	3.2901	0.0402	0.9927	0.0263	1.0191	0.2658	0.0252	0.2910		4,239.794 5	4,239.794 5	0.3080		4,247.510 0
Worker	0.1523	0.0991	1.0187	2.9600e-003	0.3353	2.1800e-003	0.2375	0.0889	1.9800e-003	0.0908		294.4498	294.4498	8.2000e-003		294.6542
Total	**0.5782**	**14.8878**	**4.3087**	**0.0432**	**1.3281**	**0.0285**	**1.3565**	**0.3748**	**0.0272**	**0.4020**		**4,534.243 8**	**4,534.243 8**	**0.3172**		**4,542.173 2**

3.3 Site Preparation - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day											lb/day				
Fugitive Dust					51.3204	0.0000	51.3204	18.8413	0.0000	18.8413			0.0000			0.0000
Off-Road	7.6289	86.0232	34.1137	0.0975		3.6738	3.6739		3.3799	3.3790		9,448.403 3	9,448.403 3	3.0558		9,524.798 4
Total	**7.6289**	**86.0232**	**34.1137**	**0.0975**	**51.3204**	**3.6738**	**54.9943**	**18.8413**	**3.3799**	**22.2212**		**9,448.403 3**	**9,448.403 3**	**3.0558**		**9,524.798 4**

3.3 Site Preparation - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3959	14.0099	3.0543	0.0319	0.9927	0.0222	1.0149	0.2658	0.0212	0.2870		4,204.471 0	4,204.471 0	0.2987		4,211.940 4
Worker	0.1450	0.0891	0.9343	2.8500e-003	0.3353	2.0800e-003	0.3374	0.0889	1.9200e-003	0.0908		283.8439	283.8439	7.3000e-003		284.0277
Total	0.5409	14.0990	3.9886	0.0427	1.3280	0.0242	1.3523	0.3748	0.0231	0.3979		4,488.315 7	4,488.315 7	0.3061		4,495.968 1

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					51.3204	0.0000	51.3204	18.8413	0.0000	18.8413			0.0000			0.0000
Off-Road	1.5974	25.7577	51.9147	0.0975		0.1597	0.1597		0.1597	0.1597	0.0000	9,448.403 2	9,448.403 2	3.0558		9,524.798 4
Total	1.5974	25.7577	51.9147	0.0975	51.3204	0.1597	51.4802	18.8413	0.1597	19.0011	0.0000	9,448.403 2	9,448.403 2	3.0558		9,524.798 4

3.3 Site Preparation - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3959	14.0099	3.0543	0.0319	0.9927	0.0222	1.0149	0.2658	0.0212	0.2870		4,204.471 9	4,204.471 9	0.2987		4,211.940 4
Worker	0.1450	0.0891	0.9343	2.8500e-003	0.3353	2.0800e-003	0.3374	0.0889	1.9200e-003	0.0908		283.8439	283.8439	7.3000e-003		284.0277
Total	**0.5409**	**14.0990**	**3.9886**	**0.0427**	**1.3280**	**0.0242**	**1.3523**	**0.3748**	**0.0231**	**0.3979**		**4,488.315 7**	**4,488.315 7**	**0.3061**		**4,495.968 1**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					33.6447	0.0000	33.6447	8.9698	0.0000	8.9698			0.0000			0.0000
Off-Road	8.5585	95.0158	58.3905	0.1431		3.8162	3.8162		3.5109	3.5109		13,853.99 47	13,853.99 47	4.4807		13,966.01 13
Total	**8.5585**	**95.0158**	**58.3905**	**0.1431**	**33.6447**	**3.8162**	**37.4609**	**8.9698**	**3.5109**	**12.4806**		**13,853.99 47**	**13,853.99 47**	**4.4807**		**13,966.01 13**

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	1.5060	55.6710	10.3710	0.1986	4.6489	0.1441	4.7930	1.2746	0.1379	1.4124		21,105.97 57	21,105.97 57	1.2462		21,135.18 00
Vendor	0.5852	19.7043	4.2958	0.0560	1.3962	0.0512	1.4474	0.4020	0.0498	0.4518		5,913.386 3	5,913.386 3	0.4202		5,923.890 4
Worker	0.1907	0.1188	1.2457	3.8000e-003	0.4471	2.7800e-003	0.4499	0.1186	2.5600e-003	0.1211		378.4584	378.4584	9.8100e-003		378.7030
Total	2.3095	75.4940	15.9133	0.2584	6.4922	0.1781	6.6703	1.7951	0.1703	1.9654		27,395.82 04	27,395.82 04	1.6762		27,437.72 46

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					33.6447	0.0000	33.6447	8.9698	0.0000	8.9698			0.0000			0.0000
Off-Road	2.2580	41.4192	80.7979	0.1431		0.2343	0.2343		0.2343	0.2343	0.0000	13,853.99 47	13,853.99 47	4.3807		13,966.01 13
Total	2.2580	41.4192	80.7979	0.1431	33.6447	0.2343	33.8790	8.9698	0.2343	9.2041	0.0000	13,853.99 47	13,853.99 47	4.3807		13,966.01 13

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	1.5060	55.6710	10.3710	0.1986	4.0489	0.1441	4.1930	1.2746	0.1379	1.4124		21,105.97 57	21,105.97 57	1.2462		21,135.18 06
Vendor	0.5582	19.7045	4.2958	0.0560	1.3962	0.0512	1.4474	0.4020	0.0498	0.4518		5,913.386 3	5,913.386 3	0.4202		5,923.890 4
Worker	0.1907	0.1188	1.2457	3.8000e-003	0.4471	2.7800e-003	0.4499	0.1186	2.5600e-003	0.1211		378.4584	378.4584	9.8100e-003		378.7030
Total	2.3095	75.4940	15.9133	0.2584	5.4922	0.1781	6.6703	1.7951	0.1703	1.9654		27,395.82 04	27,395.82 04	1.6762		27,437.72 40

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	5.5925	59.5273	35.3396	0.0860		2.5486	2.5486		2.3785	2.3785		8,221.064 3	8,221.064 3	2.2305		8,276.827 0
Total	5.5925	59.5273	35.3396	0.0860		2.5486	2.5486		2.3785	2.3785		8,221.064 4	8,221.064 4	2.2305		8,276.827 0

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	1.1032	42.1201	9.1827	0.1176	2.9846	0.0668	3.0512	0.8594	0.0617	0.9211		12,640.54 14	12,640.54 14	0.8082		12,662.09 51
Worker	12.2236	7.8801	80.5841	0.2456	29.0160	0.1790	29.0951	7.7988	0.1653	7.9641		24,476.79 67	24,476.79 67	0.5243		24,492.65 52
Total	**13.3268**	**49.9002**	**89.7668**	**0.3654**	**31.9011**	**0.2462**	**32.1473**	**8.6582**	**0.2270**	**8.7572**		**37,117.33 80**	**37,117.33 80**	**1.5325**		**37,155.65 03**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4968	27.5080	49.3012	0.0860		0.2222	0.2222		0.2222	0.2222	0.0000	8,221.064 4	8,221.064 4	2.2305		8,276.827 0
Total	**1.4968**	**27.5080**	**49.3012**	**0.0860**		**0.2222**	**0.2222**		**0.2222**	**0.2222**	**0.0000**	**8,221.064 4**	**8,221.064 4**	**2.2305**		**8,276.827 0**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day											lb/day				
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	1.1032	42.1201	9.1827	0.1198	2.9846	0.0668	3.0512	0.8594	0.0617	0.9211		12,640.54 14	12,640.54 14	0.8082		12,662.09 51
Worker	12.2938	7.8801	80.5841	0.2456	29.0160	0.1790	29.0951	7.7988	0.1653	7.9641		24,476.79 67	24,476.79 67	0.5243		24,492.65 52
Total	**13.5268**	**49.8002**	**89.7668**	**0.3654**	**31.9011**	**0.2462**	**32.1473**	**8.5282**	**0.2270**	**8.7572**		**37,117.33 80**	**37,117.33 80**	**1.5325**		**37,155.65 03**

3.6 Paving - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day											lb/day				
Off-Road	2.2056	22.2498	29.1610	0.0456		1.1358	1.1358		1.0449	1.0449		4,415.320 6	4,415.320 6	1.4280		4,451.020 7
Paving	2.0737					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**4.2794**	**22.2498**	**29.1610**	**0.0456**		**1.1358**	**1.1358**		**1.0449**	**1.0449**		**4,415.320 6**	**4,415.320 6**	**1.4280**		**4,451.020 7**

3.6 Paving - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1430	0.0891	0.9343	2.8500e-003	0.3353	2.0800e-003	0.3374	0.0889	1.9200e-003	0.0909		283.8438	283.8438	7.3600e-003		284.0277
Total	0.1430	0.0891	0.9343	2.8500e-003	0.3353	2.0800e-003	0.3374	0.0889	1.9200e-003	0.0909		283.8438	283.8438	7.3600e-003		284.0277

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.6682	20.0789	34.5913	0.0456		0.0748	0.0748		0.0748	0.0748	0.0000	4,415.3206	4,415.3206	1.4280		4,451.0207
Paving	2.0737					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	2.7419	20.0789	34.5913	0.0456		0.0748	0.0748		0.0748	0.0748	0.0000	4,415.3206	4,415.3206	1.4280		4,451.0207

3.6 Paving - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1430	0.0891	0.9343	2.8500e-003	0.3353	2.0800e-003	0.3374	0.0889	1.9200e-003	0.0909		283.8438	283.8438	7.3600e-003		284.0277
Total	**0.1430**	**0.0891**	**0.9343**	**2.8500e-003**	**0.3353**	**2.0800e-003**	**0.3374**	**0.0889**	**1.9200e-003**	**0.0909**		**283.8438**	**283.8438**	**7.3600e-003**		**284.0277**

3.7 Architectural Coating - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	29.9548					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.5454	3.7560	4.8363	7.9200e-003		0.2179	0.2179		0.2179	0.2179		750.5281	750.5281	0.0489		751.7497
Total	**30.4802**	**3.7560**	**4.8363**	**7.9200e-003**		**0.2179**	**0.2179**		**0.2179**	**0.2179**		**750.5281**	**750.5281**	**0.0489**		**751.7497**

3.7 Architectural Coating - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	2.4649	1.5348	16.1004	0.0491	5.7788	0.0359	5.8147	1.5326	0.0330	1.5656		4,891.574 8	4,891.574 8	0.1268		4,894.744 0
Total	**2.4649**	**1.5348**	**16.1004**	**0.0491**	**5.7788**	**0.0359**	**5.8147**	**1.5326**	**0.0330**	**1.5656**		**4,891.574 8**	**4,891.574 8**	**0.1268**		**4,894.744 0**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	29.9849					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1453	2.8262	4.8864	7.9200e-003		0.0106	0.0106		0.0106	0.0106	0.0000	750.5281	750.5281	0.0489		751.7497
Total	**30.0800**	**2.8262**	**4.8864**	**7.9200e-003**		**0.0106**	**0.0106**		**0.0106**	**0.0106**	**0.0000**	**750.5281**	**750.5281**	**0.0489**		**751.7497**

3.7 Architectural Coating - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	2.4649	1.5348	16.1004	0.0491	5.7788	0.0359	5.8147	1.5326	0.0330	1.5656		4,891.574 8	4,891.574 8	0.1268		4,894.744 0
Total	**2.4649**	**1.5348**	**16.1004**	**0.0491**	**5.7788**	**0.0359**	**5.8147**	**1.5326**	**0.0330**	**1.5656**		**4,891.574 8**	**4,891.574 8**	**0.1268**		**4,894.744 0**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Asphalt Surfaces	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0	0	0
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-No	0.00	0.00	0.00	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Bloomington Business Park Specific Plan (Construction - Mitigated) - San Bernardino-South Coast County, Winter

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Asphalt Surfaces	0.553113	0.036408	0.180286	0.116335	0.016165	0.005101	0.018218	0.063797	0.001357	0.001565	0.005903	0.000808	0.000944
Parking Lot	0.553113	0.036408	0.180286	0.116335	0.016165	0.005101	0.018218	0.063797	0.001357	0.001565	0.005903	0.000808	0.000944
Unrefrigerated Warehouse-No Rail	0.553113	0.036408	0.180286	0.116335	0.016165	0.005101	0.018218	0.063797	0.001357	0.001565	0.005903	0.000808	0.000944

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	62.1353	6.3900e-003	0.7003	5.0000e-005		2.5000e-003	2.5000e-003		2.5000e-003	2.5000e-003		1.4987	1.4987	3.9500e-003		1.5976
Unmitigated	62.1353	6.3900e-003	0.7003	5.0000e-005		2.5000e-003	2.5000e-003		2.5000e-003	2.5000e-003		1.4987	1.4987	3.9500e-003		1.5976

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	7.1505					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	54.9196					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0651	6.3900e-003	0.7003	5.0000e-005		2.5000e-003	2.5000e-003		2.5000e-003	2.5000e-003		1.4987	1.4987	3.9500e-003		1.5976
Total	**62.1353**	**6.3900e-003**	**0.7003**	**5.0000e-005**		**2.5000e-003**	**2.5000e-003**		**2.5000e-003**	**2.5000e-003**		**1.4987**	**1.4987**	**3.9500e-003**		**1.5976**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	7.1505					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	54.9196					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0651	6.3900e-003	0.7003	5.0000e-005		2.5000e-003	2.5000e-003		2.5000e-003	2.5000e-003		1.4987	1.4987	3.9500e-003		1.5976
Total	**62.1353**	**6.3900e-003**	**0.7003**	**5.0000e-005**		**2.5000e-003**	**2.5000e-003**		**2.5000e-003**	**2.5000e-003**		**1.4987**	**1.4987**	**3.9500e-003**		**1.5976**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Attachment B

Construction			
2021 (Opening Year - Option 2)		**Total**	
Annual Emissions (tons/year)	0.00615	Total DPM (lbs)	121.6575342
Daily Emissions (lbs/day)	0.03369863	Total DPM (g)	55183.85753
Construction Duration (days)	92	Total Construction Days	633
Total DPM (lbs)	3.100273973	Emission Rate (g/s)	0.001009008
Total DPM (g)	1406.284274	Release Height (meters)	3
Start Date	10/1/2021	Total Acreage	213
End Date	1/1/2022	Max Horizontal (meters)	1,313.00
Construction Days	92	Min Horizontal (meters)	656.50
2022 (Opening Year - Option 2)		Initial Vertical Dimension (meters)	1.5
Annual Emissions (tons/year)	0.0526	Setting	Urban
Daily Emissions (lbs/day)	0.288219178	Population	216,089
Construction Duration (days)	362	Total Construction Days	633
Total DPM (lbs)	104.3353425	Total Years of Construction	1.73
Total DPM (g)	47326.51134	Total Years of Operation	28.27
Start Date	1/1/2022		
End Date	12/29/2022		
Construction Days	362		
2023 (Future Development Area - Specific Plan Buildout)			
Annual Emissions (tons/year)	0.0145		
Daily Emissions (lbs/day)	0.079452055		
Construction Duration (days)	179		
Total DPM (lbs)	14.22191781		
Total DPM (g)	6451.061918		
Start Date	1/2/2023		
End Date	6/30/2023		
Construction Days	179		

Attachment C

```
Start date and time  11/09/21 11:25:04

                          AERSCREEN 16216


Bloomington Business Park (Option 2 & Future Development Are


           Bloomington Business Park (Option 2 & Future Development Are



        -----------------  DATA ENTRY VALIDATION  -----------------

                        METRIC              ENGLISH

 ** AREADATA **  ---------------     ----------------

 Emission Rate:    0.101E-02 g/s         0.801E-02 lb/hr

 Area Height:           3.00 meters           9.84 feet

 Area Source Length: 1313.00 meters        4307.74 feet

 Area Source Width:   656.50 meters        2153.87 feet

 Vertical Dimension:    1.50 meters           4.92 feet

 Model Mode:           URBAN

 Population:          216089

 Dist to Ambient Air:           1.0 meters             3. feet



 ** BUILDING DATA **
```

```
No Building Downwash Parameters



** TERRAIN DATA **

No Terrain Elevations
Source Base Elevation:   0.0 meters        0.0  feet

Probe distance:   5000. meters       16404. feet

No flagpole receptors

No discrete receptors used



** FUMIGATION DATA **

No fumigation requested



** METEOROLOGY DATA **

Min/Max Temperature:  250.0 / 310.0 K   -9.7 /  98.3 Deg F

Minimum Wind Speed:     0.5 m/s
```

```
 Anemometer Height:   10.000 meters

 Dominant Surface Profile: Urban
 Dominant Climate Type:    Average Moisture

 Surface friction velocity (u*): not adjusted

DEBUG OPTION ON



 AERSCREEN output file:
 2021.11.09_BloomingtonBusinessPark_Construction_Option2.out


 *** AERSCREEN Run is Ready to Begin



 No terrain used, AERMAP will not be run
**************************************************

SURFACE CHARACTERISTICS & MAKEMET
Obtaining surface characteristics...
```

```
Using AERMET seasonal surface characteristics for Urban with Average Moisture
Season              Albedo     Bo       zo
Winter               0.35     1.50     1.000
Spring               0.14     1.00     1.000
Summer               0.16     2.00     1.000
Autumn               0.18     2.00     1.000

Creating met files aerscreen_01_01.sfc & aerscreen_01_01.pfl

Creating met files aerscreen_02_01.sfc & aerscreen_02_01.pfl

Creating met files aerscreen_03_01.sfc & aerscreen_03_01.pfl

Creating met files aerscreen_04_01.sfc & aerscreen_04_01.pfl

Buildings and/or terrain present or rectangular area source, skipping probe

FLOWSECTOR   started 11/09/21 11:26:40
 ******************************************

  Running AERMOD
 Processing Winter

Processing surface roughness sector  1
```

```
**************************************************

Processing wind flow sector   1


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector   0


    ********   WARNING MESSAGES   ********

               ***  NONE  ***


**************************************************

Processing wind flow sector   2


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector   5


    ********   WARNING MESSAGES   ********

               ***  NONE  ***


**************************************************

Processing wind flow sector   3


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector  10


    ********   WARNING MESSAGES   ********

               ***  NONE  ***
```

```
**************************************************

Processing wind flow sector   4


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector  15


    ********   WARNING MESSAGES   ********

               ***  NONE  ***


**************************************************

Processing wind flow sector   5


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector  20


    ********   WARNING MESSAGES   ********

               ***  NONE  ***


**************************************************

Processing wind flow sector   6


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector  25


    ********   WARNING MESSAGES   ********

               ***  NONE  ***


**************************************************
```

```
Processing wind flow sector   7

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Winter sector  30

    ********   WARNING MESSAGES   ********

               ***  NONE  ***

 ******************************************

  Running AERMOD

 Processing Spring

Processing surface roughness sector  1

**************************************************

Processing wind flow sector   1

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector   0

    ********   WARNING MESSAGES   ********

               ***  NONE  ***

**************************************************

Processing wind flow sector   2

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector   5
```

```
    ********   WARNING MESSAGES   ********

               ***  NONE  ***


**************************************************

Processing wind flow sector   3


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector  10


    ********   WARNING MESSAGES   ********

               ***  NONE  ***


**************************************************

Processing wind flow sector   4


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector  15


    ********   WARNING MESSAGES   ********

               ***  NONE  ***


**************************************************

Processing wind flow sector   5


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector  20
```

```
    ********   WARNING MESSAGES   ********

               ***  NONE  ***


**************************************************

Processing wind flow sector   6


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector  25


    ********   WARNING MESSAGES   ********

               ***  NONE  ***


**************************************************

Processing wind flow sector   7


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Spring sector  30


    ********   WARNING MESSAGES   ********

               ***  NONE  ***

 ****************************************


  Running AERMOD

 Processing Summer


Processing surface roughness sector  1
```

```
**************************************************

Processing wind flow sector   1


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector   0


    ********   WARNING MESSAGES   ********

               ***  NONE  ***


**************************************************

Processing wind flow sector   2


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector   5


    ********   WARNING MESSAGES   ********

               ***  NONE  ***


**************************************************

Processing wind flow sector   3


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector  10


    ********   WARNING MESSAGES   ********

               ***  NONE  ***


**************************************************
```

```
Processing wind flow sector   4

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector  15

    ********   WARNING MESSAGES   ********
               ***  NONE  ***

**************************************************
Processing wind flow sector   5

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector  20

    ********   WARNING MESSAGES   ********
               ***  NONE  ***

**************************************************
Processing wind flow sector   6

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector  25

    ********   WARNING MESSAGES   ********
               ***  NONE  ***

**************************************************
Processing wind flow sector   7
```

```
 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Summer sector  30


    ********   WARNING MESSAGES   ********

               ***  NONE  ***

 *******************************************


  Running AERMOD

 Processing Autumn


Processing surface roughness sector  1


*****************************************************

Processing wind flow sector   1


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector   0


    ********   WARNING MESSAGES   ********

               ***  NONE  ***


*****************************************************

Processing wind flow sector   2


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector   5
```

```
    ********   WARNING MESSAGES   ********

               ***  NONE  ***


**************************************************

Processing wind flow sector   3


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector  10


    ********   WARNING MESSAGES   ********

               ***  NONE  ***


**************************************************

Processing wind flow sector   4


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector  15


    ********   WARNING MESSAGES   ********

               ***  NONE  ***


**************************************************

Processing wind flow sector   5


 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector  20


    ********   WARNING MESSAGES   ********
```

```
               ***  NONE  ***

**************************************************
Processing wind flow sector   6

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector  25

    ********   WARNING MESSAGES   ********
               ***  NONE  ***

**************************************************
Processing wind flow sector   7

 AERMOD Finishes Successfully for FLOWSECTOR stage 2 Autumn sector  30

    ********   WARNING MESSAGES   ********
               ***  NONE  ***

FLOWSECTOR   ended 11/09/21 11:27:18

REFINE       started 11/09/21 11:27:18

 AERMOD Finishes Successfully for REFINE stage 3 Winter sector   0

    ********   WARNING MESSAGES   ********
```

```
                ***  NONE  ***


REFINE       ended 11/09/21 11:27:20


 ********************************************

 AERSCREEN Finished Successfully

 With no errors or warnings

 Check log file for details

 ********************************************


 Ending date and time  11/09/21 11:27:22
```

Concentration	Distance	Elevation	Diag	Season/Month	Zo sector	Date	H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O LEN	Z0	BOWEN	ALBEDO	REF WS	HT	REF TA	HT
0.67295E-01	1.00	0.00	15.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.68189E-01	25.00	0.00	15.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.69097E-01	50.00	0.00	15.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.69985E-01	75.00	0.00	15.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.70860E-01	100.00	0.00	5.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.71747E-01	125.00	0.00	5.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.72617E-01	150.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.73468E-01	175.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.74300E-01	200.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.75114E-01	225.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.75911E-01	250.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.76691E-01	275.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.77455E-01	300.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.78204E-01	325.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.78937E-01	350.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.79657E-01	375.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.80362E-01	400.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.81054E-01	425.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.81734E-01	450.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.82399E-01	475.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.83052E-01	500.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.83695E-01	525.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.84323E-01	550.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.84941E-01	575.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.85549E-01	600.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	1.000	1.50	0.35	0.50	10.0	310.0	2.0
0.86148E-01	625.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0							

file:///C/Users/swinn/Downloads/2021.11.09_BloomingtonBusinessPark_Construction_Option2_max_conc_distance.txt[11/9/2021 12:38:21 PM]

1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.86733E-01	650.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
* 0.86872E-01	656.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.83541E-01	675.00	0.00	15.0	Winter	0-360	10011101	-1.30	0.043	-9.000	0.020	-999.	104.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.86464E-01	699.99	0.00	20.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.86522E-01	725.00	0.00	25.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.73791E-01	750.00	0.00	25.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.65977E-01	775.00	0.00	25.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.60368E-01	800.00	0.00	25.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.56633E-01	825.00	0.00	25.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.53602E-01	850.00	0.00	25.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.51045E-01	875.00	0.00	25.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.49059E-01	900.00	0.00	20.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.47387E-01	925.00	0.00	20.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.45843E-01	950.00	0.00	20.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.44867E-01	975.00	0.00	25.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.43372E-01	1000.00	0.00	25.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.42044E-01	1025.00	0.00	20.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.40899E-01	1050.00	0.00	20.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.39813E-01	1075.00	0.00	20.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.38795E-01	1100.00	0.00	20.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.37827E-01	1125.00	0.00	20.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.36915E-01	1150.00	0.00	20.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.36066E-01	1175.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.35366E-01	1200.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.34694E-01	1225.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.34047E-01	1250.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.33416E-01	1275.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	

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1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.32809E-01    1300.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.32223E-01    1325.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.31660E-01    1350.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.31110E-01    1375.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.30582E-01    1400.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.30062E-01    1425.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.29557E-01    1450.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.29072E-01    1475.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.28597E-01    1500.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.28138E-01    1525.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.27696E-01    1550.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.27263E-01    1575.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.26837E-01    1600.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.26423E-01    1625.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.26024E-01    1650.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.25628E-01    1675.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.25245E-01    1700.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.24875E-01    1725.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.24517E-01    1750.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.24161E-01    1775.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.23815E-01    1800.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.23476E-01    1825.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.23146E-01    1850.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.22824E-01    1875.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.22505E-01    1900.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.22196E-01    1925.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.21896E-01    1950.00     0.00   0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
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1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.21605E-01    1975.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.21322E-01    2000.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.21040E-01    2025.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.20764E-01    2050.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.20495E-01    2075.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.20231E-01    2100.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.19973E-01    2125.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.19723E-01    2150.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.19474E-01    2175.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.19229E-01    2200.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.18990E-01    2225.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.18758E-01    2250.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.18531E-01    2275.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.18310E-01    2300.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.18095E-01    2325.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.17883E-01    2350.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.17672E-01    2375.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.17465E-01    2400.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.17261E-01    2425.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.17061E-01    2450.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.16867E-01    2475.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.16676E-01    2500.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.16491E-01    2525.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.16309E-01    2550.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.16129E-01    2575.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.15950E-01    2600.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.15775E-01    2625.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
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1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.15604E-01	2650.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.15436E-01	2675.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.15272E-01	2700.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.15112E-01	2725.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.14955E-01	2750.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.14801E-01	2775.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.14651E-01	2800.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.14501E-01	2825.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.14350E-01	2850.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.14202E-01	2875.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.14058E-01	2900.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.13916E-01	2925.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.13776E-01	2950.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.13640E-01	2975.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.13506E-01	3000.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.13375E-01	3025.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.13246E-01	3050.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.13120E-01	3075.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.12996E-01	3100.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.12874E-01	3125.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.12755E-01	3150.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.12635E-01	3175.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.12517E-01	3200.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.12401E-01	3225.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.12287E-01	3250.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.12175E-01	3275.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.12065E-01	3300.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0

1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.11956E-01	3325.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.11848E-01	3350.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.11742E-01	3375.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.11638E-01	3400.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.11536E-01	3425.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.11435E-01	3450.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.11336E-01	3475.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.11239E-01	3500.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.11143E-01	3525.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.11049E-01	3550.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.10955E-01	3575.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.10861E-01	3600.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.10769E-01	3625.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.10679E-01	3650.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.10590E-01	3675.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.10502E-01	3700.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.10416E-01	3725.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.10331E-01	3750.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.10248E-01	3775.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.10165E-01	3800.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.10084E-01	3825.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.10005E-01	3850.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.99260E-02	3875.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.98486E-02	3900.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.97724E-02	3925.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.96973E-02	3950.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	
1.000	1.50	0.35	0.50	10.0	310.0	2.0								
0.96232E-02	3975.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0	

1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.95500E-02	4000.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.94771E-02	4025.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.94052E-02	4050.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.93342E-02	4075.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.92627E-02	4100.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.91922E-02	4125.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.91227E-02	4150.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.90542E-02	4175.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.89866E-02	4200.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.89199E-02	4225.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.88542E-02	4250.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.87894E-02	4275.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.87255E-02	4300.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.86624E-02	4325.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.86002E-02	4350.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.85388E-02	4375.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.84783E-02	4400.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.84185E-02	4425.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.83596E-02	4450.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.83014E-02	4475.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.82439E-02	4500.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.81872E-02	4525.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.81313E-02	4550.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.80760E-02	4575.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.80214E-02	4600.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.79676E-02	4625.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0
1.000	1.50	0.35	0.50	10.0	310.0	2.0							
0.79144E-02	4650.00	0.00	0.0	Winter	0-360	10011001	-1.30	0.043	-9.000	0.020	-999.	21.	6.0

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1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.78619E-02    4675.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.78100E-02    4700.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.77588E-02    4725.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.77082E-02    4750.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.76572E-02    4775.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.76067E-02    4800.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.75569E-02    4825.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.75077E-02    4850.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.74591E-02    4875.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.74110E-02    4900.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.73632E-02    4925.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.73157E-02    4950.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.72687E-02    4975.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
  0.72223E-02    5000.00     0.00  0.0      Winter    0-360  10011001  -1.30  0.043 -9.000  0.020 -999.  21.   6.0
1.000  1.50  0.35   0.50  10.0  310.0   2.0
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Attachment D

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

2656 29th Street, Suite 201
Santa Monica, CA 90405

Matt Hagemann, P.G, C.Hg.
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Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

Geologic and Hydrogeologic Characterization
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
Industrial Stormwater Compliance
CEQA Review

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, Matt has developed extensive client relationships and has managed complex projects that include consultation as an expert witness and a regulatory specialist, and a manager of projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2104, 2017;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

- Lead analyst and testifying expert in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at more than 100 industrial facilities.
- Expert witness on numerous cases including, for example, perfluorooctanoic acid (PFOA) contamination of groundwater, MTBE litigation, air toxins at hazards at a school, CERCLA compliance in assessment and remediation, and industrial stormwater contamination.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.
- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted

public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9.

Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific

principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt is currently a part time geology instructor at Golden West College in Huntington Beach, California where he taught from 2010 to 2014 and in 2017.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Coloradao.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal repesentatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F.** 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examinations, 2009-2011.

Attachment E

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

SOIL WATER AIR PROTECTION ENTERPRISE
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Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Thesis on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years' experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, industrial, military and agricultural sources, unconventional oil drilling operations, and locomotive and construction engines. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities. Dr. Rosenfeld has also successfully modeled exposure to contaminants distributed by water systems and via vapor intrusion.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, creosote, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at sites and has testified as an expert witness on numerous cases involving exposure to soil, water and air contaminants from industrial, railroad, agricultural, and military sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program, 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H_2O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health*. 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P**., (2015) Modeling the Effect of Refinery Emission On Residential Property Value. Journal of Real Estate Research. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.,** Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermod and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

Rosenfeld, P.E. & Feng, L. (2011). *The Risks of Hazardous Waste.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry.* Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution,* 123 (17), 319-327.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

Rosenfeld, P.E., J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

Rosenfeld, P. E., M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities.* Boston Massachusetts: Elsevier Publishing

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

Rosenfeld P. E., J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004*. New Orleans, October 2-6, 2004.

Rosenfeld, P.E., and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49(9), 171-178.

Rosenfeld, P. E., Grey, M. A., Sellew, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

Rosenfeld, P.E., Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS–6), Sacramento, CA Publication #442-02-008.

Rosenfeld, P.E., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

Rosenfeld, P.E., and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality*. 29, 1662-1668.

Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

Rosenfeld, P.E., and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

Rosenfeld, P.E., and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld.** (1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

Rosenfeld, P. E. (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

Rosenfeld, P. E. (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

Presentations:

Rosenfeld, P.E., "The science for Perfluorinated Chemicals (PFAS): What makes remediation so hard?" Law Seminars International, (May 9-10, 2018) 800 Fifth Avenue, Suite 101 Seattle, WA.

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society*. Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International*

Conferences on Soils Sediment and Water. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The *23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting*. Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition*. Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference*. Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference*. Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium, California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference, Water Supply and Emerging Contaminants.*. Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington.

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conference*. Lecture conducted from Indianapolis, Maryland.

Rosenfeld. P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation*. Lecture conducted from Anaheim California.

Rosenfeld. P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest*. Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell*. Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest*. Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E, C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. $41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001

Synagro Technologies, Corona California: $10,000 grant awarded to San Diego State University.
Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. $100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998

Northwest Biosolids Management Association, Washington State. $20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: $10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: $15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. $500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition, 5-14-2021
Trial, October 8-4-2021

In the Circuit Court of Cook County Illinois
Joseph Rafferty, Plaintiff vs. Consolidated Rail Corporation and National Railroad Passenger Corporation d/b/a AMTRAK,
Case No.: No. 18-L-6845
Rosenfeld Deposition, 6-28-2021

In the United States District Court For the Northern District of Illinois
Theresa Romcoe, Plaintiff vs. Northeast Illinois Regional Commuter Railroad Corporation d/b/a METRA Rail, Defendants
Case No.: No. 17-cv-8517
Rosenfeld Deposition, 5-25-2021

In the Superior Court of the State of Arizona In and For the Cunty of Maricopa
Mary Tryon et al., Plaintiff vs. The City of Pheonix v. Cox Cactus Farm, L.L.C., Utah Shelter Systems. Inc.
Case Number CV20127-094749
Rosenfeld Deposition: 5-7-2021

In the United States District Court for the Eastern District of Texas Beaumont Division
Robinson, Jeremy et al *Plaintiffs*, vs. CNA Insurance Company et al.
Case Number 1:17-cv-000508
Rosenfeld Deposition: 3-25-2021

In the Superior Court of the State of California, County of San Bernardino
Gary Garner, Personal Representative for the Estate of Melvin Garner vs. BNSF Railway Company.
Case No. 1720288
Rosenfeld Deposition 2-23-2021

In the Superior Court of the State of California, County of Los Angeles, Spring Street Courthouse
Benny M Rodriguez vs. Union Pacific Railroad, A Corporation, et al.
Case No. 18STCV01162
Rosenfeld Deposition 12-23-2020

In the Circuit Court of Jackson County, Missouri
Karen Cornwell, *Plaintiff*, vs. Marathon Petroleum, LP, *Defendant*.
Case No.: 1716-CV10006
Rosenfeld Deposition. 8-30-2019

In the United States District Court For The District of New Jersey
Duarte et al, *Plaintiffs*, vs. United States Metals Refining Company et. al. *Defendant*.
Case No.: 2:17-cv-01624-ES-SCM
Rosenfeld Deposition. 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk, *Plaintiffs,* vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" *Defendant.*
Case No.: 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition. 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No.: No. BC615636
Rosenfeld Deposition, 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No.: No. BC646857
Rosenfeld Deposition, 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiff vs. The 3M Company et al., Defendants
Case No.: 1:16-cv-02531-RBJ
Rosenfeld Deposition, 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants
Cause No.: 1923
Rosenfeld Deposition, 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintiffs vs. Chevron Corporation, et al., Defendants
Cause No C12-01481
Rosenfeld Deposition, 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition, 8-23-2017

In United States District Court For The Southern District of Mississippi
Guy Manuel vs. The BP Exploration et al., Defendants
Case: No 1:19-cv-00315-RHW
Rosenfeld Deposition, 4-22-2020

In The Superior Court of the State of California, For The County of Los Angeles
Warm Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No.: LC102019 (c/w BC582154)
Rosenfeld Deposition, 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., *Plaintiffs,* vs. Meritor Inc., et al., *Defendants*
Case Number: 4:16-cv-52-DMB-JVM
Rosenfeld Deposition: July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No.: No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial, March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No.: RG14711115
Rosenfeld Deposition, September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No.: LALA002187
Rosenfeld Deposition, August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action N0. 14-C-30000
Rosenfeld Deposition, June 2015

In The Iowa District Court For Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No 4980
Rosenfeld Deposition: May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case Number CACE07030358 (26)
Rosenfeld Deposition: December 2014

In the County Court of Dallas County Texas
Lisa Parr et al, *Plaintiff*, vs. Aruba et al, *Defendant.*
Case Number cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial: April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., *Plaintiffs*, vs. Republic Services, Inc., et al., *Defendants*
Case Number: 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition: October 2012

In the United States District Court for the Middle District of Alabama, Northern Division
James K. Benefield, et al., *Plaintiffs*, vs. International Paper Company, *Defendant.*
Civil Action Number 2:09-cv-232-WHA-TFM
Rosenfeld Deposition: July 2010, June 2011

In the Circuit Court of Jefferson County Alabama
Jacanette Moss Anthony, et al., *Plaintiffs*, vs. Drummond Company Inc., et al., *Defendants*
Civil Action No. CV 2008-2076
Rosenfeld Deposition: September 2010

In the United States District Court, Western District Lafayette Division
Ackle et al., *Plaintiffs*, vs. Citgo Petroleum Corporation, et al., *Defendants.*
Case Number 2:07CV1052
Rosenfeld Deposition: July 2009

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Response to Comment Letter O3: Blum Collins & Ho, LLP, dated December 3, 2021

Comment O3.1: This comment provides an introduction to the comment letter and states that the comment is submitted on behalf of the Golden State Environmental Justice Alliance (GSEJA). Additionally, it states that GSEJA requests to be notified regarding any subsequent environmental documents, public notices, and public hearings for the Bloomington Business Park Specific Plan Project.

Response O3.1: GSEJA will be added to the notification list and will be notified of any subsequent environmental documents, public notices, and public hearings regarding the proposed Project. The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required or provided.

Comment O3.2: This comment provides a summary of the Project description for the proposed Bloomington Business Park Specific Plan Project.

Response O3.2: The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment O3.3: This comment states that the Draft EIR does not include the Bloomington Business Park Specific Plan as an attachment for public review and states that the EIR must be revised and recirculated to include the Specific Plan document for public review in order to ensure meaningful disclosure pursuant to CEQA Guidelines Section 15121 and CEQA Statute Section 21003(b).

Response O3.3: The permitted uses and development standards within the Bloomington Business Park Specific Plan such as maximum height, floor area ratio, and parking requirements are summarized and outlined within Section 3.0, *Project Description,* of the Draft EIR. For example, the permitted uses within the Specific Plan are outlined in Section 3.0 in Table 3-2, Permitted Uses, and the allowed floor area ratio for each planning area is included in Table 3-1, Specific Plan Program Summary. As such, the Draft EIR supplies all the pertinent information related to the permitted uses and development standards contained in the Specific Plan in order to provide meaningful public disclosure on the environmental impacts associated with the proposed Project. Furthermore, in order to clarify that the Draft Bloomington Business Park Specific Plan was available for review during the public review period, Section 1.0, *Executive Summary*, has been revised to state:

> During the 45-day review period, the Draft EIR **and draft Bloomington Business Park Specific Plan** will be available for public review at the County's website: (http://cms.sbcounty.gov/lus/Planning/Environmental/Valley.aspx) or physically at the following location:
>
> County of San Bernardino
> Land Use Services Department, Planning Division
> 385 North Arrowhead Avenue, First Floor
> San Bernardino, CA 92415-0187

Additionally, pursuant to CEQA Guidelines Section 15148, the EIR need only cite certain documents utilized in the EIR and should not include these documents within the EIR document itself, such as in an Appendix. As such, the citation and reference to the Bloomington Business Park Specific Plan within the Draft EIR is sufficient. No recirculation of the Draft EIR is necessary.

Comment O3.4: This comment states that the Project Description says that the Specific Plan would apply the I/BP zoning designation to the entire Specific Plan Area, but that the San Bernardino County Development Code does not include an I/BP designation.

Response O3.4: This comment incorrectly quotes the Project Description and incorrectly assumes that the Project would implement an Industrial/Business Park (I/BP) zoning designation. As discussed on page 3-4 of Section 3.0, *Project Description,* the "Specific Plan applies an Industrial/Business Park (I/BP) land use designation on the developable non-roadway area of the Specific Plan." As shown on Figure 3-27, the Project would implement the Specific Plan (SP), as allowed by San Bernardino County Code Chapter 82.06. Within the Specific Plan, the area would be designated I/BP.

Comment O3.5: This comment states that Figure 3-3 is not useful as it only identifies Planning Area A and that Figure 3-25 is not useful as it only identifies Planning Area A and does not provide any useful information regarding construction phasing. The comment states that the EIR must be revised to provide figures that display and label the information they seek to communicate.

Response O3.5: In response to Comment O3.5, Figure 3-3 has been revised to label Planning Area B in the legend and Figure 3-25 has been revised to label Planning Area B, Phase I Construction, and Phase II Construction in the legend, as demonstrated in Chapter 3, *Errata,* of this Final EIR. The revisions to Figure 3-3 and Figure 3-25 is a clarification and, thus, its addition does not require recirculation of the Draft EIR.

Comment O3.6: This comment states that the EIR does not include floor plans, detailed site plans, elevations, or conceptual grading plans, which does not comply with CEQA's requirements for adequate informational documents or meaningful disclosure. Additionally, the comment states that Figures 3-10 through 3-13 do not provide any meaningful information or code requirement analysis and that Figure 3-9 provides partial elevations for one building and does not state which building is depicted.

Response O3.6: Pursuant to CEQA Guidelines Section 15124, the project description "should not supply extensive detail beyond that needed for the evaluation and review of the environmental impact". The four Development Sites included in Opening Year – Option 1 are described within Draft EIR Section 3.0, *Project Description,* on pages 3-9 through 3-11. As such, the level of detail needed for the evaluation of the Project by the public and decisionmakers and for the review of the Project's environmental impacts is adequate within the Project Description, and extensively detailed figures are not needed. Figure 3-9 provides a conceptual elevation for the proposed buildings. As demonstrated by *Citizens for a Sustainable Treasure Island v City & County of San Francisco (2014) 227 CA4th 1036, 1053,* the Draft EIR's description of the proposed Project should identify the Project's main features and other information needed for an analysis of the Project's environmental impacts. As long as the requirements set forth in CEQA Guidelines Section 15124 are met, the Project Description may allow for the flexibility needed to respond to changing conditions that could impact the Project's final design. As such, detailed plans and elevations for all buildings are not required to be included in the EIR's Project description and a general description of the Project and conceptual plans are allowed.

Comment O3.7: This comment states that the County should refer to attachments from SWAPE for a complete technical commentary and analysis related to air quality, energy, and greenhouse gas emissions.

Response O3.7: The commenter is referred to Responses O3.21 through O3.34 for responses to the attachments from SWAPE. The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment O3.8: This comment states that the EIR does not include for analysis relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed Project to the surrounding community. The comment states that according to CalEnviroScreen 4.02, the census tract including the Specific Plan ranks in the 97th percentile for pollution burden, meaning that the impacts from

pollution are among the highest in the state. The comment states that the census tract includes various schools and is affected by multiple sources of pollution and is a diverse community with a low educational attainment and is designated as a Disadvantaged Community pursuant to SB 5353. The comment also states that the San Bernardino County Policy Plan designates the area as an environmental justice focus area. The comment also states that the Upzone Site is similarly impacted by multiple sources of pollution.

Response O3.8: Refer to Master Response 4. In addition, the Draft EIR provides a detailed evaluation of the potential cumulative air quality related impacts of the proposed Project upon the surrounding community (localized impacts). Regarding the existing pollution burden, the existing air quality in the Project area is described in Draft EIR Section 5.3, *Air Quality*. Table 5.3-2 provides data from the Central San Bernardino Valley 1 monitoring station that is located approximately 5.7 miles northwest of the Project site that details that in 2019 there were 41 days that exceeded the state ozone standard and 67 days that exceeded the federal standard. In addition, 12 days exceeded the PM10 state standard and 2 days exceeded the federal standard for PM2.5. However, ambient air quality standards (NAAQS and CAAQS) were exceeded on one or more days for ozone, PM10, and PM2.5 at most monitoring locations throughout the South Coast Air Basin (SCAB).

As detailed beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate Project health risk impacts to residents, schools, and workers as a result of exposure to DPM from heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The maximum non-cancer risks to nearby residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million; and the maximum non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0. As such, operation of the Specific Plan at buildout would not cause a significant human health or cancer risk and impacts would be less than significant.

In addition, the Draft EIR evaluates the potential of the Project to expose sensitive receptors, such as residences and schools with substantial pollutant concentrations. As detailed in Draft EIR Tables 5.3-15 through 5.3-18, after implementation of Mitigation Measure AQ-2 (use of Tier 4 Final construction equipment), emissions during construction activities would not exceed the SCAQMD's localized significance thresholds. Therefore, with implementation of mitigation measures, impacts related to localized significant emissions from construction activity would be less than significant.

Also, as detailed in Draft EIR Tables 5.3-19 through 5.3-21, emissions from operation of the Specific Plan at buildout would not exceed the SCAQMD's localized significance thresholds for any criteria pollutant at the nearest sensitive receptors. Therefore, operation of the Specific Plan at buildout would result in a less than significant impact related to localized emissions. Because the Project would not exceed thresholds for either DPM or localized significance thresholds, the Project would not adversely impact neighboring disadvantaged communities.

Comment O3.9: This comment states that the Draft EIR does not provide any substantial evidence to support the SCAG RTP/SCS consistency analysis in Table 5.11-1. The comment also mentions that there are errors in modeling and states that the Project is inconsistent with Goal 5, Goal 6, and Goal 7 of Table

5.11-1. The comment states that the EIR must be revised to include finding of significance due to inconsistency with the 2020-2045 RTP/SCS Connect SoCal document.

Response O3.9: As discussed in Response 3.23 below, appropriate CalEEMod defaults were utilized and there are no errors in modeling. Substantial evidence supporting the SCAG RTP/SCS consistency analysis is provided in Section 5.3, *Air Quality* and Section 5.8, *Greenhouse Gas Emissions*. The Project consistency discussion within Table 5.11-1 provides justification for consistency with each goal. Thus, the Draft EIR does not need to be revised due to an inconsistency with the 2020-2045 RTP/SCS Connect SoCal document.

Comment O3.10: This comment states that Table 5.11-2 does not provide a consistency analysis for all applicable Countywide Plan goals and policies. The comment mentions that the EIR must be revised to include a consistency analysis to include Policy TM-1.1 and Policy HZ-3.18.

Response O3.10: As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. Thus, Policy TM-1.1 does not warrant a consistency analysis. As discussed on page 5.11-14 in Table 5.11-1 of Section 5.11, *Land Use and Planning,* Policy HZ-3.18 includes a consistency analysis. Thus, the Draft EIR would not need to be revised to include Policy TM-1.1 or Policy HZ-3.18.

Comment O3.11: This comment states that there is no analysis related to the proposed General Plan Amendment and Zone Change that are required for the Project. The comment states that the EIR must be revised to include analysis of the Project in accordance with the existing General Plan and Zoning designations. The comment also mentions that the Draft EIR must be revised to state that the Project is inconsistent with the existing land use and zoning maps.

Response O3.11: As discussed on pages 5.11-7 and 5.11-8 in Section 5.11, *Land Use and Planning*, Impact LU-2 discusses the inconsistency with the underlying land use and zoning designation. As discussed, approval of the proposed amendments as well as the adoption of the Bloomington Business Park Specific Plan land use document would resolve the inconsistency with the existing Land Use Map. Thus, the Draft EIR would not need to be revised to include the inconsistencies as it has been addressed in Section 5.11.

Comment O3.12: This comment states the use of the word anticipated to describe that construction workers are likely to come from the surrounding jurisdictions is uncertain and misleading. Additionally, it states that the EIR provides no methodology for the calculation of construction workers required in Planning Area A and does not provide a construction worker generation for Planning Area B. It concludes that the EIR should be revised to provide an accurate estimation of construction employees and a methodology source, and the EIR should provide demographic and geographic information on the location of qualified workers to fill these positions. Furthermore, the comment states that an estimate of the number of construction workers relocating to the County must be provided.

Additionally, Comment O3.12 states that the Draft EIR utilizes information and projections from the County Policy Plan EIR regarding households, employment, and population. However, the County Policy Plan EIR utilizes Southern California Association of Government's 2016-2040 Regional Transportation Plan (RTP/SCS) document as the source for estimated growth, which is out of date and does not provide accurate estimates. Additionally, the proposed project requires General Plan Land Use and Zoning amendments to proceed, which by nature indicates that the growth proposed by the project was not contemplated by the County Policy Plan EIR. The comment further provides estimates of the percentage of the estimated population and employment growth that the proposed Project represents. The comment

states that the Draft EIR must be revised to include this analysis, and also provide a cumulative analysis discussion of projects approved since 2016 and projects in the pipeline. Additionally, the comment states that the Draft EIR should provide demographic and geographic information on the location of qualified workers to fill operational positions for the proposed Project.

Response O3.12: In response to Comment O3.12, paragraph 4 of Impact POP-1, on page 5.13-8 has been revised to state that the methodology for the calculation of construction workers required in Planning Area A is CalEEMod runs from the Energy Analysis included as Appendix C4 to the Draft EIR. As stated in the Draft EIR Section 5.13, *Population and Housing,* according to the U.S. Census Bureau, 68,852 individuals are employed in the construction industry in San Bernardino County. The supply of general construction labor in the vicinity of the Specific Plan Area is not expected to be constrained due to the current 7.7 percent unemployment rate in the County and the temporary nature of construction projects (EDD, 2021). As such, there is a sufficient number of individuals employed in the construction industry within the County of San Bernardino that would provide labor for the construction of the proposed Project. As provided by CEQA Guidelines Section 15064(c)(3), an indirect physical change, such as population growth, is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. An indirect physical change which is speculative or unlikely to occur is not reasonably foreseeable. Therefore, an estimate of construction workers relocating to the County would be speculative and is not required under CEQA.

As demonstrated on pages 5.13-3 through 5.13-5 of the Draft EIR Section 5.13, *Population and Housing,* the Draft EIR utilized data from the 2020-2045 RTP/SCS to show employment, population, and housing forecasts for San Bernardino County and unincorporated San Bernardino County. However, in order to provide a more location-specific analysis, the Draft EIR utilized data from the Countywide Plan EIR in order to analyze the proposed Project's impacts on the Bloomington Community, as shown on pages 5.13-7 through 5.13-8. While there is a very nuanced difference in the data utilized by the Countywide Plan and SCAG's 2020-2045 RTP/SCS, the overall significance of the proposed Project's impacts on population and employment growth would not change. However, in response to Comment O3.12 and in order to further clarify the discussion, page 5.13-8 has been revised as follows:

> The Project-specific developments currently proposed in Planning Area A (Opening Year Development Options 1 & 2) would result in building square footages that are less than the maximum square footage of what could be developed under the proposed Specific Plan. Specifically, the proposed Opening Year Development – Option 1 consists of 2,113,640 SF of warehousing, distribution, e-commerce, light industrial and business park uses and the proposed Opening Year Development – Option 2 consists of 2,712,040 SF of light industrial and business park uses, including warehousing, distribution, and e-commerce uses, whereas the Specific Plan allows up to 3,079,910 SF in Planning Area A based on the 0.5 FAR assigned to that area.
>
> Based on the proposed building square footages, the Opening Year Development – Option 1 would generate 1,769 jobs and the Opening Year Development – Option 2 would generate 2,270 jobs. Based on Tables 5.13-1 and 5.13-5, the workforce demand of up to 2,270 employees could be filled by persons residing in unincorporated County, including from Bloomington, and the surrounding areas. Additionally, the immediate availability in the labor pool in the vicinity of the Specific Plan Area is not expected to be constrained due to the current 7.7 percent unemployment rate in the County**, which equates to approximately 75,700 unemployed individuals** (EDD, 2021). **Overall, buildout of the entire Specific Plan based on the allowed FAR would result in the need for approximately 2,709 jobs, which would represent approximately 19 percent of the employment growth in unincorporated San Bernardino County (SCAG, 2020). Furthermore, should the entire projected employment requirement for the proposed Project be filled by individuals relocating to unincorporated San Bernardino County, the projected population increase would represent 6 percent of the projected**

population growth by 2045 (SCAG, 2020). As such, both the estimated job increase, and potential population increase would be within the projected growth for the region.

Despite the fact that the proposed Project would require Policy Plan Amendments and Zoning Amendments, these actions are not considered to be precedent setting actions (defined as any act, decision, or case that serves as a guide or justification for subsequent situations), as they are commonly undertaken on a regular basis by many jurisdictions and relate specifically to the Specific Plan Area and Upzone Site, respectively. Further, as elaborated above and throughout the Draft EIR, the Project would not induce substantial population growth in an area beyond what is forecasted, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

Additionally, while the projected job increase provided by the entire Specific Plan would be a large increase, this increase in jobs would occur over approximately 20 years as the entire Specific Plan buildout would not occur until approximately 2040. Additionally, the EIR is not required by CEQA to analyze whether the current unemployed population would be interested in the jobs resulting from development of the Project, nor is it required to provide demographic or geographic information as to where these potential employees would come from, as such analysis would be speculative.

Comment O3.13: This comment states that the EIR does not include an LOS analysis even though Appendix K1 - Traffic Impact Assessment included a complete LOS analysis and that the EIR must be revised to include discussion and analysis of the LOS information provided in Appendix K1 in order to comply with the County Policy Plan: Policy TM1.1 Roadway level of service (LOS).

Response O3.13: Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion.

Comment O3.14: The comment states that Appendix K1 finds that 20 intersections of the study area will be LOS deficient/inconsistent with County Policy Plan LOS requirements (operating at LOS D or F) as a result of the proposed Project. Appendix K1 recommends mitigation requiring "fair share" payments to mitigate impacts to less than significant levels. The comment states that an assessment of fees is appropriate when linked to a specific mitigation program and payment of fees is not sufficient where there is no evidence mitigation will actually result. The comment states that the assessment of fees here is not adequate as there is no evidence mitigation will actually result and the improvements required are not part of an existing DIF/TUMF program and therefore are not planned to occur at all or by any certain date.

Additionally, the comment states that intersections #1, 2, 4, 7, 11, 12, 20, 22, and 25 are located outside of the County of San Bernardino. They are under the control of Fontana, Jurupa Valley, Riverside, and Caltrans. Any roadway improvements recommended or fees paid to mitigate impacts for these locations are beyond the control of the lead agency and evidence that these improvements will be completed or approved by the other jurisdictions has not been provided. The comment states that the Draft EIR must be revised and recirculated for public review to include enforceable mitigation that will result in quantifiably reduced LOS impacts in accordance with the County Policy Plan goals and policies.

Response O3.14: The comment states that identification of the Project's fair share of identified improvements is not adequate if the improvement is not included in an existing DIF/TUMF program. As

noted in Response to Comment 03.13, level of service is not considered an environmental impact under CEQA, and therefore any recommended roadway improvements, as well as Project fair-share payments, would not be part of the CEQA process or subject to the mitigation measures or mitigation monitoring as part of the Draft EIR. The Draft EIR does not need to include any mitigation related to roadway widening as it is not an environmental impact under CEQA. No further response is required.

Comment O3.15: The comment states that the study area for the Draft EIR is also arbitrary and capricious in that it does not include for analysis all potentially significant impacts on the transportation facilities providing access to the site. The comment states the Draft EIR must be revised to include analysis of the following transportation facilities providing direct access to the Project site:

Intersections
Santa Ana Ave. at Tamarind Ave.
Santa Ana Ave. at Alder Ave.

Freeway Merge/Diverge
I-215 at SR-60
I-215 at SR-91
I-215 at I-10
I-215 at SR-210
I-215 at I-15
I-15 at SR-60
I-15 at I-10
I-15 at SR-210

Freeway On/Off Ramps
SR-60 at Rubidoux Blvd.

The comment states this is especially vital for analysis since Figure 14 – Project Distribution within Appendix K1 depicts 5% of truck trips accessing Caltrans facilities by utilizing the SR-60 at Rubidoux Blvd. ramp. Additionally, 75% of truck trips and 20% of passenger car trips are depicted to travel on Cedar Ave. towards I-10. Additionally, the I-10 and SR-60 connect to I-215, which provides direct access to the project site from the Southern California Logistics Airport. The Draft EIR must be revised to include analysis of all transportation facilities providing direct access to the Project site.

Response O3.15: During the Traffic Impact Analysis (TIA) scoping period with the County, all signalized intersections that have 50 trips or more, in addition to all adjacent intersections, were included in the analysis as can be seen on page 15 of the TIA. Santa Ana Avenue/Tamarind Avenue and Santa Ana Avenue/Alder Avenue are not signalized nor adjacent to the Project, and SR-60 Ramps/Rubidoux Boulevard have less than 50 trips added to the intersection. Caltrans has stated in *Caltrans Vehicle Miles Traveled – Focused Transportation Impact Study Guide*, (May 20th, 2020) on page four that "the focus will no longer be on traffic at intersections and roadways immediately around project sites. Instead, the focus will be on how projects are likely to influence the overall amount of automobile use.", therefore, all freeway interchanges fully within their jurisdiction would not require LOS evaluation. Level of service is no longer considered an environmental impact under CEQA, per CEQA Guidelines Section 15064.3. As a result, effects of LOS can be handled separately from the Draft EIR through the entitlements process. Finally, the volume of trips sent north of I-10 on Cedar Avenue can be seen in Figure 15a and 16a, as well as detailed percentages of truck and auto trips in Appendix E – Additional Figures. The comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment O3.16: The comment states that the Project's vehicle miles traveled (VMT) impacts are misrepresented by the San Bernardino Transportation Analysis Model (SBTAM) model as the industrial

Specific Plan Area spans two Traffic Analysis Zone (TAZ) IDs: 53742202 and 53733302. The TAZs are mostly comprised of vacant land with a few underdeveloped properties and low-density single-family residences. The proposed Specific Plan area is unique in that TAZ 53733302 contains no warehouse buildings and 53742202 only contains one existing warehouse building at the corner of Jurupa Ave. and Cedar Ave. Therefore, the comment states that the VMT analysis does not adequately or accurately represent the VMT impacts of the proposed project and the Draft EIR must be revised to reflect this. The operational nature of industrial/warehouse uses involves high rates of truck/trailer VMT due to traveling from large regional distribution centers to smaller industrial parks and then to their final delivery destinations. Appendix C4 - Energy Analysis calculates that Opening Year Development Option 1 will generate 19,206,556 VMT annually (6,599,740 VMT from passenger cars and 12,606,816 VMT from trucks/trailers); Opening Year Development Option 2 will generate 25,557,878 VMT annually (8,868,745 VMT from passenger cars and 16,689,133 VMT from trucks/trailers); and Specific Plan area buildout will generate 35,193,301 VMT annually (11,887,216 VMT from passenger cars and 23,306,085 VMT from trucks/trailers). The average daily VMT for OYD1 is 52,621; average daily VMT for OYD2 is 70,022; and average daily VMT for the Specific Plan area buildout is 96,420. This is exponentially higher than the VMTs reported in each TAZ. The project's truck/trailer activity is unable to utilize public transit or active transportation and it is misleading to the public and decision makers to exclude the truck/trailer activity from VMT analysis. The comment further states that the EIR must be revised to reflect a quantified VMT analysis that includes truck/trailer activity to adequately and accurately analyze the potentially significant project transportation impacts.

Response O3.16: As a part of VMT analysis using SBTAM, Project TAZs are required to be modified to reflect the socio-economic data of the proposed Project along with other uses that would remain on the site. The model runs for 2016 baseline scenario and 2045 baseline scenario were conducted using the socio-economic data of TAZs 53742202 and 53733302 as provided through SBTAM. The model runs for 2016 with Project and 2045 with Project scenarios were conducted with modified socio-economic data which includes the proposed Project. These with-Project model run outputs were then compared to the baseline scenario model outputs as per the thresholds stated in the County Guidelines.

The Energy Analysis calculates VMT by multiplying the number of vehicles with an average travel distance set by the air quality district (South Coast Air Quality Management District), as compared to SBTAM which is a verified travel-demand model specific to the County of San Bernardino. The VMT output as a result of Energy Analysis is only to obtain average energy consumption estimates and is not based on verified travel-demand VMT based on socio-economic data specific to the County provided by SBTAM.

Based on local and State guidance as well as the CEQA guidelines, VMT is an evaluation of passenger cars, not truck trips. The VMT analysis conducted therefore, only analyzed VMT/Employee for home-based-work trips as per the County Guidelines. This is consistent with CEQA Guidelines Section 15064.3(a) which states "For the purpose of this section, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project". Here, the term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks. Hence the VMT analysis only includes and represents the impacts of automobile travel as a result of the proposed project using SBTAM and is not required to include truck trips as a part of the VMT analysis. The comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment O3.17: The comment states that Appendix K2- VMT Analysis states that "the number of residents for calculating VMT/Person was obtained from SBTAM socioeconomic data" for the SB 330 Upzone Site and "SBTAM socioeconomic data for the unincorporated San Bernardino County area" for the industrial Specific Plan area. However, the SBTAM socioeconomic data is not included for public review. CEQA § 15150 (f) states that incorporation by reference is most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of the problem at hand. The SBTAM data contributes directly to the analysis of the problem at hand. Not

including the SBTAM data as attachments for public review is in violation of CEQA § 15150 (f). The EIR must be revised and recirculated for public review including the SBTAM data.

Response O3.17: The input and output for the SBTAM contains over 3,400 files. The SBTAM is publicly available for request from San Bernardino County Transportation Authority. The socio-economic data (SED) file includes 4,118 records and is not easily printed for attachment to an EIR. The VMT calculation includes numerous matrices that are each over 4,000 rows by 4,000 columns. This data also cannot be printed an attached to an EIR. Pursuant to CEQA Guidelines Section 15148, highly technical documents can be cited, but are not required to be included as an appendix to the EIR. As such, Appendix K2 properly cited SBTAM and is not required to include all of the data files pursuant to the CEQA Guidelines. The only change that was made to the model was in the SED for the project and SB330 Upzone Site. These changes were fully disclosed in the VMT analysis.

Comment O3.18: This comment states that Table 7 of the VMT Analysis is from SCAG's 2016 RTP/SCS, which is out of date as the 2020-2045 RTP/SCS was adopted on September 3, 2020 and the EIR must be revised to utilize and include as an attachment Table 6: Building Square Footage Factors for Residential Units and Employment by Type from SCAG's 2020-2045 Sustainable Communities Strategy Technical Report7. Further, the comment states that Appendix K2 utilizes the suburban factor of 1,700 square feet of building per employee rather than the urban factor of 1,200 square feet of building per employee, which serves to skew employee generation and VMT downwards and Appendix K2 does not give any reasoning or justification for utilizing the suburban factor instead of the urban factor. Also, the comment states the EIR is not internally consistent as the Population and Housing analysis calculates OYD1 will generate 1,769 employees and OYD2 will generate 2,270 employees while the VMT analysis only utilizes 1,575 employees for its analysis. The comment further states that the EIR must be revised to utilize the urban factor of 1,200 square feet of building per employee.

Response O3.18: The comment states that the employment estimates for VMT are incorrect because they were generated using technical data from the 2016 RTP/SCS. The comment provides reference to the 2020-2045 RTP/SCS. It should be noted that the square footage per employee in the updated 2020-2045 RTP/SCS data is the same as in the 2016 RTP/SCS. Therefore, no changes need to be made to the analysis. The comment also states that the estimates for Urban area should have been used rather than the employees per square foot estimates for suburban area. The category "Urban" does not apply to the project area. According to the 2020-2045 RTP/SCS Technical Report, Urban areas are "often found within and directly adjacent to moderate and high-density urban centers. Virtually all 'Urban" growth would be considered infill or redevelopment." Additionally, Urban areas are "are supported by high levels of regional and local transit service." None of these characteristics apply to the Project area, therefore it is appropriate to use the employee per square foot estimates for Suburban area.

The analysis within Section 5.13, *Population and Housing,* utilized the employee demand factor of 1 employee for every 1,195 square feet of light industrial space from SCAG's Employment Density Study, which would likely result in an overestimate of potential employees needed for the proposed Project. Therefore, the generation rate utilized by the Population and Housing analysis provides a conservative analysis of potential population growth from the Project. On the other hand, the VMT analysis presented in Appendix K2 similarly provides a conservative analysis of potential VMT from the proposed Project as the Project VMT is divided by the Project employees. As such, the VMT Analysis provides a conservative analysis of the VMT per employee from the proposed Project. No further response is required.

Comment O3.19: This comment states that the EIR does not evaluate a reasonable range of alternatives as only two alternatives are analyzed beyond the required No Project/No Development Alternative. The comment states that the EIR should be revised to include an alternative that meets the Project objectives and eliminates all of the Project's significant and unavoidable impacts.

Response O3.19: Pursuant to State CEQA Guidelines Section 15126.6(a), an EIR must describe a reasonable range of alternatives to a proposed project or to a project's location that would feasibly avoid or lessen its significant environmental impacts while attaining most of the proposed project's objectives. State CEQA Guidelines Section 15126.6(b) emphasizes that the selection of project alternatives be based primarily on the ability to reduce impacts relative to the proposed project. As defined by CEQA Guidelines Section 15126.6(a), the Draft EIR does not need to include an alternative that avoids the Project's significant environmental impacts, it could include alternatives that lessen the significant environmental impacts of the Project. As such, the alternatives utilized by the EIR (No Project/No Development Alternative, No Project/Buildout of Existing Zoning Alternative, and Reduced Project/No Specific Plan Alternative) are sufficient pursuant to CEQA Guidelines Section 15126.6. No further response is required.

Comment O3.20: This comment states that based on the above comments, GSEJA believes the Draft EIR is flawed and a revised EIR must be prepared and recirculated for public review. The comment reiterates that GSEJA requests to be added to the notification list for the proposed Project.

Response O3.20: As substantiated by the responses above and below, none of the conditions arise which would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. No new significant environmental impact would result from the Project or from a new mitigation measure proposed to be implemented, there is no substantial increase in the severity of an environmental impact, no feasible project alternative or mitigation measure considerably different from others previously analyzed would lessen the environmental impacts of the proposed Project, and the Draft EIR is not fundamentally inadequate and conclusory in nature.

Comment O3.21: This comment states that SWAPE has reviewed the Draft EIR and provides a summary of the project description.

Response O3.21: The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is provided.

Comment O3.22: This comment states that the Draft EIR fails to adequately evaluate the Project's air quality, health risk, and greenhouse gas impacts. As a result, emissions and health risk impacts associated with construction of the proposed Project are underestimated and inadequately addressed. An updated EIR should be prepared to adequately assess and mitigate the potential air quality, health risk, and greenhouse gas impacts that the project may have on the surrounding environment.

Response O3.22: Refer to Master Responses 2 and 3. In addition, the Draft EIR includes air quality, health risk, and greenhouse gas analyses pursuant to SCAQMD methodology and the proposed Project information. In response to this analyses, seven mitigation measures were applied, and the Project includes 27 PDFs to reduce impacts related to air quality, health risk and greenhouse gas emissions. As provided in the responses to the detailed comments below, potential impacts have been adequately addressed and an updated EIR is not required.

Comment O3.23: This comment states that the CalEEMod default data was changed for modeling of the proposed Project and that CEQA requires such changes be justified by substantial evidence. The comment also states that several model inputs are not consistent with information disclosed in the Draft EIR. As a result, the Project's construction and operational emissions are underestimated and that an updated EIR should be prepared. The comment states that Specific Plan buildout scenarios assume that the Project's off-road construction equipment fleet would meet Tier 4 Final emissions standards, but that Mitigation Measure AQ-2 only requires Tier 4 and that Tier 4 Interim equipment has higher emission levels than Tier 4 Final equipment. Therefore, by modeling construction emissions assuming a full Tier 4 Final equipment fleet, the Draft EIR fails to account for higher emissions that may occur as a result of the use of Tier 4 Interim equipment as the mitigation measure does not identify Tier 4 Interim or Tier 4 Final equipment. The

comment provides assumptions of emissions from use of Tier 4 Interim equipment and states that an exceedance of thresholds would occur.

Response O3.23: As detailed on pages 5.3-31 through 5.3-21, modeling of anticipated construction activities pursuant to the proposed Project and appropriate CalEEMod defaults identified that emissions related to NOX would be exceeded. Thus, Mitigation Measure AQ-2 was included to require all construction equipment greater than 150 horsepower (>150 HP) to be CARB certified Tier 4 or higher. Although modeling of the mitigated emissions included use of with Tier 4 *Final* equipment, this was not identified in the EIR text or Mitigation Measure AQ-2. Therefore, to provide clarification and to ensure Tier 4 *Final* equipment would be used, the EIR text and mitigation measure have been modified to detail that Tier 4 Final equipment would be required, as detailed in Chapter 3, Revisions to the Draft EIR.

Comment O3.24: This comment summarizes the findings of the Mobile Source Health Risk assessment and states that the Draft EIR fails to discuss the health risk impacts associated with Project construction. The comment also states that the Draft EIR's evaluation of the Project's potential health risk impacts, as well as the subsequent less-than-significant impact conclusion, are incorrect for four reasons. The comment states that first, the Draft EIR's mobile-source HRAs utilize incorrect Fraction of Time at Home ("FAH") values for the various age groups and thus underestimates the cancer risk.

Response O3.24: Refer to Master Responses 2 and 3. In addition, in response to comments received to the Draft EIR a construction-source Health Risk Assessment (HRA) was prepared, as detailed in Master Response 2, which shows that cancer impacts at all receptors would be well below the 10 in one million significance threshold. As such, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction activity. Also, per Office of Environmental Health Hazard Assessment's (OEHHA) 2015 Risk Assessment Guidelines, an FAH 0.85 for 3rd trimester and 0<2 years and 0.72 for 2<16 years should be utilized, unless a school is located within the 1.0E-6 cancer risk isopleth, in which case 1.0 should be utilized. As there are no schools located within the 1.0E-6 cancer risk isopleth, FAH values of 0.85 and 0.72 were used for the 3rd Trimester/0<2 years and 2<16 years age groups, respectively.

Comment O3.25: This comment states that the Draft EIR fails to quantitatively evaluate the Project's construction-related toxic air contaminant ("TAC") emissions or make a reasonable effort to connect these emissions to potential health risk impacts posed to nearby existing sensitive receptors. This is incorrect, as construction of the proposed Project will produce emissions of DPM through the exhaust stacks of construction equipment over a potential construction duration of 14 months (p. 3-16). However, the Draft EIR fails to discuss the potential DPM associated with Project construction or indicate the concentrations at which such pollutants would trigger adverse health effects. Thus, without making a reasonable effort to connect the Project's construction-related TAC emissions to the potential health risks posed to nearby receptors, the Draft EIR is inconsistent with CEQA's requirement to correlate the increase in emissions generated by the Project with the potential adverse impacts on human health.

Response O3.25: As described by the Mobile Source HRA (Draft EIR Appendix C) the primary purpose of the HRA is to identify potential impacts of long-term exposure. The HRA evaluates the potential health risks to residents and workers over a period of 30 or 25 years of exposure, which is consistent with SCAQMD and OEHHA recommended guidance. Project construction would only last for 14-months, and therefore, does not meet the exposure timeframe to per SCAQMD and OEHHA methodology. However, the Draft EIR does include a discussion of health impacts of particulate emissions on pages 5.3-35 and includes evaluation of localized impacts associated with the Project's construction emissions, below under Impact AQ-3, and concludes that such impacts would be less than significant with implementation of mitigation that requires Tier 4 Final construction equipment. The SCAQMD's Localized Significance Thresholds (LST) represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are based on the ambient concentrations of that pollutant and distance to the nearest sensitive receptor. As detailed

on pages 5.3-37 through 5.3-41, with implementation of Tier 4 Final construction equipment (as required by Mitigation Measure AQ-2) the Project would not generate emissions on a localized scale that would exceed SCAQMD thresholds that are intended to be protective of the public health. In addition, a construction-source HRA was prepared, as detailed in Master Response 2, which shows that cancer impacts at all receptors would be well below the 10 in one million significance threshold. Therefore, the Draft EIR appropriately evaluates the potential air quality and related health risks related to construction emissions.

Comment O3.26: This comment states that the State of California Department of Justice recommends the preparation of a quantitative HRA pursuant to the OEHHA Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments in February 2015. The comment states that this guidance document recommends that all short-term projects lasting at least two months be evaluated for cancer risks to nearby sensitive receptors. The comment states that as the Project's proposed construction duration exceeds the 2-month requirement, the Project meets the threshold warranting a quantified construction-related HRA under OEHHA guidance, which reflect the most recent state health risk policies, and as such, an analysis of health risk impacts posed to nearby sensitive receptors from Project-generated construction DPM emissions should be included in the EIR for the Project.

Response O3.26: Refer to Master Response 2 and 3. In addition, as described in Response O3.25, the HRA evaluates the potential health risks to residents and workers over a period of 30 or 25 years of exposure, which is consistent with SCAQMD and OEHHA recommended guidance. Also, the Draft EIR includes evaluation of localized impacts associated with the Project's construction emissions and concludes that such impacts would be less than significant with implementation of mitigation that requires Tier 4 Final construction equipment. The SCAQMD LSTs are intended to be protective of the public health and represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are based on the ambient concentrations of that pollutant and distance to the nearest sensitive receptor. In addition, a construction-source HRA was prepared, as detailed in Master Response 2, which shows that cancer impacts at all receptors would be well below the 10 in one million significance threshold.

Comment O3.27: This comment states that the HRA fails to evaluate the cumulative lifetime cancer risk to nearby, existing receptors as a result of Project construction and operation together. The comment states that according to OEHHA guidance, as referenced by the HRA Report, "the excess cancer risk is calculated separately for each age grouping and then summed to yield cancer risk at the receptor location". However, the comment states that the HRA fails to sum each age bin to evaluate the total cancer risk over the course of the Project's total construction and operation. This is incorrect and thus, an updated analysis should quantify the entirety of the Project's construction and operational health risks together and sum them to compare to the SCAQMD threshold of 10 in one million.

Response O3.27: Refer to Master Response 2 and 3. In addition, in Response to this comment a construction-source HRA was prepared that includes the overlap of Project construction and operational emissions. As detailed in Master Response 2, at the MEIR during the overlap of construction and operational emissions, the maximum incremental cancer risk attributable to Project construction and operational-source DPM emissions is estimated at 4.91 in one million, which is less than the threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. As such, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction and operational activity. All other receptors during construction and operational activity would experience less risk than what is identified for this location. Therefore, impacts would be less than significant.

Comment O3.28: This comment provides a screening-level risk analysis and provides an estimate that an excess cancer risk of approximately 11.12 in one million over the course of a residential lifetime that would exceed the SCAQMD threshold of 10 in one million, thus resulting in a potentially significant impact not previously addressed or identified by the Draft EIR.

Response O3.28: As detailed in Master Response 2, the overlap of Project construction and operational emissions was evaluated, which would generate the maximum incremental cancer risk attributable to Project would generate DPM emissions of 4.91 in one million, which is less than the threshold of 10 in one million. The HRA does sum the risk for each age group in order to arrive at the total risk. As such, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction and operational activity. Therefore, impacts would be less than significant.

Comment O3.29: This comment states that an agency must include an analysis of health risks that connects the Project's air emissions with the health risk posed by those emissions. The comment states that the previously provided screening-level HRA, which is known to be conservative and tends to err on the side of health protection, is to demonstrate the link between the proposed Project's emissions and the potential health risk. The comment states that the screening-level HRA demonstrates that construction and operation of the Project could result in a potentially significant health risk impact, when correct exposure assumptions and up-to-date, applicable guidance are used, and that the City should prepare an updated HRA to accurately evaluates health risk impacts associated with both Project construction and operation.

Response O3.29: The HRA evaluations that were completed for the Project provide the appropriate conservative analysis pursuant to SCAQMD, CARB, and OEHHA recommended methodology, which determined that potential health impacts to sensitive receptors would be less than significant, and mitigation is not required. The HRA evaluates the closest sensitive receptors with the maximum potential emissions and continuous exposure (24-hours per day), which identifies the maximum potential impact, which is correct pursuant to CEQA. An evaluation of additional receptor locations that are farther away would result in identification of lower impacts and is not required by CEQA. Additionally, a construction-source HRA was prepared, as detailed in Master Response 2, which shows that both cancer and non-cancer health impacts at all receptors would be well below the 10 in one million significance threshold. Thus, impacts were determined to be less than significant. No further response is required.

Comment O3.30: This comment summarizes the Draft EIR evaluation of greenhouse gas emissions and describes the County's thresholds and the County's GHG Emissions Reduction Plan Update's thresholds and Screening Tables. The comment also summaries the Draft EIR findings that the Project will achieve 171 points (industrial development) and 104 points (Upzone Site) on the Screening Tables, exceeding the 100-point criteria and, thus, be consistent with the County's GHG Emissions Reduction Plan and result in a less than significant impact. The comment also describes that the EIR includes Mitigation Measure GHG-1 that requires each Specific Plan development demonstrate that it would meet a minimum of 100 points on the County's Screening Tables. The comment then recommends that the individual reduction features be included as formal mitigation measures.

The comment provides text from the Association of Environmental Professionals' (AEP) CEQA Portal Topic Paper on Mitigation Measures, which states that "While not 'mitigation', a good practice is to include those project design feature(s) that address environmental impacts in the MMRP." The comment further states that design features that are not formally included as mitigation measures may be eliminated from the Project's design altogether. Thus, as the specific reduction features are not formally included as mitigation measures in the Draft EIR, the comment states that it cannot guaranteed that they would be implemented, monitored, and enforced on the Project site. The comment concludes that until the specific reduction measures are included as mitigation measures, the Project's GHG analysis should not be relied upon to determine Project significance.

Response O3.30: The proposed Project consists of a Specific Plan, not a specific development proposal to which specific development conditions can be applied in such a way that would maximize the reduction of greenhouse gas emissions. In addition, the Specific Plan anticipates development through the year 2040 during which new technology is anticipated to become available. As intended by the County's Greenhouse Gas Reduction Plan, the GHG Screening Tables (and Mitigation Measure GHG-1) provide flexibility to

meet each development's design needs and incorporate new technology. The County's Greenhouse Gas Reduction Plan states (page 21 of Attachment 2: Screening Tables) that the Screening Tables assign points values that correspond to the minimum emissions reduction expected from each feature, and the menu of features allows maximum flexibility and options for how development projects can implement the GHG reduction measures. Thus, the Specific Plan via Mitigation Measure GHG would implement new development as intended by the County's Greenhouse Gas Reduction Plan.

As described on page 5.8-13 of the Draft EIR, any project that adopts at least 100 points of GHG performance standards listed in the proposed 2021 Screening Tables, would be consistent with the County's GHG Emissions Reduction Plan to reduce emissions to 40 percent below 2007 levels, which would be consistent with the State's long-term goal to achieve statewide carbon neutrality (zero net emissions) by 2045, and therefore, would result in a less than significant impact related to GHG emissions. Mitigation Measure GHG-1 ensures application of the GHG reduction measures and stipulates that individual projects can utilize different measures than those chosen in Draft EIR Tables 5.8-6 and 5.8-7 as longs as the total of the measures utilized meet 100 points, resulting in a less than significant impact.

Consistent with the AEP CEQA Portal Topic Paper on Mitigation Measures (as referenced by the comment), which states that a good practice is to include those project design features that address environmental impacts in the MMRP, the Draft EIR includes 27 PDFs related to air quality and greenhouse gas emissions (Draft EIR pages 5.3-57 through 5.3-59). These PDFs are included in the Project's MMRP to ensure implementation along with the Specific Plan.

Comment O3.31: This comment states that significant air quality and health risk impacts should be mitigated further and the comment lists additional measures for the proposed Project and references the Department of Justice Warehouse Project Best Practices. After the list of recommended features, the comment states that an updated EIR should be prepared to include all feasible mitigation measures, as well as include updated air quality and health risk analyses to ensure that the necessary mitigation measures are implemented to reduce emissions to below thresholds.

Response O3.31: As described previously in Response O3.8, implementation of the Specific Plan would not exceed thresholds related to DPM and LSTs, and impacts related to human health, cancer risks, and localized air quality would be less than significant with use of Tier 4 Final construction equipment (included as Mitigation Measure AQ-2. Thus, additional mitigation to reduce DMP or localized emissions is not required.

The Project includes 27 PDFs related to air quality and greenhouse gas emissions (Draft EIR pages 5.3-57 through 5.3-59). These PDFs are included in the Project's MMRP to ensure implementation along with the Specific Plan, many of these PDFs are consistent with the comment's recommended measures. The Table below compares the comment's recommended measure with the measures currently applied to the Project. As detailed below, 86 percent of the recommended measures are already included in the proposed Project. The measures that are not included are either not applicable to the Project, not required as Project impacts related to the recommended measure would not occur, or because the Project Applicant and the City do not have the authority to require the measure, as detailed below.

Comment's Recommended Measure	**Project Inclusion/Applicability**
Requiring off-road construction equipment to be zero-emission, where available, and all diesel fueled off-road construction equipment, to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use	These measures are included in the Project as PDF AQ-4 (Draft EIR page 5.3-57) and Mitigation Measure AQ-2, Tier 4 Final (Draft EIR page 5.3-59).

Comment's Recommended Measure	**Project Inclusion/Applicability**
prior to any ground-disturbing and construction activities.	
Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.	This measure is included in the Project as PDF AQ-5, as listed on Draft EIR page 5.3-57.
Requiring on-road heavy-duty haul trucks to be model year 2010 or newer if diesel-fueled.	This measure is included in the Project as PDF AQ-3, as listed on Draft EIR page 5.3-57.
Providing electrical hook ups to the power grid, rather than use of diesel-fueled generators, for electric construction tools, such as saws, drills, and compressors, and using electric tools whenever feasible.	This measure is included in the Project as PDF AQ-4, as listed on Draft EIR page 5.3-57.
Limiting the amount of daily grading disturbance area.	This measure is included in the Project as PDF AQ-2, as listed on Draft EIR page 5.3-57.
Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.	As shown in Draft EIR Table 5.3-8, Project grading activities would be less than significant with use of Tier 4 Final equipment, which is required by Mitigation Measure AQ-2. Also, as shown on Tables 5.3-15 through 5.3-17, the maximum peak construction emissions would not exceed any LST thresholds during grading activities. Thus, there is no nexus to require additional measures during grading activities, and this measure is not included.
Forbidding idling of heavy equipment for more than two minutes.	The Project would be required to be compliant with CARB Rule 2485 (13 CCR, Chapter 10 Section 2485), Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling to 5 minutes. As described previously, the Project would result in less than significant impacts related to LSTs and HRA related DPM emissions, so mitigation is not required.
Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.	This measure is included in the Project as PDF AQ-6, as listed on Draft EIR page 5.3-57.
Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.	This measure is implemented through the County's standard on-site construction inspections and permitting processes.
Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.	This measure is included as Mitigation Measure AQ-1: Super Compliant Low VOC, as listed on Draft EIR page 5.3-59.
Providing information on transit and ridesharing programs and services to construction employees.	This measure is included in the Project as PDF AQ-7, as listed on Draft EIR page 5.3-58.
Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.	This measure is included in the Project as PDF AQ-8, as listed on Draft EIR page 5.3-58.
Requiring that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet	This measure is included in the Project as PDF AQ-9, as listed on Draft EIR page 5.3-58.

Comment's Recommended Measure	**Project Inclusion/Applicability**
or exceed 2010 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and state upon request.	
Requiring all heavy-duty vehicles entering or operated on the project site to be zero-emission beginning in 2030.	This measure is included in the Project as PDF AQ-10, as listed on Draft EIR page 5.3-58.
Requiring on-site equipment, such as forklifts and yard trucks, to be electric with the necessary electrical charging stations provided.	Mitigation Measure AQ-6, *Electric Interior Vehicles*, requires that the industrial buildings shall include infrastructure to support use of electric-powered forklifts and/or other interior vehicles (on Draft EIR page 5.3-60).
Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.	This measure is included in the Project as PDF AQ-12, as listed on Draft EIR page 5.3-58.
Forbidding trucks from idling for more than two minutes and requiring operators to turn off engines when not in use.	Mitigation Measure AQ-3, *Idling Regulations*, provides that signs at loading dock facilities that include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for trucks drivers to restrict idling to no more than 5 minutes once the vehicle is stopped, the transmission is set to "neutral" or "park", and the parking brake is engaged pursuant to Title 13 of the California Code of Regulations, Section 2485; and 3) telephone numbers of the building facilities manager and CARB to report violations. Signs shall be installed prior to receipt of an occupancy permit (on Draft EIR page 5.3-59). A requirement to restrict idling longer than two minutes while on site is beyond existing CARB requirements and there is no nexus to provide additional mitigation, as impacts related to operational DPM and localized emissions would be less than significant as previously detailed.
Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the air district, and the building manager.	This measure is included in the Project as PDF AQ-1, as listed on Draft EIR page 5.3-57.
Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.	There is no nexus to provide additional measures such as air filtration systems at sensitive receptors near the Project, as impacts related to localized emissions and health risks would be less than significant as previously detailed. Thus, this measure is not included or required for the proposed Project.
Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air	There is no nexus to provide additional measures such as an air monitoring station near the Project, as

Comment's Recommended Measure	**Project Inclusion/Applicability**
monitoring station proximate to sensitive receptors and the facility for the life of the project and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.	impacts related to localized emissions would be less than significant as previously detailed. Also, as described in Response O.3.8, the Central San Bernardino Valley 1 monitoring station is located approximately 5.7 miles northwest of the Project site. This measure is not included or required for the proposed Project.
Constructing electric truck charging stations proportional to the number of dock doors at the project.	This measure is included in the Project as PDF AQ-13, as listed on Draft EIR page 5.3-58.
Constructing electric plugs for electric transport refrigeration units at every dock door, if the warehouse use could include refrigeration.	Not applicable. The proposed Project does not include refrigerated warehouses or use of refrigeration units.
Constructing electric light-duty vehicle charging stations proportional to the number of parking spaces at the project.	This measure is included in the Project as PDF AQ-14, as listed on Draft EIR page 5.3-58.
Installing solar photovoltaic systems on the project site of a specified electrical generation capacity, such as equal to the building's projected energy needs.	This measure is included in the Project as PDF AQ-15, as listed on Draft EIR page 5.3-58.
Requiring all stand-by emergency generators to be powered by a non-diesel fuel.	This measure is included in the Project as PDF AQ-16, as listed on Draft EIR page 5.3-58.
Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.	This measure is included in the Project as PDF AQ-17, as listed on Draft EIR page 5.3-58.
Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.	This measure is included in the Project as PDF AQ-18, as listed on Draft EIR page 5.3-57.
Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.	This measure is included in the Project as PDF AQ-19, as listed on Draft EIR page 5.3-58.
Achieving certification of compliance with LEED green building standards.	This measure is included in the Project as PDF AQ-20, as listed on Draft EIR page 5.3-58.
Providing meal options onsite or shuttles between the facility and nearby meal destinations.	This measure is included in the Project as PDF AQ-8, as listed on Draft EIR page 5.3-58.
Posting signs at every truck exit driveway providing directional information to the truck route.	This measure is included in the Project as PDF AQ-22, as listed on Draft EIR page 5.3-58.
Improving and maintaining vegetation and tree canopy for residents in and around the project area.	The Project includes installation of vegetative barriers that separate the Project site from offsite areas. As detailed on page 3-11 of the Draft EIR, landscaping would be focused along the perimeters of each site, building exteriors, along screen walls that secure the trailer parking and loading dock areas, and around onsite detention basins. A variety of trees, shrubs, accents, and groundcover would be planted. Tree species include Desert

Comment's Recommended Measure	**Project Inclusion/Applicability**
	Willow, Chitalpa, Crape Myrtle, Toyon, Olive, Date Palm, Afghan Pine, Chinese Pistache, California Sycamore, Coast Live Oak, and African Sumac. The conceptual landscape plans for the four sites are shown in Draft EIR Figures 3-14 through 3-17. Thus, this measure is included in the proposed Project.
Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.	This measure is included in the Project as PDF AQ-23, as listed on Draft EIR page 5.3-58.
Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program and requiring tenants to use carriers that are SmartWay carriers.	This measure is included in the Project as PDF AQ-24, as listed on Draft EIR page 5.3-58. However, instead of requiring enrollment, the measures encourage enrollment, as the Project Applicant and the City do not have the authority to require such enrollment into these programs.
Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.	This measure is included in the Project as PDF AQ-25, as listed on Draft EIR page 5.3-58.

Comment O3.32: This comment states that the commenter has received limited discovery regarding the Project, additional information may become available in the future; and the commentor retains the right to revise or amend this report when additional information becomes available. The comment also states that the comments reflect efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Response O3.32: The comment is conclusionary in nature and does not raise any specific concerns with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment O3. Attachment A: This attachment to the comment letter provides multiple CalEEMod model runs used to substantiate the comments provided and responded to above and provides resumes of SWAPE professionals who provided the SWAPE comments.

Response O3. Attachment A: This comment provides modeling used to substantiate Comments O3.1 through O3.32, which were responded to above and provides resumes for the individuals who provided the technical comments from SWAPE. The comment does not raise any specific concerns with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

LETTER O4: Robert Redford Conservancy for Southern California Sustainability Pitzer College (3 pages)

Robert Redford
CONSERVANCY
for Southern California Sustainability
PITZER COLLEGE

December 14, 2021

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

Dear County of San Bernardino,

My name is Susan Phillips, and I am a Professor of Environmental Analysis and the Director of the Robert Redford Conservancy for Southern California Sustainability (RRC) at Pitzer College. On behalf of the RRC, we write this letter in opposition to the 'Bloomington Business Park Specific Plan Project' (BBPSP). **We believe that this proposed project's significant and unavoidable impacts cannot be mitigated nor justified with an overriding consideration.** This is particularly true in the context of climate change. Climate vulnerability assessments in the region (for the Counties of San Bernardino and Riverside along with recent work specifically in Colton and Adelanto) indicate the urgent need to reduce pollution and to maximize greenspace in order to plan for detrimental changes in climate. Increasing heat and drought, combined with the human costs of rising pollution, increased traffic and noise, and proximity to homes and schools make building the BBPSP exactly the opposite of what needs to happen in order to protect our region in the short and long terms. O4.1

Part of the Robert Redford Conservancy's mission is to tackle the region's greatest environmental challenges and to advocate for healthy communities in the Inland Empire. BBPSP would create a heavy burden on the neighboring community due the increased truck traffic adding additional unhealthy air to the surrounding schools and neighborhoods. The County should oppose this project and prioritize people's health as well as long-term planning for regional climate resilience rather than profit.

We have heard many community members voice concerns regarding this project, which will dramatically change the nature of the area. Most recently, in early November, the RRC hosted a conference entitled "The Right to Breathe." This conference included a community discussion including concerned neighbors of Bloomington, who voiced their stories and concerns, increased inhaler usage, worries about their children who are already showing signs of asthma. These residents have also expressed a feeling of powerlessness regarding the planning process by which this decision has been made. O4.2

Action must be taken now to combat climate change and solve the air quality issues of Southern California, as these are compounded by environmental crises that harm residents in the region every day. We urge you to oppose this project that will cause irreversible damage to both to the people and environment of Bloomington. **We stand with the residents of Bloomington and oppose the Business Park Specific Plan Project.** O4.3

Background

The residents of the unincorporated community of Bloomington have experienced a massive influx of warehouse development and diesel trucks over the past decade. There has been public opposition by community members, small businesses, workers, elected officials, and even nearby cities over the unsustainable and dangerous growth of warehouse development near homes, schools, and parks in the Bloomington community. The County of San Bernardino even sued over the approval of a warehouse in Bloomington (the West Valley Logistics Center, a 3.5 million sq. ft. warehouse within the City of Fontana limits but is directly impacting the residents of Bloomington). We believe the County of San Bernardino should continue to look out for its residents and protect them from encroaching warehouse development. Principally, community members have participated in their General Plan process (through the Bloomington Community Plan and the Environmental Justice Element) and overwhelmingly have shown the need to monitor air quality. The goal here is to bring in more recreational resources and investments into Bloomington, instead of warehouse development that increases pollution, traffic and health risks. O4.4

We are asking the County of San Bernardino to prioritize their residents and the plan they want for their future. Instead, you have allowed a developer to come in and have given them the green light to buy out families, harass resistant homeowners, kick out tenants and displace hundreds of people throughout the Bloomington Business Park Specific Plan Project. This is not a fair or just battle. Ultimately it will not prove to be a smart one. Due to the multiple detriments of a singular industry's stranglehold on the region, the open, rural, and somewhat bucolic landscape of a place like Bloomington will become increasingly valuable if left as is.

Project Specs

- This project would rezone 213 acres of residential and agricultural land to industrial zoning - creating legally nonconforming uses in that area. This is problematic in terms of the loss of valuable greenspace, which supports both human health, acts as a natural carbon sink, allows for groundwater recharge, and protects biodiversity.
- This project would be less than 100 ft. to three public schools (Bloomington High School, Ruth O Harris Middle School and Walter Zimmerman Elementary School).
- This project would bring in over 9,000 vehicle and truck trips on roads adjacent to homes, schools, and parks.
- This project would create additional traffic, noise, poorer air quality, deterioration of commercial and residential roads, unsafe pedestrian and bicycle safety and other impacts in an area that is considered in the 90th% - 95% on CalEnviroScreen.
- This project would be in a community that is over 80% Hispanic.
- This project would have significant and unavoidable impacts for
    - obstructing the implementation of the air quality plan
    - net increase of criteria pollutants
    - cumulative impacts

O4.5

The benefits of leaving the land use as it is, or even enhancing the unique rural aspect of the area are impossible to quantify in terms of carbon sequestration, water retention and filtration, and biodiversity enhancements. A decision not to support the Business Center would be a landmark for our time. It would push other municipalities in the right direction to guard our collective future by reducing pollution and prioritizing people and the planet instead of further investing in polluting infrastructure. O4.6

Concerns

- Higher-than-normal risks come from living in a highly polluted environment. These include adverse birth outcomes, respiratory issues, and cancer, which continue to cost the O4.7

2

County as well as people's lives. Public health is at stake when we continue to increase pollution in residential communities. **O4.7 cont.**

- There are unavoidable cumulative impacts - an entire residential community will be disrupted in this development. Disrupting the fabric of that community will be devastating to residents and can never be recreated. **O4.8**
- Community members have brought up the fear of being displaced or harassed out of their homes, despite stating that they do not want to sell or rezone their homes.
- This community is over 80% Hispanic, with 20% of the community experiencing poverty - this is a common practice of environmental racism. **O4.9**
- This region deals with some of the worst traffic in the city - idling cars double the negative impact of pollution on the nearby communities. **O4.10**
- The region for the proposed development is in an area that is a fire risk and with the increasing dangers of climate change and wildfires. The County should focus its efforts on wildfire mitigation. **O4.11**
- The Municipal Advisory Council (MAC) and developer, Tim Howard has not provided adequate translation, even when requested for its constituents. In Bloomington, 66.5% of the community speaks a language other than English. **O4.12**
- The Municipal Advisory Council (MAC) has silenced voices during meetings when community members have brought up concerns.
- The Municipal Advisory Council (MAC) and County of San Bernardino have not released all minutes for their meetings.

Conclusion

We request that the County of San Bernardino Supervisors, Planning Commissioners, and Municipal Advisory Council Members oppose the Bloomington Business Park Specific Plan and honor the community's plans for residential, healthy, and thriving development. We believe that there can be no overriding consideration for the physical impact and disruption this development will have. We at the RRC are more than happy to speak out on this issue. It's time for this us to take a different tack for the region—one that can build a vibrant economy that prioritizes people, the region, and our planet instead of falling into trap of business as usual, which will be an immeasurable loss for community and for sustainability. **O4.13**

Sincerely,

Susan Phillips, Ph.D.
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Associate Dean, Pitzer College
Director, Robert Redford Conservancy for Southern California Sustainability
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susan_phillips@pitzer.edu

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Response to Comment Letter O4: Robert Redford Conservancy for Southern California Sustainability Pitzer College, dated December 14, 2021

Comment O4.1: This comment introduces the commentor and states that this letter in opposition to the proposed Project because the significant and unavoidable impacts cannot be mitigated nor justified with an overriding consideration, particularly related to climate change. The comment states that climate vulnerability assessments in the region (for the Counties of San Bernardino and Riverside along with recent work specifically in Colton and Adelanto) indicate the urgent need to reduce pollution and to maximize greenspace in order to plan for detrimental changes in climate. The comment also states that increasing heat and drought, combined with the human costs of rising pollution, increased traffic, and noise, and proximity to homes and schools make the proposed Project exactly the opposite of what needs to happen in order to protect our region in the short and long terms.

Response O4.1: The comment opposes the proposed Project on the basis that the significant and unavoidable impacts cannot be mitigated nor justified with an overriding consideration. The comment does not provide any substantial evidence supporting the assertions in the comment. As detailed in Draft EIR Section 5.8, *Greenhouse Gas Emissions*, the Project will result in a less than significant impact related to greenhouse gas emissions, pursuant to the County's Updated Greenhouse Gas Reduction Plan requirement. As detailed on Draft EIR Table 5.8-6 and Table 5.8-7 the Project would achieve 171 points (industrial development) and 104 points (Upzone Site) on the Screening Tables, exceeding the 100-point criteria and, thus, would be consistent with the County's GHG Emissions Reduction Plan and result in a less than significant impact. The EIR also includes Mitigation Measure GHG-1 that requires each Specific Plan development to demonstrate that it would meet a minimum of 100 points on the County's Screening Tables to ensure that the Greenhouse Gas Reduction Plan criteria would be met and that impacts would be less than significant. Therefore, no significant and unavoidable impact related to climate change would occur from the proposed Project.

In addition, as detailed in the Draft EIR Section 5.12, *Noise*, with implementation of existing regulations and mitigation measures impacts related to noise and vibration from the Project would be less than significant. Also, Draft EIR Section 5.15, *Transportation*, details that impacts related to vehicles miles traveled would be less than significant. The comment does not provide detailed concerns related to either the noise or traffic evaluation within the EIR. Therefore, no further response is required or provided.

Comment O4.2: This comment states the mission of the Robert Redford Conservancy and that the proposed Project would create a heavy burden on the neighboring community due the increased truck traffic adding additional unhealthy air to the surrounding schools and neighborhoods. The comment states that the County should oppose this project and prioritize people's health as well as long-term planning for regional climate resilience rather than profit. The comment asserts that many community members voice concerns regarding this project, which will dramatically change the nature of the area and that a November conference included a community discussion of neighbors of Bloomington, who voiced their concerns related to air quality health effects.

Response O4.2: Refer to Master Response 4. The comment does not provide any substantial evidence supporting the assertions in the comment. As described in Response O4.1, Draft EIR Section 5.15, *Transportation*, details that impacts related to vehicle miles traveled would be less than significant. The comment does not provide detailed concerns related to the transportation evaluation within the EIR. Therefore, no further response related to transportation is required or provided.

As detailed beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate Project health risk impacts to residents, schools, and workers as a result of exposure to Diesel Particulate Matter (DPM) from heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The commenter provides no substantial evidence that asthma cases are caused by development of the Project or other development projects. The Mobile

Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The maximum non-cancer risks to nearby residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million; and the maximum non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0 and are less than significant.

Also, as detailed in Master Responses 2 and 3, in response to comments received to the public review Draft EIR additional DPM and LST AERMOD dispersion modeling was completed (and is included as Appendix A of this Final EIR) to identify worst-case conditions, which is the highest daily peak on-site emissions resulting from overlapping operational and construction activity at the nearest land use to the Project site where an individual could remain. This additional modeling shows that neither DPM emissions or localized significance emissions would not exceed the applicable AQMD thresholds. As such, operation of the Specific Plan at buildout would not cause a significant human health or cancer risk related to DPM emissions and impacts would be less than significant.

In addition, the Draft EIR evaluates the potential of the Project to expose local sensitive receptors, such as residences and schools with substantial pollutant concentrations. As detailed in Draft EIR Tables 5.3-15 through 5.3-18, after implementation of Mitigation Measure AQ-2 (use of Tier 4 Final construction equipment), emissions during construction activities would not exceed the SCAQMD's localized significance thresholds. Also, as detailed in Draft EIR Tables 5.3-19 through 5.3-21, emissions from operation of the Specific Plan would not exceed the SCAQMD's localized significance thresholds for any criteria pollutant at the nearest sensitive receptors. Therefore, impacts related to localized emission would be less than significant impact. Because the Project would not exceed thresholds for either DPM or localized significance thresholds, the Project would not result in health risk impacts to the neighboring community.

Comment O4.3: This comment states that action must be taken now to combat climate change and solve the air quality issues of Southern California, as these are compounded by environmental crises that harm residents in the region every day. The comment expresses opposition of the Project that and asserts that it will cause irreversible damage to both to the people and environment of Bloomington.

Response O4.3: The Draft EIR has evaluated the potential environmental impacts of development and operation of the proposed Project and has determined that impacts related to greenhouse gas emissions would be less than significant (as described in Response O4.1) and health impacts related to localized emissions and DPM would be less than significant with mitigation (as described in Response O4.2). The comment does not raise a specific issue with the adequacy of the Draft EIR evaluation or raise any other CEQA issue. Therefore, no further response is required or provided.

Comment O4.4: This comment states that the residents of the unincorporated community of Bloomington have experienced a massive influx of warehouse development and diesel trucks over the past decade. The comment states that the County should continue to look out for its residents and protect them from encroaching warehouse development and monitor air quality. The comment asserts the goal of bringing in more recreational resources and investments into Bloomington, instead of warehouse development that increases pollution, traffic, and health risks. The comment further states that the County should prioritize residents and not the developer of the Project, and that the landscape of Bloomington will become increasingly valuable if left as is.

Response O4.4: Refer to Master Response 4. The comment does not provide any substantial evidence supporting the assertions in the comment. The comment expresses opposition to the Project and other warehouse development in the Bloomington area and provides general concerns. General responses related to air quality, greenhouse gas emissions, and traffic impacts are provided previously in Responses O4.2 and O4.3. As described in Section 5.3, *Air Quality*, of the Draft EIR the Central San Bernardino Valley 1 monitoring station is located approximately 5.7 miles northwest of the Project site and would continue to monitor air quality in the area. The comment does not raise a specific issue with the adequacy of the Draft EIR evaluation or raise any other CEQA issue. Therefore, no further response is required or provided.

Comment O4.5: This comment summarizes the proposed Project and states that it would create legally non-conforming uses that would result in the loss of valuable greenspace, which supports both human health, acts as a natural carbon sink, allows for groundwater recharge, and protects biodiversity. The comment states that the Project would be less than 100 ft. to three public schools, result in over 9,000 vehicle and truck trips that would create additional traffic, noise, poorer air quality, deterioration of commercial and residential roads, unsafe pedestrian and bicycle safety and other impacts in an area that is considered in the 90th% - 95% on CalEnviroScreen. The comment also states that the Project would have significant and unavoidable impacts for obstructing implementation of the air quality plan, a net increase of criteria pollutants, and for cumulative impacts.

Response O4.5: Refer to Master Response 4. The proposed Project consists of a Specific Plan that would provide for zoning and development criteria for the Project area. Thus, the new uses would be consistent with the proposed Specific Plan and would not be non-conforming uses. The Project site is not a greenspace. As detailed on Draft EIR page 5.3-15, the Specific Plan area is developed with 117 single-family residential units; some of the residences operate an additional use or business, such as a horse ranch, agricultural, truck transportation, auto repair, health services; dog club, tire distribution, welding, septic tank servicing, tree servicing, backhoe and pumping, air condition, drywall, restaurant, internet, roofing, masonry, flooring, and utility locating. The Upzone Site consists of 24 acres of land with 21 single-family residences.

The Specific Plan area is within 100 feet of two public schools, not three. The Bloomington High School is located 78 feet from the site, and the Walter Zimmerman Elementary School is located 52.8 feet from the site; however, the Ruth O Harris Middle School is located 674 feet from the site. Also, the Project would result in 8,555 PCE trips per day. Thus, the Project would not generate over 9,000 daily vehicle and truck trips.

Consistent with the comment, as detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the regional thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. This would result in a significant and unavoidable impact related to the air quality management plan and cumulative regional emissions of criteria pollutants. The Draft EIR described (page 5.3-34) that the majority of the Project's VOC emissions are derived from the use of consumer products and the majority of NOx emissions are derived from vehicle usage; neither of which can be controlled by the Project Applicant or County.

However, as described previously in Response O4.2, localized and health risk (DPM) related impacts to schools would not exceed the threshold and impacts would be less than significant. Also, Draft EIR Section 5.15, *Transportation*, details that impacts related to traffic would be less than significant. In addition, as detailed in the Draft EIR Section 5.12, *Noise*, with implementation of existing regulations and mitigation measures impacts would be less than significant. The comment does not provide detailed concerns related to either the noise or traffic evaluation within the Draft EIR. Therefore, no further response regarding those topics is required or provided.

Regarding pedestrian and bicycle safety, the Draft EIR page 5.15-6 describes that the Project includes roadway improvements within the Specific Plan area that include new sidewalks to improve the pedestrian network and retention of the existing bicycle lanes in the Project area. The Draft EIR determined that impacts related to bicycle and pedestrian facilities would be less than significant. Therefore, no further response is required.

Comment O4.6: This comment states that the benefits of leaving the land use as it is, or even enhancing the unique rural aspect of the area are impossible to quantify in terms of carbon sequestration, water retention and filtration, and biodiversity enhancements. The comment states that a decision not to support the Project would be a landmark and would push other municipalities in the direction to reduce pollution and prioritize people and the planet instead of further investing in polluting infrastructure.

Response O4.6: The comment expresses opposition to the Project and expresses support for no additional development within the Specific Plan area. The comment does not raise a specific issue with the adequacy of the Draft EIR evaluation or raise any other CEQA issue. Therefore, no further response is required or provided.

Comment O4.7: This comment states that higher-than-normal risks result from living in a highly polluted environment that includes adverse birth outcomes, respiratory issues, and cancer, which continue to cost the County as well as people's lives. The comment also states that public health is at stake when pollution increases in residential communities.

Response O4.7: The comment does not provide any substantial evidence supporting the assertions in the comment. The comment does not provide any substantial evidence linking Project impacts with the concerns laid out in the comment. The Project's potential health risks related to criteria pollutants and DPM emissions as detailed in the Draft EIR on page 5.3-2, 5.3-10 through 5.3-13, 5.3-35 and 5.3-36. However, as detailed in the previous responses, including Response O4.2, LST and DPM emissions would not exceed their respective thresholds and impacts related to health risks were determined to be less than significant. The comment does not raise a specific issue with the adequacy of the Draft EIR evaluation of the health risks of the Project or raise any other CEQA issue. Therefore, no further response is required or provided.

Comment O4.8: This comment states that there are unavoidable cumulative impacts from an entire residential community being disrupted that will be devastating to residents and can never be recreated. The comment states that community members have brought up the fear of being displaced or harassed out of their homes.

Response O4.8: Refer to Master Reponses 1 and 4.

Comment O4.9: This comment states that the community is over 80% Hispanic, with 20% of the community experiencing poverty and states this is a common practice of environmental racism.

Response O4.9: Refer to Master Responses 1 and 4. The comment does not raise a specific issue with the adequacy of the Draft EIR evaluation. Therefore, no further response is required or provided.

Comment O4.10: This comment states that the Project region deals with some of the worst traffic and that idling cars double the negative impact of pollution on nearby communities.

Response O4.10: The comment does not provide any substantial evidence supporting the assertions in the comment. As described in previous responses and O4.2, although the Project would result in significant and unavoidable regional operational emissions related to VOCs and NOx, the localized operational impacts that are identified by the LSTs and DPM emissions would be less than significant.

Comment O4.11: This comment states that the Project region is in an area of fire risk and the County should focus its efforts on climate change and wildfires.

Response O4.11: The comment does not provide any substantial evidence supporting the assertions in the comment. As discussed on page 5.9-32 of the Draft EIR in Section 5.9, *Hazards and Hazardous Materials,* both the Specific Plan area and Upzone Site are not within wildfire hazard areas. While San Bernardino County contains certain areas identified as wildfire hazard severity zones by Cal Fire, the Project area is characterized by urban development and no impacts would occur from the proposed Project related to wildfire. Comment O4.11 does not require any changes to the Draft EIR but will be forwarded to County decisionmakers as part of the Final EIR.

Comment O4.12: This comment states that the Bloomington Municipal Advisory Council (MAC) and the Project Applicant have not provided adequate translation, have silenced concerned community members during MAC meetings, and have not released all of their meeting minutes.

Response O4.12: Refer to Master Responses 1 and 4.

Comment O4.13: This comment requests that the County of San Bernardino Supervisors, Planning Commissioners, and MAC Members opposed the proposed Project. The comment states that the Conservancy does not believe that there can be an overriding consideration for the physical impact and community disruption that the proposed Project would have.

Response O4.13: The comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. The comment will be forwarded to County decisionmakers as part of the Final EIR for their consideration. Therefore, no further response is required or provided.

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LETTER O5: Center for Biological Diversity (23 pages)

CENTER for BIOLOGICAL DIVERSITY

December 15, 2021

Sent via email

Aron Liang
Senior Planner
Land Use Services Department, Planning Division
County of San Bernardino
385 North Arrowhead Ave, First Floor
San Bernardino, CA 94215
Aron.Liang@lus.sbcounty.gov

Re: Bloomington Business Park Specific Plan Draft Environmental Impact Report (SCH # 2020120545)

Dear Mr. Liang:

These comments are submitted on behalf of the Center for Biological Diversity (the "Center") regarding the Bloomington Business Park Specific Plan. The Center has reviewed the Draft Environmental Impact Report (DEIR) closely and is concerned about the proposed Project's environmental and community impacts, particularly on greenhouse gas emissions, transportation, and air quality. The Center urges the County to incorporate the Center's suggested mitigation measures and commit to clear, enforceable mitigation for these impacts.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 81,000 members and online activists throughout California and the United States. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in San Bernardino County. O5.1

As detailed below, the Center is concerned about the proposed Project's environmental impacts. To address these concerns and comply with the California Environmental Quality Act (CEQA) and other relevant laws, the County should, at a minimum, incorporate enforceable, evidence-backed mitigation measures into the EIR. The Center appreciates the opportunity to raise these concerns with the County and if you any questions about the Center's concerns, please contact Aruna Prabhala at the phone number or email listed at the end of this letter.

I. THE DEIR FAILS TO INCLUDE A STABLE PROJECT DESCRIPTION.

Under CEQA a "project" is defined as "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable O5.2

indirect physical change in the environment . . . ." (*Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1222 (citing CEQA Guidelines § 15378, subd. (a).) An "accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR." (*Cnty. of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193; (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 655 (project description held unstable and misleading) [hereinafter "*San Joaquin Raptor*"].) "However, a curtailed, enigmatic or unstable project description draws a red herring across the path of public input." (*San Joaquin Raptor*, 149 Cal.App.4th, at 655.). O5.2 cont.

An inaccurate or truncated project description is prejudicial error because it fails to "adequately apprise all interested parties of the true scope of the project." (*See City of Santee v. Cnty. of San Diego* (1989) 214 Cal.App.3d 1438, 1454-55 [hereinafter "*City of Santee*"].) "Only through an accurate view of the project may the public and interested parties and public agencies balance the proposed project's benefits against its environmental cost, consider appropriate mitigation measures, assess the advantages of terminating the proposal and properly weigh other alternatives." (*San Joaquin Raptor*, 149 Cal.App.4th, at 655.)

The Project description in the EIR violates the CEQA requirement to provide an "accurate, stable, and finite" description that accurately describes the Project. The Project description includes two build out options for the initial year of the project, Opening Year—Option 1 and Opening Year—Option 2. (DEIR 3-1.) However, the DEIR does not clearly commit to either one in the project description or alternatives analysis. (DEIR 3-1 to 37-73.) This renders it impossible to understand the actual scale of the project, since Opening Year—Option 2 is a substantially larger project that promises more traffic, emissions, and other significant impacts, and the DEIR makes no indication of how the developer plans to move forward. This range of options does not provide an accurate or stable description of the Project. O5.3

Moreover, the DEIR also includes plans for future development in its discussion of "Future Development Area – Specific Plan Buildout." (DEIR at 1-4.) Per the DEIR, "Specific Plan Buildout" would include "develop[ing] the maximum [floor area ratios] allowed . . . in addition to" either of the Opening Year scenarios. (*Id.*) Because Opening Year — Options 1 and 2 are distinct, if full build out of the property occurs, these processes would impact the project site differently. (*Id.*) As a result, in the first few pages of the DEIR, the County appears to lay out four separate scenarios that might result from the EIR: Opening Year – Option 1, Opening Year – Option 2, Opening Year – Option 1 with Specific Plan Buildout, and Opening Year – Option 2 with Specific Plan Buildout. It never clearly commits to any of them, rendering the Project Description difficult to follow and the impacts of each version impossible to ascertain. O5.4

Despite all these moving parts, the DEIR does not clarify how they are expected to work together and which path is likely for the Project. Although the impacts of various versions of the Project are analyzed separately, it is not clear whether and how the options combine to create different environmental impacts. Consequently, the DEIR provides no firm basis to assess the environmental costs and appropriate mitigation measures of the Project. (*San Joaquin Raptor*, 149 Cal.App.4th, at 655.) Traffic, energy, air quality, and greenhouse gas impacts will vary depending upon the scale of the warehouses built at the site. This lack of clarity renders the Project description unstable, such that the DEIR fails to inform decision-makers and the public of the true scope of the Project from which all interested parties could assess the direct and O5.5

indirect environmental effects of the Project. (*City of Santee*, 214 Cal.App.3d, at 1454-55; *San Joaquin Raptor*, 149 Cal.App.4th, at 655; *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 83-86.)

O5.5 cont.

II. THE DEIR'S ANALYSIS OF AND MITIGATION FOR THE PROJECT'S AIR QUALITY IMPACTS IS INADEQUATE.

Air quality is a significant environmental and public health concern in California. Unhealthy, polluted air contributes to and exacerbates many diseases and increases mortality rates. The U.S. government estimates that between 10-12 percent of total health costs can be attributed to air pollution. (VCAPCB 2003) Many plants and trees, including agricultural crops, are also injured by air pollutants. This damage ranges from decreases in productivity, a weakened ability to survive drought and pests, to direct mortality. (*Id.*) Terrestrial wildlife is also affected by air pollution as the plants and trees that constitute their habitats are weakened or killed. Aquatic species and habitats are also affected by air pollution through the formation of acid rain that raises the pH level in oceans, rivers and lakes. (EPA 2016b) Greenhouse gases, such as the air pollutant carbon dioxide, which is released by fossil fuel combustion, contribute directly to human-induced climate change (EPA 2016a), and in a positive feedback loop, poor air quality that contributes to climate change will in turn worsen the impacts of climate change and attendant air pollution. (BAAQMD 2016)

O5.6

Air pollution and its impacts are felt most heavily by young children, the elderly, pregnant women and people with existing heart and lung disease. People living in poverty are also more susceptible to air pollution as they are less able to relocate to less polluted areas, and their homes and places of work are more likely to be located near sources of pollution, such as freeways or ports, as there areas are more affordable. (BAAQMD 2016; ALA 2020.) Some of the nation's most polluted counties are in Southern California, and San Bernardino County continually tops the list. (ALA 2020) According to the American Lung Association's 2020 "State of the Air" report, San Bernardino is the fifth-worst ranked county in the nation for year-round particulate matter ($PM_{2.5}$) pollution, with a "Fail" grade from the report. (*Id.*) Even more disturbing, the same report found that San Bernardino County is *the worst-ranked county in the nation* for ozone pollution, with an "F" grade and an average number of 174.3 days per year with ozone levels in the unhealthy range. (*Id.*)

Although there are many different types of air pollution, Ozone, $PM_{2.5}$, and Toxic Air Contaminants are of greatest concern in San Bernardino County. These three air pollutants have been linked to an increased incidence and risk of cancer, birth defects, low birth weights and premature death, in addition to a variety of cardiac and lung diseases such as asthma, COPD, stroke and heart attack. (Laurent 2016; ALA 2020) Ozone (commonly referred to as smog) is created by the atmospheric mixing of gases from fossil fuel combustion and other volatile organic compounds and sunlight. Although it is invisible, ozone poses one of the greatest health risks, prompting the EPA to strengthen its National Ambient Air Quality Standard for Ozone in 2015. (ALA 2020.) $PM_{2.5}$ is a common component of vehicle exhaust emissions, and contribute to visible air pollution. These tiny participles are dangerous because they are small enough to escape our body's natural defenses and enter the blood stream. Fugitive dust is a term used for fine particulate matter that results from disturbance by human activity such as construction and

road-building operations. (VCAPCD 2003.) Toxic Air Contaminants are released from vehicle fuels, especially diesel, which accounts for over 50% of the cancer risk from TACs. (BAAQMB 2016.) This is especially relevant for Southern California with its abundance of diesel shipping traffic. (Bailey; Betancourt 2012.)

Moreover, the location of the Project will make its air quality impacts particularly significant for the surrounding community. First, the Project site is across the street from Bloomington High School and a block away from Ruth Harris Junior High School. (DEIR at Figure 3-2.) As noted above, children are particularly impacted by bad air quality: This project would place a major source of pollution with constant entry and exit by heavy polluting trucks directly next to the schools where children spend five days of the week for most of the year. Nearby schools are not the only sensitive receptors of air pollution, homes are located as close as 11 feet from the Project site. (DEIR at 5.3-16 to 5.3-24 [listing sensitive receptors near the Project site].) Full buildout of the Project would place many community members in extremely close proximity to heavy-polluting industry that would expose them to major health risks from air pollution. O5.6 cont.

Additionally, Project pollution would worsen already bad air quality in the area. The Project spans two census tracts that are some of the most heavily pollution-burdened in the state, falling in the 97th and 88th percentile for worst pollution burden.[1] The worst sources of pollution in the area are already Ozone, PM 2.5, and diesel particulate,[2] all of which would be exacerbated by the construction of massive warehouses, as well as truck and employee traffic going in and out of them. (Betancourt 2012.)

The Project would have a profound negative impact on air quality in the region and on the residents and students who will be its neighbors. The DEIR finds that the Project—even with the proposed mitigation—will result in significant impacts including an increase in criteria pollutants above regional thresholds and VOC and NOx emissions. (DEIR at 5.3-60.) While the DEIR casts these impacts as unavoidable and incorporates some of the California Attorney General's best practices for warehouses as project features, the mitigation proposed in the DEIR is insufficient and proposed measures do not exhaust possible measures to mitigate the Project's substantial impacts. (Pub. Res. C. § 21081; Cleary v. County of Stanislaus (1981) 118 Cal.App.3d 348 [a county violates CEQA where it does not adequately consider mitigation measures for a project's substantial effects].) The seven mitigation measures focus primarily on employee transit and construction, and barely touch on long term air quality harms from operation of the warehouse and trips by heavy diesel trucks in and out of the facility. (DEIR 1-8 to 1-10.) The EIR must be revised to incorporate evidence-backed solutions to these harms. O5.7

[1] CalEnviroScreen 4.0, Census Tracts # 6071002601 and # 6071004001, https://experience.arcgis.com/experience/ed5953d89038431dbf4f22ab9abfe40d/?data_id=dataSource_25-17c3d89c7e2-layer-1%3A3755.
[2] *Id.*

A. The DEIR's Proposed Project Design Features Are Impermissible under CEQA.

The DEIR includes only seven Mitigation Measures, but also lists twenty-five unanalyzed[3] Project Design Features in the Air Quality section. (DEIR 5.3-57 to 5.3-60.) The majority of mitigation actions that would have a meaningful impact on the Project's emissions—those that require electrical instead of diesel trucks and equipment, the use of solar power, and rules against idling—all appear as vague, "voluntary," and often heavily caveated Project Design Features. (*See id.*) This is impermissible under CEQA. A central purpose of CEQA is for the public to be able to read an EIR and understand the likely impacts of a project. (Pub. Res. Code § 21002.1(a).) By incorporating many of the most significant mitigation measures as voluntary design features (often including the caveat that they will only be incorporated if doing so is "economically feasible") and then explicitly declining to analyze their impact on the Project, the County has rendered it impossible to understand how the Project will impact air quality in the surrounding community. This is a clear violation of CEQA. O5.8

i. *The DEIR's Use of Project Design Features In lieu of Mitigation Measures is Impermissible*

The Project Design Features listed in the Air Quality section (PDF AQ-1 through -25) are mitigation measures and should be analyzed as such. (DEIR at 5.3-57 to 5.3-59.) A DEIR cannot disguise mitigation measures as "project design features" when they are incorporated to minimize project impacts. "[A]voidance, minimization and/or mitigation measures . . . are not "part of the project." (14 CCR §15370; *Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645, 656 [hereinafter "*Lotus*"][internal quotes removed].) Including mitigation measures as project features "disregards the requirements of CEQA." (*Id.*) This violation of CEQA must be rectified.

Here, the County incorporates 25 mitigation measures as so-called Project Design Features in the DEIR. These features have substantial range: many deal with the incorporation of electric or low-emission cars, trucks, and equipment on-site (PDF AQ-4, -10, -11, -12, -14, and-16), others relate to reducing employee-created emissions (PDF AQ-7, -8, -18, and -21), and finally others focus on reducing emissions from tenant trucks coming in and out of the facility (PDF AQ-9, -13, -17, -23, -24, and -25.) (DEIR at 5.3-57 to 5.3-59.) All these measures are explicitly included for the purpose of reducing impacts of the project. (DEIR at 5.3-57.) O5.9

However, there is no analysis of what incorporating these measures means for the Project. First, the section begins with an observation that the incorporation of these measures is "voluntary" and that some undefined best practices "have not been agreed to" or were "modified[,]" insinuating that these are not meant to be enforceable measures. (DEIR 5.3-57.) The DEIR never further clarifies this. Moreover, many of the measures contain language that limits there implementation to when doing so is "economically feasible" and when technology to

[3] The DEIR explicitly states "no reductions in impacts have been assumed due to the incorporation of these Project Design Features." (DEIR at 5.3-57.)

comply with measures is "widely available" rendering them entirely unenforceable. (DEIR 5.3-57 to 5.3-58.)

Finally, the DEIR explicitly declines to analyze the impacts of these features—perhaps attempting to avoid the scenario encountered in *Lotus*, *supra*, 223 Cal.App.4th at 656, where the Court held that finding a Project had no significant impact because of Project Design Features was impermissible under CEQA. However, refusing to analyze these measures is equally non-compliant with CEQA's mandate. To achieve this aim and facilitate public review, EIRs must allow readers to "identify the significant [environmental] effects" of a project. (Pub. Res. Code § 21002.1(a).) The DEIR explicitly declines to do this by analyzing the impacts of the Project including the Project Design Features, violating CEQA. O5.9 cont.

ii. ***The Project Design Features Should Be Treated as Mitigation Measures***

The DEIR should treat the Project Design Features in the Air Quality section as mitigation measures. As explained above, all features of the Project designed exclusively for impact avoidance and minimization are mitigation measures and should not be categorized otherwise. (*Lotus*, *supra*, 223 Cal.App.4th at 656.)

As discussed above, the primary purpose of the Project Design Features is—by the DEIR's own admission—reducing the Project's potential air quality impacts. (DEIR at 5.3-57.) This makes them Mitigation Measures. (*See Lotus*, *supra*, 223 Cal.App.4th at 656.) Not only should the DEIR be revised to redesignate them as such, but the County must add analysis of how and whether these measures would reduce the air quality impacts of the Project. CEQA and the CEQA Guidelines require that an EIR's mitigation measures must be fully enforceable through legally binding means. (See Pub. Res. Code § 21081. ["A public agency shall provide that measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures."], CEQA Guidelines § 15126.4(a)(2) ["Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments."].) This is to ensure that mitigation measures will actually be implemented, not merely adopted and then neglected or disregarded. (*Federation of Hillside & Canyon Associations v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1262 [EIR invalid where city failed to make a binding commitment to implement traffic mitigation measures].) O5.10

The DEIR must be revised to ensure that a complete analysis is conducted of the Project Design Features that should be properly treated as mitigation measures and ensure that that all mitigation measures are enforceable to comply with CEQA.

iii. ***The Project Design Features are not adequate mitigation for the Project Harms.***

As noted above, CEQA and the CEQA Guidelines require that an EIR's mitigation measures must be fully enforceable through legally binding means and their effects must be analyzed in the EIR. (See Pub. Res. Code § 21081; CEQA Guidelines §§ 15126.4(a)(1)-(2).) This is to ensure that mitigation measures will be implemented, not merely adopted and then

neglected or disregarded. (*Federation of Hillside & Canyon Associations v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1262 [EIR invalid where city failed to make a binding commitment to implement traffic mitigation measures].) O5.10 cont.

The Project Design Features fall far short of this standard. First, the Project Design Features are not apparently enforceable. As the DEIR notes, they are adopted "voluntarily" and some are "not agreed to" or "modified" where "not feasible." (DEIR 5.3-57.) This language makes it apparent that the DEIR does not intend for these measures to be enforceable in the way that mitigation measures must be. Moreover, many of the Project Design Features are tempered with language that renders them unenforceable by making compliance with them contingent on vague concepts like economic feasibility and market availability. (*Id.*) Without elaboration on what these standards mean in practice or how they should be evaluated by a court or agency with responsibility for enforcement, the DEIR has rendered these plan elements entirely unenforceable.

Second, the Project Design features impermissibly defer determination of whether certain measures are feasible to a later time. (DEIR 5.3-57 to 5.3-59 [PDF AQ-3, AQ-4, AQ-10, AQ-12, and AQ-13].) The appropriate time to determine the "feasibility" of the proposed mitigation measures is now, during the CEQA environmental review process, to ensure full transparency and public review. The County cannot delegate its responsibility to consider the feasibility of mitigation in the EIR. (*Preserve Wild Santee v. City of Santee* (2012) 210 Cal.App.4th 260, 280 [finding mitigation measure improperly deferred where it lacked specific performance criteria by which to judge its success].) The Third District Court of Appeal recently found the County of San Diego's proposed carbon-offset mitigation program for greenhouse gas emissions to be invalid for this very reason. (*Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467, 513 [mitigation measure invalid in part because it allowed the county planning director to determine, at his sole discretion after project approval and without reference to objective standards, whether the purchase of certain offsets was feasible].) Here, the Project Design Features are much less stringent than the invalid mitigation in *Golden Door*: They allow the Project applicant, not even a representative of the County with expertise in the matter, to make the ultimate and private determination about the feasibility of implementing the measures. O5.11

Because mitigation measures are improperly included in the DEIR as Project Design Features and do not comply with CEQA requirements for mitigation, the DEIR violates CEQA. The Air Quality section must be revised to include complete analysis of any measures included to mitigate air quality harms.

B. The DEIR Fails to Consider Additional Feasible Mitigation to Reduce the Project's Significant Air Quality Impacts.

The DEIR also fails to meet the County's obligation to adopt all feasible mitigation to reduce the Project's air quality impacts. By proposing inadequate mitigation and then concluding that the Project's air quality impacts are significant and unavoidable, the County has fallen short of CEQA's requirement that lead agencies consider all feasible mitigation to reduce or avoid the Project's significant impacts—particularly since the DEIR explicitly includes additional potential mitigation measures as Project Design Features (discussed above). (See Pub. Res. Code § 21002 [It is the "policy of the state that public agencies should not approve projects as proposed if there O5.12

are feasible alternatives or feasible mitigation measures which will avoid or substantially lessen the significant environmental effects of such projects."], CEQA Guidelines §§ 15092(b), 15043, 15126.4(a)(1).) Here, the EIR overlooks, simply ignores, or attempts to avoid numerous feasible mitigation measures by analyzing them as Project Design Features or leaving discussion of them out of the DEIR entirely.

O5.12 cont.

The South Coast Air Quality Management District ("SCQAMD") has recently adopted Rule 2305 - *Warehouse Indirect Source Rule—Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program)* (SCQAMD 2021). The rule applies to individual warehouses and distribution facility projects, including this one, and is intended to reduce air quality emissions from mobile sources associated with the projects. The rule contains a host of mitigation measures that warehouse facilities an adopt, which include, but are not limited to:

- Acquiring and using exclusively Zero Emissions yard trucks onsite instead of simply non-diesel powered trucks.
- Requiring that a certain percentage of trucks in warehouse operators' fleet be Zero Emissions or Near Zero Emissions.
- Installing and using onsite solar panels.
- Installing high-efficiency air filters or filtering systems in residences, schools, daycares, hospitals, or community centers.

O5.13

Some of these measures are included as voluntary Project Design Features. However, the DEIR neither analyzes the effectiveness and feasibility of these measures nor commits to following through on them. (DEIR 5.3-57 to 5.3-59.) This attempt to avoid meaningful consideration of and commitment to these measures, particularly measures that might reduce the serious health impacts the Project will have on nearby schools and residents.

Additionally, the California Air Resources Board ("CARB") has compiled a list of "Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers" (see CARB 2019, Attachment A). These include:

Recommended Construction Measures

1. Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment, and providing the necessary infrastructure (e.g. electrical hookups) to support zero and near-zero equipment and tools.

O5.14

2. Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating onsite. This includes the physical (e.g. needed footprint), energy, and fueling infrastructure for construction equipment, onsite vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.

3. In construction contracts, include language that requires all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In lieu of Tier 4 engines, equipment can incorporate retrofits such that emission reductions achieved equal or exceed that of a Tier 4 engine. The DEIR only requires this for equipment over 50hp. (DEIR at 1-8.)

4. In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers, etc.) used during project construction be battery powered.

5. In construction contracts, include language that requires all heavy-duty trucks entering the construction site, during either the grading or building construction phases be model year 2014 or later. Starting in the year 2022, all heavy-duty haul trucks should also meet CARB's lowest optional low-NOx standard.

O5.14 cont.

6. In construction contracts, include language that requires all construction equipment and fleets to be in compliance with all current air quality regulations. CARB staff is available to provide assistance in implementing this recommendation.

Recommended Operation Measures

1. Include contractual language in tenant lease agreements that require tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating onsite.

2. Include contractual language in tenant lease agreements that requires all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with transport refrigeration units (TRU) or auxiliary power units (APU). This will eliminate the amount of time that a TRU powered by a fossil-fueled internal combustion engine can operate from within the project site. Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration are encouraged and can also be included lease agreements.2

3. Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the site to be electric or powered by compressed natural gas.

4. Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering the project site to be model year 2014 or later.

5. Starting in the year 2022, include contractual language in tenant lease agreements that requires all trucks entering the project site to meet CARB's lowest optional low-NOx standard.

6. Include contractual language in tenant lease agreements that requires the tenant be in, and monitor compliance with, all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program (PSIP), and the Statewide Truck and Bus Regulation.

7. Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than five minutes while onsite.

O5.14 cont.

8. Include contractual language in tenant lease agreements that limits onsite TRU diesel engine runtime to no longer than 15 minutes. If no cold storage operations are planned, include contractual language and permit conditions that prohibit cold storage operations unless a health risk assessment is conducted and the health impacts mitigated.

9. To reduce indirect greenhouse gas (GHG) emissions, include rooftop solar panels for each proposed warehouse to the extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid.

Because the DEIR improperly failed to consider these and other feasible measures as mitigation measures, the County cannot make the requisite CEQA findings prior to approving the Project. The DEIR should be revised to include these and other measures to reduce, avoid, or minimize the Project's admittedly significant impacts to air quality and recirculated for public review and comment.

III. THE DEIR FAILS TO ADEQUATELY ANDALYZE AND MITIGATE THE PROJECT'S GREENHOUSE GAS EMISSIONS.

The DEIR's analysis of the proposed Project's greenhouse gas ("GHG") emissions (DEIR Section 5.8) is also deeply flawed. The Project would result in significant amounts of GHG emissions during construction and operation, yet the DEIR does not properly analyze the significance of, or attempt to mitigate, all the significant GHG impacts. (See CEQA Guidelines § 15126.2; Pub. Res. Code § 21002.)

O5.15

A. Climate Change Is a Catastrophic and Pressing Threat to California.

A strong, international scientific consensus has established that human-caused climate change is causing widespread harms to human society and natural systems, and that the threats from climate change are becoming increasingly dangerous. The Intergovernmental Panel on Climate Change ("IPCC"), the leading international scientific body for the assessment of climate change, concluded in its 2014 Fifth Assessment Report that: "[w]arming of the climate system is unequivocal, and since the 1950s, many of the observed changes are unprecedented over decades to millennia. The atmosphere and ocean have warmed, the amounts of snow and ice have diminished, and sea level has risen," and further that "[r]ecent climate changes have had widespread impacts on human and natural systems." (IPCC 2014, p. 2) These findings were echoed in the United States' own 2014 Third National Climate Assessment and 2017 Climate Science Special Report, prepared by scientific experts and reviewed by the National Academy of

O5.16

Sciences and multiple federal agencies. The Third National Climate Assessment concluded that "[m]ultiple lines of independent evidence confirm that human activities are the primary cause of the global warming of the past 50 years" (Melillo et al. 2014, p. 7) and "[i]mpacts related to climate change are already evident in many regions and are expected to become increasingly disruptive across the nation throughout this century and beyond." (*Id.* at 10.) The 2017 Climate Science Special Report similarly concluded:

> [B]ased on extensive evidence, … it is extremely likely that human activities, especially emissions of greenhouse gases, are the dominant cause of the observed warming since the mid-20th century. For the warming over the last century, there is no convincing alternative explanation supported by the extent of the observational evidence.
>
> In addition to warming, many other aspects of global climate are changing, primarily in response to human activities. Thousands of studies conducted by researchers around the world have documented changes in surface, atmospheric, and oceanic temperatures; melting glaciers; diminishing snow cover; shrinking sea ice; rising sea levels; ocean acidification; and increasing atmospheric water vapor.

(USGCRP 2017, p. 10.)

O5.16 cont.

The U.S. National Research Council determined that "[c]limate change is occurring, is caused largely by human activities, and poses significant risks for—and in many cases is already affecting—a broad range of human and natural systems." (NRC 2010, p. 2.) Based on observed and expected harms from climate change, in 2009 the U.S. Environmental Protection Agency found that greenhouse gas pollution endangers the health and welfare of current and future generations. (74 Fed. Reg. 66496 (Dec. 15, 2009) [U.S. EPA, Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act; Final Rule].)

These authoritative climate assessments decisively establish the dominant role of anthropogenic GHG emissions in driving climate change. As the Third National Climate Assessment explains: "observations unequivocally show that climate is changing and that the warming of the past 50 years is primarily due to human-induced emissions of heat-trapping gases." (Melillo et al. 2014, p. 2; *see also id.* at 15 [Finding 1: "The global warming of the past 50 years is primarily due to human activities, predominantly the burning of fossil fuels."].) The Assessment makes clear that "reduc[ing] the risks of some of the worst impacts of climate change" will require "aggressive and sustained greenhouse gas emission reductions" over the course of this century. (*Id.* at 13-14, 649; *see also id.* at 15 [Finding 3: "Human-induced climate change is projected to continue, and it will accelerate significantly if global emissions of heat-trapping gases continue to increase."].)

The impacts of climate change will be felt by humans and wildlife. Climate change is increasing stress on species and ecosystems—causing changes in distribution, phenology, physiology, vital rates, genetics, ecosystem structure and processes—in addition to increasing

species extinction risk. (Warren et al. 2011.) Climate-change-related local extinctions are already widespread and have occurred in hundreds of species. (Weins 2016.) Catastrophic numbers of species extinctions are projected to occur during this century if climate change continues unabated. (Thomas, et al. 2004; Maclean et al. 2011; Urban 2015.) In California, climate change will transform our climate, resulting in impacts including, but not limited to, increased temperatures and wildfires and a reduction in snowpack and precipitation levels and water availability.

Therefore, immediate and aggressive GHG emission reductions are necessary to keep warming well below 2°C above pre-industrial levels. The IPCC Fifth Assessment Report and other expert assessments have established global carbon budgets, or the total amount of carbon that can be burned while maintaining some probability of staying below a given temperature target. According to the IPCC, total cumulative anthropogenic emissions of CO_2 must remain below about 1,000 $GtCO_2$ from 2011 onward for a 66 percent probability of limiting warming to 2°C above pre-industrial levels, and to 400 $GtCO_2$ from 2011 onward for a 66 percent probability of limiting warming to 1.5°C. (IPCC 2013, p. 25; IPCC 2014, pp. 63-64, Table 2.2.) These carbon budgets have been reduced to 850 $GtCO_2$ and 240 $GtCO_2$, respectively, from 2015 onward. (Rogeli et al. 2016, Table 2.) Given that global CO_2 emissions in 2016 alone totaled 36 $GtCO_2$ (Le Quéré et al. 2017), humanity is rapidly consuming the remaining carbon budget needed to avoid the worst impacts of climate change.

O5.16 cont.

The United States has contributed more to climate change than any other country. The U.S. is the world's biggest cumulative emitter of GHGs, responsible for 27 percent of cumulative global CO_2 emissions since 1850, and the U.S. is the world's second highest emitter on an annual and per capita basis. (World Resources Institute 2014.) Nonetheless, U.S. climate policy is wholly inadequate to meet the international climate target to hold global average temperature rise to well below 2°C above pre-industrial levels to avoid the worst dangers of climate change.

In its 2018 *Special Report on Global Warming of 1.5°C*, the IPCC—the leading international scientific body for the assessment of climate change—describes the devastating harms that would occur at 2°C warming. The report highlights the necessity of limiting warming to 1.5°C to avoid catastrophic impacts to people and life on Earth (IPCC 2018). The report also provides overwhelming evidence that climate hazards are more urgent and more severe than previously thought, and that aggressive reductions in emissions within the next decade are essential to avoid the most devastating climate change harms.

In response to inadequate action on the national level, California has taken steps through legislation and regulation to fight climate change and reduce statewide GHG emissions. Enforcement of and compliance with these measures is essential to help stabilize the climate and avoid catastrophic impacts to our environment. AB 32 mandates that California reach 1990 levels of GHG emissions by the year 2020, equivalent to approximately a 15 percent reduction from a business-as-usual projection. (Health & Saf. Code § 38550.) Based on the warning of the IPPC and leading climate scientists, Governor Brown issued an executive order in April 2015 requiring GHG emissions reductions to 40 percent below 1990 levels by 2030. (Executive Order B-30-15 (2015).) The Executive Order is line with a previous Executive Order mandating the state reduce emission levels to 80 percent below 1990 levels by 2050 in order to minimize

significant climate change impacts. (Executive Order S-3-05 (2005).) In enacting SB 375, the legislature has also recognized the critical role that land use planning plays in achieving greenhouse gas emission reductions in California.

The legislature has found that failure to achieve GHG emissions reductions would be "detrimental" to California's economy. (Health & Saf. Code § 38501(b).) In his 2015 Inaugural Address, Governor Brown reiterated his commitment to reduce greenhouse gas emissions with three new goals for the next fifteen years:

- To increase electricity derived from renewable sources to 50 percent;
- To reduce petroleum use in cars and trucks by 50 percent;
- To double the efficiency of existing buildings and make heating fuels cleaner.

(Brown 2015.) In 2018, Governor Brown issued Executive Order B-55-18, in which he declared it to be a statewide goal to "achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." O5.16 cont

Although some sources of GHG emissions may appear insignificant in isolation, climate change is a problem with cumulative impacts and effects. (*Ctr. for Biological Diversity v. Nat'l Highway Traffic Safety Admin.*, (9th Cir. 2008) 538 F.3d 1172, 1217 ["the impact of greenhouse gas emissions on climate change is precisely the kind of cumulative impacts analysis" that agencies must conduct].) One source or one small project may not appear to have a significant effect on climate change, but the combined impacts of many sources can drastically damage California's climate as a whole. Therefore, project-specific GHG emissions disclosure, analysis and mitigation is vital to California meeting its climate goals and maintaining our climate.

The impacts of climate change are already being felt by humans and wildlife. Thousands of studies conducted by researchers around the world have documented changes in surface, atmospheric, and oceanic temperatures; melting glaciers; diminishing snow cover; shrinking sea ice; rising sea levels; ocean acidification; and increasing atmospheric water vapor (USGCRP 2017). In California, climate change will result in impacts including, but not limited to, increased temperatures and wildfires and a reduction in snowpack and precipitation levels and water availability.

Given the increasingly urgent need for drastic action to reduce GHG emissions, the DEIR's failure to fully disclose, analyze, mitigate, or consider alternatives to reduce the Project's significant climate change effects is all the more alarming.

B. The DEIR does not clearly describe the Project's GHG impacts as required by CEQA.

One of CEQA's central purposes is to ensure that the public and decisionmakers have considered and are able to understand the expected environmental impacts of a given project. (Pub. Res. Code. §§ 21000(g), 21001.1.) To achieve this aim and facilitate public review, Environmental Impact Reports must allow readers to "identify the significant [environmental] effects" of a project. (Pub. Res. Code § 21002.1(a).) The DEIR fails to do this. O5.17

Specifically, the DEIR estimates the Project's GHG emissions will eventually be over 30,500 MT CO2e/year. (DEIR Tables 5.8-4 and 5.8-5.) However, the DEIR neglects to include any analysis of how much—or whether at all—mitigation changes and so-called Project Design Features[4] will impact these total outputs. (*Id.*) Whether these initial calculations are setting pre- or post-mitigation emission levels is entirely unclear in the GHG section of the DEIR. (DEIR at 5.8-10 to 5.8-13.) This fails to comply with the CEQA's informational requirements that Project impacts and mitigation be clearly and completely discussed in the DEIR, without this information, it is nearly impossible to understand the extent of the Project's impacts and to what extent they are reduced by Mitigation Measures. (Pub. Res. Code § 21002.1(a).) O5.17 cont.

Moreover, the DEIR's conclusion that the impacts of the Project are insignificant after mitigation simply because the Project has adopted at least 100 points on the proposed 2021 County GHG Emissions Reduction Plan Update does not hold water under CEQA. A determination that an environmental impact complies with a particular threshold of significance does not relieve a lead agency of its obligation to consider evidence that indicates the impact may be significant despite compliance with the threshold. (CEQA Guidelines § 15064(b)(2).) If evidence shows that an environmental impact might be significant despite the significance standard used in the EIR, the agency must address that evidence. (*Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1111.) Here, because of the catastrophic risk of climate change, the County was obligated to go further to analyze and reduce the Project's GHG emissions. O5.18

C. The Project's GHG Impacts Are Significant.

Despite the DEIR's failure to clearly outline post-mitigation emissions levels, the Project's impacts on GHG emissions are plainly significant. (DEIR 5.8-13.) The claim that GHG emissions will be less than significant is entirely based on the Project incorporating a certain number of items from the County's proposed GHG performance standards that are never explicitly adopted or analyzed as mitigation measures. (DEIR 5.8-13 to 5.8-27.) Moreover, the DEIR fails to incorporate any GHG-specific mitigation (DEIR 5.8-39), this is not enough mitigation to reduce GHG emissions impacts to a point of insignificance. O5.19

First, the DEIR never actually describes how mitigation measures will reduce emissions. (DEIR 5.8-13 to 5.8-27.) Instead, the DEIR discussion of this impact runs through a long list of mitigation measures available under the County's Proposed 2021 GHG Emissions Reduction Plan Update without explicitly explaining how the various mitigation measures "assigned points" on this checklist are integrated into the Project and what effect they'll have. (DEIR Table 5.8-6.) These "points" are not explicitly incorporated in a mitigation measure and no explanation for how each of these measures will reduce GHG emissions is included. (*Id.*; DEIR 1-8 to 1-10 [listing the Air Quality mitigation measures that the GHG section relies on for mitigation].) O5.20

[4] In fact, the DEIR explicitly states that it will exclude discussion of the Project Design Features from impact analysis. (DEIR 5.3-57.) This is in itself a violation of CEQA for the reasons analyzed above in the Air Quality section of this letter.

As the DEIR readily admits, it does not consider or adopt any GHG-specific mitigation measures to reduce, avoid, or mitigate the Project's eventual 30,515 $MTCO_2e$ annual GHG emissions after full build out. (DEIR at 5.8-13, Tables 5.8-4.) Moreover, the DEIR provides no analysis in the GHG section about how the Air Quality mitigation measures sufficiently reduce GHG emissions to render the Project's impacts less than significant. (DEIR at 5.8-39.)[5] Because, as described above, the Project's GHG emissions of over 30,000 $MTCO_2e$ are significant, and the EIR provides no second calculation of emissions post-mitigation, it appears that the estimated emissions will remain at that level.

By any measure, 30,515 $MTCO_2e$ is a significant level of emissions. South Coast Air Quality Management District (whose jurisdiction extends over Project site) has established a 10,000 $MTCO_2e$ CEQA threshold of significance for industrial facilities. (SCQAMD 2019.) BAAQMD has a similar 10,000 $MTCO_2e$ threshold for stationary sources. (BAAQMD 2017 at p. 2-4.) Both these CEQA thresholds of significance were formally adopted by those agencies after long consideration and a formal notice and comment rulemaking process and are supported by substantial evidence. By further comparison, the California Air Resources Board's threshold for covered entities that are subject to the state cap-and-trade requirements for GHGs—roughly analogous to the DEIR's attempted reliance on the EPA's "Tailoring Rule" is 25,000 $MTCO_2e$ annual GHG emissions. 17 CCR 95812(c)(1). Under any of these thresholds—or any threshold supported by substantial evidence—the Project's anticipated annual GHG emissions of over 30,000 $MTCO_2e$ annually is profoundly significant. The DEIR acknowledges this, but fails to consider many additional mitigation measures that would reduce this impact, like solar power or requiring an electric fleet. Relying only on mitigation measures adopted in another section of the DEIR and a checklist of what appear to be project features that are never fully explained is not sufficient to satisfy CEQA's mandate. This lacking analysis obscures the true extent of the Project's impacts and thwarts CEQA's purposes of informed decision-making and public transparency.

O5.20 cont.

D. The EIR must be revised to include adequate analysis and mitigation for GHG impacts.

The EIR's failure to consider and adopt all feasible mitigation to reduce or avoid the Project's significant impacts violates CEQA. (See Pub. Res. Code § 21002 [It is the "policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures which will avoid or substantially lessen the significant environmental effects of such projects."], CEQA Guidelines §§ 15092(b), 15043, 15126.4(a)(1).) The EIR should be revised to adequately analyze the Project's GHG impacts,

O5.21

[5] The only paragraph discussing mitigation measures for GHGs reads "Prior to issuance of building permits for each building, the Project Applicant shall provide documentation to the County of San Bernardino Building Department demonstrating that the improvements and/or buildings subject to the building permit application include measures from the 2021 County of San Bernardino Greenhouse Gas Reduction Plan Screening Tables (June 2021), as needed to achieve the required 100 points. Specific measures may be substituted for other measures that achieve an equivalent amount of GHG reduction, subject to the County of San Bernardino Building Department approval." The comments on the structure of the Air Quality mitigation section and its effectiveness apply to GHGs as well because the Air Quality mitigation measures are meant to be the source of all GHG mitigation.

acknowledge their significance, and consider and adopt feasible mitigation to reduce those impacts, and it should be recirculated for public review and comment.

Specifically, the EIR must be revised to include actual analysis of the impacts that mitigation measures will have, specifically discuss the mitigation measures that will reduce GHG emissions, and further explain the thresholds of significance adopted and used to arrive at these conclusions. The EIR should also consider adopting the Project Design Features in the Air Quality section (DEIR 5.3-57 to 5.3-59) that are specifically relevant to GHGs as actual, enforceable mitigation measures. O5.21 cont.

IV. THE MITIGATION MEASURES FOR POSSIBLE HARMS TO BIOLOGICAL RESOURCES ARE ALL SPECULATIVE AND DO NOT INCLUDE SUFFICIENT DETAIL.

CEQA requires that mitigation measures be formulated and analyzed in the DEIR. The CEQA Guidelines prohibit agencies from deferring the formulation of mitigation measures to after project approval except in certain, strictly limited circumstances. (CEQA Guidelines § 15126.4(a)(1)(B).) An agency may develop the specifics of mitigation after project approval only "when it is *impractical* or *infeasible* to include those details during the project's environmental review." (*Id.*, emphasis added.) That is, "practical considerations" must "prevent[] the formulation of mitigations measures at the usual time in the planning process." (*POET, LLC v. State Air Res. Bd.* (2013) 218 Cal.App.4th 681, 736 [citing *Sacramento Old City Assn. v. City Council* (1991) 229 Cal.App.3d 1011, 1028-29].) Unless those considerations are "readily apparent," an EIR must explain an agency's decision to defer finalizing the specifics of mitigation. (*Preserve Wild Santee v. City of Santee* (2012) 210 CA 4th 260, 281.) O5.22

The DEIR mitigation measures for species of plants and animals that may be endangered by the Project, however, do not include specifics for how long-term mitigation will proceed if any indigenous endangered species are found on the Project site. (DEIR 5.4-26 to 5.4-29.) Specifically, MM Bio-1 through MM Bio-5 and MM Bio-7 all explain if sensitive species, plants, or vegetation communities are located on the Project site. (*Id.*) While all these measures include the performance of surveys and avoidance activities in the future, they do not identify any specific measures for long term mitigation of lasting harms to species from the Project. (*Id.*) Instead, the mitigation measures only require surveys, potentially short-term avoidance of the sensitive species, and for the developers to consult with experts on how to mitigate this harm in the future. (*Id.*) This is insufficient to comply with CEQA's mandate that mitigation measures be discussed in detail, particularly since specific measures for mitigating harm to endangered plants and animals are common and the County could have included specific examples of measures developers could deploy in the DEIR so the public could evaluate the validity of those options. They have failed to do so here. O5.23

IV. THE DEIR'S ANALYSIS OF AND MITIGATION FOR THE PROJECT'S TRAFFIC AND TRANSPORTATION IMPACTS IS DEFICIENT.

The Project's location in an already highly trafficked area of San Bernardino County will create far-reaching traffic impacts on the region. CEQA requires that an EIR analyze a project's O5.24

regional impacts on traffic. (See *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 575.) CEQA requires that the EIR fully assess the impact the Project will have on transportation and traffic. (Pub. Res. Code § 21099.) O5.24 cont.

a. The DEIR does not adequately analyze the impacts of truck travel.

The DEIR entirely fails to include analysis of impact that substantial increases of truck traffic in and out of a warehouse would have on VMT in the area, and instead exclusively focuses on traffic created by employees commuting to and from work. (DEIR 5.15-7 to 5.15-10.) Completion of the Project will bring substantial additional traffic to the area from trucks picking up goods from the warehouse. (Betancourt et al. at 4.) Trucks serving facilities often idle on public streets and clog local roads when warehouses are at capacity, creating traffic congestion and hazards to local drivers who depend on these roads. (*Id.*) Per CalEnviroScreen 4.0, this region is heavily burdened, with traffic burdens falling in the 80th and 83rd highest percentiles.[6] The addition of a major hub for trucks that will contain an estimated 993 parking stalls for trucks with trailers requires further analysis of the Project's impacts on transportation that includes analysis of additional trips from trucking. O5.25

a. The DEIR ignores traffic impacts from construction.

The DEIR never discusses the impact on VMT that the Project will have during construction when trucks, equipment, employees, and building materials will have to be constantly driven in and out of the Project site. (DEIR Section 5.15 generally.) To construct over three million total square feet of warehouse (DEIR 1-2) will require substantial manpower, equipment, and staff that will need to be transported to the Project site. The EIR must also carefully and completely assess the impacts from construction will have on traffic and transportation in the local community. Moreover, construction is expected to continue through the year 2040, meaning the DEIR anticipates nearly 20 years of construction traffic in and out of the site. (*Id.*) This is a major environmental impact of the Project that the DEIR ignores, in violation of CEQA. O5.26

The Transportation section of the DEIR requires must be revised and expanded analysis to include all CEQA-required analysis.

V. THE DEIR DOES NOT ADEQUATELY ANALYZE AND MITIGATE THE PROJECT'S CONSTRUCTION NOISE IMPACTS

To provide Californians the "freedom from excessive noise", CEQA requires that an EIR sufficiently analyze the impact proposed projects will have on ambient noise. (Pub. Res. Code § 21001(b); 14 CCR §15360.) Specifically, an EIR must sufficiently analyze whether the Project will result in a substantial permanent or temporary increase in ambient noise beyond local or other noise standards and identify the significance of each impact along with applicable O5.27

[6] CalEnviroScreen 4.0, Census Tracts # 6071002601 and # 6071004001, https://experience.arcgis.com/experience/ed5953d89038431dbf4f22ab9abfe40d/?data_id=dataSource_25-17c3d89e7e2-layer-1%3A3755.

mitigation measures. (14 CCR Appendix G; *Kings & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 883.) For this Project, analyzing noise impacts is particularly important because there are neighboring residential communities.

According to the DEIR, the ambient noise levels around the Project site range from 75 dBA to 55.3 dBA during the day and 77.6 dBA to 52.5 dBA at night. (DEIR at 4-40.) Construction of the project will increase the ambient noise in noise sensitive, residential areas with the use of demolition equipment, concrete mixers, and hauling trucks. (DEIR at 5.12-26.) The operation of the Project will also increase the ambient noise with "loading dock activity, trailer activity, truck movements, roof-top air conditioning units, parking lot vehicle movements and trash enclosure activity". (DEIR at 5.12-6.) Construction noise is anticipated to be at its loudest during the grading stage of construction, at a level of 79 dBA. (DEIR at 5.12-26.) However, the DEIR fails adequately analyze the temporary noise increases that construction will have on ambient noise levels because it utilizes a fixed threshold for analyzing the significance of construction noise impacts and offers an inadequate mitigation measure disguised as a project design feature. O5.27 cont.

A. The Draft EIR impermissibly relies on a fixed standard for determining the significance of construction related noise impacts

The Project's 80 dBA threshold for construction related noise impacts is insufficient to analyze the significance of these impacts. CEQA does not provide a specific threshold of significance for noise impacts, instead the lead agency must consider a "site sensitive threshold of significance for noise". (*Berkley Keep Jets Over the Bay Com. v. Board of Port Cmrs.* (2001) 91 Cal.App.4th 1344, 1380 [hereinafter "*Berkley Jets*") This requires a consideration of qualitative, economic and technical factors, as opposed to relying on a single-fixed standard for determining the significance of noise impacts. (*Id.* at 1379-80; Pub. Res. Code § 21001(g).) Thus, the fact that the Project would not "violate applicable local, state, or federal noise standards . . . is not determinative in setting a threshold of significance under CEQA." (*Id.*)

The threshold for determining the significance of construction related noise impacts is not "site sensitive". (*Berkley Jets*, *supra*, 91 Cal.App.4th, at 380.) The 80 dBA threshold was informed by the County's Development Code, which exempts daytime (7AM to 7PM) construction (except for Sundays and federal holidays) from its noise standards and the Federal Transit Authority (FTA) Transit Noise and Vibration Impact Assessment Manual. (DEIR at 5.12-23.) According to the FTA, an 80 dBA noise level is a "reasonable threshold for noise sensitive residential land use." (*Id.* at 5.12-24.) However, the exclusive focus on the 80 dBA standard does not consider qualitative factors such as the surrounding community's concerns and input regarding the increase in noise levels. (*See Oro Fino Mining Corp. v. County of El Dorado* (1990) 225 Cal.App.3d 872, 881-882 [court held that community complaints regarding the noise impacts of a project were substantial evidence in assessing whether these imp acts may be significant, even though the noise levels did not exceed the county's noise standards].) This standard also largely exempts construction noise, meaning essential noise considerations are not included in the DEIR. Thus, the EIR should consider factors beyond the County's and FTA noise standards and develop a more "site sensitive" threshold for analyzing construction noise. (*Berkley Jets*, *supra*, 91 Cal.App.4th, at 380.) Specifically, the DEIR should develop this O5.28

threshold considering nearby sensitive land uses from homes and schools to public parks to ensure that noise levels during construction and operation are sufficiently mitigated. The failure to consider this, particularly when there are two nearby schools and many identified nearby homes, does not satisfy CEQA's mandate. O5.28 cont.

B. Project Design Feature NOI-1 is a mitigation measure that requires a proper mitigation analysis

Project Design Feature NOI-1 (PDF NOI-1) is a mitigation measure and should be analyzed as such. (DEIR at 1-50.) Mitigation measures cannot be disguised as "project design features" when the purpose of such features is to minimize significant impacts of the Project. Actions taken to avoid, minimize, rectify, or reduce significant impacts constitute mitigation measures, which "are not part of the project." (14 CCR §15370; *Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645, 656 [hereinafter "*Lotus*"].) O5.29

PDF NOI-1 is a mitigation measure because it proposes certain construction techniques for reducing noise impacts, such as using mufflers and designated delivery truck routes, and placing equipment toward the center of the project site, away from noise receptors. (DEIR at 5.12-54.) The purpose of these measures is only to reduce the Project's otherwise significant noise impacts, which is separate from the Project itself.

i. Project Design Feature NOI-1 is not an adequate mitigation measure

Under CEQA, mitigation measures must be enforceable to minimize or reduce impacts to a less than significant level. (Pub. Res. Code § 21081.6; 14 CCR §§ 15126.4(a)(2); 15126.4(a)(1).) However, merely "stating that there will be no significant impacts because a project incorporates 'special construction techniques' is not adequate or permissible." (*Lotus*, *supra*, 223 Cal.App.4th, at 657.) Additionally, the measures proposed in the PDF are not all enforceable. To reduce the noise from delivery trucks, PDF NOI-1 requires that "delivery trucks/haul trucks use designated truck route(s) if possible." (DEIR at 5.12-55.) When contractors can use their discretion in deciding whether to use designated truck routes, this mitigation measure becomes unenforceable and affects the reduction of noise from this noise source. To adequately mitigate construction related noise impacts, the EIR must incorporate mitigation measures that go beyond changes in construction techniques and are enforceable. The failure to incorporate specific mitigation measures violates the above-discussed rule against deferring the formulation of mitigation measures and assessing their feasibility in the DEIR. (CEQA Guidelines § 15126.4(a)(1)(B).) A lead agency may only defer mitigation measure formulation when it can show practical concerns prevent it from doing so in the EIR: The County has not shown consideration of these measures was not practical here. (*Id.*) O5.30

ii. The DEIR impermissibly combines the construction noise impacts analysis and mitigation measure analysis

Due to the County's failure to treat PDF NOI-1 as a mitigation measure, the DEIR impact analysis for construction related noise is also inadequate. CEQA requires an EIR to provide separate discussions on significant environmental effects of the Project and mitigation measures. (14 CCR §15126.) The Draft EIR reaches the conclusion that "with the inclusion of PDF NOI-1, O5.31

impacts related to construction noise would be less than significant", without first identifying the level of significance the impacts would have absent the project design feature. (DEIR at 5.12-27. *See* 14 CCR Appendix G ["lead agency . . . must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant."].) This approach "compress[es] the analysis of impacts and mitigation measures into a single issue", thereby "disregard[ing] the requirements of CEQA." (*Lotus*, 223 Cal.App.4th, at 656.) The lack of an initial significance finding regarding construction impacts on ambient noise levels makes "it is impossible to determine whether mitigation measures are required or to evaluate whether other more effective measures than those proposed should be considered." (*Id.*)

O5.31 cont.

By compressing the analysis of the construction noise impacts and mitigation measures, the significance of the impacts is obscured from the public and decision makers. When the CEQA analysis is not clear, this undermines the one of the basic purposes of CEQA, which is to "inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities." (14 CCR §15002(a)(1).) A proper analysis would have distinguished between the construction impacts before and after the incorporation of PDF NOI-1. By separating the impacts analysis from the mitigation measure analysis, the reduction of noise impacts after implementing the mitigation measures would be quantified and clearly conveyed to the public. Ultimately, the County's mischaracterization of the construction noise mitigation measure as a project design feature violates CEQA's requirements and runs contrary to its basic purpose.

VI. CONCLUSION

Thank you for the opportunity to submit comments on the Draft Environmental Impact Report for the Bloomington Business Park Specific Plan.

Given the possibility that the Center will be required to pursue legal remedies in order to ensure that the County complies with its legal obligations including those arising under CEQA, we would like to remind the County of its statutory duty to maintain and preserve all documents and communications that may constitute part of the "administrative record" of this proceeding. (§ 21167.6(e); *Golden Door Properties, LLC v. Superior Court* (July 30, 2020, Nos. D076605, D076924, D076993) ___Cal.App.5th___ [2020 Cal. App. LEXIS 710.) The administrative record encompasses any and all documents and communications that relate to any and all actions taken by the County with respect to the Project, and includes "pretty much everything that ever came near a proposed [project] or [] the agency's compliance with CEQA . . . ." (*County of Orange v. Superior Court* (2003) 113 Cal.App.4th 1, 8.) The administrative record further includes all correspondence, emails, and text messages sent to or received by the County's representatives or employees, that relate to the Project, including any correspondence, emails, and text messages sent between the County's representatives or employees and the Applicant's representatives or employees. Maintenance and preservation of the administrative record requires that, *inter alia*, the County (1) suspend all data destruction policies; and (2) preserve all relevant hardware unless an exact replica of each file is made.

O5.32

Please add the Center to your notice list for all future updates to the Project and do not hesitate to contact the Center with any questions at the number or email listed below. **O5.33**

Sincerely,

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Response to Comment Letter O5: Center for Biological Diversity, dated December 15, 2021

Comment O5.1: This comment provides background on the Center for Biological Diversity ("the Center") and states that the Center has concerns about the proposed Project's environmental impacts, particularly those related to greenhouse gas emissions, transportation, and air quality. The comment states that the County should incorporate the Center's suggested mitigation measures.

Response O5.1: The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issues. Therefore, no further response is required.

Comment O5.2: This comment provides case law background related to the CEQA requirements for a project description.

Response O5.2: The comment recites various CEQA cases and legal principles and does not raise a specific issue regarding the adequacy of the Draft EIR or any specific environmental claim. Therefore, no further response is required.

Comment O5.3: This comment states that the EIR does not provide an accurate, stable, and finite project description and does not commit to either Opening Year – Option 1 or Opening Year – Option 2 in its analysis. Additionally, the comment states that the two options for the Opening Year development makes it difficult to understand the scope of the Project as the Opening Year – Option 2 results in more traffic, emissions, and other significant impacts and that the EIR does not demonstrate how the developer plans to move forward.

Response O5.3: This comment incorrectly states that the Draft EIR does not have an adequate Project description. Although the Draft EIR provides two scenarios for development of Planning Area A and one scenario for full buildout of the Specific Plan, these scenarios are adequately described and analyzed in each impacts-evaluation section of the Draft EIR. The Draft EIR document includes **bold text** headers throughout the impacts-evaluation sections to provide ease of review and clarity for the impacts associated with each scenario. For example, in Section 5.3, *Air Quality,* of the Draft EIR, construction and operational emissions generated by both Opening Year Development – Option 1 and Opening Year Development – Option 2 were analyzed for Planning Area A starting on page 5.3-31. The analysis for construction and operation of Opening Year Development – Option 1 provide the emissions associated with construction of Planning Area A pursuant to the development applications that have been submitted to the County. The analysis for construction and operation of Opening Year Development – Option 2 provides the emissions associated with the maximum development allowed in Planning Area A based on the floor area ratios prescribed in the Specific Plan.

As described in Section 3.0, *Project Description,* of the Draft EIR, the proposed Project is a Specific Plan, which would include buildout of the Specific Plan Area through the year 2040, with development of the entirety of the site dependent on market conditions. As such, the EIR evaluates the proposed development in Planning Area A based on applications submitted to the County through the analysis related to Opening Year Development – Option 1, the maximum possible buildout within Planning Area A through the analysis related to Opening Year Development – Option 2, and the maximum possible buildout allowed within each Planning Area through analysis of impacts related to Future Development Area—Specific Plan Buildout. As discussed on pages 3-1 through 3-2 of Section 3.0, *Project Description,* of the Draft EIR, the Opening Year Development – Option 1 is analyzed in this Draft EIR at the specific project-level. The Draft EIR provides programmatic impact analysis for Opening Year Development – Option 2, unless otherwise stated (e.g., Opening Year – Option 2 is analyzed at the project-level in the aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, greenhouse gas, land use and planning, noise, population and housing, public services, transportation, tribal cultural resources, and utilities analyses in the Draft EIR).

While CEQA Guidelines Section 15124 does not expressly set forth the requirements for a project description, case law has affirmed the general principle that an accurate, stable, and finite project description is necessary for a sufficient EIR. However, case law, the Public Resources Code and the CEQA Guidelines do not preclude the provision of multiple options for the final Project design so long as each option is sufficiently analyzed. Nor does CEQA require the Draft EIR to commit to a development scenario. An EIR will often evaluate multiple scenarios of development that could occur in order to provide disclosure of the potential impacts from each scenario and to allow decisionmakers to determine whether or not to approve the Project.

Comment O5.4: This comment states that the EIR also includes plans for future development within the discussion of the Future Development Area – Specific Plan Buildout. The comment states that since the EIR provides two options for the Opening Year Development, Specific Plan Buildout would vary based on which Opening Year Development would be developed. It further states that since the EIR does not commit to any of the scenarios, the Project Description is difficult to follow and impacts of each scenario are unclear.

Response O5.4: See Response O5.3. The Project consists of a Specific Plan that guides land uses and development within the Project area, the buildout of which are dependent upon market conditions and would occur through the year 2040. As discussed in Section 3.0, *Project Description,* of the Draft EIR on pages 3-1 to 3-2, the Opening Year Development – Option 1 is consistent with the development applications that have been submitted to the County for the construction and operation of three warehouse structures and a truck trailer parking lot on the four Development Sites encompassing approximately 115 acres of Planning Area A.

Opening Year Development – Option 2 is included in the Draft EIR to represent a maximum reasonable development scenario for Planning Area A. In this option, the warehouse footprints at Development Sites 1 and 3 would be expanded (Development Sites 2 and 4 would remain the same as in Opening Year – Option 1). As a result, the four Development Sites would incorporate all 141.4 acres of Planning Area A. Applications for this development option have not been submitted to the County, therefore, should the Opening Year Development – Option 2 be developed in the future, development applications must be submitted to the County and additional CEQA documentation, such as an Addendum to the Draft EIR pursuant to CEQA Guidelines Section 15162, would be necessary if any discretionary approvals are required.

The Future Development Area – Specific Plan Buildout scenario analyzes impacts that would result from the full buildout of the approximately 213-acre Specific Plan Area pursuant to the implementation of the Specific Plan, which is expected to occur by the year 2040. These impacts are analyzed at the programmatic level based on the future buildout of the entire Specific Plan (i.e., buildout of both Planning Area A and Planning Area B to their maximum FAR, which is inclusive of both Opening Year Option 1 and Option 2). As such, impacts related to the Future Development Area – Specific Plan Buildout scenario were modeled upon and analyzed based on development of both Planning Areas to their maximum FAR, which equates to development of 3,235,836 square feet.

Comment O5.5: This comment states that the EIR does not clarify how the various scenarios work together and which path is likely for the Project. Additionally, it states that impacts from the three scenarios are analyzed separately, but it is not clear if and how options would combine to create different environmental impacts. It states traffic, energy, air quality, and greenhouse gas impacts would vary depending on the size of warehouses built within the Specific Plan Area, which renders the Project Description unclear and unstable.

Response O5.5: The commenter is referred to Responses O5.3 and O5.4 for a detailed summary of how the three scenarios (i.e., Option 1 for Planning Area A, Option 2 for Planning Area A, and full buildout of the Specific Plan) work together and how the EIR is not legally required to commit to the most likely path.

In addition, an EIR can analyze multiple options for buildout of a Project, so long as the analysis disclose all potential environmental impacts (*SoMa, supra*, 33 Cal.App.5th). As discussed, the Specific Plan Buildout scenario analyzes impacts from development of the full Specific Plan Area based on each Planning Area's maximum FAR. As such, impacts within this scenario are inclusive of both Opening Year Development – Option 1 and Opening Year Development – Option 2, independent of which is constructed. Modeling conducted for the respective transportation, air quality, energy, and greenhouse gas emissions analysis for the Specific Plan Buildout is based on the development of the maximum 3,235,836 square feet of light industrial uses, which conservatively estimates impacts of the development of the entirety of the Specific Plan Area, inclusive of the Opening Year developments. As such, the Project Description is stable and the Draft EIR sufficiently informs decisionmakers and the public of the potential direct and indirect impacts of the proposed Project.

Comment O5.6: The comment states that air quality is a significant environmental and public health concern in California and provides information about adverse health effects from air pollution. The comment states that ozone, PM2.5, and Toxic Air Contaminants are of greatest concern in San Bernardino County and are linked to various health issues. The comment also states that the location of the Project will make its air quality impacts particularly significant for the surrounding community that includes two schools. The comment states that the Project would place a major source of pollution with constant entry and exit by heavy polluting trucks directly next to the schools where children spend five days of the week for most of the year. Nearby schools are not the only sensitive receptors of air pollution, homes are located as close as 11 feet from the Project site. The comment also states that buildout of the Project would place many community members in extremely close proximity to heavy-polluting industry that would expose them to major health risks from air pollution.

Response O5.6: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate Project health risk impacts to residents, schools, and workers as a result of exposure to Diesel Particulate Matter (DPM) from heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The maximum non-cancer risks to nearby residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding nearby schools, such as Walter Zimmerman Elementary School and Bloomington High School, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million, which is less than the significance threshold of 10 in one million, and the maximum non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0. As such, operation of the Specific Plan at buildout would not cause a significant human health or cancer risk related to DPM emissions, and impacts would be less than significant.

In addition, the Draft EIR evaluates the potential of the Project to expose local sensitive receptors, such as residences and schools, to substantial pollutant concentrations. As detailed in Draft EIR Tables 5.3-15 through 5.3-18, after implementation of Mitigation Measure AQ-2 (use of Tier 4 Final construction equipment), emissions during construction activities would not exceed the SCAQMD's localized significance thresholds. Also, as detailed in Draft EIR Tables 5.3-19 through 5.3-21, emissions from operation of the Specific Plan would not exceed the SCAQMD's localized significance thresholds for any criteria pollutant, including NOx, which is a precursor to ozone, and PM2.5, at the nearest sensitive receptors. Therefore, impacts related to localized emission would be less than significant impact. Because the Project would not exceed thresholds established by SCAQMD for either DPM or localized significance thresholds, the Project would not result in significant health risks to the neighboring community.

Comment O5.7: The comment states that the Project would have a profound negative impact on air quality in the region and on the residents and students who will be its neighbors. The comment describes that the Project would result in significant impacts related to regional thresholds and VOC and NOx emissions. The comment states that the California Attorney General's best practices for warehouses as project features and mitigation proposed in the Draft EIR is insufficient and that the proposed measures do not exhaust possible measures to mitigate the Project's substantial impacts. The comment states that the seven mitigation measures focus primarily on employee transit and construction, and barely touch on long-term air quality harms from
operation of the warehouse and trips by heavy diesel trucks in and out of the facility. Further the comment states that the EIR must be revised to incorporate evidence-backed solutions to these harms.

Response O5.7: This comment does not provide any substantial evidence that the Project's proposed mitigation measures and project design features are inadequate. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the regional thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements, Mitigation Measures AQ-3 through AQ-8, and 27 Project Design Features (PDFs).

As described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products that include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCQMD thresholds. Additionally, it should be noted that the majority of the Project's NOx emissions are derived from vehicle usage. Neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, and no existing feasible mitigation measures exist that would reduce these emissions to levels that are less-than-significant. However, the PDFs include future use of zero emissions trucks and implementation of future new technologies that incorporate evidence-backed solutions for long-term air quality, including the following:

- PDF AQ-4: The Project shall provide electrical hook ups to the power grid, rather than use diesel-fueled generators, for electric construction tools, such as saws, drills, and compressors, and shall use electric tools whenever feasible.
- PDF AQ-10: The Project Applicant/Developer/Tenant shall require that all heavy-duty trucks entering or operated on the project site to be zero-emission beginning in 2030, if such trucks are commercially available, as reasonably determined by the County Planning Division.
- PDF AQ-11: The Project Applicant/Developer/Tenant shall require all on-site equipment, such as forklifts and yard trucks, to be electric, propane or natural gas with the necessary electrical charging stations provided.
- PDF AQ-12: The Project Applicant/Developer/Owner shall require tenants to use zero-emission light- and medium-duty trucks as part of business operations, if such trucks are commercially available, as reasonably determined by the County Planning Division.
- PDF AQ-13: The Project Applicant/Developer shall construct electric truck charging infrastructure consisting of infrastructure (i.e., conduit) to support future installation of charging stations, when such trucks are commercially available, as reasonably determined by the County Planning Division.
- PDF AQ-14: The Project Applicant/Developer shall construct electric light-duty truck charging infrastructure consisting of infrastructure (i.e., conduit) proportional, i.e., conduit for one charging station for every five light-duty truck parking spaces at the Project.

These PDFs are included in the Project's Mitigation Monitoring and Reporting Program (MMRP) to ensure implementation along with the Specific Plan.

Also, described on page 5.3-9 of the Draft EIR, the SCAQMD Rule 2305 imposes a "Warehouse Points Compliance Obligation" (WPCO) on warehouse operators. Operators would be allowed to satisfy the WPCO by accumulating "Warehouse Actions and Investments to Reduce Emissions Points" (WAIRE Points) in a given 12-month period. WAIRE Points will be awarded by implementing measures to reduce emissions listed on the WAIRE Menu, or by implementing a custom WAIRE Plan approved by the SCAQMD. Rule 2305 would apply to the Project and would further reduce the Project's potential air quality impacts.

Comment O5.8: The comment states that the Draft EIR includes seven mitigation measures and twenty-five unanalyzed Project Design Features. The comment states that the majority of mitigation actions that would have a meaningful impact on the Project's emissions—those that require electrical instead of diesel trucks and equipment, the use of solar power, and rules against idling—all appear as vague, "voluntary," and often heavily caveated, which is impermissible under CEQA. The comment states that a central purpose of CEQA is for the public to be able to read an EIR and understand the likely impacts of a project, and that by incorporating many of the most significant mitigation measures as voluntary design features (often including the caveat that they will only be incorporated if doing so is "economically feasible") and then explicitly declining to analyze their impact on the Project, the County has rendered it impossible to understand how the Project will impact air quality in the surrounding community, which is a clear violation of CEQA.

Response O5.8: This comment does not provide any substantial evidence that the Project's proposed mitigation measures and project design features are inadequate. This comment is also incorrect that the Draft EIR's inclusion of PDFs for future actions makes it impossible to understand the Project's potential air quality impacts. Consistent with the requirements of CEQA, the Draft EIR provides a conservative analysis of the proposed Project, meaning that the maximum potential impacts (such as maximum peak emissions) are identified in the analysis to convey to decision makers the greatest potential impact of the Project. As such, the EIR does not credit the Project with emissions reductions for future implementation of PDFs. As described previously, the significant and unavoidable impacts of the Project are related to regional operational emissions of VOCs derived from consumer products such as cleaning supplies, aerosols, and other consumer products and NOx that is generated from tailpipe emissions, neither of which can be controlled by the Applicant or the County. However, the Project includes mitigation measures and PDFs that utilize existing and anticipate future technologies, as the Project would be built out through the year 2040. For example, to currently require all trucks accessing the site to be zero-emission would be infeasible because the existing use of zero-emissions light- and medium-duty trucks is limited and an infrastructure network to support their use is limited throughout southern California. Thus, this cannot currently be required by the County; however, the PDFs provide for the future use of zero-emissions trucks, the feasibility of which would be determined by the County as the Lead Agency during the development permitting process. The PDFs are included in the Project's Mitigation Monitoring and Reporting Program (MMRP) to ensure implementation along with the Specific Plan.

Regarding future feasibility of new technology and the reduction of operational emissions over time, CARB passed the updated Advanced Clean Truck Rule on July 1, 2020, that requires medium-and heavy-duty truck manufacturers to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales are required to be 55% of Class 2b – 3 truck sales, 75% of Class 4 – 8 straight truck sales, and 40% of truck tractor sales[6]. The rule begins in 2024, at which point an infrastructure network to support zero-emission trucks throughout southern California is anticipated to begin to become available. CARB estimates that by 2030, nearly one in three

[6] https://ww2.arb.ca.gov/resources/fact-sheets/advanced-clean-trucks-fact-sheet

new trucks will be zero-emissions[7]. Based on these CARB estimates, PDF AQ-10 requires that all heavy-duty trucks entering or operated on the Project site to be zero-emission beginning in 2030, and PDF-12 requires tenants to use zero-emission light- and medium-duty trucks as part of business operations, if such trucks are widely available as determined by the County during development permitting. Therefore, no further response is required or provided.

Comment O5.9: The comment states that the PDFs listed in the Air Quality section are mitigation measures and should be analyzed as such. The comment states that a Draft EIR cannot disguise mitigation measures as "project design features" when they are incorporated to minimize project impacts. "[A]voidance, minimization and/or mitigation measures . . . are not "part of the project." (14 CCR §15370; Lotus v. Department of Transportation (2014) 223 Cal.App.4th 645, 656. The comment states that the PDFs have substantial range and are explicitly included for the purpose of reducing impacts of the Project; however, there is no analysis of what incorporating these measures means for the Project. The comment also states that the measures are "voluntary" and that some undefined best practices "have not been agreed to" or were "modified[,]" insinuating that these are not meant to be enforceable measures. The comment further states that many of the measures contain language that limits implementation to when doing so is "economically feasible" and when technology to comply with measures is "widely available" rendering them entirely unenforceable. The comment states that the EIR does not analyze the impacts of the PDFs and that the EIR must allow readers to "identify the significant [environmental] effects" of a project and the Draft EIR explicitly declines to do this by analyzing the impacts of the Project including the PDFs, violating CEQA.

Response O5.9: This comment does not provide any substantial evidence that the Project's proposed mitigation measures and PDFs are inadequate. See Response O5.8. The PDFs listed in the Air Quality section are not mitigation measures but would be included in the Project's Mitigation Monitoring and Reporting Program (MMRP) to ensure implementation. As detailed on Draft EIR page 5.3-57, the air quality PDFs are various measures from the California Attorney General's Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act, which states that "it is meant to help lead agencies pursue CEQA compliance and promote environmentally-just development"[8]. It also states that "Lead Agencies and developers should also consider designing projects with their long-term viability in mind. Constructing the necessary infrastructure to prepare for the zero-emission future of goods movement not only reduces a facility's emissions and local impact now, but it can also save money as regulations tighten and demand for zero-emission infrastructure grows" and lists recommended measures, most of which have been implemented into the Project in consistency with the Attorney General's direction. The Draft EIR's impact analysis does not take credit for air quality or greenhouse gas emissions reductions as a result of implementation of these PDFs. The PDFs serve to reduce impacts over and above those disclosed in the Draft EIR after implementation of the air-quality and GHG mitigation measures. However, contrary to the commenter's claim, the EIR's not taking credit for reductions associated with the PDFs does not prevent the public from identifying the Project's potential emissions impacts. Rather, the Draft EIR merely provides a more conservative disclosure of potential impacts, which is encouraged under CEQA.

To clarify that the PDFs listed in the Draft EIR are Project features, the following text (footnote 5 on Draft EIR page 5.3-57) has been revised, with additions shown in underline and deletions in strikethrough:

> [5] Some of the Best Practices have not been agreed to, or have been modified, when such Best Practices do not constitute feasible ~~mitigation~~ measures.

Regarding PDF enforceability, applicability, inclusion, and modification, as described in Response O5.8, the PDFs provide for future technology (as directed by the California Attorney General) and would be

[7] https://ww2.arb.ca.gov/rulemaking/2019/advancedcleantrucks
[8] https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf

required at the time each measure is feasible and infrastructure to support exists as determined by the County (as Lead Agency) during each development's permitting process. Also, some of the specific measures are not applicable to the Project (such as refrigerated warehouses and use of refrigerated trucks are not allowed under the Specific Plan zoning regulations), and other measures exceed existing regulations (such as CARB regulations limiting idling to 5 minutes), and no potential impact would occur that would require exceeding the existing regulation. Also, see Response O3.31. As described in Responses O5.4 and O5.5, in compliance with CEQA, the Draft EIR provides a detailed evaluation of potential impacts of the Project from the anticipated maximum feasible development. Specifically, in the case of a Specific Plan, such as the proposed Project, that would develop through the year 2040, based on market conditions and PDFs based on new technology and infrastructure availability, a variety of potential scenarios could occur. Thus, the Draft EIR appropriately evaluates the maximum reasonable development scenario in each Planning Area.

Comment O5.10: The comment states that the Draft EIR should treat the PDFs in the Air Quality section as mitigation measures and that all features of the Project designed exclusively for impact avoidance and minimization are mitigation measures and should not be categorized otherwise. The comment states that the primary purpose of the PDFs is to reduce the Project's potential air quality impacts and that this makes them mitigation measures. The comment states that the Draft EIR be revised to redesignate them as such and add analysis of how and whether these measures would reduce the air quality impacts of the Project. The comment also states that CEQA requires that an EIR's mitigation measures must be fully enforceable through legally binding means to ensure that mitigation measures will actually be implemented, not merely adopted and then neglected or disregarded.

Response O5.10: This comment does not provide any substantial evidence that the Project's proposed mitigation measures and PDFs are inadequate. As described in Response O5.9, PDFs listed in the Air Quality section are not mitigation measures but are PDFs to provide best management practices as directed by the California Attorney General. The commenter's citation of *Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645, which did not involve any project design features, does not stand for the proposition commenter claims, as the Project Draft EIR did not account for emissions reductions, or a reduction in impacts associated with the PDFs, as was done in *Lotus*. The PDFs included in the Draft EIR do not serve to avoid environmental impacts associated with the Project, and all potential impacts associated with the Project have been appropriately disclosed. The PDFs are included in the Project's MMRP to ensure implementation. Thus, the PDFs would be monitored for implementation as though they were mitigation measures to ensure thorough implementation through the MMRP and through conditions of approval and/or permit measures by the County during processing of each development project.

Comment O5.11: The comment states that the PDFs fall far short of standards for mitigation measures. The comment states that the language of the PDFs makes it apparent that the measures are not enforceable in the way that mitigation measures must be with them contingent on vague concepts like economic feasibility and market availability. The comment states that without elaboration on what these standards mean in practice or how they should be evaluated by a court or agency with responsibility for enforcement, they are unenforceable. The comment also states that the PDFs defer feasibility, and that the appropriate time to determine the "feasibility" of the proposed measures is during the CEQA environmental review process, to ensure full transparency and public review.

The comment also states that the Third District Court of Appeal recently found the County of San Diego's proposed carbon-offset mitigation program for greenhouse gas emissions to be invalid because it allowed the county planning director to determine, at his sole discretion after project approval and without reference to objective standards, whether the purchase of certain offsets was feasible. The comment further states that, here, the PDFs allow the Project applicant to make the determination about the feasibility of implementing the measures and that because mitigation measures are improperly included in

the Draft EIR as PDFs and do not comply with CEQA requirements for mitigation, the Draft EIR violates CEQA and that the Air Quality section must be revised.

Response O5.11: This comment does not provide any substantial evidence that the Project's proposed mitigation measures and PDFs are inadequate. As described in Responses O5.9 and O5.10, the PDFs listed in the Air Quality section are not mitigation measures but are Project Design Features to provide best management practices as directed by the California Attorney General. The PDFs are included in the Project's MMRP to ensure implementation. However, as described in Responses O5.8, the Project is a Specific Plan that would be built out through the year 2040, and some of the PDFs provide for future technologies that are currently unavailable, which future-looking provisions are recommended by the Attorney General as best practices. Thus, the PDFs would be implemented as new technology and the necessary infrastructure becomes available, the feasibility of which would be determined by the County as the Lead Agency during the development permitting process for each new development within the Specific Plan area. In short, the commenter incorrectly applies standards applicable to mitigation measures to the PDFs in an effort to claim the PDFs are inadequate; this contention is clearly erroneous. The Draft EIR, including the PDFs, is compliant with CEQA, and no revision is required.

Comment O5.12: The comment states that the Draft EIR fails to meet the County's obligation to adopt all feasible mitigation to reduce the Project's air quality impacts, particularly since the Draft EIR explicitly includes additional potential mitigation measures as PDFs. The comment includes Public Resource Code text describing the "policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures which will avoid or substantially lessen the significant environmental effects of such projects." The comment further states that the EIR overlooks, simply ignores, or attempts to avoid numerous feasible mitigation measures by analyzing them as PDFs or leaving discussion of them out of the Draft EIR entirely.

Response O5.12: This comment does not provide any substantial evidence that the County fails to meet its obligation to adopt all feasible mitigation measures to reduce air quality impacts. Furthermore, the comment does not reference any feasible mitigation measures for inclusion in the analysis. Refer to Response O5.7 that details the Project's air quality significant impacts, the inability to reduce VOC emissions that are derived from consumer products (e.g., cleaning supplies and aerosols) that trigger the significant VOC impact and the Project's significant NOx emissions derived from vehicle usage. Neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, and no existing feasible mitigation measures exist that would reduce these emissions to levels that are less-than-significant. The Draft EIR provides substantial evidence that there are no feasible mitigation measures to reduce this impact (*Citizens for Open Government v. City of Lodi* 205 Cal.App.4th).

As described in Responses O5.9, O5.10, and O5.11, the PDFs listed in the Air Quality section are not mitigation measures but are Project Design Features to provide best management practices as directed by the California Attorney General. These PDFs do not constitute feasible mitigation measures, particularly as many of the PDFs involve implementation of future technologies as they become available. These PDFs are included in the Project's MMRP and would be applied by the County as conditions of approval or permit conditions, as applicable to each future proposed development within the Specific Plan. The comment does not identify any specific measures to potentially reduce impacts to air quality.

Comment O5.13: The comment states that the South Coast Air Quality Management District (SCQAMD) has recently adopted Rule 2305 - Warehouse Indirect Source Rule—Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program) (SCQAMD 2021). The comment states that the rule applies to individual warehouses and distribution facility projects, including this one, and is intended to reduce air quality emissions from mobile sources associated with the projects. The comment states that the rule contains a host of mitigation measures that warehouse facilities can adopt and that some of these measures are included as voluntary PDFs. The comment states that the Draft EIR neither analyzes the effectiveness and feasibility of these measures nor commits to following through on them. The comment further states that this

is an attempt to avoid meaningful consideration of and commitment to these measures, particularly measures that might reduce the serious health impacts the Project will have on nearby schools and residents.

Response O5.13: This comment does not provide any substantial evidence that the Draft EIR mitigation measures and PDFs fail to analyze the effectiveness of these measures, or that the Draft EIR does not include requirements for the Project applicant to commit to implement them as part of the WAIRE Program. Refer to Response O5.14 below. In addition, as described in Response O5.7, page 5.3-9 of the Draft EIR details that SCAQMD Rule 2305 imposes a "Warehouse Points Compliance Obligation" (WPCO) on warehouse operators. Operators would be allowed to satisfy the WPCO by accumulating "Warehouse Actions and Investments to Reduce Emissions Points" (WAIRE Points) in a given 12-month period. WAIRE Points will be awarded by implementing measures to reduce emissions listed on the WAIRE Menu or by implementing a custom WAIRE Plan approved by the SCAQMD.

It is currently unknown what tenants or warehouse operators would be in the Specific Plan area as it develops through the year 2040. The WAIRE Plan is designed to be customized as needed by each operator based on detailed operational data and is approved by the SCAQMD. Thus, specific measures for each future operation in each building within the Specific Plan area are unknown at this time. However, the County would facilitate implementation of SCAQMD Rule 2305 – Warehouse Indirect Source Rule as a condition of approval or permit requirement during the permitting process for each building operator. AQMD Rule 2305 is listed along with the other applicable SCAQMD Rules on page 5.3-56 of the Draft EIR and would be implemented in the same manner (as conditions of approval or permit requirements) as the other AQMD Rules identified in the Draft EIR. Consistent with the previous Responses herein, the Draft EIR evaluates the maximum probable development and identifies the maximum impacts that would occur from the Project. As specific building operators and their operations are unknown, it would be speculative to identify what measures would be implemented. Furthermore, as detailed in Response O5.6, localized and DPM operational air quality impacts related to schools and residents was determined to be less than significant.

Comment O5.14: The comment states that the California Air Resources Board (CARB) has compiled a list of "Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers" and that because the Draft EIR improperly failed to consider these and other feasible measures as mitigation measures, the County cannot make the requisite CEQA findings prior to approving the Project. The comment states that the Draft EIR should be revised to include these and other measures to reduce, avoid, or minimize the Project's significant impacts to air quality and recirculated the EIR for public review and comment.

Response O5.14: This comment does not provide any substantial evidence that the Project's proposed mitigation measures and PDFs are inadequate in meeting CARB's 'Recommended Air Pollution Emission Reduction Measures for Distribution Centers". As detailed in Responses O5.7 and O5.12, the Project's air quality significant impacts cannot be reduced to a less than significant level because the VOC emissions that are causing the threshold exceedance is caused by consumer products, and the Project's NOx emissions are caused by mobile sources. Neither the Project applicant nor the County have regulatory authority to control these emissions.

The below table compares CARB's recommended measures with the measures currently applied to the Project. As detailed in the table, nearly all of the recommended measures are already included in the proposed Project; the measures that are not already included are variously: not applicable to the Project; not required, as Project impacts related to the recommended measure would not be significant; or exceed existing regulations to impose. Thus, commenter is incorrect that the Draft EIR has not considered the measures proposed. Further, as discussed in Chapter 3, *Errata,* of this Final EIR, additional PDFs (PDF AQ-26 through AQ-27) have been included that would provide requirements for community liaisons and prohibiting grading on days with an Air Quality Index forecast of greater than 100.

Comment's Recommended Measure	**Project Inclusion/Applicability**
Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment, and providing the necessary infrastructure (e.g. electrical hookups) to support zero and near-zero equipment and tools.	The Draft EIR includes PDF AQ-4, which states that the Project shall provide electrical hook ups to the power grid, rather than use diesel-fueled generators, for electric construction tools, such as saws, drills and compressors, and shall use electric tools whenever feasible. In addition, the Project would be required to be compliant with CARB Rule 2485 (13 CCR, Chapter 10 Section2485), Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling to 5 minutes.
Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating onsite. This includes the physical (e.g. needed footprint), energy, and fueling infrastructure for construction equipment, onsite vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.	The Draft EIR includes PDF AQ-4, which states that the Project shall provide electrical hook ups to the power grid, rather than use diesel-fueled generators, for electric construction tools, such as saws, drills, and compressors, and shall use electric tools whenever feasible. In addition, Mitigation Measure AQ-2 that requires all construction equipment greater than 50 horsepower (>50 HP) to be CARB certified Tier 4 Final or higher.
In construction contracts, include language that requires all off-road diesel powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In lieu of Tier 4 engines, equipment can incorporate retrofits such that emission reductions achieved equal or exceed that of a Tier 4 engine. The Draft EIR only requires this for equipment over 50 hp.	There is no nexus to require all off-road diesel powered equipment used during construction to be equipped with Tier 4 or cleaner engines because engines with lower horsepower would not result in significant emissions related to Project construction. As detailed on Draft EIR page 5.3-32, with implementation of Mitigation Measure AQ-2 that requires all construction equipment greater than 50 horsepower (>50 HP) to be CARB certified Tier 4 Final or higher, emissions from the Project would be below the SCAQMD thresholds; and therefore, impacts would be less than significant. Thus, this measure is not included or required for the proposed Project.
In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers, etc.) used during project construction be battery powered.	As described previously, PDF AQ-4, provides for electrical hook ups for construction equipment. Additional, conditions of approval may be included in County construction permitting requirements. However, there is no nexus to require battery powered equipment used during construction, as construction impacts would be less than significant with inclusion of Tier 4 Final or cleaner engines for all equipment greater than 50 horsepower, as required by Mitigation Measure AQ-2. Thus, this measure is not included or required for the proposed Project.
In construction contracts, include language that requires all heavy-duty trucks entering the construction site, during either the grading or building construction phases be model year 2014 or later. Starting in the year 2022, all heavy-duty	Requiring use of model year 2014 or later for trucks during the grading and building construction phases is not feasible as it far exceeds the existing CARB requirements that provides for 2010 engine model years and is not currently widely in use by

haul trucks should also meet CARB's lowest optional low-NOx standard.	trucks (included as PDFs AQ-3 and AQ-9). In addition, impacts related to construction emission would be less than significant with mitigation. Thus, no additional mitigation is required. Also, throughout construction of the Project, all trucks would be required to meet CARB's emissions requirements. Thus, this measure is not included or required for the proposed Project.
In construction contracts, include language that requires all construction equipment and fleets to be in compliance with all current air quality regulations. CARB staff is available to provide assistance in implementing this recommendation.	The County's existing construction permitting requirements include implementation of all current air quality regulations and SCAQMD Rules.
Include contractual language in tenant lease agreements that require tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating onsite.	The Project includes various PDFs that require tenants to use the cleanest technologies and provision of the necessary infrastructure to support zero-emission vehicles and equipment on the site including the following (as listed on Draft EIR page 5.3-58): PDF AQ-10 states that the Project Applicant/Developer/Tenant shall require that all heavy-duty trucks entering or operated on the Project site to be zero-emission beginning in 2030, if such trucks are commercially available, as reasonably determined by the County Planning Division. PDF AQ-12 states that the Project Applicant/Developer/Owner shall require tenants to use zero-emission light- and medium-duty trucks as part of business operations, if such trucks are commercially available, as reasonably determined by the County Planning Division. PDF AQ-13 states that the Project Applicant/Developer shall construct electric truck charging infrastructure consisting of infrastructure (i.e., conduit) to support future installation of charging stations, when such trucks are commercially available, as reasonably determined by the County Planning Division. PDF AQ-14 states that the Project Applicant/Developer shall construct electric light-duty truck charging infrastructure consisting of infrastructure (i.e., conduit) proportional, i.e., conduit for one charging station for every five light-duty truck parking spaces at the Project. PDF AQ-15 states that the Project Applicant/Developer shall install all necessary

	infrastructure (i.e., wiring, reinforced roofs) to allow solar photovoltaic systems on the project site to be installed in the future, with a specified electrical generation capacity, in order to meet California Green Building Code Standards. In addition, Mitigation Measure AQ-6, Electric Interior Vehicles, provides that the Project plans and specifications for all of the industrial buildings shall include infrastructure to support use of electric-powered forklifts and/or other interior vehicles.
Include contractual language in tenant lease agreements that requires all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with transport refrigeration units (TRU) or auxiliary power units (APU). This will eliminate the amount of time that a TRU powered by a fossil fueled internal combustion engine can operate from within the project site. Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration are encouraged and can also be included lease agreements.	The Project does not include refrigerated warehousing areas and would not involve the use of TRUs. Thus, measures related to TRUs are not applicable to the Project and would not be included or required.
Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the site to be electric or powered by compressed natural gas.	Mitigation Measure AQ-6, Electric Interior Vehicles, provides that the Project plans and specifications for all of the industrial buildings shall include infrastructure to support use of electric-powered forklifts and/or other interior vehicles.
Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering the project site to be model year 2014 or later.	Requiring use of model year 2014 or later for trucks accessing the site is not feasible as it far exceeds the existing CARB requirements that provides for 2010 engine model years and is not currently widely in use by trucks (included as PDFs AQ-3 and AQ-9). Throughout operation of the Project, all trucks would be required to meet CARB's emissions requirements.
Starting in the year 2022, include contractual language in tenant lease agreements that requires all trucks entering the project site to meet CARB's lowest optional low-NOx standard.	The County's existing construction permitting requirements include implementation of all current air quality regulations, including CARB regulations.
Include contractual language in tenant lease agreements that requires the tenant be in, and monitor compliance with, all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program (PSIP), and the Statewide Truck and Bus Regulation.	The Draft EIR includes PDF AQ-23 on 5.3-58, which states that the Project Applicant/Developer/Owner shall require that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also, if the tenant/facility operator owns its own fleet of vehicles, subject to 13 California Code of Regulations section 2025, require such tenants/facility operators to maintain

	records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.
Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than five minutes while onsite.	Mitigation Measure AQ-3, Idling Regulations, states that the Project plans and specifications shall include signs at loading dock facilities that include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for trucks drivers to restrict idling to no more than 5 minutes once the vehicle is stopped, the transmission is set to "neutral" or "park", and the parking brake is engaged pursuant to Title 13 of the California Code of Regulations, Section 2485; and 3) telephone numbers of the building facilities manager and CARB to report violations. Signs shall be installed prior to receipt of an occupancy permit.
Include contractual language in tenant lease agreements that limits onsite TRU diesel engine runtime to no longer than 15 minutes. If no cold storage operations are planned, include contractual language and permit conditions that prohibit cold storage operations unless a health risk assessment is conducted, and the health impacts mitigated.	The Project does not include refrigerated warehousing areas and would not involve the use of TRUs. Thus, measures related to TRUs are not applicable to the Project and would not be included or required. The County would include operational conditions during the permitting of each building within the Specific Plan area.
To reduce indirect greenhouse gas (GHG) emissions, include rooftop solar panels for each proposed warehouse to the extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid.	The Project includes PDF AQ-15, which states that the Project Applicant/Developer shall install all necessary infrastructure (i.e., wiring, reinforced roofs) to allow solar photovoltaic systems on the Project site to be installed in the future, with a specified electrical generation capacity in order to meet California Green Building Code Standards.

Comment O5.15: The comment states that the Draft EIR fails to adequately analyze and mitigate the Project's Greenhouse Gas (GHG) emissions. The comment states that the Draft EIR's analysis of the proposed Project's GHG emissions is deeply flawed. The comment states that the Project would result in significant amounts of GHG emissions during construction and operation, yet the Draft EIR does not properly analyze the significance of, or attempt to mitigate, all the significant GHG impacts.

Response O5.15: This comment does not provide any substantial evidence that the Project would have a significant GHG impact. As described in Section 5.8 of the Draft EIR, the Project would be implemented consistent with the County's Greenhouse Gas Reduction Plan Update and would implement GHG reduction measures through Mitigation Measure GHG-1 and the County's GHG Screening Tables that identify various measures to meet the County's points requirements to ensure that impacts would be reduced to a less than significant level. This comment does not provide specific concerns related to the Draft EIR's analysis. Thus, no additional response is required.

Comment O5.16: The comment states that climate change is a catastrophic and pressing threat to California and provides information related to human activities increasing climate change and the general effects anticipated related to climate change. The comment also discusses the volume of GHGs generated by the United States and the volume that must be reduced to limit climate change. The comment also describes the state regulations that have been implemented, such as AB 32 to reduce GHG emissions and

Executive Order B-55-18 to achieve carbon neutrality. In addition, the comment states that sources of GHG emissions may appear insignificant in isolation, climate change is a problem with cumulative effects. The comment further states that one source or one small project may not appear to have a significant effect on climate change, but the combined impacts of many sources can drastically damage California's climate as a whole. Therefore, project-specific GHG emissions disclosure, analysis and mitigation is vital to California meeting its climate goals and maintaining our climate. The comment also asserts that the Draft EIR failed to fully disclose, analyze, mitigate, or consider alternatives to reduce the Project's significant effect on climate change.

Response O5.16: The comment provides a history of the adverse environmental impacts caused by GHG emissions and describes various regulatory efforts to reduce GHG emissions. The comments ends by making an unsubstantiated assertion that the Draft EIR "fails to fully disclose, analyze, mitigate, or consider alternatives to reduce the Project's significant climate change effects". See Response O5.15. The Project would result in a less than significant impact related to GHG emissions with implementation of Mitigation Measure GHG-1 that would ensure that the County's Greenhouse Gas Reduction Plan Update Screening Tables would be implemented to ensure that each development provides enough GHG reduction features to ensure that impacts would be less than significant. Thus, impacts of the Project were fully mitigated by the Draft EIR. Regarding emissions disclosures, Tables 5.8-1 through 5.8-5 in Draft EIR Section 5.8 identify the emissions that would occur from the Project. Alternatives are evaluated in Section 6, Alternatives of the Draft EIR. Effects related to GHG were evaluated under each of the alternatives. Therefore, no further response is required or provided.

Comment O5.17: The comment states that one of the central purposes of CEQA is to ensure that the public and decisionmakers have considered and are able to understand the expected environmental impacts of a given project and facilitate public review. The comment states that the Draft EIR does not allow readers to identify the significant environmental effects of the Project. The comment states that the Draft EIR estimates the Project's GHG emissions will eventually be over 30,500 MT CO2e/year, but neglects to include any analysis of how much—or whether at all—mitigation changes and PDFs will impact these total outputs. The comment asserts that whether these initial calculations are setting pre- or post-mitigation emission levels is entirely unclear in the GHG section of the Draft EIR and that this fails to comply with the CEQA's informational requirements and understand the extent of the Project's impacts and to what extent they are reduced by mitigation.

Response O5.17: This comment does not provide any substantial evidence that the Project would have a significant GHG impact. This comment inaccurately states that the Draft EIR does not disclose the Project's potential pre-mitigation GHG emissions. The specific amounts of GHG emissions that would be generated from each of the Project scenarios is provided in Tables 5.8-1 through 5.8-5. In addition, it is described on page 5.8-13 of the Draft EIR that any project that adopts at least 100 points of GHG performance standards listed in the 2021 Screening Tables is consistent with the County's GHG Emissions Reduction Plan Update to reduce emissions to 40 percent below 2007 levels, which would be consistent with the State's long-term goal to achieve statewide carbon neutrality (zero net emissions) by 2045, and therefore, would result in a less than significant impact related to GHG emissions. Tables 5.8-6 and 5.8-7 (beginning on page 5.8-14) show that the proposed Specific Plan Project (including all three development scenarios) would earn 171 points, and the Upzone Site would earn 104 points on the County's 2021 GHG Screening Tables, which would both exceed 100 points and exceed a 40 percent reduction below 2007 levels, and therefore, would be less than significant.

Comment O5.18: The comment states that the Draft EIR's conclusion that the impacts of the Project are insignificant after mitigation because the Project has adopted at least 100 points on the 2021 County GHG Emissions Reduction Plan Update does not hold water under CEQA. The comment states that a determination that an environmental impact complies with a particular threshold of significance does not relieve a lead agency of its obligation to consider evidence that indicates the impact may be significant despite compliance with the threshold. The comment states that if evidence shows that an environmental

impact might be significant despite the significance standard used in the EIR, the agency must address that evidence. The comment asserts that here, because of the catastrophic risk of climate change, the County is obligated to go further to analyze and reduce the Project's GHG emissions.

Response O5.18: This comment does not provide any substantial evidence that the Project would have a significant GHG impact. The evidence that the comment requests to support the determination that the Project's GHG emissions would be less than significant with an exceedance of 100 points on the County's Screening Tables is provided by the County's GHG Emissions Reduction Plan Update, which details that 100 points of GHG performance standards listed in the 2021 Screening Tables would be consistent with an emissions reduction of 40 percent below 2007 levels. The screening tables provide multiple measures that projects can implement to increase energy efficiency, reduce use of fossil fuels, and reduce overall GHG impacts. Meeting the 40 percent reduction in GHG emissions below 2007 levels through use of the County's GHG Emissions Reduction Plan Update would be consistent with the State's long-term goal to achieve statewide carbon neutrality (zero net emissions) by 2045. Therefore, projects that implement measures set forth in the County's Screening Tables in order to reach or exceed 100 points would result in a less than significant impact related to GHG emissions. The qualitative and quantitative evidence in the County's GHG Emissions Reduction Plan Update provides substantial evidence that the exceedance of 100 points results in a less than significant impact. Therefore, no further response is required or provided.

Comment O5.19: The comment states that the Project's impacts on GHG emissions are significant and that the claim that GHG emissions will be less than significant is entirely based on the Project incorporating a certain number of items from the County's proposed GHG performance standards that are never explicitly adopted or analyzed as mitigation measures. The comment also states that the Draft EIR fails to incorporate any GHG-specific mitigation, which is not enough mitigation to reduce GHG emissions impacts to a point of insignificance.

Response O5.19: This comment does not provide any substantial evidence that the Project would have a significant GHG impact. As described in Responses O5.17 and O5.18, the Draft EIR's evaluation of the Project is consistent with the County's GHG Emissions Reduction Plan Update. Any project that adopts at least 100 points of GHG performance standards listed in the 2021 Screening Tables is consistent with the County's GHG Emissions Reduction Plan Update to reduce emissions to 40 percent below 2007 levels, which would be consistent with the State's long-term goal to achieve statewide carbon neutrality (zero net emissions) by 2045, and, therefore, would result in a less than significant impact related to GHG emissions. Tables 5.8-6 and 5.8-7 (beginning on page 5.8-14) show that the proposed Specific Plan Project (including all three development scenarios) would earn 171 points and the Upzone Site would earn 104 points on the County's 2021 GHG Screening Tables, which would both exceed 100 points and exceed a 40 percent reduction below 2007 levels, and, therefore, would be less than significant. Mitigation Measure GHG-1 has been included to require that each development within the Specific Plan demonstrate that it includes enough measures to achieve a minimum of 100 points on the Screening Tables, which is adequate mitigation to reduce impacts to a less than significant level. As stipulated by Mitigation Measure GHG-1, individual projects can utilize different measures than those chosen in Table 5.8-6 and 5.8-7 as long as the total of the measures utilized meet 100 points. As the proposed developments in the Specific Plan would be for speculative warehouse and industrial buildings, with future tenants currently unknown, Mitigation Measure GHG-1 and the County's Screening Tables provide flexibility for implementing projects to reach 100 points.

Comment O5.20: The comment states that the Draft EIR does not describe how the mitigation would reduce impacts and that the points are not incorporated as mitigation. The comment states that no specific mitigation for GHG emissions is adopted and the Project's GHG emissions of over 30,000 MTCO2e are significant, and the EIR provides no second calculation of emissions post-mitigation, it appears that the estimated emissions will remain at that level. The comment compares the Project's emissions to the SCAQMD and BAAQMD thresholds of 10,000 MTCO2e annual emissions and the EPS Tailoring Rule of 25,000

MTCO2e annual emissions. The comment also states that the EIR fails to consider many additional mitigation measures, like solar power or requiring an electric fleet.

Response O5.20: This comment does not provide any substantial evidence that the Project would have a significant GHG impact. See Response O5.19. Specific mitigation has been included to reduce GHG emissions. Mitigation Measure GHG-1 would reduce impacts to a less than significant level because it would require each development project in the Specific Plan area to achieve a minimum of 100 points on the County's Greenhouse Gas Screening Tables. Because the Project consists of a Specific Plan, not all of the Screening Table measures and points would necessarily be applicable to each building and structure in the Specific Plan. The use of the Screening Tables provides development flexibility as intended by the County's GHG Emissions Reduction Plan Update and to provide for new technologies as the Specific Plan area builds out through 2040. Pursuant to the County's GHG Emissions Reduction Plan Update, projects that garner at least 100 points are consistent with the reduction quantities anticipated in the GHG Reduction Plan Update, which would include the countywide reduction of 7,891 Metric Tons of Carbon Dioxide Equivalents (MT CO2e) per year from new development by 2030 as compared to the 2030 business as usual (BAU) scenario.

As described in Response O5.19, achieving 100 points on the Screening Table (through implementation of Mitigation Measure GHG-1) would achieve a 40 percent reduction below 2007 levels, which meets the statewide goal, and therefore would reduce GHG emissions impacts to a less than significant level. In addition, as described previously in Response O5.9, the Project includes PDFs that would be implemented through the Project's MMRP that include installation of solar infrastructure to meet the operational needs of each building, use of net zero emissions trucks, and other similar GHG reducing features. Thus, the Draft EIR considers a variety of measures, including solar power and requiring an electric fleet, to reduce Project GHG emissions. Therefore, no further response is required or provided.

Comment O5.21: The comment states that the EIR's failure to consider and adopt all feasible mitigation to reduce or avoid the Project's significant impacts violates CEQA. The comment states that the EIR should be revised to adequately analyze the Project's GHG impacts, acknowledge their significance, and consider and adopt feasible mitigation to reduce those impacts, and it should be recirculated for public review and comment. The comment further states that the EIR must be revised to discuss the mitigation measures that will reduce GHG emissions, and further explain the thresholds of significance adopted and used to arrive at these conclusions. In addition, the comment states that the EIR should also consider adopting the PDFs in the Air Quality section that are specifically relevant to GHGs as actual, enforceable mitigation measures.

Response O5.21: This comment does not provide any substantial evidence that the Project would have a significant GHG impact. As detailed previously in Responses O5.15 through O5.20, the Draft EIR clearly describes the County's GHG Emissions Reduction Plan Update threshold and provides an adequate analysis of the Project's GHG emissions and identifies feasible mitigation to reduce those impacts to a less than significant level. In addition, as discussed in Response O5.9, PDFs listed in the Air Quality section are not mitigation measures but are Project Design Features to provide best management practices as directed by the California Attorney General or incorporate design features included in plans for proposed developments. These PDFs reduce GHG emissions as well as air quality emissions and would be included in the Project MMRP to ensure implementation of development within the Specific Plan area. Therefore, no further response is required or provided.

Comment O5.22: This comment summarizes the requirements set forth in the CEQA Guidelines for mitigation measures and states that CEQA prohibits agencies from deferring the formulation of mitigation measures to after project approval.

Response O5.22: This comment recites various CEQA principles and does not raise a specific issue regarding the adequacy of the Draft EIR or raise any specific environmental claim. Therefore, no further response is required.

Comment O5.23: This comment states that the Draft EIR mitigation measures for endangered species of plants and animal do not include specifics for how long-term mitigation would proceed if species are found within the Specific Plan Area or Upzone Site. It states that Mitigation Measures BIO-1 through BIO-5 and BIO-7 only require surveys, short-term avoidance of the sensitive species, and consultation with experts for how to mitigate these harms, and that this is insufficient to comply with CEQA.

Response O5.23: This comment does not provide any substantial evidence that the Project would have a significant biological impact or that applicable mitigation measures are inadequate. As explained in Section 5.4.11, of the Draft EIR, Mitigation Measure BIO-1 through Mitigation Measure BIO-5 are specifically applicable to "*future projects* proposed within the Specific Plan Area & Upzone Site" (emphasis added), i.e., during the phase of full buildout of the Specific Plan after buildout of Planning Area A. Impacts related to biological resources from development of Planning Area B and the Upzone Site are only analyzed programmatically in this EIR as no development is currently proposed within those areas, and the scope of physical impacts to biological resources from development within those areas is yet unknown. As such, MM BIO-1 through BIO-5 will only be triggered upon future projects within these areas, which will require surveys for certain biological resources, such as rare plants and sensitive bat species, among others. Development of additional mitigation measures related to species that may occur within Planning Area B and the Upzone Site would be speculative in nature at this time and therefore is not required in this Draft EIR (CEQA Guidelines Section 15064). Further, MM BIO-2 provides performance standards and measures for conduct of preconstruction burrowing owl surveys for the entire Specific Plan Area and Upzone Site in line with the California Department of Fish and Wildlife *Staff Report on Burrowing Owl Mitigation*. The provision of performance standards, including requiring a burrowing owl Protection and Relocation Plan if relocation is required, does not constitute improper mitigation deferral pursuant to CEQA Guidelines Section 15126.4. Finally, MM BIO-7 requires the applicant to hire a biologist to conduct a preconstruction nesting bird survey only if construction activities take place during nesting season and prescribes measures should nesting birds be encountered pursuant to the Migratory Bird Treaty Act. As such, MM BIO-7 does not constitute deferred mitigation.

Comment O5.24: This comment states that the Project is located in a highly trafficked area of San Bernardino County and that CEQA requires an EIR to analyze a project's regional impacts on traffic.

Response O5.24: This comment does not provide any substantial evidence that the Project would have a significant transportation impact. SB 743 required the California Governor's Office of Planning and Research to amend the State CEQA Guidelines to provide an alternative to levels of service (LOS) as the metric for evaluating transportation impacts under CEQA. Particularly within areas served by transit, SB 743 requires the alternative criteria to promote the reduction of greenhouse gas emissions, development of multimodal transportation networks, and diversity of land uses. The alternative metric for transportation impacts detailed in the State CEQA Guidelines is vehicle miles traveled (VMT). Jurisdictions had until July 1, 2020, to adopt and begin implementing VMT thresholds for traffic analysis. As outlined in State CEQA Guidelines Section 15064.3, except as provided for roadway capacity transportation projects (which the Project is not), a project's effect on automobile delay shall not constitute a significant environmental impact. Therefore, in order to comply with CEQA Guidelines Section 15064.3, impacts associated with automobile delay are not analyzed in the Draft EIR. As traffic measured by congestion is no longer an environmental impact under CEQA, no further response is required. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools.

Comment O5.25: The comment states that the VMT analysis does not evaluate the impacts of truck traffic and is therefore inadequate.

Response O5.25: This comment does not provide any substantial evidence that the Project would have a significant transportation impact. Based on local and State guidance as well as the CEQA guidelines, VMT is an evaluation of passenger cars, not truck trips. The County's Transportation Impact Study Guidelines discuss the type of VMT that should be evaluated for various types of projects. For employment projects, such as the proposed Project, the County guidelines specify that VMT per employee for only the home-based-work trip purpose is analyzed. This is consistent with CEQA Guidelines Section 15064.3(a), which states "For the purpose of this section, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project". Based on both of these guidance documents, truck trips are not included in the VMT analysis.

As shown on Figure 3-4, Project trucks would utilize established County truck routes, which are directed away from schools in Bloomington. Furthermore, the Project would implement PDF AQ-22, which would require the Project Applicant/Developer/Owner to post signs at every truck exit driveway providing directional information to the truck route. As such, Project trucks would be directed away from residences and schools and would not result in a safety hazard for residents or students. Furthermore, sidewalks currently exist on Cedar Avenue intermittently on both side of the roadway, on Santa Ana Avenue intermittently on the north side of the roadway, on Jurupa Avenue on the north side east of Linden Avenue. Implementation of the Specific Plan would include roadway improvements within the Specific Plan area that would provide for new sidewalks where none exist currently, thereby improving pedestrian facilities and the sidewalk network. As such, the Project would provide safer sidewalk connectivity for pedestrians and truck routes directed away from sensitive uses, which would limit hazards presented by truck traffic from the proposed Project.

Comment O5.26: The comment states that the Draft EIR does not evaluate the impacts of Project construction on VMT. The comment also notes that the construction would require trucks, equipment, employees, and building materials to be transported to and from the site that should be analyzed.

Response O5.26: This comment does not provide any substantial evidence that the Project would have a significant transportation impact. As discussed in Response O5.24 and O5.29, VMT analysis is not required to analyze truck trips. The VMT impact of employee trips was evaluated for operation of the Project. For purposes of the VMT analysis, a generation of 1,575 employees was evaluated. According to estimates from the Air Quality study, there would be an average of 855 employees on site each day of construction. As VMT is measured on a per employee basis, the evaluation of VMT per employee that was conducted for the Project operation would also apply to construction. Therefore, there would be no greater VMT impacts associated with construction employees when compared to Project employees during operation.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, while the comment is correct in stating that the Project would result vehicle trips during construction, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion during Project construction. However, it would be estimated that only 25 percent of construction trips would arrive during of the peak hours. Therefore, the construction peak hour trips would be negligible in comparison to the peak hour operational trips, and construction of the Project would not result in substantial congestion to area streets.

Comment O5.27: The comment states that the EIR must sufficiently analyze whether the Project will result in a substantial permanent or temporary increase in ambient noise beyond local or other noise standards and identify the significance of each impact along with applicable mitigation measures. The comment states that the ambient noise levels around the Project site range from 75 dBA to 55.3 dBA during the day and 77.6 dBA to 52.5 dBA at night, and construction noise is anticipated to be at its loudest during the grading stage of construction, at a level of 79 dBA. The comment states that the Draft EIR fails adequately analyze the temporary noise increases that construction will have on ambient noise levels because it utilizes a fixed threshold for analyzing the significance of construction noise impacts and includes a mitigation measure disguised as a PDF.

Response O5.27: This comment does not provide any substantial evidence that the Project would have a significant noise impact. As detailed on page 5.12-23 of the Draft EIR, Appendix G of State CEQA Guidelines indicates that a project could have a significant noise effect if it were to generate a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. It is described on Draft EIR page 5.12-26 that the County's Development Code Section 83.01.080(g)(3) exempts noise sources associated with construction activities from the County's established noise standards as long as the construction activity does not take place between the hours of 7:00 p.m. of any one day and 7:00 a.m. of the next day, or on Sundays or federal holidays. The proposed Project's construction activities would occur pursuant to these regulations. Thus, the construction activities would be in compliance with the County's construction related noise standards.

Further, the Draft EIR provides additional information to describe the highest construction noise levels from the Project boundary to the closest sensitive receptors, and the existing ambient noise levels at those sensitive receptors are provided in Draft EIR Table 5.12-3 (page 5.12-7). The Draft EIR provides the noise levels for both with and without construction noise. The Draft EIR also compares the construction noise generated by the Project to "applicable standards of other agencies" (as indicated in the CEQA Guidelines threshold): a numerical construction threshold based on Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual* is used for analysis of daytime construction noise, as has been used in past County CEQA documents for noise analysis purposes. The FTA considers a daytime exterior construction noise level of 80 dBA Leq as a reasonable threshold for noise sensitive residential land use (Draft EIR page 5.12-24). As detailed on Tables 5.12-5 through 5.12-7, construction activities would not exceed the 80 dba Leq. Therefore, impacts would also be less than significant under this standard.

Because the construction noise generated by the Project would not exceed applicable standards, significant impacts would not occur, and mitigation measures are not required. However, to reduce construction noise to the maximum extent feasible at nearby residential uses, PDF NOI-1 would be incorporated into the Project to require construction best management practices related to construction noise. As described in the previous responses, the PDFs are included in the Project's MMRP to ensure implementation along with the permitting of each development in the Specific Plan area.

In regard to operational noise, as detailed in the Impact NOI-1 discussion that begins on page 5.12-26 of the Draft EIR, each of the Project scenarios would implement PDF NOI-2, which would require 12- to 14-foot-high cement block walls at Sites 1 and 2 and 9-foot-high cement walls at Site 4. With implementation of PDF NOI-2, onsite operational noise levels for all scenarios would not exceed the County's exterior noise level standards, as adjusted to reflect the ambient noise levels at all nearby sensitive receiver locations. Additionally, the increase in ambient noise levels would range from 0.1 to 3.0 dBA Leq with the implementation of PDF NOI-2, which would not generate a significant daytime or nighttime operational noise level increase at nearby receiver locations. Furthermore, pursuant to Specific Plan guidelines, future projects developed near residences or schools would be required to install at least 12-foot-high screen walls.

Comment O5.28: The comment states that an 80 dBA threshold for construction related noise impacts is insufficient to analyze the significance of these impacts. CEQA does not provide a specific threshold of significance for noise impacts, instead the lead agency must consider a "site sensitive" threshold of significance for noise" that requires consideration of qualitative, economic, and technical factors, as opposed to relying on a single-fixed standard for determining the significance of noise impacts. The comment states that the 80 dBA standard does not consider qualitative factors such as the surrounding community's concerns and input regarding the increase in noise levels. The comment states that the EIR should consider a more "site sensitive" threshold for analyzing construction noise considering nearby sensitive land uses from homes and schools to public parks to ensure that noise levels during construction and operation are sufficiently mitigated.

Response O5.28: This comment misconstrues the Draft EIR's analysis and does not provide any substantial evidence that the Project would have a significant noise impact. The CEQA requirements related to construction noise are described in Response O5.27. The evaluation in the EIR provides a site-sensitive analysis for nearby sensitive receivers. As detailed in Table 5.12-3, existing ambient noise at sensitive receivers range from 59.8 to 80.1 CNEL dBA, and as shown in Table 5.12-2, exterior noise levels standards have an instantaneous noise maximum (Lmax) of 75 dBA during the daytime. It is anticipated that higher levels of temporary and intermittent noise will occur during construction activities; thus, construction noise is exempt by the County Development Code from the County's noise standards. However, neither the County of San Bernardino Countywide Plan or Development Code establish numeric maximum acceptable construction source noise levels at potentially affected receivers, which would allow for a quantified determination of what CEQA constitutes a substantial temporary or periodic noise increase. Therefore, a numerical construction threshold based on Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual was used for analysis of daytime construction impacts. As described in the Noise Impact Analysis prepared for the Project (Draft EIR Appendix J1), the FTA considers a daytime exterior construction noise level of 80 dBA Leq a reasonable threshold for noise sensitive land uses. Therefore, the EIR does rely on a site sensitive threshold of significance for noise that is related to the potential impacts to adjacent sensitive receptors. The existing ambient noise levels at sensitive receptors are between 59.8 and 83.6 dBA CNEL, as listed on Draft EIR Table 5.12-3. Therefore, a construction threshold of 80 dBA is lower than existing conditions as some of the sensitive receptors in the Project vicinity. Thus, the standard is applicable to the Project area and provides a conservative threshold to identify a potential substantial temporary or periodic noise increase from construction activity. Further, as detailed in Response O5.27, construction noise impacts are less than significant, and no mitigation measures are required. However, PDF NOI-1 is included to provide construction noise reduction measures to limit noise on surrounding residences.

Comment O5.29: The comment states that PDF NOI-1 is a mitigation measure and should be analyzed as such. The comment states that mitigation measures cannot be disguised as "project design features" when the purpose of such features is to minimize significant impacts of the Project. The comment asserts that PDF NOI-1 is a mitigation measure because it proposes certain construction techniques for reducing noise impacts, such as using mufflers and designated delivery truck routes, and placing equipment toward the center of the project site, away from noise receptors. The comment states that the purpose of these measures is only to reduce the Project's otherwise significant noise impacts, which is separate from the Project itself.

Response O5.29: This comment does not provide any substantial evidence that the Project would have a significant noise impact. As discussed in Response O5.9, the Draft EIR's PDFs are not mitigation measures but are design features to provide best management practices. The Commenter's citation of *Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645, which did not involve any project design features, does not support the commenter's claim as the Project Draft EIR did not account for emissions reductions, or a reduction in impacts associated with the PDFs, as was done in *Lotus*. The PDFs included in the Draft EIR do not serve to avoid environmental impacts associated with the Project, and all potential impacts associated with the Project have been appropriately disclosed. Response O5.27 details that the

Project's impacts related to construction noise would be less than significant. Therefore, mitigation measures are not required. However, the Project includes PDF NOI-1 to reduce construction noise at the residential uses adjacent to the Specific Plan area to the greatest extent possible. As described in the previous responses, the PDFs are included in the Project's MMRP to ensure implementation along with the permitting of each development in the Specific Plan area.

Comment O5.30: The comment states that PDF NOI-1 is not an adequate mitigation measure. The comment states that under CEQA, mitigation measures must be enforceable to minimize or reduce impacts to a less than significant level. However, merely "stating that there will be no significant impacts because a project incorporates 'special construction techniques' is not adequate or permissible." Additionally, the measures proposed in the PDF are not all enforceable and the failure to incorporate specific mitigation measures violates the rule against deferring the formulation of mitigation measures and assessing their feasibility in the Draft EIR.

Response O5.30: This comment does not provide any substantial evidence that the Project would have a significant noise impact. Refer to Response O5.29. As detailed in the previous response, no mitigation is required, as impacts would be less than significant. Thus, there is no deferral of mitigation. Further, the PDFs are included in the Project's MMRP to ensure implementation along with the permitting of each development in the Specific Plan area.

Comment O5.31: The comment states that the Draft EIR impermissibly combines the construction noise impacts
analysis and mitigation measure analysis. The comment states that the Draft EIR reaches a conclusion of less than significance without first identifying the level of significance the impacts would have absent the project design feature. The comment states that by compressing the analysis of the construction noise impacts and mitigation measures, the significance of the impacts is obscured from the public and decision makers. The comment states a proper analysis would distinguish between the construction impacts before and after the incorporation of PDF NOI-1 and by separating the impacts analysis from the mitigation measure analysis, the reduction of noise impacts after implementing the mitigation measures would be quantified and clearly conveyed to the public.

Response O5.31: This comment does not provide any substantial evidence that the Project would have a significant noise impact. Refer to Response O5.29. As detailed in the previous responses, no mitigation is required, as impacts would be less than significant. The construction noise at the sensitive receptors that are listed in Tables 5.12-5 through 5.12-7 do not include the PDFs and identify the maximum anticipated construction noise that would occur at the closest sensitive receptors. The analysis of construction noise was not compressed and is clearly identified in the Draft EIR for the public and decision makers to review.

Comment O5.32: This comment thanks the County for the opportunity to submit comments on the Draft EIR for the Bloomington Business Park Specific Plan and states that given the possibility that the Center would be required to pursue legal remedies, the County has a statutory duty to maintain and preserve all document and communications that are part of the administrative record. Additionally, the comment provides a summary of the administrative record.

Response O5.32: The County will continue to comply with its statutory duty to maintain all correspondence and documents related to the proposed Project that are part of the administrative record. The comment does not raise any specific issue with the adequacy of the Draft EIR. Therefore, no further response is required.

Comment O5.33: This comment requests that the County add the Center to the notification list.

Response O5.33: The County will add the Center for Biological Diversity to the notification list for future updates regarding the Bloomington Business Park Specific Plan. No further response is required.

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LETTER O6: Earthjustice (65 pages)

EARTHJUSTICE

ALASKA CALIFORNIA FLORIDA MID-PACIFIC NORTHEAST NORTHERN ROCKIES
NORTHWEST ROCKY MOUNTAIN WASHINGTON, D.C. INTERNATIONAL

December 15, 2021

Via E-Mail

Aron Liang
Senior Planner
County of San Bernardino Land Use Services Department – Planning Division
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San Bernardino, CA 92415-0187
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RE: Bloomington Business Park Specific Plan (PROJ-2020-00204)

Dear Mr. Liang:

We respectfully submit the following comments to the Draft Environmental Impact Report ("DEIR") for the Bloomington Business Park Specific Plan ("BBPSP" or "Project") on behalf of the People's Collective For Environmental Justice ("PC4EJ"). PC4EJ is membership-based organizations whose members reside in and around the proposed site and in the region. As such, they have a direct interest in San Bernardino County's ("County") and specifically in the County Planning Department's careful analysis regarding the implications of this project on the residents of Bloomington and its surrounding areas.

This proposal asks the County of San Bernardino ("County") to zone land near residences and several schools to accommodate a large warehouse operations and other development. Unfortunately, the DEIR fails in its duty to comply with the California Environmental Quality Act ("CEQA"). As such, the County cannot rely on the document as a form of environmental impact review for the purpose of Project approval, and must engage in a new Draft Environmental Impact Report ("DEIR") to allow the public and decision-makers an opportunity for meaningful review of the Project's impacts. O6.1

Attached to these comments is a technical report from Dr. Ron Sahu that identifies flaws with this DEIR. Please includes these comments as part of the record and as specific comments on the DEIR.

I. The DEIR Is Inadequate as an Informational Document and Precludes Meaningful Public Review.

There are myriad problems with the DEIR. Importantly, the County recognized the need to provide notice in Spanish of the DEIR, but it failed to translate any portion of the DEIR into Spanish. A large portion of residents in the impacted area includes primary Spanish speakers. And while Spanish speakers had notice that a DEIR had been produced, they do not have any of the documents actually translated into Spanish. If the County wants to provide meaningful O6.2

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opportunities to review the DEIR, it should translate the DEIR and the technical reports into Spanish. Once the translated documents are released, the County should provide a 60 day comment period for review and comments. O6.2 cont

II. The DEIR Fails to Comply with CEQA.

CEQA has two basic purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. 14 Cal. Code Regs. ("CEQA Guidelines") § 15002(a)(1). The EIR is the "heart" of this requirement. *See No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 84. The EIR has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return." *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810. O6.3

Second, CEQA directs public agencies to avoid or reduce environmental damage when possible by requiring alternatives or mitigation measures. *See* CEQA Guidelines § 15002(a)(2) and (3). *See also Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564; *Laurel Heights Improvement Ass'n v. Regents of the University of California* (1988) 47 Cal.3d 376, 400.

Unfortunately, the DEIR fails in both regards to these critical components of CEQA.

A. The DEIR's Impacts and Mitigation Analyses are Based on an Improper Project Description.

"[A]n accurate, stable and finite project description is the sine qua non" of a legally sufficient EIR, and "the defined project and not some different project must be the EIR's bona fide subject." *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199. The County states that the purpose of the Project "is to accomplish the orderly development of an industrial business park," and it lays out several objectives through which it intends to achieve this purpose. DEIR at 22. However, these self-referential objectives are overly narrow and thus inevitably exclude a host of feasible alternatives to the Project.

Under CEQA, the County is required "to consider alternatives to proposed actions affecting the environment." *North Coast Rivers Alliance v. Kawamura* (2015) 243 Cal.App.4th 647, 666 [196 Cal.Rptr.3d 559, 573] (hereafter *Kawamura*) (citing Pub. Resources Code, § 21001(g)) (internal quotations omitted). The County cannot "approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." *Id.* "The process of selecting the alternatives to be included in the EIR begins with the establishment of project objectives by the lead agency." *Id.*; *see also* Cal. Code Regs. tit. 14, § 15124(b) (hereafter Guidelines) (stating an EIR requires a statement of the objectives sought by the proposed project). The DEIR must include "[a] clearly written statement of objectives," as this will guide the County in developing a reasonable range of alternatives. Guidelines, § 15124(b). O6.4

By referencing the Specific Plan in its objectives, the County demonstrates that it intends to focus its reasonable range of alternatives analysis on alternatives that will still entail building out the Project as planned, albeit to varying degrees. For example, the Project's objectives include "[c]reat[ing] a comprehensive master plan for the Specific Plan area to provide a mix of industrial and business park uses with supporting infrastructure facilities"; "[i]dentify[ing] and provid[ing] for the installation and ongoing maintenance of water, sewer, drainage, and road facility infrastructure to adequately serve the Specific Plan area"; and "[p]rovid[ing] guidelines and standards for building and site development aesthetics that provide a well-defined identity for the Specific Plan development." DEIR at 676. These narrow objectives limit the available alternatives the County will consider. Indeed, Alternative 2 still involves the Specific Plan area being fully built out but based on the existing underlying zoning, and Alternative 3 entails the majority of the intended Specific Plan being built out but as an individual project. DEIR at 677–78. O6.4 cont.

While there is a "rule of reason" that governs the County's consideration of alternatives, and the DEIR need "set forth only those alternatives necessary to permit a reasoned choice," the County's narrow objectives prevent it from discussing alternatives "in a manner to foster meaningful public participation and informed decision making." *Kawamura, supra*, 243 Cal.App.4th at 667 (citing Guidelines, § 15126.6, subd. (f)). This ultimately taints the entire analysis, and accordingly, violates CEQA.

B. The DEIR Fails to Consider a Reasonable Range of Alternatives.

Even with unlawful Project Objectives, the Draft Report must consider a reasonable range of alternatives. Alternatives are central to an EIR, and their assessment is a major function of the EIR. *Laurel Heights Improvement Ass'n v. Regents of the Univ. of California*, 47 Cal.3d 376, 400 (1988). The purpose of the requirement to contemplate alternatives is to identify ways to mitigate or avoid the significant effects of a project. Cal. Pub. Res. Code § 21002.1. "[A]n agency may not approve a proposed project if feasible alternatives exist that would substantially lessen its significant environmental effects." *Save Panoche Valley v. San Benito Cnty.*, 217 Cal. App. 4th 503, 520 (2013) (citations omitted); *See also* Cal. Pub. Res. Code § 21081(a); 14 Cal. Code Regs. § 15091(a)(3); *California Native Plant Soc. v. City of Santa Cruz*, 177 Cal. App. 4th 957, 1002 (2009). The alternatives discussion must be "meaningful" and must "contain analysis sufficient to allow informed decision making." *Laurel Heights*, 47 Cal.3d at 403-4. O6.5

Importantly, the DEIR does not look at several alternatives that would allow for a more full consideration of this Project. Importantly, this Project is very close to sensitive land uses. DEIR at 5.3-37 (noting that the closest sensitive receptor is "59 feet from the Opening Year Development area boundary and 19 feet from the Future Development area boundary.") This incredibly close proximity to sensitive land uses should be addressed in additional alternatives. O6.6

For example, the Attorney General of California put out an advisory noting that good neighbor policies should be adopted: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. That guidance notes the following:

- "Per CARB guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors."
- "For example, the Western Riverside Council of Governments policy sets a minimum buffer zone of 300 meters between warehouses and sensitive receptors, and it requires a number of design features to reduce truck impacts on nearby sensitive receptors."

O6.6 cont.

These are just two examples of a recognition of the need for larger buffers between warehouse projects and sensitive sites. Thus, the EIR should include alternatives that provide greater buffers than the less than a dozen or so feet provided now to protect communities from this development. Moreover, the EIR should examine alternatives that decrease the intensity of this project. The lack of alternatives that reduce the intensity of the development and provide greater buffers for sensitive sites renders the analysis unlawful under CEQA.

C. **The DEIR Violates CEQA Because it Fails to Address Environmental Justice Impacts, Which Renders it Inconsistent with San Bernardino County's General Plan.**

The DEIR fails to address the significant environmental justice concerns the Project presents for Bloomington residents. The South Coast Air Basin ("South Coast") is among nation's most polluted regions, and Bloomington in particular is amongst the most polluted cities in the South Coast. As demonstrated in the images on the following pages,[1] residents in the Project's specific census tracts endure a pollution burden heavier than most of the State of California.

O6.7

[1] California Environmental Protection Agency, *CalEnviroScreen 4.0* (last updated Oct. 20, 2021), *available at* https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40.



Legend

CalEnviroScreen 4.0 Results

- > 90 - 100 (Highest Scores)
- > 80 - 90
- > 70 - 80
- > 60 - 70
- > 50 - 60
- > 40 - 50
- > 30 - 40
- > 20 - 30
- > 10 - 20
- 0 - 10 (Lowest Scores)

CalEnviroScreen 4.0 High Pollution, Low Population

Census Tract: 6071004001 (Population: 4,366)

The results for each indicator range from 0-100 and represent the percentile ranking of census tract 6071004001 relative to other census tracts.

Overall Percentiles	
CalEnviroScreen 4.0 Percentile	94
Pollution Burden Percentile	88
Population Characteristics Percentile	89

Exposures	
Ozone	97
Particulate Matter 2.5	91
Diesel Particulate Matter	80
Toxic Releases	68
Traffic	83
Pesticides	31
Drinking Water	94
Lead from Housing	62

Environmental Effects	
Cleanup Sites	0
Groundwater Threats	26
Hazardous Waste	36
Impaired Waters	0
Solid Waste	53

Sensitive Populations	
Asthma	83
Low Birth Weight	69
Cardiovascular Disease	90

Socioeconomic Factors	
Education	90
Linguistic Isolation	85
Poverty	78
Unemployment	81
Housing Burden	32

O6.7 cont.



5





O6.7 cont.

Importantly, within the Specific Plan census tract—which is where most of the Project's emissions will occur—residents are exposed to more PM 2.5 than 91 percent of census tracts in California, more diesel particulate matter than 80 percent of census tracts, and more traffic than 83 percent of census tracts. Their overall pollution burden is heavier than 94 percent of the state. This heavy burden is unsurprising given the large influx of industrial projects in Bloomington,

many of which are sited near homes and schools. This phenomenon has resulted in Bloomington being labeled a "diesel death zone."[2] O6.7 cont.

Despite the closest residence to the Project being located *only 11 feet north of the area*, the DEIR fails the analyze and mitigate the environmental justice impacts of these large warehouse operations. *See* DEIR at 272. The Specific Plan area is surrounded by sensitive receptors, including Bloomington High School, single-family residences, a church, Walter Zimmerman Elementary School, Kessler Park, and Ruth Harris Middle School. *Id.* at 185 "The Upzone is surrounded by single-family residential uses to the north, Mary Lewis Elementary School northwest of the San Bernardino Avenue/Locust Avenue intersection, single-family residences southwest of Hawthorne Avenue at Locust Avenue, and single-family residences to the south and east." *Id.* Even with the paltry and ineffective mitigation measures, the Project will expose sensitive receptors to substantial pollutant concentrations. O6.8

Moreover, this failure to acknowledge the Bloomington residents' environmental justice concerns renders the Project inconsistent with San Bernardino County's general plan. "An action, program, or project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment." *Pfeiffer v. City of Sunnyvale City Council* (2011) 200 Cal.App.4th 1552, 1562–63, 135 Cal.Rptr.3d 380, 389. "It is enough that the proposed project will be compatible with the objectives, policies, general land uses and programs specified in the applicable plan." *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490, 1511, 19 Cal.Rptr.3d 1. San Bernardino County incorporated environmental justice policies into various elements through its general plan, the County Policy Plan,[3] in accordance with Senate Bill 1000. *See* Gov. Code § 65302, subd. (h)(1). Of relevance, Policy HZ-3.18 (Application Requirements) states that O6.9

> In order for a Planning Project Application . . . to be deemed complete, we require applicants to indicate whether the project is within, adjacent to, or nearby an unincorporated environmental justice focus area and, if so, to:
>
> - document to the County's satisfaction how an applicant will address environmental justice concerns potentially created by the project; and
> - present a plan to conduct at least two public meetings for nearby residents, businesses, and property owners to obtain public input for applications involving a change in zoning or

[2] Megan Jamerson, *Community Members Distribute Petition to Stop Approval of a New Bloomington Warehouse District*, KVCR News (Feb. 3, 2021), *available at* https://www.kvcrnews.org/local-news/2021-02-03/community-members-distribute-petition-to-stop-approval-of-a-new-bloomington-warehouse-district; *see also* Ivette Torres et al., *Warehouses, Pollution, and Social Disparities* (Apr. 2021), *available at* https://earthjustice.org/sites/default/files/files/warehouse_research_report_4.15.2021.pdf.

[3] San Bernardino County, *County Policy Plan* (Oct. 2020), *available at* http://countywideplan.com/wp-content/uploads/2021/01/CWP_PolicyPlan_HardCopy_MainText_Tables_20201027_adopted.pdf.

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> the Policy Plan. The County will require additional public outreach if the proposed project changes substantively in use, scale, or intensity.

The DEIR is inconsistent with Policy HZ-3.18 for both procedural and substantive reasons. As an initial matter, the DEIR incorrectly states that the policy requires at least one public meeting when it actually requires at least *two*. DEIR at 528. The DEIR then affirms consistency with the general plan because "[a] public meeting will be conducted for nearby residents, businesses, and property owners to obtain public input and address environmental justice concerns." *Id.* We are unsurprised by this inconsistency, given that the County has already denied Bloomington residents a meaningful opportunity to participate in this decision making at least once.[4] In light of this, we note that the County must ensure this public meeting requirement is procedurally satisfied with sufficient accommodations to ensure due process for non-English speaking community members. This is essential, given that 66.5 percent of Bloomington residents speak a language other than English at home.[5]

O6.9 cont.

Moreover, the DEIR is inconsistent with the general plan because it does not document any methods through which it will address environmental justice concerns potentially created by the Project. The DEIR merely states that the County will hold the singular public meeting "to obtain public input *and address environmental justice concerns*." DEIR at 528 (emphasis added). Folding this into the public meeting require is insufficient, because addressing environmental justice concerns is its own separate requirement. The County also cannot plausibly argue that it must first hold this meeting to receive initial input and then address concerns, because many of those concerns were submitted to the County in response to the notice of preparation. *See, e.g.*, DEIR at 81–82, 83–85, 89–90. Notably, these comments were completely unaddressed in the DEIR. The County even categorized one comment, wherein "[t]he commenter wanted to learn about the Project's outreach effort because many in the community are opposed to the Project and they need to communicate that opinion in public meetings"—as not being relevant to any DEIR section. *Id.* at 89. Beyond these comment letters, news outlets have covered residents'

O6.10

[4] According to numerous Bloomington residents, the Project applicants, Howard Industrial Partners, presented on the Bloomington Business Park and addressed the public in English at a Bloomington Municipal Advisory Council meeting on October 6, 2021. It was stated that Spanish translation would be provided, but the translation equipment was never provided by Howard Industrial Partners. Instead, translation equipment was made available by Inland Coalition for Immigrant Justice and Warehouse Worker Resource Center. Additionally, Bloomington residents reported that Bloomington Municipal Advisory Councilmember Dianne Mendez-Cantu, who presided over the meeting, stated she was not aware of rules for non-English speakers during public comment. This lack of understanding resulted in a Spanish speaker to be interrupted during public comment by Ms. Mendez-Cantu. Finally, while simultaneous English translation was provided during the meeting via audio equipment, consecutive English translations for Spanish speakers at the podium were not provided for Spanish speakers.

[5] *See* United States Census Bureau, *QuickFacts Bloomington CDP, California; Palermo CDP, California; Ontario city, California; Eureka city, California; Pinole city, California; Arden-Arcade CDP, California*, (July 1, 2019), *available at* https://www.census.gov/quickfacts/fact/table/bloomingtoncdpcalifornia,palermocdpcalifornia,ontariocitycalifornia,eurekacitycalifornia,pinolecitycalifornia,ardenarcadecdpcalifornia/PST045219.

concerns.[6] The DEIR's failure to acknowledge and blatant disregard of these concerns is inconsistent with the general plan, and therefore a clear violation of CEQA. O6.10 cont.

Finally, the DEIR baldly asserts that this Project complies with the Countywide Environmental Justice goals and policies by "construct[ing] frontage improvements, including sidewalks, which would encourage walking in the Project area." DEIR at 5.11-9. The DEIR does not provide substantial evidence how simply installing some sidewalks addresses the environmental justice concerns of adding more diesel truck traffic, air pollution, noise and other impacts to a community already overburdened by air pollution. Being able to walk outside on a sidewalk in an area some people call a "diesel death zone" that is made more harmful by attracting more diesel trucks does not address environmental justice impacts. And, this statement in the DEIR underscores the lack of understanding of the harm being imposed on the community by this large development. The DEIR must be revised for a full and fair analysis of the environmental justice impacts of this Project. O6.11

D. **The Traffic Analysis Fails to disclose and Mitigate Significant Traffic Impacts.**

A proper traffic analysis is critical to understanding the impacts of any project. Here, the traffic analysis is very faulty, which taints many sections of the DEIR analysis. O6.12

i. The DEIR Underestimate the Traffic Impacts Associated with this Project.

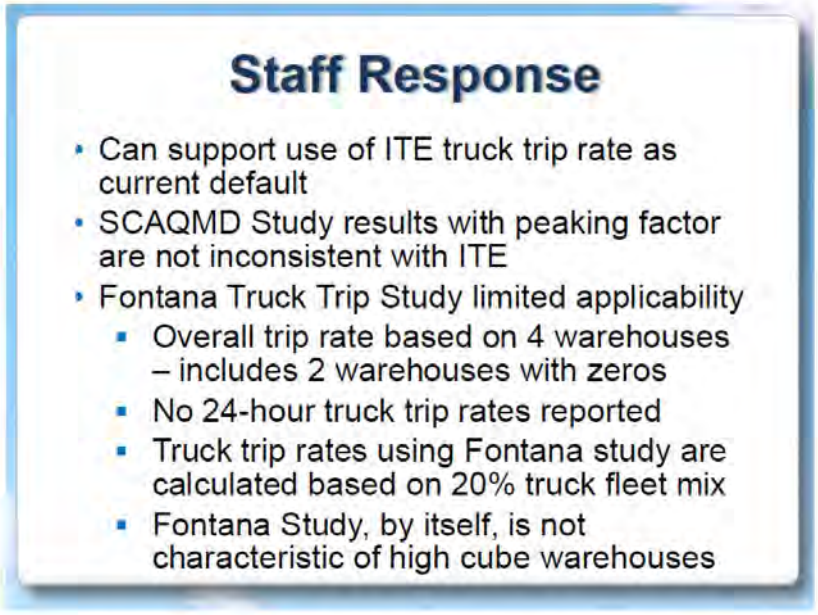
The DEIR underestimates traffic impacts in a number of material ways. This section will focus on two ways – truck share and trip length. O6.13

Truck Share

Establishing a proper truck share is vital to understanding the impacts of this Project. In particular, the DEIR assumes a low number of trucks as a share of total trips related to this project. Appendix A identifies this critical flaw that the DEIR assumes these overly rosy assumptions on the number of trucks visiting this Project. Notably, the DEIR deviates from O6.14

[6] *See* Justine Calma, *Black Friday is Causing Toxic Traffic Jams at Us Ports and Warehouses*, The Verge (Nov. 24, 2021), *available at* https://www.theverge.com/22800410/black-friday-holiday-shopping-supply-chain-pollution-ports-warehouses-california (A resident expressed that he "is now worried about pollution from" the Project, which will "be built about two blocks from his home. Bloomington, a majority-Hispanic community, already has a higher burden of smog and fine particulate pollution than 95 percent of census tracts in the nation."); Orlando Mayorquin, *How a warehouse boom is impacting minority, low-income residents*, ABC 10 (Feb. 12, 2021), *available at* https://www.abc10.com/article/news/local/california/when-a-package-at-the-front-door-means-a-warehouse-next-door/103-a150ef51-3c94-4502-8f7e-a0329ba32ea2 ("[R]ecent proposals have called for rezoning residential land for industrial use, instilling fear among residents that their communities are being razed right before their eyes in the name of economic development. In one case, the county is planning to 'upzone' entire blocks of Bloomington, leaving nothing but a business park between a middle school and an elementary school.").

recommendations made by the South Coast Air Quality Management District, which are designed to ensure that an EIR portrays a "worst case" scenario to comply with CEQA. *See* SCAQMD, Warehouse Truck Trip Study Data Results and Usage, *available at* http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/finaltrucktripstudymsc072514.pdf?sfvrsn=2. While the EIR uses a relatively recent version of the ITE trip generation manual, it bases truck share for several components of the development on the 2003 Fontana Truck Study. The DEIR, including the traffic study, VMT analysis, and other studies, do not provide substantial evidence that this close to 20 year old analysis represents a clear picture of how many trucks will be attracted to this site. In fact, the South Coast AQMD has cautioned against using the 2003 Fontana Trucks Study in an instance like the current project. Here is a slide from the 2014 presentation from South Coast AQMD:



O6.14 cont.

The AQMD concluded that Fontana Study, by itself, is not characteristic of high cube warehouses, which comprise a large portion of this proposed project. The DEIR provides no evidence why it could go against AQMD's recommendation for the high cube warehouse portion of the Project.

In fact, SCAQMD recommends using a truck share percentage of 40 for projects like this that have unidentified future tenants. *See* CalEEMOD Guidance Appendix E, *available at* http://www.aqmd.gov/docs/default-source/caleemod/caleemod-appendixe.pdf?sfvrsn=2. Here, the Project assumes far fewer trucks.

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The inadequacy of the 2003 Fontana Trip Study for High Cube Warehouses was further confirmed by the Riverside County Transportation Commission in a 2017 study at this link: Microsoft Word - RCTCLogisiticsFeeExisting&FutureConditionsReport(171030).docx.

Table 20. Summary of Uses Related to Warehouse Activities and Trip Generation Methodologies

Land use Category with Significant Warehouse Activity		Trip Generation Reference				SCAG Future Forecast (2040)
		Fontana Study	SCAG RTP (2012 Base Year)	SCAQMD	ITE	
Primary Warehouse Activity	High-cube transload / short-term warehouse			✓	✓	✓
	High-cube fulfillment center			✓	✓	
	High-cube cold storage			✓	✓	
	High-cube parcel hub			✓	✓	
	Light warehouse *	✓	✓		✓	✓
	Heavy warehouse **	✓	✓			
Secondary Warehouse Activity	Industrial park*	✓			✓	
	Light industry (manufacturing)	✓	✓		✓	✓
	Heavy industry (manufacturing)	✓				
	Wholesale		✓		✓	✓

✓ = available but not suitable for primary study use
✓ = available and suitable for supplemental reference
✓ = available and preferred for primary study use
*: Light warehouse also includes "low-cube" as defined by SCAG but not the Fontana Study
**: Heavy warehouse includes "high-cube" as defined by SCAG but not the Fontana Study

O6.14 cont

This failure to justify the use of an approach with substantially fewer trucks than will likely visit the site violations CEQA.

Truck Length

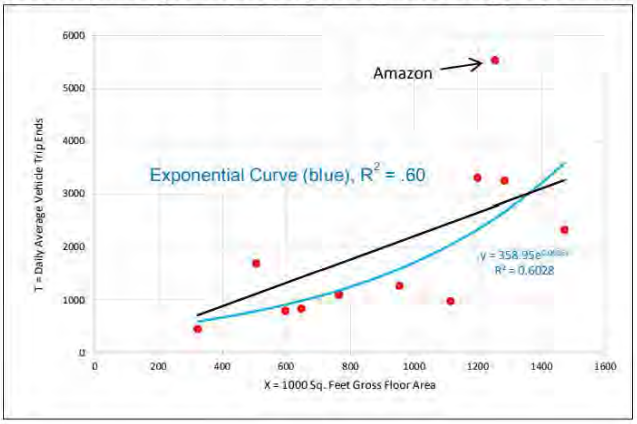
The DEIR also underestimates a range of impacts by picking an arbitrary trip length for trucks. The DEIR provides no information on where these trips will be coming from and what growth at the facilities within 40 miles justify this development. The DEIR does not explain how the basinwide assumption for the 2016 AQMP is relevant to this project, which is more than 65 miles from the Ports of Los Angeles and Long Beach and similarly far from other transportation hubs.

O6.15

ii. The DEIR does not Protect Against Amazon Fulfillment Center Traffic and Pollution Impacts.

The DEIR notes that future tenants are not known. But, we do know that some tenants impose more impacts and harm on the community for these large fulfillment center. The trip rates from TUMF High-Cube Warehouse Trip Generation Study, WSP, January 29, 2009 form the basis of data for the fulfillment center in the DEIR.[7] This WSP report shows that Amazon fulfillment centers have dramatically higher trips as exhibited by the chart below.

Exhibit 1: Data Plot for Daily Total Vehicle Trip Ends against Building Size (Fulfillment Center)



O6.16

Since the WSP study excludes the Amazon numbers in its calculations for fulfillment center, this could make the DEIR even more faulty than it actually is if Amazon is a tenant down the road. The DEIR and Specific Plan should include restrictions on tenants like Amazon, which will add more impacts to the community.

iii. The Improper Traffic Analysis Infects the Analysis of Many Other Impacts.

Given that the DEIR has underestimated the impacts from traffic, the analysis contained in the document, and in the documents relied upon are similarly faulty. These impact areas include, but are not limited to, the Project's impacts on air quality, noise, greenhouse gasses, and energy analysis.

O6.17

E. The Vehicle Miles Traveled ("VMT") Analysis is Improper Because It Excludes Truck VMT.

[7] The DEIR lists this as a 2009 study, but commenters believe the EIR is relying on a study that was produced in 2019.

The VMT analysis in the DEIR and technical appendix does not include heavy-duty truck VMT in its calculation. The calculation of VMT should not be limited to miles traveled by only automobiles. The OPR Technical Advisory makes clear that "Heavy-duty truck VMT could be included for modeling convenience and ease of calculation (for example, where models or data provide combined auto and heavy truck VMT)." Excluding heavy-duty trucks from the VMT fails to take a hard look at an important environmental impact – which is especially important here because the design of the vast majority of this project is to attract these large trucks. This failure to include heavy-duty truck VMT as part of the VMT analysis violates CEQA. O6.18

F. The Greenhouse Gas ("GHG") Emissions Analysis is Patently Unlawful.

The Sahu Memo identifies several problems with the GHG report. These flaws must be cured in any future EIR. In addition to those flaws, there are problems with the mitigation measures. O6.19

G. The Air Quality Analysis Suffers Significant Flaws.

The Air Quality analysis in the DEIR similarly suffers from many flaws, including an underestimation of air pollution associated with the project due to undercounting the number of trucks associated with this project and minimizing the truck trip length associated with them. In addition to the flaws identified in the Sahu Memo, the following problems are present in the DEIR. O6.20

i. The DEIR Omits a *Friant Ranch*-type Analysis.

A Friant Ranch-type analysis that connects the identified excessive pollution levels with actual human health impacts can and must be done. One of the most important analysis would study the impact of the Project's NOx emissions on ozone formation in the South Coast air basin, and the resulting cumulative impact of these air emissions on human health. The California Supreme Court, in the case *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, at 519-522 *("Friant Ranch")* found that CEQA requires just such an analysis correlating increased project air emissions to the probable resulting human health effects.

Several public agencies have already performed a *Friant Ranch*-type analysis, demonstrating that it is technically feasible and can produce information that is useful and appears valid. For example, the Sacramento Metropolitan Air Quality Management District (SMAQMD), which in 2020 produced Guidance to Address The *Friant Ranch* Ruling For CEQA Projects in The Sac Metro Air District (SMAQMD Guidance), available at http://www.airquality.org/LandUseTransportation/Documents/SMAQMDFriantRanchFinalOct2020.pdf. The SMAQMD Guidance states: O6.21

> Provides insight on the health effects that may result from a project emitting at the maximum thresholds of significance (TOS) levels in the Five-Air-District Region for oxides of nitrogen (NO_X), volatile organic compounds (VOCs), and PM, in addition to levels of CO and oxides of sulfur (SO_X) calculated proportional to

> NO_X (as described in Section 4.1). This information can be used in environmental documents to provide a conservative estimate of the health effects of criteria pollutant emissions at the significance thresholds or below.

(SMAQMD Guidance, p. 2.)

SMAQMD performed photochemical grid modeling, looking at over 40 locations in its jurisdiction where new projects could be sited (based on General Plan classification and zoning, among other factors), and then estimated generic emissions from such new projects, and calculated the amount by which ambient air concentrations of pollutants would change when those emissions were added to the mix.

The District then ran a health impacts model using those ambient concentrations predictions as inputs to the model (SMAQMD used the Benefits Mapping and Analysis Program [BenMAP] used by U.S. EPA [SMAQMD Guidance, pp. 4-5]), enabling it to predict resulting health hazards, e.g., predicting rates of increases in asthma attacks based on increased ozone concentrations when a new project's emissions were added to the region's inventory, or increased incidences of myocardial infarctions when PM2.5 emissions rose. (SMAQMD Guidance, pp. 6-7.)

Moreover Cal State University Dominguez Hills ("CSUDH") completed an EIR and described its modeling in this way:

O6.21 cont.

> An analysis of the potential health effects of the project's criteria pollutant emissions was prepared by Ramboll US Corporation. (See EIR Appdx. B.4, which contains detailed information regarding the methodology, input parameters, limitations and uncertainties associated with this analysis.) The analysis focuses on health effects attributable to ozone and particulate matter, as those are the criteria pollutants considered by the USEPA in its Benefits Mapping and Analysis Program (BenMAP), the analytical model it relies on and publicly distributes for use in estimating the health effects of air pollution. A photochemical grid model (CAMx) was used to estimate the incremental increase in ambient air quality concentrations as a result of project-related emissions.

(California State University Dominguez Hills Campus Master Plan EIR, p. 3.2-2, available at https://www.csudh.edu/Assets/csudh-sites/fpcm/docs/campus-master-plan/2019-09-11-FEIR.pdf;.)

Comparison to the CSUDH EIR is appropriate because of its regional proximity and recent preparation. In preparing the Final EIR for its campus master plan, CSUDH was prompted by a comment letter that complained of the lack of an analysis responding to the *Friant Ranch* opinion to hire an additional air quality consultant (Ramboll) to perform computerized modeling of the master plan's expected air pollutant emissions over the entire South Coast Air Basin, and to identify health impacts that might be caused by these emissions.

To create a worst-case analysis, the VOC emissions from the year of project construction with the highest VOC use (principally from architectural coatings) were added to the full build-out operational emissions of all other criteria pollutants from both stationary and mobile (vehicle) sources. (CSUDH FEIR, Appdx. B4, p. 4.) Annual emissions were distributed in a grid model used by the SCAQMD to represent the South Coast Air Basin, appropriately allocated over time, and the model estimated the change in concentrations of ozone and PM2.5 that would result from the addition of the master plan's emissions. (*Id.*) Those results were then evaluated using BenMAP, a health-effects prediction model used by USEPA in its evaluation of the health impacts of potential air pollution control strategies. The FEIR reported the results of the modeling for ozone and PM2.5, because those are the pollutants for which USEPA generally uses BenMAP, and because those pollutants have the most serious health impacts. (*Id.*, p. 2.)[8]

The CSUDH's FEIR reported the following results at FEIR, p. RTC-31:

> Based on the Ramboll analysis, PM2.5-related health effects attributed to the project include asthma-related emergency room visits (4.38 incidences per year), asthma-related hospital admissions (0.38 incidences per year), cardiovascular-related hospital admissions (excepting myocardial infarctions) (1.05 incidences per year), respiratory-related hospital admissions (2.44 incidences per year), mortality (10.31 incidences per year), and nonacute myocardial infarctions (less than 0.53 incidences per year). Ozone-related health effects attributed to the project include respiratory-related hospital admissions (0.67 incidences per year), mortality (0.28 incidences per year), and asthma-related emergency room visits (lower than 3.38 incidences per year.)

O6.21 cont.

The CSUDH FEIR noted that these results were conservatively estimated, but acknowledged "regulatory agencies, including the USEPA, have judged that, even so, the results supply sufficient information to the public to allow them to understand the health effects of increases or decreases in air pollution." (*Id.*)

The CSUDH FEIR demonstrates that a *Friant Ranch* analysis can be done. It is both appropriate and necessary to do such an analysis here, given that …. emissions of ozone precursors (VOC and NOx) and fine particulates are very high for this project.

It is also inappropriate for the DEIR to wrongly claim the following:

> The SCAQMD and the San Joaquin Valley Unified Air Pollution Control District (SJVAPD), experts in the area of air quality, both recognize that a meaningful, accurate analysis of potential health impacts resulting from criteria pollutants is not currently

O6.22

[8] This process is very similar to the use of CAMx and BenMAP by SMAQMD. See also 2020 Mineta San Jose International Airport Master Plan Amendment Integrated EIR, Supplemental Air Quality Analysis, at Introduction, p. 2, available at https://www.sanjoseca.gov/Home/ShowDocument?id=61650.

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possible and not likely to yield substantive information that promotes informed decision making.

DEIR at 5.3-35. In fact, the South Coast AQMD has recently commented on another EIR where it asked for the exact analysis this EIR claims the agency mentions as impossible. In relevant part, the South Coast AQMD wrote this:

> *The Revised Draft EIR Did Not Conduct the Required Health Impact Assessment*
>
> In December 2018, the California Supreme Court ruled in Sierra Club v. County of Fresno (2018) 6 Cal.5th 502 that projects with significant air quality impacts are required to relate the expected adverse air quality impacts to likely health consequences or explain why it is not feasible at the time of drafting to provide such an analysis, so that the public may make informed decisions regarding the costs and benefits of the project. Although the SCIG project would result significant localized and regional air quality impacts, the Revised Draft EIR fails to conduct the required health impact assessment. Specifically, the Revised Draft EIR claims there are no accepted methodologies for conducting a health impact assessment that could accurately quantify local health effects. This is unsupported. According to the U.S. EPA, BenMAP-CE is a proven computer program that estimates changes in the number of adverse health effects associated with a change in exposure to air pollution, specifically ground-level ozone and fine particles. In other words, BenMAP-CE can be used to estimate the resulting health impacts from change in ambient air pollutant concentrations for related health endpoints such as premature mortality, hospital admissions, and emergency room visits, and it can be used for both local- and regional-scale analyses. Concentrations at a project-level can be estimated by air dispersion model (e.g., AERMOD). The Revised Draft EIR has NO2, PM2.5, and PM10 concentrations, although underestimated, and these concentrations can be input into BenMAP-CE to estimate health effects. Both BenMap-CE and AERMOD are available for download on the U.S. EPA's website, and can be used to estimate the SCIG project's likely health consequences. Therefore, the Revised Draft EIR must be revised and recirculated to provide the necessary health impact assessment, or alternatively include a discussion to explain why the use of AERMOD and BenMap-CE models is not appropriate to provide such an analysis. LAHD, SCIG Recirculated Draft EIR (September 2012), pgs. 2-7 analysis.

O6.22 cont.

South Coast AQMD, Southern California International Gateway Comments, (August 25, 2021), *available at* LAC210519-01 RDEIR Southern California International Gateway (SCIG) Project (scaqmd.gov) (footnotes omitted). It is misleading for the DEIR to claim with absolutely no cites to actual evidence that the South Coast AQMD thinks this DEIR's approach of excluding a *Friant*-type analysis is appropriate. This failure to do an analysis clearly required by CEQA is a fatal flaw in the DEIR.

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i. The DEIR's Measures for Mitigating Air Quality Impacts Are Insufficient and Unenforceable.

It is incumbent upon the County to provide more stringent mitigation measures for air quality impact that are more clearly enforceable. We reiterate our concern that the air quality section severely underestimates emissions from the Project. Even still, the DEIR notes that "with compliance with existing rules, and implementation of the mitigation measures, emissions would continue to exceed regional thresholds of significance established by the SCAQMD for emissions of VOC and NOx." DEIR at 290. While the DEIR concludes that this is unavoidable, these emissions must be mitigated to the maximum extent possible. O6.23

First, as described in the attached Sahu Memo, we note that the substantial reductions assumed by using MM AQ-1 (Super-Compliant Low VOC) and MM AQ-2 (Tier 4) should not be assumed. Given that accurately disclosing air quality impacts is crucial to the County's ability to fulfill its legal obligations under CEQA, the County must resolve these issues in subsequent versions of the DEIR. Additionally, neither MM AQ-1 nor MM AQ-2 has any clear method of enforcement. MM AQ-1 states that "[t]he construction plans and specifications shall state that the Project shall utilize 'Super- Compliant' low VOC paints for nonresidential interior and exterior surfaces and low VOC paint for parking lot surfaces." DEIR at 24. Although the DEIR does quantify what constitutes super-compliant low VOC paints, the DEIR does not provide or cite to any authority or permit that will ensure oversight by a regulatory or similar body. Moreover, we support MM AQ-2's inclusion of an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts, but there is no specification as to when these inspections will occur, how often they will occur, and what the consequences are for noncompliance. MM AQ-2 should also state that trucks hauling dirt or other materials must be always covered during transit to and from the site. O6.24

We generally agree with MM AQ-3's (Idling Regulations) approach but believe this measure should be stricter. Specifically, the measure must include language regarding enforcement of the idling rules. In conjunction with recordkeeping and enforcement, this measure should also include a 30-minute limit on truck turnaround time. Although the measure states that signs will include the telephone numbers for the building facilities manager and CARB to report violations, we suggest making it clear that either the building facilities manager or at least one other full time staff person is designated to proactively ensure that idling rules are followed and that trucks are moving through the Project site as efficiently as possible. Whistleblowing will not be a sufficient deterrent to violations. This measure should also include idling limits for yard tractors, which would save fuel and cut pollution and reduce a significant source of worker exposure. Idling limits for captive fleets such as these should be easy to enforce. O6.25

As with most of the other mitigation measures, MM AQ-4 (Energy Efficient Vendor Trucks) lacks enforceability. We agree that the Project plans and specifications should call for vendor trucks to include energy efficiency improvement features to reduce fuel consumption. However, the DEIR is unclear regarding whether Carl Moyer grant funding has already been awarded. If grant funding has not been secured, the measure should include "or similar funding O6.26

programs" and specify that the Project should still include the Carl Moyer Program requirements, such as truck modernization, retrofits, and/or aerodynamic kits and low rolling resistance tires. O6.26 cont.

For both MM AQ-5 (Electric Vehicle Charging Stations and Carpool Parking) and MM AQ-6 (Electric Interior Vehicles), we suggest strengthening these measures by electrifying operations to the maximum extent possible. Where access to the power grid is not possible, on-site generators should meet the equivalent current off-road standards for NOx and be equipped with Best Available Control Technology (BACT) for emissions reductions of PM. Where access to the power grid is possible, these measures should be established instead of using stationary or mobile power generators. All cranes, forklifts and equipment that can be electrified, should be. We also suggest MM AQ-6 quantify its requirements for infrastructure, much like MM AQ-5 says "at a minimum of 5 carpool parking spaces." O6.27

Finally, we applaud the inclusion MM AQ-7 (Transportation Management), but the DEIR should be clearer regarding what incentive programs will be offered and how the Project will proactively encourage participation. MM AQ-7 also states that "[t]he Project plans and specifications for the industrial buildings shall require that a Transportation Management Association (TMA) or similar mechanism shall be established by the Project to encourage and coordinate carpooling," but does not clarify what requirements would be necessary in a "similar mechanism." DEIR at 25. The County should also set compliance dates for this measure, including by when the Project plans must incorporate its transportation management program. The measure should include recordkeeping provisions. O6.28

H. The DEIR Fails to Adequately Analyze and Mitigate Impacts to Energy Resources.

The DEIR misreads the requirements of Appendix F of CEQA. With barebones analysis, the DEIR claims "[t]his use of energy is typical for urban development, and no operational activities or land uses would occur that would result in extraordinary energy consumption." DEIR, at 5.6-14. This violates CEQA for several reasons. O6.29

First, neither the DEIR nor any of the technical appendices identify what is a normal energy footprint for an "urban development." Thus, this standard is meaningless. It also misses that normality is not what the Legislature directed in requiring an energy analysis. The Legislature wanted agencies to figure out how to reduce fossil fuel use and maximize energy efficiency. Second, the DEIR seems to argue that a significance standard is "extraordinary" energy consumption. That standard is not founded in Appendix F or the caselaw, and makes no sense. O6.30

Overall, the DEIR misreads the contours of Appendix F of CEQA. Appendix F clearly states its goals as follows:

> The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:
>
> (1) decreasing overall per capita energy consumption,
>
> (2) decreasing reliance on fossil fuels such as coal, natural gas and oil, and

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(3) increasing reliance on renewable energy sources.

The Energy Analysis required under CEQA provides a good opportunity for Projects to evaluate the consequences of their decisions. Even if this standard of consistency with "urban development" were a relevant and quantifiable metric, this DEIR misses the point of these provisions, which are there to have developers think about whether to power their buildings with natural gas or whether to install solar panels to reduce impacts. Finally, as stated before, the Energy Analysis is incorrect because the traffic inputs were wrong. The faulty approach taken in the DEIR and the energy technical appendix violate CEQA. O6.30 cont.

I. Requiring the Usage of Zero-Emission Class 7 and 8 trucks at the Project Site is an Effective Mitigation Measure under CEQA for the Project's Significant GHG, Air Quality, Noise, and Energy Impacts.

Under CEQA, potential mitigation measures cannot be properly labelled mitigation measures unless they are at least partially effective in reducing the significance of the impacts at issue. [9] Here, the Project's relevant impacts are GHG, air quality, noise, and energy impacts, due largely to the increased amount of diesel-fueled semi-truck trips associated with the Project. The DEIR indicates that the air quality impacts associated with the construction and operation of the Project will not be mitigated to a level of insignificance. The DEIR's claims that the Project's GHG impacts will be reduced to a level of insignificance. This finding is deeply flawed, as is discussed in length elsewhere in myriad other comments. Thus, the Project as currently constructed has both significant GHG, air quality and energy impacts. Requiring the usage of zero-emission Class 7 and 8 semi-trucks in lieu of diesel semi-trucks is therefore an effective mitigation measure under CEQA because these vehicles have no tailpipe emissions, and much lower life-cycle GHG emissions. O6.31

According to the Union of Concerned Scientists, battery-electric Class 7 and 8 trucks have lower life cycle GHG emissions than diesel trucks no matter the operating characteristics of the vehicle or the electric grid. [10] While battery-electric vehicles do not have tailpipe GHG emissions like diesel vehicles, there are still GHG emissions associated with the generation of the electricity used to power the vehicle. With the current mix of electricity generation sources in the United States, the Union of Concerned Scientists found that a battery-electric semi-truck operating locally offers 65% life cycle GHG reductions compared its diesel counterpart. [11] Battery-electric semi-trucks operating on highways offer 50% GHG reductions compared to diesel semi-trucks. [12] These reductions are likely even higher in California, since California has a

[9] Sierra Club v. County of Fresno, 431 P.3d 1151, 1166 (Cal. 2018).
[10] Union of Concerned Citizens, *Ready for Work: Now is the Time for Heavy Duty Electric Vehicles*, at 6 (Dec. 11, 2019) https://www.ucsusa.org/sites/default/files/2019-12/ReadyforWorkFullReport.pdf.
[11] *Id.* at 7.
[12] *Id.*

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larger proportion of renewable electricity generation sources than the national average.[13] Further, the GHG reductions associated with operating battery-electric semi-trucks will only increase as California moves closer to its goal of ending its dependence on fossil fuels for electricity generation. Thus, requiring battery-electric Class 7 and 8 semi-trucks in lieu of semi-trucks fueled by diesel would significantly reduce the amount of GHG emissions associated with the Project, making it effective mitigation under CEQA for the Project's significant GHG impacts.

Zero-emission vehicles, including Class 7 and 8 battery-electric semi-trucks, also cause significantly less air pollution than diesel semi-trucks. Diesel semi-trucks are a major source of both Particulate Matter 2.5, and well as Nitrogen Oxides ("NO_x"), a precursor for ozone.[14] These air pollutants have serious health consequences, as exposure to them is associated with asthma, bronchitis, increased cancer risk, increased hospitalization, and even premature death.[15] Battery-electric semi-trucks have no tailpipe emissions.[16] The only significant air pollutant associated with the operation of battery-electric semi-trucks is the Particulate Matter emitted from brake wear.[17] However, according to CARB, zero emission vehicles produce 50% less Particulate Matter from brake wear when compared to diesel vehicles.[18] This is because zero emission vehicles utilize "regenerative braking", which reduces brake usage.[19] Thus, requiring zero emission Class 7 and 8 semi-trucks in lieu of diesel semi-trucks would greatly reduce the significant air quality impacts associated with the Project, and is therefore effective mitigation under CEQA. O6.31 cont.

i. Requiring the Usage of Class 7 and 8 Zero-Emission Trucks at the Project Site is a Feasible Mitigation Measure under CEQA

Under CEQA, a public agency cannot approve a project as proposed if there are "feasible mitigation measures which substantially lessen the significant environmental effects" of the project.[20] Feasibility is defined under CEQA as, "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors".[21] The CEQA Guidelines add "legal" factors to this definition.[22] Public agencies have the power and duty to assess the adequacy of mitigation measures, subject O6.32

[13] Nuclear Energy Institute, *State Electricity Generation Fuel Shares* https://www.nei.org/resources/statistics/state-electricity-generation-fuel-shares.
[14] Union of Concerned Scientists, *supra* note 14 at 2.
[15] *Id.*
[16] California Air Resources Board, *Updated Costs and Benefits Analysis for the Proposed Advanced Clean Truck Regulation*, at 3 (April 28, 2020) https://ww3.arb.ca.gov/regact/2019/act2019/30dayattc.pdf.
[17] *Id.*
[18] *Id.*
[19] *Id.*
[20] CAL. PUB. RES. CODE § 21002 (West. 2020).
[21] CAL. PUB. RES. CODE § 2106.1 (West. 2020)
[22] CAL. CODE REGS. tit. 14, § 15364 (2020).

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only to judicial review for abuse of discretion.[23] A determination on the feasibility of a particular mitigation measure will be upheld by a reviewing court if a "fair argument" can be made to support the public agency's conclusion.[24]

Requiring the usage of Class 7 and 8 battery-electric site at the Project site is a feasible mitigation measure under CEQA for a multitude of factors. First, numerous studies show that the current total cost of ownership for a large battery-electric semi-truck is less than a diesel equivalent. As the decade progresses, the cost of battery-electric semi-trucks will drop even lower, whereas diesel trucks are expected to increase in cost, or remain stagnant. Second, the two largest technological barriers to widespread usage of battery-electric semi-trucks, which are the existence of cheap batteries that can sustain long range freight movement, and sufficient charging infrastructure to support battery-electric semi-trucks, have been overcome with immense public and private investment. Third, there are currently numerous Class 7 and 8 battery-electric truck models available for purchase, and many freight facilities have already committed to utilizing these trucks. Finally, government agencies in California are aggressively pushing for widespread usage of large battery-electric semi-trucks, through regulatory mandates, grant programs, and financial incentives.

O6.32 cont.

i. *The Current Total Cost of Ownership of Battery-Electric Semi-Trucks is Less than Diesel Semi-Trucks*

Numerous studies have compared battery-electric semi-trucks with their diesel and natural gas counterparts using a Total Cost of Ownership ("TCO") analysis. A TCO analysis attempts to capture the total cost of purchasing and operating a vehicle throughout its entire life. While each study has slightly varied methodology, each TCO analysis generally consists of vehicle purchase cost, lifetime fuel and maintenance costs, and necessary infrastructure costs. Some studies analyze additional factors, including California's available financial incentives, the charging infrastructure investments made by California's utilities, and the environmental externalities associated with Class 7 and 8 semi-trucks. Multiple comprehensive studies show that, with financial incentives, electric semi-trucks currently have a lower, TCO than both diesel and natural gas semi-trucks. Further, these studies indicate that the cost of battery-electric Class 7 and 8 semi-trucks will continue to decrease as the 2020s progress, whereas the cost of diesel trucks will either increase or remain stagnant.

CARB undertook a TCO analysis that compared battery-electric and diesel Class 8 Day Cab semi-trucks.[25] Day Cabs are a type of truck generally used for day trips less than 250 miles, and are also known as regional-haul or short-haul trucks. The study compared the TCO of this type of semi-truck in three different scenarios: if the vehicle is purchased in 2018, 2024, and

[23] City of Marina v. Board of Trustees of California State University, 138 P.3d 692, 705 (Cal. 2006).
[24] CAL. CODE REGS. tit. 14, § 15384 (2020).
[25] California Air Resourced Board, *Draft Advanced Clean Trucks Total Cost of Ownership Discussion Document* (Oct. 22, 2019) https://ww3.arb.ca.gov/regact/2019/act2019/apph.pdf.

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2030.[26] The study concluded that the TCO for a battery-electric Class 8 Day Cab purchased in 2018 is about $200,000 more than its diesel counterpart.[27] The TCO for a battery-electric truck purchased in 2024 is about $100,000 less than a diesel truck.[28] For 2030, the TCO is about $150,000 less than a diesel truck.[29]

A study done by the International Council on Clean Transportation ("ICCT") has similar results.[30] The ICCT study compares the TCO of Class 8 long-haul battery-electric and diesel semi-trucks in three scenarios: if the vehicle is purchased in 2020, 2025, and 2030.[31] In 2020, the study indicates the TCO of a battery-electric long-haul truck is about $150,000 more than a diesel equivalent.[32] In 2025, the TCO for a battery-electric truck is about $50,000 more than a diesel truck; in 2030, battery-electric trucks have a favorable TCO, which is about $20,000 less than a diesel truck.[33]

O6.32 cont.

Both of these studies indicate the current TCO of a battery electric semi-truck is significantly more than a diesel equivalent, but that battery-electric semi-trucks will have a favorable TCO sometime within the next decade. However, these conclusions are misleading. The ICCT study does not take into account the financial incentives available in California, and the CARB study only considers the Low Carbon Fuel Standard. California has many more incentives available, with the most prominent being the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project ("HVIP").[34] For certain Class 7 battery-electric trucks, this HVIP program provides $95,000 as a voucher to offset some of the purchase price.[35] For certain Class 8 battery-electric trucks, the voucher amount is $150,000.[36] Further, in their respective analyses of charging infrastructure costs, neither study incorporates the hundreds of millions of dollars which California utilities have already committed to support the development heavy-duty charging infrastructure.[37]

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[26] *Id.* at 1.
[27] *Id.* at 2.
[28] *Id.*
[29] *Id.*
[30] The International Council on Clean Transportation, *Estimating the Infrastructure Needs and Costs for the Launch of Zero-Emission Trucks* (Aug. 9, 2019) https://theicct.org/sites/default/files/publications/ICCT_EV_HDVs_Infrastructure_20190809.pdf
[31] *Id.* at 20.
[32] *Id.*
[33] *Id.*
[34] California Hybrid and Zero-Emission Truck and Bus Voucher Program https://www.californiahvip.org/.
[35] *See generally,* California HVIP Eligible Vehicle Catalog https://www.californiahvip.org/how-to-participate/#Eligible-Vehicle-Catalog.
[36] *Id.*
[37] California Public Utilities Commission, *Transportation Electrification Activities Pursuant to Senate Bill 350* https://www.cpuc.ca.gov/sb350te/.

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A study conducted by ICF finds that, when the HVIP program and the utilities' charging infrastructure investments are incorporated into a TCO analysis, battery-electric semi-trucks currently have a favorable TCO compared to diesel.[38] ICF's study compares the TCO of battery-electric and diesel Class 8 short-haul semi-trucks and Class 8 long-haul semi-trucks purchased in 2019 and 2030.[39] For battery-electric short-haul trucks purchased in 2019, the TCO is about $150,000 less than a diesel equivalent.[40] For battery-electric short-haul trucks purchased in 2030, the TCO is about $200,000 less than a diesel equivalent.[41] For battery-electric long-haul trucks purchased in 2019, the TCO is about $200,000 less than a diesel truck.[42] For battery-electric trucks purchased in 2030, the TCO is about $300,000 less than an equivalent diesel truck.[43] This study finds that, when HVIP incentives, and the cumulative hundreds of millions California utilities have invested to build charging infrastructure are included in a TCO analysis, large battery-electric semi-trucks currently have a favorable TCO compared to diesel. Further, consistent with the findings of CARB and ICCT, ICF indicates that battery-electric trucks should be able to compete without HVIP incentives on a TCO basis by 2030.[44]

In addition to financial incentives and utility charging infrastructure investment, when the environmental externalities of air pollution and GHG emissions are monetized and incorporated into a TCO analysis, battery-electric trucks are even cheaper compared to diesel. A study done by the Lawrence Berkeley National Laboratory ("LBNL") monetizes the reductions in GHG emissions and air pollution associated with battery-electric trucking in three different scenarios: when electricity comes from 90% renewable sources and 10% gas, when it comes from 100% gas, and when it comes from 100% coal.[45] The study found that, when battery-electric trucks are fueled by electricity generated with 90% renewables and 10% gas, these trucks save $0.28 per mile compared to diesel.[46] When battery-electric trucks are powered by electricity generated with 100% gas, these trucks save $0.20 per mile compared to diesel.[47] California's electricity generation mix is somewhere in between these two extremes of 100% gas and 90% renewable.[48] Therefore, battery-electric trucks operating within California would likely save somewhere between $0.20 and $0.28 per mile in GHG and air pollution costs compared to a diesel truck operating in California. Further, even without the monetization of environmental externalities,

O6.32 cont.

[38] ICF, *Comparison of Medium and Heavy-Duty Technologies in California, Part Two: Total Cost of Ownership Analysis* (December 2019) https://caletc.com/wp-content/uploads/2019/12/ICF-Truck-Report_Final_December-2019.pdf.
[39] *Id.* at
[40] *Id.* at 20.
[41] *Id.*
[42] *Id.* at 19.
[43] *Id.*
[44] *Id.* at 32.
[45] Lawrence Berkeley National Laboratory, *Long-Haul Battery Electric Trucks are Technically Feasible and Economically Compelling*, at 10 https://eta-publications.lbl.gov/sites/default/files/working_paper_005_battery_electric_trucks_906_0.pdf.
[46] *Id.*
[47] *Id.*
[48] Nuclear Energy Institute, *supra* note 17.

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the LBNL study concludes that the current TCO of a Class 8 semi-truck with a 400-mile range is about 20% less than a diesel equivalent.[49]

When analyzed cumulatively, these studies show that battery-electric Class 7 and 8 semi-trucks are *currently* an economically feasible alternative to diesel and natural gas semi-trucks. If incentive programs like the HVIP and LCFS, as well as the significant investment made by California utilities in charging infrastructure are incorporated into a TCO analysis, battery-electric trucks are currently cheaper than diesel equivalents. As the 2020s progress, battery-electric trucks will become even cheaper, as diesel trucks become more expensive. Further, by 2030, battery-electric semi-trucks are expected to compete with diesel semi-trucks on a TCO basis without any financial incentives. O6.32 cont.

ii. The Most Significant Technological Barriers to Widespread Usage of Battery-Electric Semi-Trucks Have Been Overcome with Immense Public and Private Investment

a. Battery Pack Prices are Expected to Continue Declining Significantly, and Battery Technology has Advanced to Support Long Range Freight Movement

According to CARB, the cost of battery packs is the most important factor in the price of a battery-electric semi-truck.[50] The price of battery packs for semi-trucks, and all heavy-duty vehicles, has significantly declined over the past decade, and is expected to continue declining over the next decade. Between 2010 and 2018, battery pack prices declined approximately 80 percent.[51] A report conducted by the Rocky Mountain Institute indicates that the cost of manufacturing battery capacity will drop 50% between 2018 and 2023.[52] This unexpected, rapid scaling of battery manufacturing is due largely to the fact that "total manufacturing investment, both previous and planned until 2023, represents about $150 billion dollars."[53] As battery prices continue to decline, battery-electric trucks will become an even more favorable option when compared to diesel or natural gas trucks. O6.33

Not only are battery prices falling significantly, but battery technology is progressing to such an extent that it is technologically feasible for battery-electric semi-trucks to operate effectively over the long ranges necessary for some kinds of freight movement. The LBNL study referenced above found that "recent technological developments indicate that electric trucks, like electric cars, can be fully charged in thirty minutes."[54] This is consistent with claims by Tesla

[49] Lawrence Berkeley, *supra* note 49 at 3.
[50] California Air Resources Board, *Clean Truck Total Cost of Ownership Discussion*, *supra* note 17 at 6.
[51] *Id.*
[52] Rocky Mountain Institute, *Breakthrough Batteries*, at 14 (2019) https://rmi.org/insight/breakthrough-batteries.
[53] *Id.* at 7.
[54] Lawrence Berkeley, *supra* note 49 at 4.

that its Tesla Semi can be fully charged in under thirty minutes.[55] Fast-charging is crucial for freight movement, as approximately 40% of large semi-trucks travel 500 miles or more per trip.[56] Each thirty-minute charging session is estimated to provide 4-6 hours of driving time, allowing long-haul battery-electric truck operators to effectively compete with operators using diesel and/or natural gas trucks.[57] The ICCT study referenced above found that with fast charging, a battery-electric semi-truck operator would spend approximately two hours charging on a trip between Los Angeles and Chicago.[58] Although two hours is more time than a diesel or natural gas semi-truck operator would spend refueling, ICCT concludes this time "does not significantly affect total daily driving time within legal limits."[59] Therefore, not only are battery prices falling dramatically, but battery technology is advancing exponentially, making it technologically feasible for battery-electric trucks to operate over both short and long ranges.

O6.33 cont.

b. California's Electric Utilities Have Committed Hundreds of Millions of Dollars to Build Medium and Heavy-Duty Charging Infrastructure

While it has been shown that battery prices are falling significantly, and battery technology is increasing rapidly, this means little if there is insufficient charging infrastructure. According to CARB, charging infrastructure has emerged as the largest current issue preventing the widespread usage of heavy-duty battery-electric trucks.[60] Fortunately, there has been significant investment by California public utilities in medium and heavy-duty charging infrastructure. Further, the cost of charging infrastructure per vehicle diminishes significantly as the volume of vehicles increases. Therefore, the utilities' investment allows the battery-electric semi-truck market to circumvent the high costs currently associated with early charging infrastructure development, and helps to create economies of scale for future buyers.

O6.34

The California Public Utilities Commission ("CPUC") has approved significant investments proposed by California's major public utilities in medium and heavy-duty charging infrastructure.[61] For example, in 2018, the CPUC approved Pacific Gas & Electric's ("PG&E") proposed investment of $236 million to support medium and heavy-duty charging infrastructure installations across their service territory.[62] The CPUC in 2018 also approved Southern California Edison's ("SCE") proposed investment of $343 million to support medium and heavy-

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[55] *Id.*
[56] Shashank Sripad and Vekatasubramanian Viswanathan, *Quantifying the Economic Case for Electric Semi-Trucks*, at 149 (available at https://pubs.acs.org/doi/pdf/10.1021/acsenergylett.8b02146).
[57] Lawrence Berkeley, *supra* note 37 at 4.
[58] The International Council on Clean Transportation, *supra* note 4 at 17.
[59] *Id.*
[60] California Air Resources Board, *Heavy-Duty Investment Strategy*, at D-41 (Sep. 20, 2019) https://ww2.arb.ca.gov/sites/default/files/2019-09/fy1920fundingplan-appd.pdf.
[61] In Concordance with SB 350 (De Leon, Chapter 547, Statutes of 2015), https://www.cpuc.ca.gov/sb350te/.
[62] *Id.*

duty charging infrastructure installations in its service territory.[63] In 2019, the CPUC approved a similar program proposed by the San Diego Gas and Electric ("SDG&E"), although the exact dollar amount is unclear at this point.[64] Altogether, these investments will support the development of charging infrastructure for *at least* 18,000 trucks and busses. Therefore, although charging infrastructure is a significant barrier to widespread usage of heavy-duty vehicles, the almost $1 billion dollars already committed to building this infrastructure by California's utilities is a huge step in overcoming this barrier.

This investment by California's utilities is vital because it has been shown that the cost of charging infrastructure per truck diminishes significantly as the amount of infrastructure installations increases. In the ICCT study referenced above, the ICCT calculates the expected cost of charging infrastructure per Class 8 long-haul battery-electric truck. With 100 trucks and 150 charging installations, the cost of infrastructure per vehicle is $189,000.[65] With 1,000 trucks and 1,200 installations, the cost drops to $114,000 per truck; with 10,000 trucks and 9,700 installations, the cost drops even further to $71,000 per truck.[66] The economies of scale associated with charging infrastructure shows why the utilities' investments are so crucial in ensuring the technological feasibility of battery-electric semi-trucks. The utilities' committed investment will help early battery-electric truck purchasers avoid the high costs currently associated with charging infrastructure. Further, the investment will aid the battery-electric market generally, as these hundreds of millions of dollars will create the economies of scale needed to significantly lower the cost of charging infrastructure for future buyers. This is partly why, as the ICF study shows, when these utility investments are incorporated into a TCO analysis, large battery-electric semi-trucks currently have a favorable TCO when compared to diesel. Thus, with these investments, the cost of charging infrastructure is no longer an obstacle to the widespread usage of Class 7 and 8 battery-electric semi-trucks at freight facilities. O6.35

c. Class 7 and Class 8 Battery-Electric Semi-Truck Models are Available for Purchase, and Many Freight Facilities are Have Committed to Utilizing these Trucks

There are numerous models of Class 7 and 8 Battery-Electric semi-trucks that are currently available for purchase, and are already in operation across the nation. Based on company announcements, there are at least ten Class 7 or 8 models with ranges up to 550 miles that are slated for commercial deployment by 2021.[67] As early as January of 2018, 19 companies had already ordered 375 Tesla Semis, with UPS ordering 125 and PepsiCo ordering 100.[68] BYD, a Chinese zero-emission vehicle manufacturer, announced in January 2020 that it had delivered its 100th battery-electric truck within the United States, which was a second generation Class 8 O6.36

[63] *Id.*
[64] *Id.*
[65] The International Council on Clean Transportation, *supra* note 4 at i.
[66] *Id.*
[67] *Id.* at 2.
[68] Business Insider, *Companies that Have Ordered Tesla Semis* (April 25, 2018), https://www.businessinsider.com/companies-that-ordered-tesla-semi-2017-12.

semi-truck.[69] The German company Daimler announced it delivered its first battery-electric semi-truck in 2019, and had delivered five more by early 2020.[70] Daimler is planning on significantly increasing the volume of its battery-electric semi-trucks on the road in 2021.[71]

Not only are there multiple Class 7 and 8 battery-electric semi-truck models available for purchase and currently on the road, but many freight facilities have already committed to incorporating these trucks into their fleets. Walmart announced that it will be opening a fulfillment center in British Columbia in 2022 which will feature a *fully electric* fleet.[72] Anheuser-Busch announced in 2018 that it had ordered 800 electric and hydrogen semi-trucks.[73] Frito-Lay is currently working on upgrading an existing freight facility, which will include use of 15 Tesla Semis and a 1 Megawatt photovoltaic array with charging infrastructure.[74] Loblaw, a Canadian supermarket company, has committed to fully transforming its fleet to zero emission vehicles by 2030, and had already ordered 25 Tesla Semis by late 2017.[75] Further, the Port of Los Angeles has committed to deploying ten Kenworth and Toyota Class 8 fuel cell trucks, and two battery-electric yard tractors.[76] The South Coast Air Quality Management District has committed to deploying 23 Class 8 Volvo battery-electric trucks to move freight across the Inland Empire.[77] O6.36 cont.

In addition to multiple studies demonstrating that battery-electric semi-trucks are cheaper on a lifetime basis than diesel semi-trucks, these examples of semi-trucks currently available for purchase, and facilities committed to transforming their fleets, indicate that widespread usage of Class 7 and 8 battery-electric trucks at freight facilities is currently feasible.

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[69] BYD, *BYD Delivers its 100th Battery-Electric Truck in the United States* (Jan. 8, 2020), https://en.byd.com/news-posts/byd-delivers-100th-battery-electric-truck-in-the-united-states/.
[70] Electrek, *Daimler Delivers More Electric Freightliner eCascadia Semi-Trucks* (Mar. 4, 2020), https://electrek.co/2020/03/04/daimler-electric-freightliner-semi-trucks-ecascadia/.
[71] *Id.*
[72] CleanTechnica, *Walmart Orders 30 More Tesla Semi Electric Trucks* (Sep. 7, 2018), https://cleantechnica.com/2018/09/07/walmart-orders-30-more-tesla-semi-electric-trucks/.
[73] Transport Topics, *Anheuser-Busch, Nikola, BYD Complete First Zero-Emission Run* (Nov. 21, 2019), https://www.ttnews.com/articles/anheuser-busch-nikola-byd-complete-first-zero-emission-beer-run.
[74] Frito-Lay, *Frito-Lay Transforms California Production Site into First-of-its-Kind Showcase for Sustainability* (Oct. 3, 2019), https://www.fritolay.com/news/frito-lay-transforms-california-production-site-into-first-of-its-kind-showcase-for-sustainability.
[75] Financial Post, *Loblaw Says it Ordered 25 Tesla Semis, Wants Fully Electric Fleet by 2030* (Nov. 17, 2017), https://business.financialpost.com/news/retail-marketing/loblaw-says-it-ordered-25-tesla-electric-trucks-wants-fully-electric-fleet-by-2030.
[76] California Air Resources Board, *CARB Announces More than $200 Million in New Funding for Clean Freight Transportation* (Sep. 26, 2018), https://ww2.arb.ca.gov/news/carb-announces-more-200-million-new-funding-clean-freight-transportation.
[77] *Id.*

d. California Regulatory Agencies are Aggressively Pushing for Increased Utilization of Battery-Electric Semi-Trucks

Multiple government agencies within California are attempting to increase the number of battery-electric semi-trucks on the road, through regulatory mandates, grant programs, and incentive programs. These are in addition to the Low Carbon Fuel Standard, the HVIP program, and the utility investments in charging infrastructure referenced above. In addition to the favorable TCO of battery-electric semi-trucks, these various agency actions increase the feasibility of widespread usage of these types of trucks at freight facilities.

The South Coast Air Quality Management District ("SCAQMD") has recently approved an Indirect Source Rule that would apply to freight facilities within the South Coast region, where the Project is located.[78] Under this rule, freight facilities above 100,000 square feet would be required to accumulate a certain number of Warehouse Actions and Investments to Reduce Emissions ("WAIRE") points per year.[79] WAIRE points can be generated through the purchase and usage of zero-emission and near zero-emission equipment, including vehicles and charging infrastructure.[80] Zero-emissions and near-zero-emission truck trips also generate WAIRE points. The most points that can be allocated for a singular action is for the purchase and usage of Class 8 battery-electric or fuel cell trucks.[81] O6.37

SCAQMD cites the commercial availability of battery electric Class 7 and 8 trucks in the technical document supplementing the regulatory language.[82] While the specific acquisition and usage of Class 7 and Class 8 zero-emission trucks is not *per se* required, this rule would strongly incentivize, if not force, many freight facilities to acquire these types of trucks and/or ensure that a certain number of truck trips made to their warehouse each year are by these trucks. With the proposal of this rule, SCAQMD indicates that increased usage of Class 7 and 8 battery electric trucks is feasible, and seeks to ensure more of these trucks are on the road.

SCAQMD is not the only California agency attempting to increase the usage of battery-electric trucks in the state. CARB has proposed an update to its Advanced Clean Truck rule, which will increase the number of zero-emission vehicles that medium-duty and heavy-duty manufacturers are required to sell into California.[83] Further, CARB oversees an over $200

[78] South Coast Air Quality Management District, Proposed Rule 2305: Warehouse Indirect Source Rule (Nov. 10, 2019), http://www.aqmd.gov/docs/default-source/planning/fbmsm-docs/warehouse-isr_prelim-1st-draft.pdf?sfvrsn=6.
[79] *Id.* at 2305-3.
[80] South Coast Air Quality Management District, *Draft WAIRE Menu Technical Report at 1* (Mar. 3, 2020), http://www.aqmd.gov/docs/default-source/planning/fbmsm-docs/waire-menu-technical-report_draft_3-3-20.pdf?sfvrsn=6 (Attached as Exhibit C).
[81] *Id.* at 2.
[82] *Id.* at 4.
[83] *See generally* California Air Resources Board, *Advanced Clean Trucks Regulation*, https://ww2.arb.ca.gov/rulemaking/2019/advancedcleantrucks.

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million program designed to facilitate the transition to zero-emission freight fleets.[84] This amount has grown much larger as a result of the 2021 California Budget. This CARB program funded the deployment of zero-emission semi-trucks done by the Port of Los Angeles and the SCAQMD, referenced above. CARB also oversees a grant program called the Carl Moyer Memorial Air Quality Standards Attainment Program.[85] This program provides funding to vehicles that have less particulate matter and NOx emissions than is currently required by state and federal law. In addition, CARB oversees the Air Quality Improvement Program ("AQIP"), which is almost exclusively used to provide financing for small fleet owners to purchase clean fleets.[86]

O6.37 cont.

This is certainly not an exhaustive list of the grant programs and incentives available in California. Altogether, CARB indicates that more than a dozen California agencies issue hundreds of millions of dollars annually to support the deployment of heavy-duty vehicles.[87] These grant programs, regulations, and incentives further illustrate the feasibility of widespread usage of battery-electric semi-trucks at freight facilities. None of the TCO studies analyzed above incorporate these programs and regulations into their calculation. Even without considering any of these, the TCO of a battery-electric semi-truck is currently less than a diesel equivalent. When these programs, regulations, and incentives are also considered, the case for the feasibility of requiring Class 7 and 8 battery-electric semi-trucks at freight facilities becomes even stronger.

iii. There are Multiple Co-Benefits Associated with the Widespread Usage of Class 7 and 8 Zero-Emission Semi-Trucks at the Project site

Requiring the Usage of Class 7 and 8 Battery-Electric Semi-Trucks will Reduce Local Air Pollution

The operation of Class 7 and 8 diesel semi-trucks within and around communities has devastating, sometimes deadly, air quality impacts. As mentioned above, diesel semi-trucks are significant sources of particulate matter and NO_x pollution. The impacts of these pollutants are so severe that the International Agency for Research on Cancer, which is part of the World

O6.38

[84] California Air Resources Board, *CARB Announces More than $200 Million in New Funding for Clean Freight* Transportation (Sep. 26, 2018), https://ww2.arb.ca.gov/news/carb-announces-more-200-million-new-funding-clean-freight-transportation.
[85] California Air Resources Board, *Carl Moyer Air Quality Standards Attainment Program*, https://ww2.arb.ca.gov/our-work/programs/carl-mover-memorial-air-quality-standards-attainment-program.
[86] California Air Resources Board, *AQIP Formal Regulatory Documents*, https://ww2.arb.ca.gov/resources/documents/aqip-formal-regulatory-documents.
[87] California Air Resources Board, *Heavy-Duty Investment Strategy*, at D-90 (Sep. 20, 2019) https://ww2.arb.ca.gov/sites/default/files/2019-09/fy1920fundingplan-appd.pdf.

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Health Organization, has classified diesel exhaust as carcinogenic to humans.[88] According to the California Office of Environmental Health Hazard Assessment ("OEHHA"), particulate matter pollution is linked to increased hospital visits, emergency room visits, asthma attacks, and premature deaths among those suffering from respiratory illnesses.[89] Children are especially susceptible to this harmful pollution, as their lungs and respiratory systems are still developing.[90] NO_x emissions are also quite harmful, and can damage lung tissue, lower the body's resistance to respiratory infection, and worsen chronic lung diseases. Further, NO_x reacts with other pollutants in the atmosphere to form ozone, a precursor to smog.[91]

Class 7 and 8 zero-emission semi-trucks almost fully eliminate the creation of these potentially deadly pollutants. As referenced above, zero-emission vehicles, including battery-electric trucks, have no tailpipe emissions. The only significant air pollutant associated with these semi-trucks is the particulate matter caused by braking. However, according to CARB, battery-electric trucks emit about 50% less particulate matter from braking than diesel semi-trucks, through the use of "regenerative braking". Therefore, requiring the usage of Class 7 and 8 zero-emission semi-trucks is not only economically and technologically feasible, but will provide significant health benefits to the people of Bloomington and surrounding areas. Thus, requiring the usage of these trucks is not only required under CEQA as a feasible mitigation measure, but is a moral imperative. No person within the community should be subjected to asthma, lung cancer, or worse, when it is clearly possible to avoid this.

O6.38 cont.

Requiring Usage of Class 7 and 8 Battery-Electric Semi-Trucks will Aid California in Reaching its GHG and Air Pollution Reduction Goals

California has multiple stringent GHG and air pollution reduction goals, and electrification of freight fleets is a vital component to achieving these goals. California is mandated under the federal Clean Air Act to reduce its air pollution consistent with the National Ambient Air Quality Standards ("NAAQS").[92] Currently, the South Coast and Valley Air Districts are out of compliance with the eight-hour and twenty-four-hour ozone standard.[93] According to CARB, an 80% reduction in truck and bus NO_x tailpipe emissions is required by 2031 from 2019 levels to meet the NAAQS for the South Coast region.[94] As mentioned above, diesel semi-trucks are a significant source of NO_x tailpipe emissions, whereas battery-electric

O6.39

[88] American Cancer Society, *Diesel Exhaust and Cancer*, https://www.cancer.org/cancer/cancer-causes/diesel-exhaust-and-cancer.html#:~:text=The%20EPA%20classifies%20diesel%20exhaust,a%20%E2%80%9Cpotential%20occupational%20carcinogen.%E2%80%9D.
[89] California Office of Health Hazard Assessment, *Health Effects of Diesel Exhaust* (May 21, 2001), https://oehha.ca.gov/air/health-effects-diesel-exhaust.
[90] *Id.*
[91] *Id.*
[92] ICF, *supra* note 42 at 3.
[93] *Id.*
[94] *Id.*

semi-trucks have zero tailpipe emissions. Thus, requiring the usage of these vehicles at the Project site will aid California in achieving compliance with the federal NAAQS.

California also has aggressive GHG reduction goals. State Bill 32 mandates that GHG emissions be reduced 40% below 1990 levels by 2030. Executive Order S-3-05 mandates that GHG emissions be reduced 80% below 1990 levels by 2050. Executive Order B-55-18 mandates that California achieve economy-wide carbon neutrality by 2045. According to a report by the Energy Futures Initiative, meeting the goals for 2045 and 2050 will be "extremely challenging."[95] According to the ICF study mentioned above, deployment of 100,000 electric medium and heavy-duty vehicles is necessary to achieve both the 2030 and 2050 GHG reduction goals.[96] Heavy-duty vehicles, including diesel semi-trucks, are a significant source of GHG emissions. According to the Union of Concerned Scientists, heavy-duty vehicles constitute 10% of vehicles in the United States, but emit 28% of vehicle-related GHG emissions.[97] Battery-electric trucks, as shown above, have significantly less life cycle GHG emissions than diesel semi-trucks, and the GHG emissions from battery-electric trucks will continue to decrease as California increases the proportion of electricity generated by renewable sources. Thus, requiring usage of battery-electric semi-trucks at the Project site will aid California in meeting its aspirational GHG emissions reduction goals. O6.39 cont.

iv. Electrification of Freight Fleets has Positive Economic Impacts for California

In addition to the TCO calculation, the ICF study referenced above also analyzes the economic impacts associated with electrification of freight fleets in the state of California. The report concluded that widespread electrification has multiple positive economic impacts. For one, transitioning from petroleum fuels to electricity allows funds that would otherwise flow out of California's economy to be retained within the state.[98] Further, investment in battery-electric vehicles results in greater net employment, Gross Regional Product, and industrial activity per dollar invested, when compared to investment in natural gas vehicles.[99] Also, investment in the electrification of freight fleets results in a doubling of jobs in the medium and heavy-duty sectors relative to investment in natural gas and diesel vehicles.[100] These economic benefits are consistent with the findings of the LBNL. In a letter to CARB regarding its Advanced Clean Truck Rule, LBNL indicates that a mandate that manufacturers must sell 100% zero-emission vehicles across all truck classes would result in $49 billion in savings to the state economy

[95] Energy Futures Initiative, *Optionality, Flexibility, and Innovation: Pathways for Deep Decarbonization in California* at x (April 2019), https://static1.squarespace.com/static/58ec123cb3db2bd94e057628/t/5cadebd04cd61c00017a563b/1554901977873/EFI+California+Summary+DE+PM.pdf.
[96] ICF, *supra* note 42 at 28.
[97] Union of Concerned Scientists, *supra* note 14 at 2.
[98] ICF, *supra* note 42 at 6.
[99] *Id.*
[100] *Id.*

compared when to a "business-as-usual" scenario.[101] This failure to include all feasible mitigation violates CEQA. O6.39 cont.

Conclusion

There are myriad flaws with this DEIR. They must be fixed if the County wants to proceed with this Project. We appreciate your consideration of these comments. Please do not hesitate to contact us at amartinez@earthjustice.org or cvoungblood@earthjustice.org if you have questions about this comment letter. O6.40

Sincerely,

Adrian Martinez
Candice Youngblood
Attorneys for Earthjustice

Counsel for PC4E1

[101] Lawrence Berkeley National Laboratory, *Letter to CARB Regarding Proposed Amendments to the ACT Standard Yield $11 Billion in Savings and 50% Emissions Reductions over Original Standards* (May 20, 2020), https://www.arb.ca.gov/lists/com-attach/4122-act2019-AWBdOAZzAzMKYwFs.pdf.

APPENDIX A

Comments on Selected Aspects of the

Bloomington Business Park Specific Plan
Draft Environmental Impact Report (DEIR)
County of San Bernardino, California
State Clearinghouse No. 2020120545
September 2021

by

Dr. Ranajit (Ron) Sahu, Consultant[1]

A. Introduction

This comment letter addresses the air quality, greenhouse gas, traffic, and health risk assessment aspects of the DEIR for this proposed project which are discussed in Appendix C1 (Air Quality); Appendix C3 (Greenhouse Gases); Appendix K1 (Traffic Impact); Appendix K2 (Vehicle Miles Traveled, VMT); and Appendix C2 (Health Risk Assessment) of the DEIR. In addition, which it is surprisingly not addressed in the project description section of the DEIR, I have also reviewed Appendix C5 which addresses the substantial additional air quality and greenhouse gas emissions impacts of a substantial residential Upzone project in the vicinity of the Bloomington Business Park. O6.41

B. Project Description

The proposed Bloomington Business Park Project ("Project") as described in the DEIR represents the redevelopment of approximately 213 acres for around 3,235,836 square feet (sf) of industrial uses. The DEIR analyzes three scenarios described as follows:

(i) Specific Plan Development Plan (Opening Year Development Option 1 "OYD1") which would include sites 1, 2, 3, and 4 and consist of up to 383,000 sf of fulfillment center (Site 1), 1,251,640 sf of high-cube warehouse (Site 2), 479,000 sf of fulfillment center (Site 3), and an ancillary truck parking area (Site 4). O6.42

(ii) Specific Plan Development Plan (Opening Year Development Option 2 "OYD2")which would include sites 1, 2, 3, and 4 and consist of up to 710,400 sf of fulfillment center (Site 1), 1,251,640 sf of high-cube warehouse (Site 2), 750,000 sf of fulfillment center (Site 3), and an ancillary truck parking area (Site 4).

(iii) Specific Plan Buildout (SP) which would consist of the full buildout of the Project, which includes the development of up to 598,400 sf of fulfillment center and 523,796 sf of industrial park uses.

[1] Resume provided in Attachment A.

Note that in OYD1 and OYD2 the largest portion of the Project would consist of high-cube warehouse use. In the interest of space and brevity, I am not enclosing the figures showing the referenced Sites in the description above, which are provided throughout in the DEIR and the Appendices.

O6.42 cont.

In these comments I will occasionally provide examples of deficiencies using either OYD1 or OYD2 or SP scenarios. Unless otherwise stated, these deficiencies apply to all scenarios and not just the scenario used as an example.

C. Site Location

As noted in the DEIR, the proposed Project is located south of Santa Ana Avenue, west of Linden Avenue, north of Jurupa Avenue, and east of Alder Avenue in the unincorporated area of Bloomington in the County of San Bernardino. Location figures of the proposed development, south of I-10 and north of I-60 are provided in the DEIR and the various Appendices and are therefore not repeated in these comments except to illustrate technical issues later. Importantly, while the Project area consists of lower density, large lot residential uses, commercial nurseries, trucking operations, and vacant and undeveloped parcels, there are residential uses, churches, and schools as well as at least one park (Kessler Park) in the general vicinity.

O6.43

D. General Comments

D1. Lack of Clarity on the Interrelated Nature of the Impacts Analyses

While specific impacts, by subject, are discussed in the various Appendices, the DEIR does not make clear the inter-relationships and dependencies of the various analyses and does not discuss how assumptions underlying one set of analyses (for example traffic) carry over to other analyses (for example air quality, greenhouse gas emissions, VMT analysis and the health risk assessment). It is clear that from an operational standpoint a significant activity that will be associated with this Project is the movement of both passenger cars, and importantly, heavy duty trucks into and out of the development as a whole, including the fulfillment centers and the high-cube warehouse. Thus, each of the assumptions underlying the activity levels of goods and people movement into and out of the Project – such as the numbers of passenger cars and their types and miles travelled to and from the Project, the numbers and types of heavy duty trucks and their miles travelled to and from the Project, and the manner in which these trips are distributed along the major arterials in the vicinity of the Project – will substantially affect not only the traffic congestion analysis but also the air quality, greenhouse gas emissions, VMT and health risk impacts as well. Yet, in spite of this interconnectedness the DEIR fails in properly communicating the dependencies of inputs and assumptions of one set of analyses on other analyses. That is a major failing of the DEIR, one of whose primary purposes is to serve as a clear communication tool regarding impacts of the Project.

O6.44

D2. Lack of Clarity on Critical Inputs and Assumptions

As written, it is almost impossible to identify the major or critical assumptions and inputs that affect the findings and conclusions of a particular analysis. That is, in part, because there is no

O6.45

way to properly locate, much less understand all of the critical assumptions and inputs, some of which are haphazardly discussed in various locations of this multi-1000 page DEIR while others are buried deep in the technical attachments such as the model outputs used for traffic, air quality, and health risk assessments. Thus, as written, the DEIR fails to provide the clarity required of a CEQA document. Instead, it successfully obscures critical assumptions and inputs and makes the analysis and its findings opaque.

I recommend that all critical inputs and assumptions associated with each analysis be clearly enumerated in the summary section for that analysis in the final EIR along with each related Appendix. This should be done in tabular form so that the reader can, at a glance, understand each of the critical inputs and assumptions associated with each respective analysis. Where a specific input or assumption is a numerical quantity, the choice of value for that quantity should be explained and supported along with the impact associated with uncertainties in that choice (see the next comment). Where an assumption is qualitative and not numerical, the basis for that qualitative choice should also be described and supported.

O6.45 cont.

D3. Lack of Sensitivity Analysis

In almost all cases the results of the DEIR's analyses are provided as single-point values. This includes emissions estimates for various air pollutants, including greenhouse gases, the congestion parameters associated with traffic impacts, the results of the VMT analyses, and finally the results of the incremental cancer and non-cancer risks to specific receptors as a result of the Project. Often these results are stated to high levels of precision such as the number of significant digits, falsely indicating the level of confidence in the analyses.

In reality, there is significant uncertainty in almost every step of every analysis. Other than precision in the square footage of the various portions of the development and its location, almost everything else that any analysis relies upon is uncertain. In some cases the DEIR admits that much is unknown at the present time such as specific future tenants and uses of the fulfillment center or the warehouse. However, in most other instances, the DEIR's analyses simply make single-point assumptions – such as the number of cars or trucks; the trip generation values; the trip distribution values on the surrounding roadways; the emissions associated with these vehicles, including when they are idling; the VMT associated with the project; the VMT associated with the arbitrarily chosen regional area for comparison; the choice of meteorological data used in the air quality and health risk assessments; and the many assumptions inherent in the health risk assessment itself. These are merely examples. The point is that the results of any analysis presented in the DEIR rely on a large set of inputs, almost all of which are not firm but are, in fact, the results of assumptions and choices. Even when the analysis relies on authoritative references, such as the ITE manual for trip generation, as example, the inputs are not firm and fixed and the uncertainty associated with them is often clear when reviewing the source documents. In the case of the ITE trip generation estimates, they are based on data collected by ITE for "similar" applications and there is significant scatter in the data for trip generation associated with any specific land use. Yet, by using just a mean or average value, the analysis effectively pretends that the underlying data have no uncertainty, and that is simply false.

O6.46

Instead, a proper analysis should include the uncertainties associated with critical (if not all) input values for each analysis and present the results as a range, along with a confidence interval. O6.46 cont.

Consider as an example, the excess cancer risk at OYD2-R7, a residence located just 154 feet southeast of the vast Project site, which is stated to be precisely 5.78 in a million in the health risk assessment (and noted, therefore, as being below the 10 per million threshold, and therefore acceptable). This is a ludicrous level of false precision given the large number of inputs and assumptions that went into its determination including, critically, that: (i) no truck will idle for longer than 15 minutes, a clearly unenforceable assumption; (ii) that each truck will have specific emission rates of diesel particulate matter (DPM) at not only idle but also at 5 mph and 25 mph speeds, also unverifiable and unenforceable; (iii) that these DPM emissions would be emitted at the very precisely modeled volume sources with "release height of 3.49 meters, and an initial lateral dimension of 4.0 meters, and an initial vertical dimension of 3.25 meters"; (iv) that the site meteorology is the same as that in Fontana, regardless of the topographical differences of Bloomington versus Fontana; and (v) that there are zero emissions of other known carcinogens from trucks and vehicles such as benzene and formaldehyde, etc.[2]

O6.47

Clearly, given these and many other assumptions, the excess cancer risk is unlikely to be precisely 5.78 in a million as estimated in the health risk assessment. Instead it is more likely to be a range, for example anywhere from, say, 2-25 in a million with a confidence level of, say, 80%. Thus, if such a range was presented, a reader would be in a better position to understand the uncertainties in the inputs and assumptions and their impacts on the results. The contributions of specific inputs to this range could and should also be discussed. For example, it could be that the single largest determinant of this excess cancer risk could be the idling emissions of trucks; or it could be the meteorological data used, etc. That would provide useful information to the decision maker and the public.

Yet, there is simply no discussion of uncertainty – and therefore no ability to understand the meaning of the highly precise results for most of the analyses, such as the cancer risk estimate noted above as an example. The DEIR is grossly misleading as a result.

E. Specific Comments

In addition to the general comments noted above, in this section I discuss specific comments for the selected analysis I have reviewed. O6.48

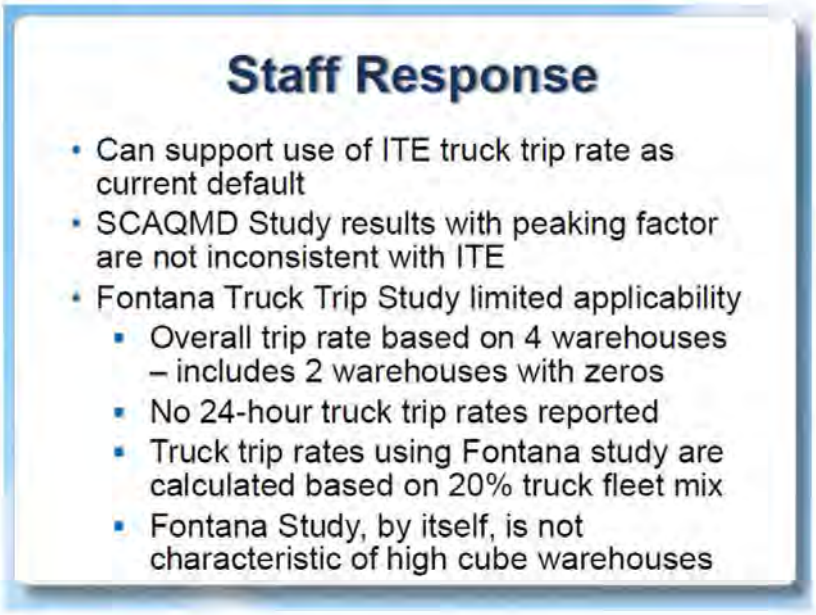
E1. Unsupported and Underestimated Truck Share (i.e., 20%) Assumed

[2] This last factor alone is a significant omission since diesel organic emissions such as benzene and formaldehyde, both known human carcinogens, can and are emitted from diesel engines. Their contributions to excess cancer have not been accounted for since these are volatile organic compounds and not particulate matter and thus not included in DPM.
See
https://www.fhwa.dot.gov/ENVIRonment/air_quality/air_toxics/research_and_analysis/us_95_nevada_case_study/us95nv02.cfm

The DEIR underestimates traffic impacts in a number of material ways. I discuss a specific example, namely the choice of the truck share as a result of the Project assumed in the analysis.

Establishing a proper truck share is vital to understanding the impacts of this Project, especially in view of the interconnectedness of the traffic analysis and how it is foundational to subsequent analyses such as air quality, VMT, and health risk assessment. Specifically, the DEIR assumes a low number of trucks as a share of total trips related to this Project. In doing so, it deviates from recommendations made by the South Coast Air Quality Management District (SCAQMD), which are designed to ensure that the DEIR portrays a "worst case" scenario to comply with CEQA.[3] While the DEIR uses a recent version of the ITE trip generation manual for trip generation (improperly neglecting any uncertainty analysis even from this document as noted previously), it bases the truck share assumption on an almost 20-year old 2003 Fontana Truck Study. The DEIR provides no justification anywhere as to why this almost 20-year old analysis provides a representative picture of how many additional trucks will be attracted to this site. Since emissions from operation and idling of trucks is a significant driver of the air quality and health risk assessment impacts, this is not a trivial assumption. O6.49

Further, the authors of the DEIR's analyses are likely aware that the SCAQMD has cautioned against using this 2003 Fontana Trucks Study. Shown below is a slide from a 2014 presentation from the SCAQMD: O6.50



[3] *See* SCAQMD, Warehouse Truck Trip Study Data Results and Usage, *available at* http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/finaltrucktripstudymsc072514.pdf?sfvrsn=2.

5

As confirmed, the SCAQMD concluded 7 years ago that the Fontana Study which uses a 20% truck fleet mix "is not characteristic of high cube warehouses," which comprise the single largest portion of this proposed Project as I have pointed out previously. Thus, the use of the 20% truck fleet mix is improper and serves to underestimate not only traffic impacts but also all subsequent impacts such as air quality, greenhouse gas emissions, and the health risk assessment. Moreover, the DEIR does not provide sufficient evidence why the Fontana Report-based truck share percentage is appropriate for the "industrial park" portion of the development.

Instead, the SCAQMD recommends using a truck share percentage of 40 for projects like this that have unidentified future tenants.[4] The inadequacy of the 2003 Fontana Trip Study is also further confirmed by the Riverside County Transportation Commission in a 2017 study[5] which specifically omits the use of the 2003 Fontana Trip Study for high-cube warehouses.

Table 20. Summary of Uses Related to Warehouse Activities and Trip Generation Methodologies

Land use Category with Significant Warehouse Activity		Trip Generation Reference				
		Fontana Study	SCAG RTP (2012 Base Year)	SCAQMD	ITE	SCAG Future Forecast (2045)
Primary Warehouse Activity	High-cube transload / short-term warehouse			✓	✓	
	High-cube fulfillment center			✓	✓	✓
	High-cube cold storage			✓	✓	
	High-cube parcel hub			✓	✓	
	Light warehouse *	✓	✓		✓	✓
	Heavy warehouse **	✓	✓		✓	
	Industrial park*	✓			✓	
Secondary Warehouse Activity	Light industry (manufacturing)	✓			✓	
	Heavy industry (manufacturing)	✓	✓			✓
	Wholesale		✓		✓	✓

✓ = available but not suitable for primary study use
✓ = available and suitable for supplemental reference
✓ = available and preferred for primary study use
* Light warehouse also includes "low cube" as defined by SCAG but not the Fontana Study
** Heavy warehouse includes "high cube" as defined by SCAG but not the Fontana Study

O6.50 cont.

I should note that the truck share assumption is not the only wrong assumption in the traffic analysis. There is no justification provided or discussed for the assumed trip lengths and the trip distributions to and from the Project as used in the analysis. While these may not be known with certainty and assumptions may be unavoidable, the sensitivity of these assumptions (i.e., effects of these assumptions if they were to be different than what is assumed) can and should be done and presented.

O6.51

E2. Unenforceable Mitigation Measures for Reducing Significant Construction Air Quality Impacts

[4] *See* CalEEMOD Guidance Appendix E, *available at* http://www.aqmd.gov/docs/default-source/caleemod/caleemod-appendixe.pdf?sfvrsn=2. ....

[5] Microsoft Word - RCTC'LogisiticsFeeExisting&FutureConditionsReport(171030).docx

6

The table below shows the summary of various air quality impacts as assessed in the DEIR – i.e., including the underestimated truck share and other unsupported traffic assumptions noted previously.

TABLE ES-1: SUMMARY OF CEQA SIGNIFICANCE FINDINGS

Analysis	Scenario	Report Section	Significance Findings	
			Unmitigated	Mitigated
Regional Construction Emissions	OYD1	5.1	*Potentially Significant*	*Less Than Significant*
	OYD2	6.1	*Potentially Significant*	*Less Than Significant*
	Specific Plan Buildout	7.1	*Potentially Significant*	*Less Than Significant*
Localized Construction Emissions	OYD1	5.4	*Less Than Significant*	*n/a*
	OYD2	6.4	*Less Than Significant*	*n/a*
	Specific Plan Buildout	7.4	*Potentially Significant*	*Less Than Significant*
Regional Operational Emissions	OYD1	5.2	*Potentially Significant*	*Significant and Unavoidable*
	OYD2	6.2	*Potentially Significant*	*Significant and Unavoidable*
	Specific Plan Buildout	7.2	*Potentially Significant*	*Significant and Unavoidable*
Localized Operational Emissions	OYD1	5.5	*Less Than Significant*	*n/a*
	OYD2	6.5	*Less Than Significant*	*n/a*
	Specific Plan Buildout	7.5	*Less Than Significant*	*n/a*
CO "Hot Spot" Analysis		8	*Less Than Significant*	*n/a*
Air Quality Management Plan		9	*Potentially Significant*	*Significant and Unavoidable*
Sensitive Receptors		10	*Less Than Significant*	*n/a*
Odors		11	*Less Than Significant*	*n/a*
Cumulative Impacts		12	*Potentially Significant*	*Significant and Unavoidable*

O6.52

While the DEIR admits that some of the significant impacts are unavoidable, for others it states that they can be mitigated to become less than significant. I have carefully reviewed each of the proposed mitigation measures for both construction (MM AQ-1 and MM AQ-2 as discussed in ES.3.1 of the Air Quality impacts discussion) and operations (MM AQ-3 through MM AQ-7 as discussed in ES.3.2 of the Air Quality discussion) and it is clear that not one of these mitigation measures is enforceable as a practical matter.

Consider MM AQ-1, which states that "[T]he Project shall utilize "Super-Compliant" low VOC paints for nonresidential interior and exterior surfaces and low VOC paint for parking lot surfaces." Yet, there is no discussion of how this will be achieved and ensured – i.e., made enforceable. There is no authority or permit that is cited which will ensure oversight by a regulatory or similar body. As such this is a promise which may or may not be kept.

O6.53

Similarly MM AQ-2 states that "[T]he Construction Contractor shall ensure that off-road diesel construction equipment rated at 50 horsepower (hp) or greater, complies with Environmental Protection Agency (EPA)/California Air Resources Board (CARB) Tier 4 off-road emissions standards or equivalent and shall ensure that all construction equipment is tuned and maintained

O6.54

in accordance with the manufacturer's specifications." Again, who will verify that this is actually going to occur and be documented as such for each such piece of equipment? It is nothing more than an aspirational goal, unlikely to be implemented as used in the analysis, which takes credit for its implementation. O6.54 cont.

For the operational emissions, the DEIR at least admits that there is no way to quantify if the proposed measures MM AQ-3 through MM AQ-7 will actually ensure any reductions, so I do not discuss them further. O6.55

But the substantial reductions assumed by using MM AQ-1 and MM AQ-2, which are unenforceable, should not be assumed at all. Construction emissions are therefore likely to be significantly greater than estimated and the results of these greater construction emissions have not therefore been properly assessed in the health risk analysis – which therefore underestimates the health impacts from the construction emissions. O6.56

E3. Unenforceable Construction Equipment Assumptions

As example, the excerpted tables below show for OYD1 the types, numbers, and usage rates of various construction equipment that will be used in the Project. These are the basis for construction air quality emissions estimates and their impacts, as well as impacts such as health risk due to construction. There are similar assumptions for the other Project scenarios.

Yet, like the mitigation measures discussed above, these assumptions are simply not enforceable.

TABLE 5-3: OYD1 CONSTRUCTION EQUIPMENT ASSUMPTIONS (1 OF 2)

Development Area	Phase Name	Equipment	Amount	Hours Per Day
OYD1	Demolition	Concrete/Industrial Saws	2	8
		Excavators	6	8
		Rubber Tired Dozers	4	8
	Site Preparation	Crawler Tractors	7	8
		Rubber Tired Dozers	5	8

O6.57

TABLE 5-3: OYD1 CONSTRUCTION EQUIPMENT ASSUMPTIONS (2 OF 2)

Development Area	Phase Name	Equipment	Amount	Hours Per Day
OYD1	Grading	Crawler Tractors	4	8
		Excavators	4	8
		Graders	2	8
		Rubber Tired Dozers	2	8
		Scrapers	4	8
	Building Construction	Cranes	2	8
		Crawler Tractors	6	8
		Forklifts	6	8
		Generator Sets	2	8
		Welders	2	8
	Paving	Pavers	4	8
		Paving Equipment	4	8
		Rollers	4	8
	Architectural Coating	Air Compressors	2	8

O6.57 cont.

For example, if the Project was to use not 2 but 4 graders during the grading phase of OYD1, how is that tracked and checked against this assumption used in the DEIR? Same for every other equipment type. And, if a specific equipment is used not for 8 hours but 10 or 12, how is that barred as a practical matter?

In fact, these assumptions are simply unenforceable and are therefore only used in the "paper exercise" that constitutes the entirety of this DEIR.

E4. The VMT Analyses Use Numerous Unsupported Assumptions and Are Therefore Unreliable

As a basic methodology, the VMT analysis relies on a comparison of Project VMT on an employee/person as compared to the existing VMT per employee/person for the "unincorporated County." In doing this analysis, the analysis used the VMT/employee metric for "only home-based-work" trip purposes. This VMT was obtained from the SBTAM for the Project site and divided by the number of employees estimated to obtain the metric. Similarly, the HBW VMT from SBTAM for all of the unincorporated County was obtained and was divided by the total number of employees in the entire unincorporated portion of the County (itself developed from socioeconomic data) to obtain the baseline VMT/employee metric. The Project metric was then compared to the baseline metric. A similar analysis was conducted for the Upzone residential site. The analysis was done for 2016 and 2040, and the 2021 metric was interpolated.

O6.58

It is clear from the description that the entire analysis rests on assumption stacked on top of unsupported assumption. I start with the fact that San Bernardino County is the largest County in the US. It is not clear how the TAM for the County estimates both the HBW VMT and/or the number of employees in the entire unincorporated portion of this County with any sort of precision. There is no discussion of how any of these inputs are valid or what their degree of imprecision is. This is critical because the Project and Upzone metrics are compared to the baseline metrics and are assessed as to whether they are within 4% of each other – i.e., that the Project/Upzone metrics are lower than 95% of the baseline metrics – which is a very small margin. It is simply ridiculous to presume that, given the undoubtedly wide assumptions made in this analysis, that comparing the two metrics and determining if one is lower than 96% of the other is meaningless. It would be meaningful if the uncertainties in the metrics were also discussed. Otherwise this "difference" has no statistical significance at all. O6.58 cont.

Thus, the VMT analyses and their conclusions are meaningless and unreliable.

E5. The Air Quality Impacts of the Upzone Projects Are Considerable

The table below summarizes the Upzone project's air quality impacts as presented in Appendix C5.

TABLE 3: EXISTING ZONING VS. PROPOSED ZONING OPERATIONAL EMISSIONS SUMMARY

Source	Emissions (lbs/day)					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summer						
Existing Zoning	24.05	5.29	18.72	0.05	3.77	1.12
Proposed Zoning	34.03	48.78	172.76	0.46	34.75	10.33
Net Change (Proposed – Existing)	**9.98**	**43.50**	**154.05**	**0.41**	**30.99**	**9.21**
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Winter						
Area Source	23.97	5.42	17.05	0.05	3.76	1.12
Energy Source	33.30	50.00	157.38	0.44	34.74	10.33
Net Change (Proposed – Existing)	**9.33**	**44.58**	**140.33**	**0.39**	**30.97**	**9.21**
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

O6.59

I would like to draw attention to the estimated NOx impacts, which are 43.5 lb/day and 44.58 lb/day for summer and winter, respectively. The corresponding significance threshold is 55 lb/day. It is my opinion that given the numerous assumptions inherent in the emissions estimates for these operation emissions, including uncertainties in emissions factors and emissions estimation methods, without strict enforceability and actual verifiability of each of the inputs used in arriving at the summer and winter lb/day estimates the threshold of 55 lb/day is at risk of being exceeded. As it is the summer and winter estimates for NOx are around 80% of the threshold. This is not a significant and robust margin for compliance. Therefore, the DEIR should discuss how the NOx estimate inputs

and assumptions can be made verifiable and enforceable such that the 55 lb/day threshold will not be exceeded in practice. O6.59 cont.

E6. Deficiencies in the GHG Analysis

E6.1 It is Not Clear Which Global Warming Potential (GWP) Values Are Used in the GHG Analysis

The table excerpted below provides, correctly the GWP values for selected greenhouse gases (GHG) from an earlier Intergovernmental Panel on Climate Change (IPCC) 2nd Assessment Report as well as a more recent 5th Assessment Report.

TABLE 2-2: GWP AND ATMOSPHERIC LIFETIME OF SELECT GHGS

Gas	Atmospheric Lifetime (years)	GWP (100-year time horizon)	
		2nd Assessment Report	5th Assessment Report
CO_2	See*	1	1
CH_4	12 .4	21	28
N_2O	121	310	265
HFC-23	222	11,700	12,400
HFC-134a	13.4	1,300	1,300
HFC-152a	1.5	140	138
SF_6	3,200	23,900	23,500

*As per Appendix 8.A. of IPCC's 5th Assessment Report, no single lifetime can be given.
Source: Table 2.14 of the IPCC Fourth Assessment Report, 2007

O6.60

However, it is not clear which of these two sets of GWP values was used in the DEIR's GHG estimates. The DEIR should have used the more recent GWP values.

E6.2 The Basis for the Methane and Nitrous Oxide Emission Factors is Not Clear

As the table above shows, two of the more important GHG gases that are or can be emitted from combustion equipment are methane and nitrous oxide (N_2O). However, the DEIR does not discuss the basis for the emission factors for these two pollutants which are used in the calculations for the specific equipment engine types considered. The DEIR should provide a more thorough discussion of these emission factors. O6.61

E6.3 The Enforceability of the San Bernardino County GHG Approach to Mitigating Significant GHG Emissions is Not Clear

The DEIR states that San Bernardino County includes a GHG Development Review Process that specifies a two-step approach in quantifying and then mitigating GHG emissions. First, a screening threshold of 3,000 million tons CO_2e/year is used to determine if additional analysis is required. Projects that exceed the 3,000 $MTCO_2e$/year, such as certain scenarios in this Project, are then required to either "achieve a minimum 100 points" per certain tables in San Bernardino guidelines O6.62

in order to be determined to have a less than significant impact for GHGs. However, there is scant discussion of the 100-point requirement and also how any commitments associated with these point determinations are made enforceable in the DEIR. This should be discussed more thoroughly.

O6.62 cont.

Attachment A

RANAJIT (RON) SAHU, Ph.D, QEP, CEM (Nevada)

CONSULTANT, ENVIRONMENTAL AND ENERGY ISSUES

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EXPERIENCE SUMMARY

Dr. Sahu has over thirty one years of experience in the fields of environmental, mechanical, and chemical engineering including: program and project management services; design and specification of pollution control equipment for a wide range of emissions sources including stationary and mobile sources; soils and groundwater remediation including landfills as remedy; combustion engineering evaluations; energy studies; multimedia environmental regulatory compliance (involving statutes and regulations such as the Federal CAA and its Amendments, Clean Water Act, TSCA, RCRA, CERCLA, SARA, OSHA, NEPA as well as various related state statutes); transportation air quality impact analysis; multimedia compliance audits; multimedia permitting (including air quality NSR/PSD permitting, Title V permitting, NPDES permitting for industrial and storm water discharges, RCRA permitting, etc.), multimedia/multi-pathway human health risk assessments for toxics; air dispersion modeling; and regulatory strategy development and support including negotiation of consent agreements and orders.

He has over twenty eight years of project management experience and has successfully managed and executed numerous projects in this time period. This includes basic and applied research projects, design projects, regulatory compliance projects, permitting projects, energy studies, risk assessment projects, and projects involving the communication of environmental data and information to the public.

He has provided consulting services to numerous private sector, public sector and public interest group clients. His major clients over the past twenty six years include various trade associations as well as individual companies such as steel mills, petroleum refineries, chemical plants, cement manufacturers, aerospace companies, power generation facilities, lawn and garden equipment manufacturers, spa manufacturers, chemical distribution facilities, land development companies, and various entities in the public sector including EPA, the US Dept. of Justice, several states (including Oregon, New Mexico, Pennsylvania, and others), various agencies such as the California DTSC, and various municipalities. Dr. Sahu has performed projects in all 50 states, numerous local jurisdictions and internationally.

In addition to consulting, for approximately twenty years, Dr. Sahu taught numerous courses in several Southern California universities including UCLA (air pollution), UC Riverside (air pollution, process hazard analysis), and Loyola Marymount University (air pollution, risk assessment, hazardous waste management). He also taught at Caltech, his alma mater (various engineering courses), at the University of Southern California (air pollution controls) and at California State University, Fullerton (transportation and air quality).

Dr. Sahu has and continues to provide expert witness services in a number of environmental areas discussed above in both state and Federal courts as well as before administrative bodies (please see Annex A).

EXPERIENCE RECORD

2000-present **Independent Consultant.** Providing a variety of private sector (industrial companies, land development companies, law firms, etc.), public sector (such as the US Department of Justice), and

public interest group clients with project management, environmental consulting, project management, as well as regulatory and engineering support consulting services.

1995-2000 Parsons ES, **Associate, Senior Project Manager and Department Manager for** Air Quality/Geosciences/Hazardous Waste Groups, Pasadena. Responsible for the management of a group of approximately 24 air quality and environmental professionals, 15 geoscience, and 10 hazardous waste professionals providing full-service consulting, project management, regulatory compliance and A/E design assistance in all areas.

Parsons ES, **Manager for Air Source Testing Services**. Responsible for the management of 8 individuals in the area of air source testing and air regulatory permitting projects located in Bakersfield, California.

1992-1995 Engineering-Science, Inc. **Principal Engineer and Senior Project Manager** in the air quality department. Responsibilities included multimedia regulatory compliance and permitting (including hazardous and nuclear materials), air pollution engineering (emissions from stationary and mobile sources, control of criteria and air toxics, dispersion modeling, risk assessment, visibility analysis, odor analysis), supervisory functions and project management.

1990-1992 Engineering-Science, Inc. **Principal Engineer and Project Manager** in the air quality department. Responsibilities included permitting, tracking regulatory issues, technical analysis, and supervisory functions on numerous air, water, and hazardous waste projects. Responsibilities also include client and agency interfacing, project cost and schedule control, and reporting to internal and external upper management regarding project status.

1989-1990 Kinetics Technology International, Corp. **Development Engineer.** Involved in thermal engineering R&D and project work related to low-NOx ceramic radiant burners, fired heater NOx reduction, SCR design, and fired heater retrofitting.

1988-1989 Heat Transfer Research, Inc. **Research Engineer**. Involved in the design of fired heaters, heat exchangers, air coolers, and other non-fired equipment. Also did research in the area of heat exchanger tube vibrations.

EDUCATION

1984-1988 Ph.D., Mechanical Engineering, California Institute of Technology (Caltech), Pasadena, CA.

1984 M. S., Mechanical Engineering, California Institute of Technology (Caltech), Pasadena, CA.

1978-1983 B. Tech (Honors), Mechanical Engineering, Indian Institute of Technology (IIT) Kharagpur, India

TEACHING EXPERIENCE

Caltech

"Thermodynamics," Teaching Assistant, California Institute of Technology, 1983, 1987.

"Air Pollution Control," Teaching Assistant, California Institute of Technology, 1985.

"Caltech Secondary and High School Saturday Program," - taught various mathematics (algebra through calculus) and science (physics and chemistry) courses to high school students, 1983-1989.

"Heat Transfer," - taught this course in the Fall and Winter terms of 1994-1995 in the Division of Engineering and Applied Science.

"Thermodynamics and Heat Transfer," Fall and Winter Terms of 1996-1997.

U.C. Riverside, Extension

"Toxic and Hazardous Air Contaminants," University of California Extension Program, Riverside, California. Various years since 1992.

"Prevention and Management of Accidental Air Emissions," University of California Extension Program, Riverside, California. Various years since 1992.

"Air Pollution Control Systems and Strategies," University of California Extension Program, Riverside, California, Summer 1992-93, Summer 1993-1994.

"Air Pollution Calculations," University of California Extension Program, Riverside, California, Fall 1993-94, Winter 1993-94, Fall 1994-95.

"Process Safety Management," University of California Extension Program, Riverside, California. Various years since 1992-2010.

"Process Safety Management," University of California Extension Program, Riverside, California, at SCAQMD, Spring 1993-94.

"Advanced Hazard Analysis - A Special Course for LEPCs," University of California Extension Program, Riverside, California, taught at San Diego, California, Spring 1993-1994.

"Advanced Hazardous Waste Management" University of California Extension Program, Riverside, California. 2005.

Loyola Marymount University

"Fundamentals of Air Pollution - Regulations, Controls and Engineering," Loyola Marymount University, Dept. of Civil Engineering. Various years since 1993.

"Air Pollution Control," Loyola Marymount University, Dept. of Civil Engineering, Fall 1994.

"Environmental Risk Assessment," Loyola Marymount University, Dept. of Civil Engineering. Various years since 1998.

"Hazardous Waste Remediation" Loyola Marymount University, Dept. of Civil Engineering. Various years since 2006.

University of Southern California

"Air Pollution Controls," University of Southern California, Dept. of Civil Engineering, Fall 1993, Fall 1994.

"Air Pollution Fundamentals," University of Southern California, Dept. of Civil Engineering, Winter 1994.

University of California, Los Angeles

"Air Pollution Fundamentals," University of California, Los Angeles, Dept. of Civil and Environmental Engineering, Spring 1994, Spring 1999, Spring 2000, Spring 2003, Spring 2006, Spring 2007, Spring 2008, Spring 2009.

International Programs

"Environmental Planning and Management," 5 week program for visiting Chinese delegation, 1994.

"Environmental Planning and Management," 1 day program for visiting Russian delegation, 1995.

"Air Pollution Planning and Management," IEP, UCR, Spring 1996.

"Environmental Issues and Air Pollution," IEP, UCR, October 1996.

PROFESSIONAL AFFILIATIONS AND HONORS

President of India Gold Medal, IIT Kharagpur, India, 1983.

Member of the Alternatives Assessment Committee of the Grand Canyon Visibility Transport Commission, established by the Clean Air Act Amendments of 1990, 1992.

American Society of Mechanical Engineers: Los Angeles Section Executive Committee, Heat Transfer Division, and Fuels and Combustion Technology Division, 1987-mid-1990s.

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Air and Waste Management Association, West Coast Section, 1989-mid-2000s

PROFESSIONAL CERTIFICATIONS

EIT, California (#XE088305), 1993.

REA I, California (#07438), 2000.

Certified Permitting Professional, South Coast AQMD (#C8320), since 1993.

QEP, Institute of Professional Environmental Practice, since 2000.

CEM, State of Nevada (#EM-1699). Expiration 10/07/2021.

PUBLICATIONS (PARTIAL LIST)

"Physical Properties and Oxidation Rates of Chars from Bituminous Coals," with Y.A. Levendis, R.C. Flagan and G.R. Gavalas, *Fuel*, **67**, 275-283 (1988).

"Char Combustion: Measurement and Analysis of Particle Temperature Histories," with R.C. Flagan, G.R. Gavalas and P.S. Northrop, *Comb. Sci. Tech.* **60**, 215-230 (1988).

"On the Combustion of Bituminous Coal Chars," PhD Thesis, California Institute of Technology (1988).

"Optical Pyrometry: A Powerful Tool for Coal Combustion Diagnostics," *J. Coal Quality*, **8**, 17-22 (1989).

"Post-Ignition Transients in the Combustion of Single Char Particles," with Y.A. Levendis, R.C. Flagan and G.R. Gavalas, *Fuel*, **68**, 849-855 (1989).

"A Model for Single Particle Combustion of Bituminous Coal Char." Proc. ASME National Heat Transfer Conference, Philadelphia, **HTD-Vol. 106**, 505-513 (1989).

"Discrete Simulation of Cenospheric Coal-Char Combustion," with R.C. Flagan and G.R. Gavalas, *Combust. Flame*, **77**, 337-346 (1989).

"Particle Measurements in Coal Combustion," with R.C. Flagan, in "**Combustion Measurements**" (ed. N. Chigier), Hemisphere Publishing Corp. (1991).

"Cross Linking in Pore Structures and Its Effect on Reactivity," with G.R. Gavalas in preparation.

"Natural Frequencies and Mode Shapes of Straight Tubes," Proprietary Report for Heat Transfer Research Institute, Alhambra, CA (1990).

"Optimal Tube Layouts for Kamui SL-Series Exchangers," with K. Ishihara, Proprietary Report for Kamui Company Limited, Tokyo, Japan (1990).

"HTRI Process Heater Conceptual Design," Proprietary Report for Heat Transfer Research Institute, Alhambra, CA (1990).

"Asymptotic Theory of Transonic Wind Tunnel Wall Interference," with N.D. Malmuth and others, Arnold Engineering Development Center, Air Force Systems Command, USAF (1990).

"Gas Radiation in a Fired Heater Convection Section," Proprietary Report for Heat Transfer Research Institute, College Station, TX (1990).

"Heat Transfer and Pressure Drop in NTIW Heat Exchangers," Proprietary Report for Heat Transfer Research Institute, College Station, TX (1991).

"NOx Control and Thermal Design," Thermal Engineering Tech Briefs, (1994).

"From Purchase of Landmark Environmental Insurance to Remediation: Case Study in Henderson, Nevada," with Robin E. Bain and Jill Quillin, presented at the AQMA Annual Meeting, Florida, 2001.

"The Jones Act Contribution to Global Warming, Acid Rain and Toxic Air Contaminants," with Charles W. Botsford, presented at the AQMA Annual Meeting, Florida, 2001.

PRESENTATIONS (PARTIAL LIST)

"Pore Structure and Combustion Kinetics - Interpretation of Single Particle Temperature-Time Histories," with P.S. Northrop, R.C. Flagan and G.R. Gavalas, presented at the AIChE Annual Meeting, New York (1987).

"Measurement of Temperature-Time Histories of Burning Single Coal Char Particles," with R.C. Flagan, presented at the American Flame Research Committee Fall International Symposium, Pittsburgh, (1988).

"Physical Characterization of a Cenospheric Coal Char Burned at High Temperatures," with R.C. Flagan and G.R. Gavalas, presented at the Fall Meeting of the Western States Section of the Combustion Institute, Laguna Beach, California (1988).

"Control of Nitrogen Oxide Emissions in Gas Fired Heaters - The Retrofit Experience," with G. P. Croce and R. Patel, presented at the International Conference on Environmental Control of Combustion Processes (Jointly sponsored by the American Flame Research Committee and the Japan Flame Research Committee), Honolulu, Hawaii (1991).

"Air Toxics - Past, Present and the Future," presented at the Joint AIChE/AAEE Breakfast Meeting at the AIChE 1991 Annual Meeting, Los Angeles, California, November 17-22 (1991).

"Air Toxics Emissions and Risk Impacts from Automobiles Using Reformulated Gasolines," presented at the Third Annual Current Issues in Air Toxics Conference, Sacramento, California, November 9-10 (1992).

"Air Toxics from Mobile Sources," presented at the Environmental Health Sciences (ESE) Seminar Series, UCLA, Los Angeles, California, November 12, (1992).

"Kilns, Ovens, and Dryers - Present and Future," presented at the Gas Company Air Quality Permit Assistance Seminar, Industry Hills Sheraton, California, November 20, (1992).

"The Design and Implementation of Vehicle Scrapping Programs," presented at the 86th Annual Meeting of the Air and Waste Management Association, Denver, Colorado, June 12, 1993.

"Air Quality Planning and Control in Beijing, China," presented at the 87th Annual Meeting of the Air and Waste Management Association, Cincinnati, Ohio, June 19-24, 1994.

Annex A

Expert Litigation Support

A. Occasions where Dr. Sahu has provided Written or Oral testimony before Congress:

1. In July 2012, provided expert written and oral testimony to the House Subcommittee on Energy and the Environment, Committee on Science, Space, and Technology at a Hearing entitled "Hitting the Ethanol Blend Wall – Examining the Science on E15."

B. Matters for which Dr. Sahu has provided affidavits and expert reports include:

2. Affidavit for Rocky Mountain Steel Mills, Inc. located in Pueblo Colorado – dealing with the technical uncertainties associated with night-time opacity measurements in general and at this steel mini-mill.
3. Expert reports and depositions (2/28/2002 and 3/1/2002; 12/2/2003 and 12/3/2003; 5/24/2004) on behalf of the United States in connection with the Ohio Edison NSR Cases. *United States, et al. v. Ohio Edison Co., et al.*, C2-99-1181 (Southern District of Ohio).
4. Expert reports and depositions (5/23/2002 and 5/24/2002) on behalf of the United States in connection with the Illinois Power NSR Case. *United States v. Illinois Power Co., et al.*, 99-833-MJR (Southern District of Illinois).
5. Expert reports and depositions (11/25/2002 and 11/26/2002) on behalf of the United States in connection with the Duke Power NSR Case. *United States, et al. v. Duke Energy Corp.*, 1:00-CV-1262 (Middle District of North Carolina).
6. Expert reports and depositions (10/6/2004 and 10/7/2004; 7/10/2006) on behalf of the United States in connection with the American Electric Power NSR Cases. *United States, et al. v. American Electric Power Service Corp., et al.*, C2-99-1182, C2-99-1250 (Southern District of Ohio).
7. Affidavit (March 2005) on behalf of the Minnesota Center for Environmental Advocacy and others in the matter of the Application of Heron Lake BioEnergy LLC to construct and operate an ethanol production facility – submitted to the Minnesota Pollution Control Agency.
8. Expert Report and Deposition (10/31/2005 and 11/1/2005) on behalf of the United States in connection with the East Kentucky Power Cooperative NSR Case. *United States v. East Kentucky Power Cooperative, Inc.*, 5:04-cv-00034-KSF (Eastern District of Kentucky).
9. Affidavits and deposition on behalf of Basic Management Inc. (BMI) Companies in connection with the BMI vs. USA remediation cost recovery Case.
10. Expert Report on behalf of Penn Future and others in the Cambria Coke plant permit challenge in Pennsylvania.
11. Expert Report on behalf of the Appalachian Center for the Economy and the Environment and others in the Western Greenbrier permit challenge in West Virginia.
12. Expert Report, deposition (via telephone on January 26, 2007) on behalf of various Montana petitioners (Citizens Awareness Network (CAN), Women's Voices for the Earth (WVE) and the Clark Fork Coalition (CFC)) in the Thompson River Cogeneration LLC Permit No. 3175-04 challenge.
13. Expert Report and deposition (2/2/07) on behalf of the Texas Clean Air Cities Coalition at the Texas State Office of Administrative Hearings (SOAH) in the matter of the permit challenges to TXU Project Apollo's eight new proposed PRB-fired PC boilers located at seven TX sites.
14. Expert Testimony (July 2007) on behalf of the Izaak Walton League of America and others in connection with the acquisition of power by Xcel Energy from the proposed Gascoyne Power Plant – at the State of

Minnesota, Office of Administrative Hearings for the Minnesota PUC (MPUC No. E002/CN-06-1518; OAH No. 12-2500-17857-2).

15. Affidavit (July 2007) Comments on the Big Cajun I Draft Permit on behalf of the Sierra Club – submitted to the Louisiana DEQ.

16. Expert Report and Deposition (12/13/2007) on behalf of Commonwealth of Pennsylvania – Dept. of Environmental Protection, State of Connecticut, State of New York, and State of New Jersey (Plaintiffs) in connection with the Allegheny Energy NSR Case. *Plaintiffs v. Allegheny Energy Inc., et al.*, 2:05cv0885 (Western District of Pennsylvania).

17. Expert Reports and Pre-filed Testimony before the Utah Air Quality Board on behalf of Sierra Club in the Sevier Power Plant permit challenge.

18. Expert Report and Deposition (October 2007) on behalf of MTD Products Inc., in connection with *General Power Products, LLC v MTD Products Inc.*, 1:06 CVA 0143 (Southern District of Ohio, Western Division) .

19. Expert Report and Deposition (June 2008) on behalf of Sierra Club and others in the matter of permit challenges (Title V: 28.0801-29 and PSD: 28.0803-PSD) for the Big Stone II unit, proposed to be located near Milbank, South Dakota.

20. Expert Reports, Affidavit, and Deposition (August 15, 2008) on behalf of Earthjustice in the matter of air permit challenge (CT-4631) for the Basin Electric Dry Fork station, under construction near Gillette, Wyoming before the Environmental Quality Council of the State of Wyoming.

21. Affidavits (May 2010/June 2010 in the Office of Administrative Hearings))/Declaration and Expert Report (November 2009 in the Office of Administrative Hearings) on behalf of NRDC and the Southern Environmental Law Center in the matter of the air permit challenge for Duke Cliffside Unit 6. Office of Administrative Hearing Matters 08 EHR 0771, 0835 and 0836 and 09 HER 3102, 3174, and 3176 (consolidated).

22. Declaration (August 2008), Expert Report (January 2009), and Declaration (May 2009) on behalf of Southern Alliance for Clean Energy in the matter of the air permit challenge for Duke Cliffside Unit 6. *Southern Alliance for Clean Energy et al., v. Duke Energy Carolinas, LLC*, Case No. 1:08-cv-00318-LHT-DLH (Western District of North Carolina, Asheville Division).

23. Declaration (August 2008) on behalf of the Sierra Club in the matter of Dominion Wise County plant MACT.us

24. Expert Report (June 2008) on behalf of Sierra Club for the Green Energy Resource Recovery Project, MACT Analysis.

25. Expert Report (February 2009) on behalf of Sierra Club and the Environmental Integrity Project in the matter of the air permit challenge for NRG Limestone's proposed Unit 3 in Texas.

26. Expert Report (June 2009) on behalf of MTD Products, Inc., in the matter of *Alice Holmes and Vernon Holmes v. Home Depot USA, Inc., et al.*

27. Expert Report (August 2009) on behalf of Sierra Club and the Southern Environmental Law Center in the matter of the air permit challenge for Santee Cooper's proposed Pee Dee plant in South Carolina).

28. Statements (May 2008 and September 2009) on behalf of the Minnesota Center for Environmental Advocacy to the Minnesota Pollution Control Agency in the matter of the Minnesota Haze State Implementation Plans.

29. Expert Report (August 2009) on behalf of Environmental Defense, in the matter of permit challenges to the proposed Las Brisas coal fired power plant project at the Texas State Office of Administrative Hearings (SOAH).

30. Expert Report and Rebuttal Report (September 2009) on behalf of the Sierra Club, in the matter of challenges to the proposed Medicine Bow Fuel and Power IGL plant in Cheyenne, Wyoming.

31. Expert Report (December 2009) and Rebuttal reports (May 2010 and June 2010) on behalf of the United States in connection with the Alabama Power Company NSR Case. *United States v. Alabama Power Company*, CV-01-HS-152-S (Northern District of Alabama, Southern Division).

32. Pre-filed Testimony (October 2009) on behalf of Environmental Defense and others, in the matter of challenges to the proposed White Stallion Energy Center coal fired power plant project at the Texas State Office of Administrative Hearings (SOAH).

33. Pre-filed Testimony (July 2010) and Written Rebuttal Testimony (August 2010) on behalf of the State of New Mexico Environment Department in the matter of Proposed Regulation 20.2.350 NMAC – *Greenhouse Gas Cap and Trade Provisions*, No. EIB 10-04 (R), to the State of New Mexico, Environmental Improvement Board.

34. Expert Report (August 2010) and Rebuttal Expert Report (October 2010) on behalf of the United States in connection with the Louisiana Generating NSR Case. *United States v. Louisiana Generating, LLC*, 09-CV100-RET-CN (Middle District of Louisiana) – Liability Phase.

35. Declaration (August 2010), Reply Declaration (November 2010), Expert Report (April 2011), Supplemental and Rebuttal Expert Report (July 2011) on behalf of the United States in the matter of DTE Energy Company and Detroit Edison Company (Monroe Unit 2). *United States of America v. DTE Energy Company and Detroit Edison Company*, Civil Action No. 2:10-cv-13101-BAF-RSW (Eastern District of Michigan).

36. Expert Report and Deposition (August 2010) as well as Affidavit (September 2010) on behalf of Kentucky Waterways Alliance, Sierra Club, and Valley Watch in the matter of challenges to the NPDES permit issued for the Trimble County power plant by the Kentucky Energy and Environment Cabinet to Louisville Gas and Electric, File No. DOW-41106-047.

37. Expert Report (August 2010), Rebuttal Expert Report (September 2010), Supplemental Expert Report (September 2011), and Declaration (November 2011) on behalf of Wild Earth Guardians in the matter of opacity exceedances and monitor downtime at the Public Service Company of Colorado (Xcel)'s Cherokee power plant. No. 09-cv-1862 (District of Colorado).

38. Written Direct Expert Testimony (August 2010) and Affidavit (February 2012) on behalf of Fall-Line Alliance for a Clean Environment and others in the matter of the PSD Air Permit for Plant Washington issued by Georgia DNR at the Office of State Administrative Hearing, State of Georgia (OSAH-BNR-AQ-1031707-98-WALKER).

39. Deposition (August 2010) on behalf of Environmental Defense, in the matter of the remanded permit challenge to the proposed Las Brisas coal fired power plant project at the Texas State Office of Administrative Hearings (SOAH).

40. Expert Report, Supplemental/Rebuttal Expert Report, and Declarations (October 2010, November 2010, September 2012) on behalf of New Mexico Environment Department (Plaintiff-Intervenor), Grand Canyon Trust and Sierra Club (Plaintiffs) in the matter of *Plaintiffs v. Public Service Company of New Mexico* (PNM), Civil No. 1:02-CV-0552 BB/ATC (ACE) (District of New Mexico).

41. Expert Report (October 2010) and Rebuttal Expert Report (November 2010) (BART Determinations for PSCo Hayden and CSU Martin Drake units) to the Colorado Air Quality Commission on behalf of Coalition of Environmental Organizations.

42. Expert Report (November 2010) (BART Determinations for TriState Craig Units, CSU Nixon Unit, and PRPA Rawhide Unit) to the Colorado Air Quality Commission on behalf of Coalition of Environmental Organizations.

43. Declaration (November 2010) on behalf of the Sierra Club in connection with the Martin Lake Station Units 1, 2, and 3. *Sierra Club v. Energy Future Holdings Corporation and Luminant Generation Company LLC*, Case No. 5:10-cv-00156-DF-CMC (Eastern District of Texas, Texarkana Division).

44. Pre-Filed Testimony (January 2011) and Declaration (February 2011) to the Georgia Office of State Administrative Hearings (OSAH) in the matter of Minor Source HAPs status for the proposed Longleaf Energy Associates power plant (OSAH-BNR-AQ-1115157-60-HOWELLS) on behalf of the Friends of the Chattahoochee and the Sierra Club).

45. Declaration (February 2011) in the matter of the Draft Title V Permit for RRI Energy MidAtlantic Power Holdings LLC Shawville Generating Station (Pennsylvania), ID No. 17-00001 on behalf of the Sierra Club.

46. Expert Report (March 2011), Rebuttal Expert Report (June 2011) on behalf of the United States in *United States of America v. Cemex, Inc.*, Civil Action No. 09-cv-00019-MSK-MEH (District of Colorado).

47. Declaration (April 2011) and Expert Report (July 16, 2012) in the matter of the Lower Colorado River Authority (LCRA)'s Fayette (Sam Seymour) Power Plant on behalf of the Texas Campaign for the Environment. *Texas Campaign for the Environment v. Lower Colorado River Authority*, Civil Action No. 4:11-cv-00791 (Southern District of Texas, Houston Division).

48. Declaration (June 2011) on behalf of the Plaintiffs MYTAPN in the matter of Microsoft-Yes, Toxic Air Pollution-No (MYTAPN) v. State of Washington, Department of Ecology and Microsoft Corporation Columbia Data Center to the Pollution Control Hearings Board, State of Washington, Matter No. PCHB No. 10-162.

49. Expert Report (June 2011) on behalf of the New Hampshire Sierra Club at the State of New Hampshire Public Utilities Commission, Docket No. 10-261 – the 2010 Least Cost Integrated Resource Plan (LCIRP) submitted by the Public Service Company of New Hampshire (re. Merrimack Station Units 1 and 2).

50. Declaration (August 2011) in the matter of the Sandy Creek Energy Associates L.P. Sandy Creek Power Plant on behalf of Sierra Club and Public Citizen. *Sierra Club, Inc. and Public Citizen, Inc. v. Sandy Creek Energy Associates, L.P.*, Civil Action No. A-08-CA-648-LY (Western District of Texas, Austin Division).

51. Expert Report (October 2011) on behalf of the Defendants in the matter of *John Quiles and Jeanette Quiles et al. v. Bradford-White Corporation, MTD Products, Inc., Kohler Co., et al.*, Case No. 3:10-cv-747 (TJM/DEP) (Northern District of New York).

52. Declaration (October 2011) on behalf of the Plaintiffs in the matter of *American Nurses Association et. al. (Plaintiffs), v. US EPA (Defendant)*, Case No. 1:08-cv-02198-RMC (US District Court for the District of Columbia).

53. Declaration (February 2012) and Second Declaration (February 2012) in the matter of *Washington Environmental Council and Sierra Club Washington State Chapter v. Washington State Department of Ecology and Western States Petroleum Association*, Case No. 11-417-MJP (Western District of Washington).

54. Expert Report (March 2012) and Supplemental Expert Report (November 2013) in the matter of *Environment Texas Citizen Lobby, Inc and Sierra Club v. ExxonMobil Corporation et al.*, Civil Action No. 4:10-cv-4969 (Southern District of Texas, Houston Division).

55. Declaration (March 2012) in the matter of *Center for Biological Diversity, et al. v. United States Environmental Protection Agency*, Case No. 11-1101 (consolidated with 11-1285, 11-1328 and 11-1336) (US Court of Appeals for the District of Columbia Circuit).

56. Declaration (March 2012) in the matter of *Sierra Club v. The Kansas Department of Health and Environment*, Case No. 11-105,493-AS (Holcomb power plant) (Supreme Court of the State of Kansas).

57. Declaration (March 2012) in the matter of the Las Brisas Energy Center *Environmental Defense Fund et al., v. Texas Commission on Environmental Quality*, Cause No. D-1-GN-11-001364 (District Court of Travis County, Texas, 261st Judicial District).

58. Expert Report (April 2012), Supplemental and Rebuttal Expert Report (July 2012), and Supplemental Rebuttal Expert Report (August 2012) on behalf of the states of New Jersey and Connecticut in the matter of the Portland Power plant *State of New Jersey and State of Connecticut (Intervenor-Plaintiff) v. RRI Energy Mid-Atlantic Power Holdings et al.*, Civil Action No. 07-CV-5298 (JKG) (Eastern District of Pennsylvania).

59. Declaration (April 2012) in the matter of the EPA's EGU MATS Rule, on behalf of the Environmental Integrity Project.

60. Expert Report (August 2012) on behalf of the United States in connection with the Louisiana Generating NSR Case. *United States v. Louisiana Generating, LLC*, 09-CV100-RET-CN (Middle District of Louisiana) – Harm Phase.

61. Declaration (September 2012) in the Matter of the Application of *Energy Answers Incinerator, Inc.* for a Certificate of Public Convenience and Necessity to Construct a 120 MW Generating Facility in Baltimore City, Maryland, before the Public Service Commission of Maryland, Case No. 9199.

62. Expert Report (October 2012) on behalf of the Appellants (Robert Concilus and Leah Humes) in the matter of Robert Concilus and Leah Humes v. Commonwealth of Pennsylvania Department of Environmental Protection and Crawford Renewable Energy, before the Commonwealth of Pennsylvania Environmental Hearing Board, Docket No. 2011-167-R.

63. Expert Report (October 2012), Supplemental Expert Report (January 2013), and Affidavit (June 2013) in the matter of various Environmental Petitioners v. North Carolina DENR/DAQ and Carolinas Cement Company, before the Office of Administrative Hearings, State of North Carolina.

64. Pre-filed Testimony (October 2012) on behalf of No-Sag in the matter of the North Springfield Sustainable Energy Project before the State of Vermont, Public Service Board.

65. Pre-filed Testimony (November 2012) on behalf of Clean Wisconsin in the matter of Application of Wisconsin Public Service Corporation for Authority to Construct and Place in Operation a New Multi-Pollutant Control Technology System (ReACT) for Unit 3 of the Weston Generating Station, before the Public Service Commission of Wisconsin, Docket No. 6690-CE-197.

66. Expert Report (February 2013) on behalf of Petitioners in the matter of Credence Crematory, Cause No. 12-A-J-4538 before the Indiana Office of Environmental Adjudication.

67. Expert Report (April 2013), Rebuttal report (July 2013), and Declarations (October 2013, November 2013) on behalf of the Sierra Club in connection with the Luminant Big Brown Case. *Sierra Club v. Energy Future Holdings Corporation and Luminant Generation Company LLC*, Civil Action No. 6:12-cv-00108-WSS (Western District of Texas, Waco Division).

68. Declaration (April 2013) on behalf of Petitioners in the matter of *Sierra Club, et al., (Petitioners) v Environmental Protection Agency et al. (Resppondents)*, Case No., 13-1112, (Court of Appeals, District of Columbia Circuit).

69. Expert Report (May 2013) and Rebuttal Expert Report (July 2013) on behalf of the Sierra Club in connection with the Luminant Martin Lake Case. *Sierra Club v. Energy Future Holdings Corporation and Luminant Generation Company LLC*, Civil Action No. 5:10-cv-0156-MHS-CMC (Eastern District of Texas, Texarkana Division).

70. Declaration (August 2013) on behalf of A. J. Acosta Company, Inc., in the matter of *A. J. Acosta Company, Inc., v. County of San Bernardino*, Case No. CIVSS803651.

71. Comments (October 2013) on behalf of the Washington Environmental Council and the Sierra Club in the matter of the Washington State Oil Refinery RACT (for Greenhouse Gases), submitted to the Washington State Department of Ecology, the Northwest Clean Air Agency, and the Puget Sound Clean Air Agency.

72. Statement (November 2013) on behalf of various Environmental Organizations in the matter of the Boswell Energy Center (BEC) Unit 4 Environmental Retrofit Project, to the Minnesota Public Utilities Commission, Docket No. E-015/M-12-920.

73. Expert Report (December 2013) on behalf of the United States in *United States of America v. Ameren Missouri*, Civil Action No. 4:11-cv-00077-RWS (Eastern District of Missouri, Eastern Division).

74. Expert Testimony (December 2013) on behalf of the Sierra Club in the matter of Public Service Company of New Hampshire Merrimack Station Scrubber Project and Cost Recovery, Docket No. DE 11-250, to the State of New Hampshire Public Utilities Commission.

75. Expert Report (January 2014) on behalf of Baja, Inc., in *Baja, Inc., v. Automotive Testing and Development Services, Inc. et. al*, Civil Action No. 8:13-CV-02057-GRA (District of South Carolina, Anderson/Greenwood Division).

76. Declaration (March 2014) on behalf of the Center for International Environmental Law, Chesapeake Climate Action Network, Friends of the Earth, Pacific Environment, and the Sierra Club (Plaintiffs) in the matter of *Plaintiffs v. the Export-Import Bank (Ex-Im Bank) of the United States*, Civil Action No. 13-1820 RC (District Court for the District of Columbia).

77. Declaration (April 2014) on behalf of Respondent-Intervenors in the matter of *Mexichem Specialty Resins Inc., et al., (Petitioners) v Environmental Protection Agency et al.*, Case No., 12-1260 (and Consolidated Case Nos. 12-1263, 12-1265, 12-1266, and 12-1267), (Court of Appeals, District of Columbia Circuit).

78. Direct Prefiled Testimony (June 2014) on behalf of the Michigan Environmental Council and the Sierra Club in the matter of the Application of DTE Electric Company for Authority to Implement a Power Supply Cost Recovery (PSCR) Plan in its Rate Schedules for 2014 Metered Jurisdictional Sales of Electricity, Case No. U-17319 (Michigan Public Service Commission).

79. Expert Report (June 2014) on behalf of ECM Biofilms in the matter of the US Federal Trade Commission (FTC) v. ECM Biofilms (FTC Docket #9358).

80. Direct Prefiled Testimony (August 2014) on behalf of the Michigan Environmental Council and the Sierra Club in the matter of the Application of Consumers Energy Company for Authority to Implement a Power Supply Cost Recovery (PSCR) Plan in its Rate Schedules for 2014 Metered Jurisdictional Sales of Electricity, Case No. U-17317 (Michigan Public Service Commission).

81. Declaration (July 2014) on behalf of Public Health Intervenors in the matter of *EME Homer City Generation v. US EPA* (Case No. 11-1302 and consolidated cases) relating to the lifting of the stay entered by the Court on December 30, 2011 (US Court of Appeals for the District of Columbia).

82. Expert Report (September 2014), Rebuttal Expert Report (December 2014) and Supplemental Expert Report (March 2015) on behalf of Plaintiffs in the matter of *Sierra Club and Montana Environmental Information Center (Plaintiffs) v. PPL Montana LLC, Avista Corporation, Puget Sound Energy, Portland General Electric Company, Northwestern Corporation, and Pacificorp (Defendants)*, Civil Action No. CV 13-32-BLG-DLC-JCL (US District Court for the District of Montana, Billings Division).

83. Expert Report (November 2014) on behalf of Niagara County, the Town of Lewiston, and the Villages of Lewiston and Youngstown in the matter of CWM Chemical Services, LLC New York State Department of Environmental Conservation (NYSDEC) Permit Application Nos.: 9-2934-00022/00225, 9-2934-00022/00231, 9-2934-00022/00232, and 9-2934-00022/00249 (pending).

84. *Declaration (January 2015) relating to Startup/Shutdown in the MATS Rule (EPA Docket ID No. EPA-HQ-OAR-2009-0234) on behalf of the Environmental Integrity Project.*

85. Pre-filed Direct Testimony (March 2015), Supplemental Testimony (May 2015), and Surrebuttal Testimony (December 2015) on behalf of Friends of the Columbia Gorge in the matter of the Application for a Site Certificate for the Troutdale Energy Center before the Oregon Energy Facility Siting Council.

86. Brief of Amici Curiae Experts in Air Pollution Control and Air Quality Regulation in Support of the Respondents, On Writs of Certiorari to the US Court of Appeals for the District of Columbia, No. 14-46, 47, 48. *Michigan et. al., (Petitioners) v. EPA et. al., Utility Air Regulatory Group (Petitioners) v. EPA et. al., National Mining Association et. al., (Petitioner) v. EPA et. al.*, (Supreme Court of the United States).

87. Expert Report (March 2015) and Rebuttal Expert Report (January 2016) on behalf of Plaintiffs in the matter of *Conservation Law Foundation v. Broadrock Gas Services LLC, Rhode Island LFG GENCO LLC, and Rhode Island Resource Recovery Corporation (Defendants)*, Civil Action No. 1:13-cv-00777-M-PAS (US District Court for the District of Rhode Island).

88. Declaration (April 2015) relating to various Technical Corrections for the MATS Rule (EPA Docket ID No. EPA-HQ-OAR-2009-0234) on behalf of the Environmental Integrity Project.

89. Direct Prefiled Testimony (May 2015) on behalf of the Michigan Environmental Council, the Natural Resources Defense Council, and the Sierra Club in the matter of the Application of DTE Electric Company for Authority to Increase its Rates, Amend its Rate Schedules and Rules Governing the Distribution and Supply of Electric Energy and for Miscellaneous Accounting Authority, Case No. U-17767 (Michigan Public Service Commission).

90. Expert Report (July 2015) and Rebuttal Expert Report (July 2015) on behalf of Plaintiffs in the matter of *Northwest Environmental Defense Center et. al., v. Cascade Kelly Holdings LLC, d/b/a Columbia Pacific Bio-Refinery, and Global Partners LP (Defendants)*, Civil Action No. 3:14-cv-01059-SI (US District Court for the District of Oregon, Portland Division).

91. Declaration (August 2015, Docket No. 1570376) in support of "Opposition of Respondent-Intervenors American Lung Association, et. al., to Tri-State Generation's Emergency Motion;" Declaration (September 2015, Docket No. 1574820) in support of "Joint Motion of the State, Local Government, and Public Health Respondent-Intervenors for Remand Without Vacatur," Declaration (October 2015) in support of "Joint Motion of the State, Local Government, and Public Health Respondent-Intervenors to State and Certain Industry Petitioners' Motion to Govern, *White Stallion Energy Center, LLC v. US EPA*, Case No. 12-1100 (US Court of Appeals for the District of Columbia).

92. Declaration (September 2015) in support of the Draft Title V Permit for Dickerson Generating Station (Proposed Permit No 24-031-0019) on behalf of the Environmental Integrity Project.

93. Expert Report (Liability Phase) (December 2015) and Rebuttal Expert Report (February 2016) on behalf of Plaintiffs in the matter of *Natural Resources Defense Council, Inc., Sierra Club, Inc., Environmental Law and Policy Center, and Respiratory Health Association v. Illinois Power Resources LLC, and Illinois Power Resources Generating LLC (Defendants)*, Civil Action No. 1:13-cv-01181 (US District Court for the Central District of Illinois, Peoria Division).

94. Declaration (December 2015) in support of the Petition to Object to the Title V Permit for Morgantown Generating Station (Proposed Permit No 24-017-0014) on behalf of the Environmental Integrity Project.

95. Expert Report (November 2015) on behalf of Appellants in the matter of *Sierra Club, et al. v. Craig W. Butler, Director of Ohio Environmental Protection Agency et al.*, ERAC Case No. 14-256814.

96. Affidavit (January 2016) on behalf of Bridgewatch Detroit in the matter of *Bridgewatch Detroit v. Waterfront Petroleum Terminal Co., and Waterfront Terminal Holdings, LLC.*, in the Circuit Court for the County of Wayne, State of Michigan.

97. Expert Report (February 2016) and Rebuttal Expert Report (July 2016) on behalf of the challengers in the matter of the Delaware Riverkeeper Network, Clean Air Council, et. al., vs. Commonwealth of Pennsylvania Department of Environmental Protection and R. E. Gas Development LLC regarding the Geyer well site before the Pennsylvania Environmental Hearing Board.

98. Direct Testimony (May 2016) in the matter of Tesoro Savage LLC Vancouver Energy Distribution Terminal, Case No. 15-001 before the State of Washington Energy Facility Site Evaluation Council.

99. Declaration (June 2016) relating to deficiencies in air quality analysis for the proposed Millenium Bulk Terminal, Port of Longview, Washington.

100. Declaration (December 2016) relating to EPA's refusal to set limits on PM emissions from coal-fired power plants that reflect pollution reductions achievable with fabric filters on behalf of Environmental Integrity Project, Clean Air Council, Chesapeake Climate Action Network, Downwinders at Risk represented by Earthjustice in the matter of *ARIPPA v EPA, Case No. 15-1180*, (D.C. Circuit Court of Appeals).

101. Expert Report (January 2017) on the Environmental Impacts Analysis associated with the Huntley and Huntley Poseidon Well Pad on behalf citizens in the matter of the special exception use Zoning Hearing Board of Penn Township, Westmoreland County, Pennsylvania.

102. Expert Report (January 2017) on the Environmental Impacts Analysis associated with the Apex Energy Backus Well Pad on behalf citizens in the matter of the special exception use Zoning Hearing Board of Penn Township, Westmoreland County, Pennsylvania.

103. Expert Report (January 2017) on the Environmental Impacts Analysis associated with the Apex Energy Drakulic Well Pad on behalf citizens in the matter of the special exception use Zoning Hearing Board of Penn Township, Westmoreland County, Pennsylvania.

104. Expert Report (January 2017) on the Environmental Impacts Analysis associated with the Apex Energy Deutsch Well Pad on behalf citizens in the matter of the special exception use Zoning Hearing Board of Penn Township, Westmoreland County, Pennsylvania.

105. Affidavit (February 2017) pertaining to deficiencies water discharge compliance issues at the Wood River Refinery in the matter of *People of the State of Illinois (Plaintiff) v. Phillips 66 Company, ConocoPhillips Company, WRB Refining LP (Defendants)*, Case No. 16-CH-656, (Circuit Court for the Third Judicial Circuit, Madison County, Illinois).

106. Expert Report (March 2017) on behalf of the Plaintiff pertaining to non-degradation analysis for waste water discharges from a power plant in the matter of *Sierra Club (Plaintiff) v. Pennsylvania Department of Environmental Protection (PADEP) and Lackawanna Energy Center*, Docket No. 2016-047-L (consolidated), (Pennsylvania Environmental Hearing Board).

107. Expert Report (March 2017) on behalf of the Plaintiff pertaining to air emissions from the Heritage incinerator in East Liverpool, Ohio in the matter of *Save our County (Plaintiff) v. Heritage Thermal Services, Inc. (Defendant), Case No. 4:16-CV-1544-BYP*, (US District Court for the Northern District of Ohio, Eastern Division).

108. Rebuttal Expert Report (June 2017) on behalf of Plaintiffs in the matter of *Casey Voight and Julie Voight (Plaintiffs) v Coyote Creek Mining Company LLC (Defendant)*, Civil Action No. 1:15-CV-00109 (US District Court for the District of North Dakota, Western Division).

109. Expert Affidavit (August 2017) and Penalty/Remedy Expert Affidavit (October 2017) on behalf of Plaintiff in the matter of *Wildearth Guardians (Plaintiff) v Colorado Springs Utility Board (Defendant,)* Civil Action No. 1:15-cv-00357-CMA-CBS (US District Court for the District of Colorado).

110. Expert Report (August 2017) on behalf of Appellant in the matter of *Patricia Ann Troiano (Appellant) v. Upper Burrell Township Zoning Hearing Board (Appellee)*, Court of Common Pleas of Westmoreland County, Pennsylvania, Civil Division.

111. Expert Report (October 2017), Supplemental Expert Report (October 2017), and Rebuttal Expert Report (November 2017) on behalf of Defendant in the matter of *Oakland Bulk and Oversized Terminal (Plaintiff) v City of Oakland (Defendant,)* Civil Action No. 3:16-cv-07014-VC (US District Court for the Northern District of California, San Francisco Division).

112. Declaration (December 2017) on behalf of the Environmental Integrity Project in the matter of permit issuance for ATI Flat Rolled Products Holdings, Breckenridge, PA to the Allegheny County Health Department.

113. Expert Report (Harm Phase) (January 2018), Rebuttal Expert Report (Harm Phase) (May 2018) and Supplemental Expert Report (Harm Phase) (April 2019) on behalf of Plaintiffs in the matter of *Natural Resources Defense Council, Inc., Sierra Club, Inc., and Respiratory Health Association v. Illinois Power Resources LLC, and Illinois Power Resources Generating LLC (Defendants)*, Civil Action No. 1:13-cv-01181 (US District Court for the Central District of Illinois, Peoria Division).

114. Declaration (February 2018) on behalf of the Chesapeake Bay Foundation, et. al., in the matter of the Section 126 Petition filed by the state of Maryland in *State of Maryland v. Pruitt (Defendant)*, Civil Action No. JKB-17-2939 (Consolidated with No. JKB-17-2873) (US District Court for the District of Maryland).

115. Direct Pre-filed Testimony (March 2018) on behalf of the National Parks Conservation Association (NPCA) in the matter of *NPCA v State of Washington, Department of Ecology and BP West Coast Products, LLC*, PCHB No. 17-055 (Pollution Control Hearings Board for the State of Washington.

116. Expert Affidavit (April 2018) and Second Expert Affidavit (May 2018) on behalf of Petitioners in the matter of *Coosa River Basin Initiative and Sierra Club (Petitioners) v State of Georgia Environmental Protection Division, Georgia Department of Natural Resources (Respondent) and Georgia Power Company (Intervenor/Respondent)*, Docket Nos: 1825406-BNR-WW-57-Howells and 1826761-BNR-WW-57-Howells, Office of State Administrative Hearings, State of Georgia.

117. Direct Pre-filed Testimony and Affidavit (December 2018) on behalf of Sierra Club and Texas Campaign for the Environment (Appellants) in the contested case hearing before the Texas State Office of Administrative Hearings in Docket Nos. 582-18-4846, 582-18-4847 (Application of GCGV Asset Holding, LLC for Air Quality Permit Nos. 146425/PSDTX1518 and 146459/PSDTX1520 in San Patricio County, Texas).

118. Expert Report (February 2019) on behalf of Sierra Club in the State of Florida, Division of Administrative Hearings, Case No. 18-2124EPP, Tampa Electric Company Big Bend Unit 1 Modernization Project Power Plant Siting Application No. PA79-12-A2.

119. Declaration (March 2019) on behalf of Earthjustice in the matter of comments on the renewal of the Title V Federal Operating Permit for Valero Houston refinery.

120. Expert Report (March 2019) on behalf of Plaintiffs for Class Certification in the matter of *Resendez et al v Precision Castparts Corporation* in the Circuit Court for the State of Oregon, County of Multnomah, Case No. 16cv16164.

121. Expert Report (June 2019), Affidavit (July 2019) and Rebuttal Expert Report (September 2019) on behalf of Appellants relating to the NPDES permit for the Cheswick power plant in the matter of *Three Rivers Waterkeeper and Sierra Club (Appellants) v. State of Pennsylvania Department of Environmental Protection (Appellee) and NRG Power Midwest (Permittee)*, before the Commonwealth of Pennsylvania Environmental Hearing Board, EHB Docket No. 2018-088-R.

122. Affidavit/Expert Report (August 2019) relating to the appeal of air permits issued to PTTGCA on behalf of Appellants in the matter of *Sierra Club (Appellants) v. Craig Butler, Director, et. al., Ohio EPA (Appellees)* before the State of Ohio Environmental Review Appeals Commission (ERAC), Case Nos. ERAC-19-6988 through -6991.

123. Expert Report (October 2019) relating to the appeal of air permit (Plan Approval) on behalf of Appellants in the matter of *Clean Air Council and Environmental Integrity Project (Appellants) v. Commonwealth of Pennsylvania Department of Environmental Protection and Sunoco Partners Marketing and Terminals L.P.*, before the Commonwealth of Pennsylvania Environmental Hearing Board, EHB Docket No. 2018-057-L.

124. Expert Report (December 2019), Affidavit (March 2020), Supplemental Expert Report (July 2020), and Declaration (February 2021) on behalf of Earthjustice in the matter of *Objection to the Issuance of PSD/NSR and Title V permits for Riverview Energy Corporation*, Dale, Indiana, before the Indiana Office of Environmental Adjudication, Cause No. 19-A-J-5073.

125. Affidavit (December 2019) on behalf of Plaintiff-Intervenor (Surfrider Foundation) in the matter of *United States and the State of Indiana (Plaintiffs), Surfrider Foundation (Plaintiff-Intervenor), and City of Chicago (Plaintiff-Intervenor) v. United States Steel Corporation (Defendant)*, Civil Action No. 2:18-cv-00127 (US District Court for the Northern District of Indiana, Hammond Division).

126. Declarations (January 2020, February 2020, May 2020, July 2020, and August 2020) and Pre-filed Testimony (April 2021) in support of Petitioner's Motion for Stay of PSCAA NOC Order of Approval No. 11386 in the matter of the *Puyallup Tribe of Indians v. Puget Sound Clean Air Agency (PSCAA) and Puget Sound Energy (PSE)*, before the State of Washington Pollution Control Hearings Board, PCHB No. P19-088.

127. Expert Report (April 2020) on behalf of the plaintiff in the matter of Orion Engineered Carbons, GmbH (Plaintiff) vs. Evonik Operations, GmbH (formerly Evonik Degussa GmbH) (Respondent), before the German Arbitration Institute, Case No. DIS-SV-2019-00216.

128. Expert Independent Evaluation Report (June 2020) for *PacifiCorp's Decommissioning Costs Study Reports dated January 15, 2020 and March 13, 2020 relating to the closures of the Hunter, Huntington, Dave Johnston, Jim Bridger, Naughton, Wyodak, Hayden, and Colstrip (Units 3&4) plants*, prepared for the Oregon Public Utility Commission (Oregon PUC).

129. Direct Pre-filed Testimony (July 2020) on behalf of the Sierra Club in the matter of *the Application of the Ohio State University for a certificate of Environmental Compatibility and Public Need to Construct a Combined Heat and Power Facility in Franklin County, Ohio*, before the Ohio Power Siting Board, Case No. 19-1641-EL-BGN.

130. Expert Report (August 2020) and Rebuttal Expert Report (September 2020) on behalf of WildEarth Guardians (petitioners) in the matter of *the Appeals of the Air Quality Permit No. 7482-M1 Issued to 3 Bear Delaware Operating – NM LLC (EIB No. 20-21(A) and Registrations Nos. 8729, 8730, and 8733 under General Construction Permit for Oil and Gas Facilities (EIB No. 20-33 (A)*, before the State of New Mexico, Environmental Improvement Board.

131. Expert Report (July 2020) on the *Initial Economic Impact Analysis (EIA) for A Proposal To* Regulate *NOx Emissions from Natural Gas Fired Rich-Burn Natural Gas Reciprocating Internal Combustion Engines (RICE) Greater Than 100 Horsepower* prepared on behalf of Earthjustice and the National Parks Conservation Association in the matter of Regulation Number 7, Alternate Rules before the Colorado Air Quality Control Commission.

132. Expert Report (August 2020) and Supplemental Expert Report (February 2021) on the Potential Remedies to Avoid Adverse Thermal Impacts from the Merrimack Station on behalf of Plaintiffs in the matter of *Sierra Club Inc. and the* Conservation *Law Foundation (Plaintiffs) v. Granite Shore Power, LLC et. al., (Defendants)*, Civil Action No. 19-cv-216-JL (US District Court for the District of New Hampshire.)

133. Expert Report (August 2020) and Supplemental Expert Report (December 2020) on behalf of Plaintiffs in the matter of *PennEnvironment Inc., and Clean Air Council (Plaintiffs) and Allegheny County Health Department (Plaintiff-Intervenor) v. United States Steel Corporation (Defendant)*, Civil Action No. 2-19-cv-00484-MJH (US District Court for the Western District of Pennsylvania.)

134. Pre-filed Direct Testimony (October 2020) and Sur-rebuttal Testimony (November 2020) on behalf of petitioners (Ten Persons Group, including citizens, the Town of Braintree, the Town of Hingham, and the City of Quincy) in the matter of Algonquin Gas Transmission LLC, Weymouth MA, No. X266786 Air Quality Plan Approval, before the Commonwealth of Massachusetts, Department of Environmental Protection, the Office of Appeals and Dispute Resolution, OADR Docket Nos. 2019-008, 2019-009, 2019010, 2019-011, 2019-012 and 2019-013.

135. Expert Report (November 2020) on behalf of Protect PT in the matter of *Protect PT v. Commonwealth of Pennsylvania Department of Environmental Protection and Apex Energy (PA) LLC*, before the Commonwealth of Pennsylvania Environmental Hearing Board, Docket No. 2018-080-R (consolidated with 2019-101-R)(the "Drakulic Appeal").

136. Expert Report (December 2020) on behalf of Plaintiffs in the matter of *Sierra Club Inc. (Plaintiff) v. GenOn Power Midwest LP (Defendants)*, Civil Action No. 2-19-cv-01284-WSS (US District Court for the Western District of Pennsylvania.)

137. Pre-filed Testimony (January 2021) on behalf of the Plaintiffs (Shrimpers and Fishermen of the Rio Grande Valley represented by Texas RioGrande Legal Aid, Inc.) in the matter of the Appeal of Texas Commission on Environmental Quality (TCEQ) Permit Nos. 147681, PSDTX1522, GHGPSDTX172 for the Jupiter Brownsville Heavy Condensate Upgrader Facility, Cameron County, before the Texas State Office of Administrative Hearings, SOAH Docket No. 582-21-0111, TCEQ Docket No. 2020-1080-AIR.

138. Expert Report (June 2021) and Declarations (May 2021 and June 2021) on behalf of Plaintiffs in the matter of *Sierra Club (Plaintiff) v. Woodville Pellets, LLC (Defendant)*, Civil Action No. 9:20-cv-00178-MJT (US District Court for the Eastern District of Texas, Lufkin Division.)

139. Declaration (July 2021) on behalf of Plaintiffs in the matter of *Stephanie Mackey and Nick Migliore, on behalf of themselves and all others similarly situated (Plaintiffs) v. Chemtool Inc. and Lubrizol Corporation (Defendants)*, Case No. 2021-L-0000165, State of Illinois, Circuit Court of the 17th Judicial Circuit, Winnebago County.

140. Expert Report (April 2021) and Sur-Rebuttal Report (June 2021) on behalf of the Plaintiffs in the matter of *Modern Holdings, LLC, et al. (Plaintiffs) v. Corning Inc., et al. (Defendants)*, Civil Action No. 5:13-cv-00405-GFVT, (US District Court for the Eastern District of Kentucky, Central Division at Lexington).

141. Expert Witness Disclosure (June 2021) on behalf of the Plaintiffs in the matter of *Jay Burdick, et. al., (Plaintiffs) v. Tanoga Inc. (d/b/a Taconic) (Defendant)*, Index No. 253835, (State of New York Supreme Court, County of Rensselaer).

142. Expert Report (June 2021) on behalf of Appellants in the matter of *PennEnvironment and Earthworks (Appellants) v. Commonwealth of Pennsylvania Department of Environmental Protection (Appellee) and MarkWest Liberty Midstream and resource, LLC (Permittee)*, before the Commonwealth of Pennsylvania Environmental Hearing Board, EHB Docket No. 2020-002-R.

143. Expert Reports (March 2021 and May 2021) regarding the Aries Newark LLC Sludge Processing Facility, Application No. CPB 20-74, Central Planning Board, City of Newark, New Jersey.

144. Expert Report (April 2021) for *Charles Johnson Jr. (Plaintiff) v. BP Exploration and Production Inc., et. al. (Defendant)*, Civil Action No. 2:20-CV-01329, (US District Court for the Eastern District of Louisiana, New Orleans Division)

145. Expert Report (April 2021) for *Floyd Ruffin (Plaintiff), v. BP Exploration and Production Inc., et. al. (Defendant)*, Civil Action No. 2:20-cv-00334-CJB-JCW (US District Court for the Eastern District of Louisiana, New Orleans Division).

146. Expert Report (May 2021) for *Clifford Osmer (Plaintiff) v. BP Exploration and Production Inc., et. al., (Defendants)* related to No. 2:19-CV-10331 (US District Court for the Eastern District of Louisiana, New Orleans Division).

147. Expert Report (June 2021) for *Antonia Saavedra-Vargas (Plaintiff) v. BP Exploration and Production Inc., et. al. (Defendant)*, Civil Action No. 2:18-CV-11461 (US District Court for the Eastern District of Louisiana, New Orleans Division).

148. Affidavit (June 2021) for Lourdes Rubi in the matter of *Lourdes Rubi (Plaintiff) v. BP Exploration and Production Inc., et. al., (Defendants)*, related to 12-968 BELO in MDL No. 2179 (US District Court for the Eastern District of Louisiana, New Orleans Division).

149. Expert Report (May 2021) for *James Noel (Plaintiff) v. BP Exploration and Production Inc., et. al. (Defendant)*, Civil Action No. 1:19-CV-00694 (US District Court for the Southern District of Alabama, Mobile Division).

150. Expert Report (June 2021) for *Wallace Smitht (Plaintiff) v. BP Exploration and Production Inc., et. al. (Defendant)*, Civil Action No. 2:19-CV-12880 (US District Court for the Eastern District of Louisiana, New Orleans Division).

C. Occasions where Dr. Sahu has provided oral testimony in depositions, at trial or in similar proceedings include the following:

151. Deposition on behalf of Rocky Mountain Steel Mills, Inc. located in Pueblo, Colorado - dealing with the manufacture of steel in mini-mills including methods of air pollution control and BACT in steel mini-mills and opacity issues at this steel mini-mill.

152. Trial Testimony (February 2002) on behalf of Rocky Mountain Steel Mills, Inc. in Denver District Court.

153. Trial Testimony (February 2003) on behalf of the United States in the Ohio Edison NSR Cases, *United States, et al. v. Ohio Edison Co., et al.*, C2-99-1181 (Southern District of Ohio).

154. Trial Testimony (June 2003) on behalf of the United States in the Illinois Power NSR Case, *United States v. Illinois Power Co., et al.*, 99-833-MJR (Southern District of Illinois).

155. Deposition (10/20/2005) on behalf of the United States in connection with the Cinergy NSR Case. *United States, et* al. *v. Cinergy Corp., et al.*, IP 99-1693-C-M/S (Southern District of Indiana).

156. Oral Testimony (August 2006) on behalf of the Appalachian Center for the Economy and the Environment re. the Western Greenbrier plant, WV before the West Virginia DEP.

157. Oral Testimony (May 2007) on behalf of various Montana petitioners (Citizens Awareness Network (CAN), Women's Voices for the Earth (WVE) and the Clark Fork Coalition (CFC)) re. the Thompson River Cogeneration plant before the Montana Board of Environmental Review.

158. Oral Testimony (October 2007) on behalf of the Sierra Club re. the Sevier Power Plant before the Utah Air Quality Board.

159. Oral Testimony (August 2008) on behalf of the Sierra Club and Clean Water re. Big Stone Unit II before the South Dakota Board of Minerals and the Environment.

160. Oral Testimony (February 2009) on behalf of the Sierra Club and the Southern Environmental Law Center re. Santee Cooper Pee Dee units before the South Carolina Board of Health and Environmental Control.

161. Oral Testimony (February 2009) on behalf of the Sierra Club and the Environmental Integrity Project re. NRG Limestone Unit 3 before the Texas State Office of Administrative Hearings (SOAH) Administrative Law Judges.

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162. Deposition (July 2009) on behalf of MTD Products, Inc., in the matter of *Alice Holmes and Vernon Holmes v. Home Depot USA, Inc., et al.*

163. Deposition (October 2009) on behalf of Environmental Defense and others, in the matter of challenges to the proposed Coleto Creek coal fired power plant project at the Texas State Office of Administrative Hearings (SOAH).

164. Deposition (October 2009) on behalf of Environmental Defense, in the matter of permit challenges to the proposed Las Brisas coal fired power plant project at the Texas State Office of Administrative Hearings (SOAH).

165. Deposition (October 2009) on behalf of the Sierra Club, in the matter of challenges to the proposed Medicine Bow Fuel and Power IGL plant in Cheyenne, Wyoming.

166. Deposition (October 2009) on behalf of Environmental Defense and others, in the matter of challenges to the proposed Tenaska coal fired power plant project at the Texas State Office of Administrative Hearings (SOAH). (April 2010).

167. Oral Testimony (November 2009) on behalf of the Environmental Defense Fund re. the Las Brisas Energy Center before the Texas State Office of Administrative Hearings (SOAH) Administrative Law Judges.

168. Deposition (December 2009) on behalf of Environmental Defense and others, in the matter of challenges to the proposed White Stallion Energy Center coal fired power plant project at the Texas State Office of Administrative Hearings (SOAH).

169. Oral Testimony (February 2010) on behalf of the Environmental Defense Fund re. the White Stallion Energy Center before the Texas State Office of Administrative Hearings (SOAH) Administrative Law Judges.

170. Deposition (June 2010) on behalf of the United States in connection with the Alabama Power Company NSR Case. *United States v. Alabama Power Company*, CV-01-HS-152-S (Northern District of Alabama, Southern Division).

171. Trial Testimony (September 2010) on behalf of Commonwealth of Pennsylvania – Dept. of Environmental Protection, State of Connecticut, State of New York, State of Maryland, and State of New Jersey (Plaintiffs) in connection with the Allegheny Energy NSR Case in US District Court in the Western District of Pennsylvania. *Plaintiffs v. Allegheny Energy Inc., et al.*, 2:05cv0885 (Western District of Pennsylvania).

172. Oral Direct and Rebuttal Testimony (September 2010) on behalf of Fall-Line Alliance for a Clean Environment and others in the matter of the PSD Air Permit for Plant Washington issued by Georgia DNR at the Office of State Administrative Hearing, State of Georgia (OSAH-BNR-AQ-1031707-98-WALKER).

173. Oral Testimony (September 2010) on behalf of the State of New Mexico Environment Department in the matter of Proposed Regulation 20.2.350 NMAC – *Greenhouse Gas Cap and Trade Provisions*, No. EIB 10-04 (R), to the State of New Mexico, Environmental Improvement Board.

174. Oral Testimony (October 2010) on behalf of the Environmental Defense Fund re. the Las Brisas Energy Center before the Texas State Office of Administrative Hearings (SOAH) Administrative Law Judges.

175. Oral Testimony (November 2010) regarding BART for PSCo Hayden, CSU Martin Drake units before the Colorado Air Quality Commission on behalf of the Coalition of Environmental Organizations.

176. Oral Testimony (December 2010) regarding BART for TriState Craig Units, CSU Nixon Unit, and PRPA Rawhide Unit) before the Colorado Air Quality Commission on behalf of the Coalition of Environmental Organizations.

177. Deposition (December 2010) on behalf of the United States in connection with the Louisiana Generating NSR Case. *United States v. Louisiana Generating, LLC*, 09-CV100-RET-CN (Middle District of Louisiana).

178. Deposition (February 2011 and January 2012) on behalf of Wild Earth Guardians in the matter of opacity exceedances and monitor downtime at the Public Service Company of Colorado (Xcel)'s Cherokee power plant. No. 09-cv-1862 (D. Colo.).

179. Oral Testimony (February 2011) to the Georgia Office of State Administrative Hearings (OSAH) in the matter of Minor Source HAPs status for the proposed Longleaf Energy Associates power plant (OSAH-BNR-AQ-1115157-60-HOWELLS) on behalf of the Friends of the Chattahoochee and the Sierra Club).

180. Deposition (August 2011) on behalf of the United States in *United States of America v. Cemex, Inc.*, Civil Action No. 09-cv-00019-MSK-MEH (District of Colorado).

181. Deposition (July 2011) and Oral Testimony at Hearing (February 2012) on behalf of the Plaintiffs MYTAPN in the matter of Microsoft-Yes, Toxic Air Pollution-No (MYTAPN) v. State of Washington, Department of Ecology and Microsoft Corporation Columbia Data Center to the Pollution Control Hearings Board, State of Washington, Matter No. PCHB No. 10-162.

182. Oral Testimony at Hearing (March 2012) on behalf of the United States in connection with the Louisiana Generating NSR Case. *United States v. Louisiana Generating, LLC*, 09-CV100-RET-CN (Middle District of Louisiana).

183. Oral Testimony at Hearing (April 2012) on behalf of the New Hampshire Sierra Club at the State of New Hampshire Public Utilities Commission, Docket No. 10-261 – the 2010 Least Cost Integrated Resource Plan (LCIRP) submitted by the Public Service Company of New Hampshire (re. Merrimack Station Units 1 and 2).

184. Oral Testimony at Hearing (November 2012) on behalf of Clean Wisconsin in the matter of Application of Wisconsin Public Service Corporation for Authority to Construct and Place in Operation a New Multi-Pollutant Control Technology System (ReACT) for Unit 3 of the Weston Generating Station, before the Public Service Commission of Wisconsin, Docket No. 6690-CE-197.

185. Deposition (March 2013) in the matter of various Environmental Petitioners v. North Carolina DENR/DAQ and Carolinas Cement Company, before the Office of Administrative Hearings, State of North Carolina.

186. Deposition (August 2013) on behalf of the Sierra Club in connection with the Luminant Big Brown Case. *Sierra Club v. Energy Future Holdings Corporation and Luminant Generation Company LLC*, Civil Action No. 6:12-cv-00108-WSS (Western District of Texas, Waco Division).

187. Deposition (August 2013) on behalf of the Sierra Club in connection with the Luminant Martin Lake Case. *Sierra Club v. Energy Future Holdings Corporation and Luminant Generation Company LLC*, Civil Action No. 5:10-cv-0156-MHS-CMC (Eastern District of Texas, Texarkana Division).

188. Deposition (February 2014) on behalf of the United States in *United States of America v. Ameren Missouri*, Civil Action No. 4:11-cv-00077-RWS (Eastern District of Missouri, Eastern Division).

189. Trial Testimony (February 2014) in the matter of *Environment Texas Citizen Lobby, Inc and Sierra Club v. ExxonMobil Corporation et al.*, Civil Action No. 4:10-cv-4969 (Southern District of Texas, Houston Division).

190. Trial Testimony (February 2014) on behalf of the Sierra Club in connection with the Luminant Big Brown Case. *Sierra Club v. Energy Future Holdings Corporation and Luminant Generation Company LLC*, Civil Action No. 6:12-cv-00108-WSS (Western District of Texas, Waco Division).

191. Deposition (June 2014) and Trial (August 2014) on behalf of ECM Biofilms in the matter of the *US Federal Trade Commission (FTC) v. ECM Biofilms* (FTC Docket #9358).

192. Deposition (February 2015) on behalf of Plaintiffs in the matter of *Sierra Club and Montana Environmental Information Center (Plaintiffs) v. PPL Montana LLC, Avista Corporation, Puget Sound Energy, Portland General Electric Company, Northwestern Corporation, and Pacificorp (Defendants)*, Civil Action No. CV 13-32-BLG-DLC-JCL (US District Court for the District of Montana, Billings Division).

193. Oral Testimony at Hearing (April 2015) on behalf of Niagara County, the Town of Lewiston, and the Villages of Lewiston and Youngstown in the matter of CWM Chemical Services, LLC New York State Department of Environmental Conservation (NYSDEC) Permit Application Nos.: 9-2934-00022/00225, 9-2934-00022/00231, 9-2934-00022/00232, and 9-2934-00022/00249 (pending).

194. Deposition (August 2015) on behalf of Plaintiff in the matter of *Conservation Law Foundation (Plaintiff) v. Broadrock Gas Services LLC, Rhode Island LFG GENCO LLC, and Rhode Island Resource Recovery*

Corporation (Defendants), Civil Action No. 1:13-cv-00777-M-PAS (US District Court for the District of Rhode Island).

195. Testimony at Hearing (August 2015) on behalf of the Sierra Club in the matter of *Amendments to 35 Illinois Administrative Code Parts 214, 217, and 225* before the Illinois Pollution Control Board, R15-21.

196. Deposition (May 2015) on behalf of Plaintiffs in the matter of *Northwest Environmental Defense Center et. al., (Plaintiffs) v. Cascade Kelly Holdings LLC, d/b/a Columbia Pacific Bio-Refinery, and Global Partners LP (Defendants)*, Civil Action No. 3:14-cv-01059-SI (US District Court for the District of Oregon, Portland Division).

197. Trial Testimony (October 2015) on behalf of Plaintiffs in the matter of *Northwest Environmental Defense Center et. al., (Plaintiffs) v. Cascade Kelly Holdings LLC, d/b/a Columbia Pacific Bio-Refinery, and Global Partners LP (Defendants)*, Civil Action No. 3:14-cv-01059-SI (US District Court for the District of Oregon, Portland Division).

198. Deposition (April 2016) on behalf of the Plaintiffs in *UNatural Resources Defense Council, Respiratory Health Association, and Sierra Club (Plaintiffs) v. Illinois Power Resources LLC and Illinois Power Resources Generation LLC (Defendants)*, Civil Action No. 1:13-cv-01181 (Central District of Illinois, Peoria Division).

199. Trial Testimony at Hearing (July 2016) in the matter of Tesoro Savage LLC Vancouver Energy Distribution Terminal, Case No. 15-001 before the State of Washington Energy Facility Site Evaluation Council.

200. Trial Testimony (December 2016) on behalf of the challengers in the matter of the Delaware Riverkeeper Network, Clean Air Council, et. al., vs. Commonwealth of Pennsylvania Department of Environmental Protection and R. E. Gas Development LLC regarding the Geyer well site before the Pennsylvania Environmental Hearing Board.

201. Trial Testimony (July-August 2016) on behalf of the United States in *United States of America v. Ameren Missouri*, Civil Action No. 4:11-cv-00077-RWS (Eastern District of Missouri, Eastern Division).

202. Trial Testimony (January 2017) on the Environmental Impacts Analysis associated with the Huntley and Huntley Poseidon Well Pad Hearing on behalf citizens in the matter of the special exception use Zoning Hearing Board of Penn Township, Westmoreland County, Pennsylvania.

203. Trial Testimony (January 2017) on the Environmental Impacts Analysis associated with the Apex energy Backus Well Pad Hearing on behalf citizens in the matter of the special exception use Zoning Hearing Board of Penn Township, Westmoreland County, Pennsylvania.

204. Trial Testimony (January 2017) on the Environmental Impacts Analysis associated with the Apex energy Drakulic Well Pad Hearing on behalf citizens in the matter of the special exception use Zoning Hearing Board of Penn Township, Westmoreland County, Pennsylvania.

205. Trial Testimony (January 2017) on the Environmental Impacts Analysis associated with the Apex energy Deutsch Well Pad Hearing on behalf citizens in the matter of the special exception use Zoning Hearing Board of Penn Township, Westmoreland County, Pennsylvania.

206. Deposition Testimony (July 2017) on behalf of Plaintiffs in the matter of *Casey Voight and Julie Voight v Coyote Creek Mining Company LLC (Defendant)* Civil Action No. 1:15-CV-00109 (US District Court for the District of North Dakota, Western Division).

207. Deposition Testimony (November 2017) on behalf of Defendant in the matter of *Oakland Bulk and Oversized Terminal (Plaintiff) v City of Oakland (Defendant,)* Civil Action No. 3:16-cv-07014-VC (US District Court for the Northern District of California, San Francisco Division).

208. Deposition Testimony (December 2017) on behalf of Plaintiff in the matter of *Wildearth Guardians (Plaintiff) v Colorado Springs Utility Board (Defendant)* Civil Action No. 1:15-cv-00357-CMA-CBS (US District Court for the District of Colorado).

209. Deposition Testimony (January 2018) in the matter of National Parks Conservation Association (NPCA) v. State of Washington Department of Ecology and British Petroleum (BP) before the Washington Pollution Control Hearing Board, Case No. 17-055.

210. Trial Testimony (January 2018) on behalf of Defendant in the matter of *Oakland Bulk and Oversized Terminal (Plaintiff) v City of Oakland (Defendant,)* Civil Action No. 3:16-cv-07014-VC (US District Court for the Northern District of California, San Francisco Division).

211. Trial Testimony (April 2018) on behalf of the National Parks Conservation Association (NPCA) in the matter of NPCA v State of Washington, Department of Ecology and BP West Coast Products, LLC, PCHB No. 17-055 (Pollution Control Hearings Board for the State of Washington.

212. Deposition (June 2018) (harm Phase) on behalf of Plaintiffs in the matter of *Natural Resources Defense Council, Inc., Sierra Club, Inc., and Respiratory Health Association v. Illinois Power Resources LLC, and Illinois Power Resources Generating LLC (Defendants)*, Civil Action No. 1:13-cv-01181 (US District Court for the Central District of Illinois, Peoria Division).

213. Trial Testimony (July 2018) on behalf of Petitioners in the matter of *Coosa River Basin Initiative and Sierra Club (Petitioners) v State of Georgia Environmental Protection Division, Georgia Department of Natural Resources (Respondent) and Georgia Power Company (Intervenor/Respondent)*, Docket Nos: 1825406-BNR-WW-57-Howells and 1826761-BNR-WW-57-Howells, Office of State Administrative Hearings, State of Georgia.

214. Deposition (January 2019) and Trial Testimony (January 2019) on behalf of Sierra Club and Texas Campaign for the Environment (Appellants) in the contested case hearing before the Texas State Office of Administrative Hearings in Docket Nos. 582-18-4846, 582-18-4847 (Application of GCGV Asset Holding, LLC for Air Quality Permit Nos. 146425/PSDTX1518 and 146459/PSDTX1520 in San Patricio County, Texas).

215. Deposition (February 2019) and Trial Testimony (March 2019) on behalf of Sierra Club in the State of Florida, Division of Administrative Hearings, Case No. 18-2124EPP, Tampa Electric Company Big Bend Unit 1 Modernization Project Power Plant Siting Application No. PA79-12-A2.

216. Deposition (June 2019) relating to the appeal of air permits issued to PTTGCA on behalf of Appellants in the matter of *Sierra Club (Appellants) v. Craig Butler, Director, et. al., Ohio EPA (Appellees)* before the State of Ohio Environmental Review Appeals Commission (ERAC), Case Nos. ERAC-19-6988 through -6991.

217. Deposition (September 2019) on behalf of Appellants relating to the NPDES permit for the Cheswick power plant in the matter of *Three Rivers Waterkeeper and Sierra Club (Appellants) v. State of Pennsylvania Department of Environmental Protection (Appellee) and NRG Power Midwest (Permittee)*, before the Commonwealth of Pennsylvania Environmental Hearing Board, EHB Docket No. 2018-088-R.

218. Deposition (December 2019) on behalf of the Plaintiffs in the matter of David Kovac, individually and on behalf of wrongful death class of Irene Kovac v. BP Corporation North America Inc., Circuit Court of Jackson County, Missouri (Independence), Case No. 1816-CV12417.

219. Deposition (February 2020, virtual) and testimony at Hearing (August 2020, virtual) on behalf of Earthjustice in the matter of *Objection to the Issuance of PSD/NSR and Title V permits for Riverview Energy Corporation*, Dale, Indiana, before the Indiana Office of Environmental Adjudication, Cause No. 19-A-J-5073.

220. Hearing (July 14-15, 2020, virtual) on behalf of the Sierra Club in the matter of *the Application of the Ohio State University for a certificate of Environmental Compatibility and Public Need to Construct a Combined Heat and Power Facility in Franklin County, Ohio*, before the Ohio Power Siting Board, Case No. 19-1641-EL-BGN.

221. Hearing (September 2020, virtual) on behalf of WildEarth Guardians (petitioners) in the matter of *the Appeals of the Air Quality Permit No. 7482-M1 Issued to 3 Bear Delaware* Operating – *NM LLC (EIB No. 20-21(A) and Registrations Nos. 8729, 8730, and 8733 under General Construction Permit for Oil and Gas Facilities (EIB No. 20-33 (A)*, before the State of New Mexico, Environmental Improvement Board.

222. Deposition (December 2020, March 4-5, 2021, all virtual) and Hearing (April 2021, virtual) in support of Petitioner's Motion for Stay of PSCAA NOC Order of Approval No. 11386 in the matter of the *Puyallup Tribe of Indians v. Puget Sound Clean Air Agency (PSCAA) and Puget Sound Energy (PSE)*, before the State of Washington Pollution Control Hearings Board, PCHB No. P19-088.

223. Hearing (September 2020, virtual) on the *Initial Economic Impact Analysis (EIA) for A Proposal To* Regulate *NOx Emissions from Natural Gas Fired Rich-Burn Natural Gas Reciprocating Internal Combustion Engines (RICE) Greater Than 100 Horsepower* prepared on behalf of Earthjustice and the National Parks Conservation Association in the matter of Regulation Number 7, Alternate Rules before the Colorado Air Quality Control Commission.

224. Deposition (December 2020, virtual and Hearing February 2021, virtual) on behalf of the Plaintiffs (Shrimpers and Fishermen of the Rio Grande Valley represented by Texas RioGrande Legal Aid, Inc.) in the matter of the Appeal of Texas Commission on Environmental Quality (TCEQ) Permit Nos. 147681, PSDTX1522, GHGPSDTX172 for the Jupiter Brownsville Heavy Condensate Upgrader Facility, Cameron County, before the Texas State Office of Administrative Hearings, SOAH Docket No. 582-21-0111, TCEQ Docket No. 2020-1080-AIR.

225. Deposition (January 2021, virtual) on behalf of Plaintiffs in the matter of *PennEnvironment Inc., and Clean Air Council (Plaintiffs) and Allegheny County Health Department (Plaintiff-Intervenor) v. United States Steel Corporation (Defendant)*, Civil Action No. 2-19-cv-00484-MJH (US District Court for the Western District of Pennsylvania.)

226. Deposition (February 2021, virtual) on behalf of Plaintiffs in the matter of *Sierra Club Inc. (Plaintiff) v. GenOn Power Midwest LP* (Defendants), Civil Action No. 2-19-cv-01284-WSS (US District Court for the Western District of Pennsylvania.)

227. Deposition (April 2021, virtual) on the Potential Remedies to Avoid Adverse Thermal Impacts from the Merrimack Station on behalf of Plaintiffs in the matter of *Sierra Club Inc. and the* Conservation *Law Foundation (Plaintiffs) v. Granite Shore Power, LLC et. al., (Defendants)*, Civil Action No. 19-cv-216-JL. (US District Court for the District of New Hampshire.)

228. Deposition (June 2021, virtual) on behalf of Plaintiffs in the matter of *Sierra Club (Plaintiff) v. Woodville Pellets, LLC (Defendant)*, Civil Action No. 9:20-cv-00178-MJT (US District Court for the Eastern District of Texas, Lufkin Division).

229. Deposition (June 2021, virtual) on behalf of the Plaintiffs in the matter of *Modern Holdings, LLC, et al. (Plaintiffs) v. Corning Inc., et al. (Defendants)*, Civil Action No. 5:13-cv-00405-GFVT, (US District Court for the Eastern District of Kentucky, Central Division at Lexington).

230. Testimony (June 2021, virtual) regarding the Aries Newark LLC Sludge Processing Facility, Application No. CPB 20-74, Central Planning Board, City of Newark, New Jersey.

Response to Comment Letter O6: Earthjustice, dated December 15, 2021

Comment O6.1: This comment provides an introduction to the comment letter on behalf of the People's Collective for Environmental Justice. The comment states that the Draft EIR does not comply with CEQA and the County cannot rely on the document as a form of environmental review and must prepare a new Draft EIR to allow the public and decisionmakers an opportunity for meaningful review. The comment also states that a technical report from Dr. Ron Sahu identifies flaws within the Draft EIR and asks to include these comments as part of the public record.

Response O6.1: The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR nor does it provide evidence of additional significant impacts from the Project. Therefore, no further response is provided.

Comment O6.2: This comment states that while notices were provided in Spanish, none of the Draft EIR or associated technical studies were translated into Spanish. The comment states that if the County wants to provide meaningful public participation, it should translate the Draft EIR and technical report into Spanish and recirculate the reports for a 60-day public review period.

Response O6.2: CEQA does not require translation of CEQA documents and associated technical documents into additional languages as requested by commenters. CEQA addresses public participation in CEQA Guidelines Section 15201 which states that "[e]ach public agency should include provisions in its CEQA procedures for wide public involvement, formal and informal, consistent with its existing activities and procedures, in order to receive and evaluate public reactions to environmental issues related to the agency's activities. Such procedures should include, whenever possible, making environmental information available in electronic format on the Internet, on a web site maintained or utilized by the public agency." Translation of CEQA documents is not part of the County's standard CEQA procedures and is not consistent with the County's existing activities or procedures. In order to provide additional access to the notification process consistent with Countywide Plan Policy HZ-3.16 and HZ-3.17, the County provided the Notice of Preparation and Notice of Availability in Spanish and English and made the Draft EIR and technical studies available to a wide audience by following the public review procedures prescribed by CEQA, including by posting the Draft EIR and associated Appendices on the County's website and to the State Clearinghouse. The Notice of Preparation and Notice of Availability were mailed to all residents and business owners within 1,300 feet of the Specific Plan area and 700 feet of the Upzone Site. Furthermore, in order to provide adequate time for review of the Draft EIR for any non-English speakers, the public review period was extended from a standard 45-day review to a 75-day review.

Furthermore, Public Resources Code (PRC) Section 21083.1 states that CEQA and the CEQA Guidelines shall not be interpreted in manner which imposes procedural or substantive requirements beyond those explicitly stated. Further, PRC Section 21003 declares that "[a]ll persons and public agencies involved in the environmental review process [are] responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment." (Public Resources Code, Section 21003, subd. (f)) CEQA's emphasis on environmental protection and public disclosure cannot be a basis for ignoring statutory language emphasizing the need to consider financial cost of CEQA compliance. As neither CEQA nor any other statutory or regulatory mandate requires that environmental documents be published in any language other than English, the County is not required to, provide the Draft EIR in Spanish.

Comment O6.3: This comment states that CEQA has two basic purposes: to inform decisionmakers and the public about the potential significant environmental effects of a project and to direct public agencies to avoid or reduce environmental damage, when possible, by requiring alternatives or mitigation measures.

Response O6.3: The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR. Therefore, no further response is required.

Comment O6.4: This comment states that the Project objectives provided within the Draft EIR are self-referential and overly narrow, which excludes multiple feasible alternatives to the Project, and that by focusing on the Specific Plan within its objectives, the County intends to focus its reasonable range of alternatives on alternatives that would still entail building out the Project as planned to varying degrees. It further states that Alternative 2 involves the entire Specific Plan Area being fully built out based on underlying zoning and Alternative 2 entails the majority of the Specific Plan Area being built out by one development. It concludes by stating while the rule of reason governs the County's consideration of alternatives, the narrow objectives prevent it from discussing alternatives in a manner which fosters public participation and informed decision making, which taints the analysis and violates CEQA.

Response O6.4: As outlined in Section 3.3, *Project Objectives,* starting on page 3-2, the Draft EIR provides a list of eight Project objectives to provide the orderly development of an industrial business park. Pursuant to CEQA Guidelines Section 15124(b), there is no specific requirement for the range or number of Project objectives that are required to be included in the Project Description within the Draft EIR, so long as the Project Description provides a summary of Project objectives. One of the main Project objectives in reality is to provide for orderly development of a master-planned industrial business park, which can be fulfilled through a Specific Plan. As such, there is no requirement or need to remove Project objectives related to development of a specific plan.

Pursuant to CEQA Guidelines Section 15126.6(a), "an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation." Neither the CEQA statute, the State CEQA Guidelines, nor recent court cases specify a specific number of alternatives to be evaluated in an EIR. Rather, "the range of alternatives required in an EIR is governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice" (State CEQA Guidelines 15126(f)).

Pursuant to CEQA Guidelines Section 15126.6(a), an EIR can analyze alternatives that are potentially feasible and that do not necessarily attain all of the applicant's project objectives. As discussed in Section 7.0, *Alternatives,* the Draft EIR provides three alternatives for consideration. Alternative 1 consists of the Project not being approved, and the Specific Plan Area and Upzone Site would remain in the conditions that existed at the time the Notice of Preparation was published (December 30, 2020). Alternative 2 consists of the Project not being approved, and the Specific Plan area would be fully built out based on the existing underlying zoning. As this alternative would not cause the Specific Plan area to be rezoned to a non-residential use, the Upzone Site would not need to be rezoned to RM from its existing RS-20M zone. Alternative 3 consists of development only consisting of the Opening Year Development – Option 1 as an individual project, and no Specific Plan would be adopted. The Opening Year Development – Option 2 would not be developed. Only 7 acres within the Upzone Site would be rezoned to RM in order to offset the loss of housing from development of the Opening Year Development – Option 1. This alternative represents an approximately 35 percent decrease from the maximum buildout potential of the Specific Plan and an approximately 46 percent decrease in land acreage that would be developed by the Specific Plan. As such, the Draft EIR provides two alternatives beyond the No Project Alternative required pursuant to Guidelines Section 15126.6(e) and provides a reasonable range of alternatives for informed public disclosure and decision making. Therefore, no further response is required or provided.

Comment O6.5: This comment states that even with the objectives included in the Draft EIR, the Draft EIR must consider a reasonable range of alternatives and the purpose of the requirement for alternatives is to identify ways to mitigate or avoid the significant effects of the project. The comment references that an agency may not approve a proposed project if feasible alternatives exist that would substantially lessen its significant effects. It further states that the alternatives discussion must be meaningful and must contain analysis sufficient to allow informed decision making.

Response O6.5: For a discussion of the Draft EIR's analyzing a reasonable range of alternatives, the commenter is referred to Response O6.4. Furthermore, as shown on Table 7-7 of the Draft EIR, all three alternatives would reduce impacts of the proposed Project. Specifically related to the Project's significant and unavoidable impacts, Alternative 1 would require no air quality mitigation measures and would avoid the Project's significant impacts. Alternative 2 would require fewer mitigation measures and would avoid the Project's significant air quality impacts. Alternative 3 would require fewer mitigation measures but would not avoid the Project's significant air quality impacts as it would result in VOC and NOx emissions that exceed SCAQMD thresholds. The comment misconstrues PRC Section 21081(a), which allows for an agency to approve a proposed project if the agency makes a finding that "[s]pecific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report" (Public Resource Code Section 21081, subd. (a)). As such, the County could approve the Project so long as it makes the finding that specific overriding economic, legal, social, technological, or other benefits of the Project outweigh the significant effects on the environment. Therefore, no further response is required or provided.

Comment O6.6: This comment states that the Draft EIR does not include several alternatives that would allow for full consideration of the Project and that the proximity to sensitive receptors (59 feet) should be addressed in additional alternatives. The comment references the Attorney General's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" memorandum, which provides recommendations for siting warehouses approximately 1,000 feet from property lines of sensitive receptors. The comment states that the Draft EIR should include alternatives that would provide greater buffers from sensitive receptors and alternatives that decrease the intensity of the Project and that a lack of these alternatives is unlawful under CEQA.

Response O6.6: Pursuant to CEQA Guidelines Section 15126.6(a), "an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation." Neither the CEQA statute, the State CEQA Guidelines, nor recent court cases specify a specific number of alternatives to be evaluated in an EIR. Rather, "the range of alternatives required in an EIR is governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice" (State CEQA Guidelines 15126(f)).

As discussed in Response O6.4, Alternative 3 consists of a decrease in industrial square footage being developed and therefore a decrease in intensity when compared to the proposed Project. Under Alternative 3, only Opening Year Development – Option 1 would be developed, and no Specific Plan would be adopted. Alternative 3 would provide greater buffers from adjacent schools, but due to the arrangement of uses in the surrounding area, it would not provide the full 1,000-foot buffer as outlined in the Attorney General's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" memorandum. Due to the arrangement of residential uses in the surrounding area, an increase in buffers from surrounding sensitive receptors would not be feasible, as there are sensitive receptors within 1000-feet of all proposed buildings and sites. As such, an alternative with an increased buffer to address proximity to sensitive receptors would not be considered feasible and

is not required to be analyzed in the EIR pursuant to CEQA Guidelines Section 15126.6. Overall, the Draft EIR has sufficiently analyzed a reasonable range of potentially feasible alternatives.

Comment O6.7: The comment states that the Draft EIR fails to address significant environmental justice concerns and states that Bloomington is amongst the most polluted cities in the South Coast Air Basin. The comment includes data from CalEnviroScreen and states that the residents are exposed to more PM 2.5 than 91 percent of census tracts in California, more diesel particulate matter than 80 percent of census tracts, and more traffic than 83 percent of census tracts. The comment also states that Bloomington is being labeled a diesel death zone.

Response O6.7: Refer to Master Response 4. As discussed on pages 5.3-44 and 5.3-45 of Section 5.3, *Air Quality*, a Mobile Source Health Risk Assessment was prepared to evaluate the health risk impacts from diesel particulate matter. As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

Comment O6.8: This comment states that the closest residence is only located 11 feet north of the area and the Draft EIR fails to analyze and mitigate the environmental justice impacts of the large warehouse operations. The comment also states that the Project will expose sensitive receptors to substantial pollutant concentrations.

Response O6.8: Refer to Master Responses 1 and 4.

Comment O6.9: This comment states that the Project is inconsistent with the County's General Plan due to the failure to acknowledge environmental justice concerns. The comment states "An action, program, or project is consistent with the General Plan if, considering all its aspects it will further the objectives and policies of the General Plan and not obstruct their attainment." The comment cites Policy HZ-3.18 and states that the Draft EIR is inconsistent with Policy HZ-3.18. The comment states that the Draft EIR incorrectly states that the policy requires at least one public meeting when it requires at least two. The comment states that there is an inconsistency as the County has denied Bloomington residents a meaningful opportunity to participate in the decision making. The comment also states that the County must ensure due process for non-English speaking community members given that 66.5 percent of Bloomington residents speak a language other than English at home.

Response O6.9: Refer to Master Response 4. Policy HZ-3.18 of the Countywide plan states, "In order for a Planning Project Application (excluding Minor Use Permits) to be deemed complete, we require applicants to indicate whether the project is within or adjacent to an unincorporated environmental justice focus area and, if so, to:

- Document to the County's satisfaction how an applicant will address environmental justice concerns potentially created by the project; and
- Present a plan to conduct at least one public meeting for nearby residents, businesses, and property owners to obtain public input for applications involving a change in zoning or the Policy Plan. The County will require additional public outreach if the proposed project changes substantively in use, scale, or intensity from the proposed project presented at previous public outreach meeting(s)

As discussed in Table 5.11-1 in Section 5.11, *Land Use and Planning*, the Project is consistent with Policy HZ-3.18. A scoping meeting was held on January 14, 2021, and a notice was mailed in English and Spanish

two weeks prior to 954 residents within the 1300-foot radius of the Specific Plan along with a 700-foot radius from the Upzone Site. A direct mailer was sent to 3,754 approved mailboxes in Bloomington on August 1, 2021. Two community meetings were held on August 5, 2021, and October 6, 2021, which included notices mailed two weeks prior in English and Spanish. Further, this policy does not pertain to the Project's Draft EIR but is a general administrative rule for the submission of development applications.

Comment O6.10: This comment states that the Draft EIR is inconsistent with the General Plan because it does not document any methods that will address environmental justice concerns potentially created by the project. The Draft EIR states that the County would hold one public meeting. The comment states that folding the environmental justice concerns into the public meeting is insufficient as it is a separate requirement. The comment also states that environmental justice concerns were submitted to the County in response to the NOP and were unaddressed in the Draft EIR. The comment states that the Draft EIR's failure to acknowledge and disregard these concerns is inconsistent with the General Plan and are a clear violation of CEQA.

Response O6.10: Refer to Master Response 4. Refer to responses O6.8 and O6.9. A scoping meeting was held on January 14, 2021, and a notice was mailed in English and Spanish two weeks prior to 954 residents within the 1300-foot radius of the Specific Plan along with a 700-foot radius from the Upzone Site. A direct mailer was sent to 3,754 approved mailboxes in Bloomington on August 1, 2021. Two community meetings were held on August 5, 2021, and October 6, 2021, which included notices mailed two weeks prior in English and Spanish. Neither CEQA statute nor CEQA guidelines explicitly require consideration of social and economic issues related to environmental justice (Golden Door Properties v. County of San Diego (June 12,2020) 50 Cal.App.5th).

Comment O6.11: This comment states that the Draft EIR states that the Project complies with the Countywide Environmental Justice goals and policies and does not provide substantial evidence on how installing sidewalks addresses the environmental justice concerns of adding more diesel truck traffic, air pollution, noise, and other impacts to a community already overburdened by air pollution. The comment states walking outside on a sidewalk in a "diesel death zone" does not address environmental justice impacts. The comment states that the Draft EIR underscores the lack of understanding of harm being imposed by this large development and states that the Draft EIR must be revised for a full and fair analysis of the environmental justice impacts of the Project.

Response O6.11: Refer to Master Responses 1 and 4.

Comment O6.12: This comment states that a proper traffic analysis is critical to understanding the impacts of any project and the Project's traffic analysis is faulty which taints sections of the Draft EIR.

Response O6.12: The comment provides the commenter's opinion and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required.

Comment O6.13: This comment states that the Draft EIR underestimates traffic impacts in a number of material ways such as ways related to truck share and trip length.

Response O6.13: The comment is introductory in nature and does not provide evidence of additional significant impacts from the Project. Therefore, no further response is required.

Comment O6.14: This comment states that the Draft EIR assumes a low number of trucks as a share of total trips related to this Project and the Draft EIR deviates from recommendations made by the South Coast Air Quality Management District, which are designed to ensure that an EIR portrays a "worst case" scenario to comply with CEQA. The comment states that, while the Draft EIR uses a relatively recent version of the ITE trip generation manual, it bases truck share for several components of the development on the 2003

Fontana Truck Study and SCAQMD has cautioned against using the 2003 Fontana Trucks Study in an instance like the current Project. The SCAQMD concluded that Fontana Study, by itself, is not characteristic of high cube warehouses, which comprise a large portion of this proposed Project. According to the comment, the Draft EIR provides no evidence why it could go against SCAQMD's recommendation for the high cube warehouse portion of the Project. The comment states that SCAQMD recommends using a truck share percentage of 40 for projects like this that have unidentified future tenants and the failure to justify the use of an approach with substantially fewer trucks than will likely visit the site violations CEQA.

Response O6.14: The Traffic Impact Analysis (TIA) Trip Generation used the trip rates and truck splits provided in the TUMF High-Cube Warehouse Trip Generation Study (WSP, January 29, 2019) for buildings 1 and 3 (fulfillment center). The TIA uses the trip rates provided by the Institute of Transportation Engineer's *Trip Generation, 10th Edition, 2017* and the truck splits provided by the Fontana Truck Trip Generation Study (City of Fontana, August 2003 Heavy Warehouse splits) for building 2 (High Cube Warehouse) and the future development in Planning Area A and B (Industrial Park). The comment mischaracterizes the Fontana Truck Trip Generation Study, which is commonly utilized for truck splits for high-cube warehouses and industrial parks in the Inland Empire, and provides an accurate representation of potential uses for Building 2 and the future development in Planning Area A and B. The County of San Bernardino Traffic Impact Study Guidelines (July 9, 2019) state that trip generation for high truck generating uses should be handled on a project-by-project basis. The City of Fontana (the closest jurisdiction) Traffic Impact Analysis (TIA) Guidelines for Vehicle Miles Traveled (VMT) and Level Of Service Assessment (October 21, 2020) states that vehicle splits from the Truck Trip Generation Study prepared by the City of Fontana shall be used for industrial uses. In certain cases, for industrial projects in the vicinity of Fontana, the County recommends using truck splits from the *Truck Trip Generation Study* prepared by the City of Fontana. The County of San Bernardino Public Works Department also reviewed and approved the trip generation and vehicle splits. In addition, studies in the Bloomington area have previously used the same vehicle splits (i.e., TUMF and Fontana Study) that are used in the Bloomington Business Park Specific Plan TIA. Thus, the TIA analysis is consistent with previously used truck percentages in the area. Therefore, the Draft EIR appropriately analyzed the volume of trucks that would be generated by the proposed Project. Therefore, no further response is required or provided.

Also, the comments states that to comply with CEQA, the analysis should analyze the worst-case scenario. As substantiated by CEQA case law, (High Sierra Rural Alliance v County of Plumas (2018) 29 CA 5th 102, 126) an analysis of speculative worst-case scenario is not required. The Project analysis utilizes appropriate sources that are consistent with other industrial projects in the Bloomington area and required by the adjacent jurisdiction. Therefore, the trip generation for the Bloomington Business Park Specific Plan is a reasonable representation of the potential Project impacts and complies with CEQA.

Comment O6.15: The comment states that the Draft EIR also underestimates a range of impacts by picking an arbitrary trip length for trucks and provides no information on where these trips will be coming from and what growth at the facilities within 40 miles justify this development. The comment states that the Draft EIR does not explain how the basin wide assumption for the 2016 AQMP is relevant to this Project, which is more than 65 miles from the Ports of Los Angeles and Long Beach and similarly far from other transportation hubs.

Response O6.15: The proposed Project consists of a Specific Plan that would regulate long-term buildout of the Project site through 2040 and like most Specific Plans, the exact timing of buildout and the specific onsite tenants are unknown. The 2016 AQMP is the existing air quality planning document for the basin for which the Project is within and identifies projected growth and methods to meet criteria pollutant standards. As detailed on page 54 of the Air Quality Impact Analysis, the length for trucks used in the analysis was based on the Facility-Based Mobile Source Measures (FBMSMs) adopted in the 2016 AQMP SCAQMD's "Preliminary Warehouse Emission Calculations" document. That document cites that a 39.9-mile

trip length should be used for heavy-heavy trucks. The analysis used 40 miles for all trucks, in addition to assuming all trips were primary trips, for a conservative analysis. Therefore, the analysis is consistent with SCAQMD methodology for a planning level analysis. In addition, this is consistent with the CalEEMod default trip length for industrial warehousing uses. Therefore, the use of a 40-mile trip length is not arbitrary, but pursuant to existing AQMD methodology. Further it is speculative to assume that truck trips to and/or from the Specific Plan area would come from either the Ports of Los Angeles or Long Beach. Thus, the existing SCAQMD methodology and CalEEMod defaults were used. Therefore, no further response is required or provided.

Comment O6.16: The comment states that some tenants impose more impacts and harm on the community for large fulfillment centers. The trip rates from TUMF High-Cube Warehouse Trip Generation Study, WSP, January 29, 2009 form the basis of data for the fulfillment center in the Draft EIR. The comment states that this WSP report shows that Amazon fulfillment centers have dramatically higher trips.

Response O6.16: The TUMF High-Cube Warehouse Trip Generation Study, WSP, January 29, 2019 (incorrectly cited as 2009 in the comment) uses a range of different fulfillment center uses to provide an average trip rate for high-cube warehouse fulfillment center uses, and the study includes an Amazon facility to represent the high-end potential trip rates. These average rates for fulfillment center uses were used for the Bloomington Business Park Specific Plan TIA as the Project does not currently propose an Amazon fulfillment center; it proposes speculative industrial buildings. In addition, as stated in Response O6.14, (High Sierra Rural Alliance v County of Plumas (2018) 29 CA 5th 102, 126), an analysis of a speculative worst-case scenario is not required. If Amazon does purchase one or multiple buildings at a later date, there would be a need for a conformity determination pursuant to Section 5.3 of the Bloomington Business Park Specific Plan. In order for the County to render a conformity determination, an additional trip generation and distribution analysis would be required, which would be prepared using Amazon specific trip rates to analyze the potential change in trip generation from the previously analyzed Specific Plan. If the Amazon trip generation exceeds the trip generation assumption in the Draft EIR, additional analysis might be necessary to demonstrate adequate conformity to what was analyzed in the Draft EIR. Therefore, no further response is required or provided.

Comment O6.17: The comment states that the Draft EIR has underestimated the impacts from traffic, the analysis contained in the document, and in the documents relied upon are similarly faulty. The comment states that these impact areas include, but are not limited to, the Project's impacts on air quality, noise, greenhouse gasses, and energy analysis.

Response O6.17: As stated in Response O6.14, the Project Trip Generation used valid trip rates and truck splits consistent with the County's guidelines and those of bordering jurisdictions, as well as similar projects in the Bloomington area. The rest of the comment is the commenter's opinion and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required.

Comment O6.18: The comment states that the VMT analysis in the Draft EIR and technical appendix does not include heavy-duty truck VMT in its calculation. The calculation of VMT should not be limited to miles traveled by only automobiles. Excluding heavy-duty trucks from the VMT fails to take a hard look at an important environmental impact – which is especially important here because the design of the vast majority of this project is to attract these large trucks. This failure to include heavy-duty truck VMT as part of the VMT analysis violates CEQA.

Response O6.18: The comment correctly states that the "heavy-duty truck VMT could be included for modeling convenience and ease of calculation (for example, where models or data provide combined auto and heavy truck VMT)." However, there is no requirement for heavy-duty truck VMT to be included in the modeling of VMT.

Based on local and State guidance as well as the CEQA Guidelines, VMT is specifically an evaluation of passenger cars, not truck trips. It intends to reduce the vehicle miles traveled by passenger cars. This is consistent with CEQA Guidelines Section 15064.3(a), which states "For the purpose of this section, vehicle miles traveled refers to the amount and distance of automobile travel attributable to a project". Here, the term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks. In addition, the County guidelines state that the VMT analysis for employment Projects should be of the home-based work attraction trips, which does not include heavy truck trips. Hence the VMT analysis only includes and represents the impacts of automobile travel as a result of the proposed Project using SBTAM and is not required to include truck trips as a part of the VMT analysis. Therefore, no further response is required or provided.

Comment O6.19: This comment states that the GHG emissions analysis is patently unlawful. The Sahu Memo identifies several problems with the GHG report. These flaws must be cured in any future EIR. In addition to those flaws, there are problems with the mitigation measures.

Response O6.19: As described in Draft EIR Section 5.8, the GHG emissions analysis of the proposed Project has been completed in compliance with the methodology of the SCAQMD and the County's Greenhouse Gas Reduction Plan Update, which determined that impacts would be less than significant with meeting a minimum of 100 points on the Greenhouse Gas Reduction Plan Screening Tables, which would be implemented through Mitigation Measure GHG-1. This comment does not identify a specific issue with the adequacy of the Draft EIR and defers to the Sahu Memo. Therefore, no further response is required.

Comment O6.20: This comment states that the Air Quality analysis in the Draft EIR has flaws, including an underestimation of air pollution associated with the Project due to undercounting the number of trucks associated with this Project and minimizing the truck trip length associated with them. In addition to the flaws identified in the Sahu Memo.

Response O6.20: The Traffic Impact Analysis (TIA) Trip Generation used the trip rates and truck splits provided in the TUMF High-Cube Warehouse Trip Generation Study (WSP, January 29, 2019) for buildings 1 and 3 (fulfillment center). The TIA uses the trip rates provided by the Institute of Transportation Engineer's *Trip Generation, 10th Edition, 2017* and the truck splits provided by the Fontana Truck Trip Generation Study (City of Fontana, August 2003 Heavy Warehouse splits) for building 2 (High Cube Warehouse) and the future development in Planning Area A and B (Industrial Park). The County of San Bernardino Traffic Impact Study Guidelines (July 9, 2019) state that trip generation for high truck generating uses should be handled on a project-by-project basis. The City of Fontana (the closest jurisdiction) Traffic Impact Analysis (TIA) Guidelines for Vehicle Miles Traveled (VMT) and Level Of Service Assessment (October 21, 2020) states that vehicle splits from the Truck Trip Generation Study prepared by the City of Fontana shall be used for industrial uses. In certain cases, for industrial projects in the vicinity of Fontana, the County recommends using truck splits from the *Truck Trip Generation Study* prepared by the City of Fontana. The County of San Bernardino Public Works Department also reviewed and approved the trip generation and vehicle splits. In addition, studies in the Bloomington area have previously used the same vehicle splits (i.e., TUMF and Fontana Study) that are used in the Bloomington Business Park Specific Plan TIA. Thus, the TIA analysis is consistent with previously used truck percentages in the area. Therefore, the Draft EIR appropriately analyzed the volume of trucks that would be generated by the proposed Project. The Air Quality analysis that was prepared for the Project was completed in compliance with SCAQMD methodology. As detailed in Draft EIR Appendix C1 on page 54, the average trip length for heavy trucks used for the analysis is from the SCAQMD document for the implementation of the Facility-Based Mobile Source Measures (FBMSMs) adopted in the 2016 AQMP, which cites 39.9-mile trip length for "Preliminary Warehouse Emission Calculations". As a conservative measure, a trip length of 40 miles has been utilized for all trucks for the purpose of the EIR analysis. Thus, the truck trip length has not been

minimized in the analysis. This comment does not identify other specific issues with the adequacy of the Draft EIR and defers to the Sahu Memo. Therefore, no further response is required.

Comment O6.21: This comment states that the Draft EIR omits a Friant Ranch-type analysis that connects the identified excessive pollution levels with human health impacts, such as the impact of the Project's NOx emissions on ozone formation in the air basin, and the resulting cumulative impact of these air emissions on human health. The comment also provides recommended methodology from other air basins and EIR documents.

Response O6.21: The Draft EIR includes a Friant Ranch-type analysis that begins on page 5.3-43. As detailed, for extremely large regional projects (unlike the proposed Specific Plan), the SCAQMD states that it has been able to correlate potential health outcomes for very large emissions sources – as part of their rulemaking activity, specifically 6,620 lbs./day of NOx and 89,180 lbs./day of VOC were expected to result in approximately 20 premature deaths per year and 89,947 school absences due to asthma.

The proposed Specific Plan Project does not generate anywhere near 6,620 lbs/day of NOx or 89,190 lbs/day of VOC emissions. Therefore, the Project would not warrant a basin-wide analysis pursuant to SCAQMD's guidelines. As shown on Draft EIR Tables 5.3-8, 5.3-9, and 5.3-10:

- The Opening Year – Option 1 would generate up to 79.49 lbs/day of NOx during construction and 185.90 lbs/day of NOx during operations (1.20% and 2.81% of 6,620 lbs/day, respectively). The VOC emissions would be a maximum of 39.13 lbs/day during construction and 64.89 lbs/day during operations (0.04% and 0.07% of 89,190 lbs/day, respectively).
- The Opening Year – Option 2 would generate up to 83.24 lbs/day of NOx during construction and 249.06 lbs/day of NOx during operations (1.26% and 3.76% of 6,620 lbs/day, respectively). The VOC emissions would be 49.84 lbs/day during construction and 82.08 lbs/day during operations (0.06% and 0.09% of 89,190 lbs/day, respectively).
- The Future Development Area – Specific Plan Buildout would generate up to 79.49 lbs/day of NOx during construction and 298.17 lbs/day of NOx during operations (1.20% and 4.50% of 6,620 lbs/day, respectively). The VOC emissions would be 46.91 lbs/day during construction and 35.73 lbs/day during operations (0.05% and 0.04% of 89,190 lbs/day, respectively).

Therefore, the emissions are not sufficiently high enough to correlate health effects on a basin-wide level based on the Project's size. The Southern California International Gateway project that the commenter is referring to that SCAQMD commented on is a large railyard that would assist in transporting goods from the San Pedro port throughout California, resulting in much higher emissions than the proposed Project. Furthermore, SCAQMD's comments on the Southern California International Gateway project are requesting that the project prepare a Health Impact Assessment utilizing either BenMAP or AERMOD. The project that the commenter references is not comparable to the proposed Project as they are different in scale, proposed use, and emissions levels. Further, as the referenced project is a railyard for a port, the referenced project had more potential for basin-wide impacts which would require analysis. Furthermore, the Draft EIR and modeling conducted follow guidance provided by SCAQMD as it is the applicable air quality management district for the Project. Additionally, multiple methods for analysis provided by the commenter would not be applicable to the proposed Project as emissions from the Project are not high enough to correlate to health effects on a basin-wide level. In addition, the Draft EIR evaluates each of the Specific Plan's development scenarios localized impacts to air quality for emissions of CO, NOx, PM10, and PM2.5 by comparing the onsite emissions to the SCAQMD's applicable LST thresholds. Also, a Mobile Source Health Risk Assessment was prepared that determined the operational impacts are less than significant.

Comment O6.22: This comment states that the Draft EIR did not conduct the required Friant-type Health Impact Assessment and states that the South Coast AQMD has recently commented on another EIR where it asked for the exact analysis. The comment also states that failure to do an analysis clearly required by CEQA is a fatal flaw in the Draft EIR.

Response O6.22: As detailed in Response O6.21, the Draft EIR includes a Friant Ranch-type analysis that begins on page 5.3-43.

Comment O6.23: This comment states that it is incumbent upon the County to provide more stringent mitigation measures for air quality impacts that are more clearly enforceable. The comment expresses concern that the air quality section severely underestimates emissions from the Project and that "with compliance with existing rules, and implementation of the mitigation measures, emissions would continue to exceed regional thresholds of significance established by the SCAQMD for emissions of VOC and NOx." The comment states that these emissions must be mitigated to the maximum extent possible.

Response O6.23: The Air Quality analysis that was prepared for the Project was completed in compliance with SCAQMD methodology and used a conservative truck trip length and number of truck trips. Thus, emissions were not underestimated. The regional significant emissions that the Project would generate have been mitigated to the maximum extent possible with feasible mitigation measures and inclusion of various PDFs. With Mitigation Measures AQ-1 through AQ-2, construction emissions of VOC are reduced by 83%, NOx emissions are reduced by 52%, PM10 emissions are reduced by 10%, and PM2.5 emissions are reduced by 28%. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

Comment O6.24: This comment states that substantial reductions assumed by using Mitigation Measure AQ-1 (Super-Compliant Low VOC) and Mitigation Measure AQ-2 (Tier 4) should not be assumed and that accurately disclosing air quality impacts is crucial to the County's ability to fulfill its legal obligations under CEQA. The comment states that neither Mitigation Measure AQ-1 nor Mitigation Measure AQ-2 has any clear method of enforcement. The comment states that the Draft EIR does not provide or cite to any authority or permit that will ensure oversight by a regulatory or similar body. The comment also states there is no specification as to when inspections to verify compliance will occur, how often they will occur, and what the consequences are for noncompliance. The comment also states that Mitigation Measure AQ-2 should also state that trucks hauling dirt or other materials must be always covered during transit to and from the site.

Response O6.24: The Draft EIR provides calculations of air quality emissions both prior to (Table 5.3-7 on page 5.3-32) and after implementation of mitigation (Table 5.3-8 on page 5.3-32). Mitigation Measure AQ-1 and Mitigation Measure AQ-2 would be implemented through the County's construction permitting process. As shown in Chapter 4 of this Final EIR, the Mitigation Monitoring and Reporting Program (MMRP), the measures would be required to be shown in the construction plans and permits and the County of San Bernadino Building and Safety Division would verify compliance during typical construction site visits and

permitting reviews. In addition, the requirement that trucks hauling dirt or other materials be covered during transit to and from the site is part of the SCAQMD Rule 403, Fugitive Dust, which is also required as a part of construction permitting. Further, this requirement is part of the California Vehicle Code Section 23114 and is subject to citation from police officers.

Comment O6.25: This comment states that Mitigation Measure AQ-3, Idling Regulations, should be stricter to include language regarding enforcement of the idling rules. The comment states that this measure should include a 30-minute limit on truck turnaround time. The comment recommends making it clear onsite signage that either the building facilities manager or at least one other full time staff person is designated to proactively ensure that idling rules are followed and that trucks are moving through the Project site as efficiently as possible. The comment also states that the measure should include idling limits for yard tractors, which would save fuel and cut pollution and reduce a significant source of worker exposure. Idling limits for captive fleets such as these should be easy to enforce.

Response O6.25: PDF AQ-1 and MM AQ-3 requires the posting of signs at loading dock facilities that include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for trucks drivers to restrict idling to no more than 5 minutes once the vehicle is stopped, the transmission is set to "neutral" or "park", and the parking brake is engaged pursuant to Title 13 of the California Code of Regulations, Section 2485; and 3) telephone numbers of the building facilities manager and CARB to report violations. . PDF AQ-17 provides that facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks. In addition, PDF AQ-11 provides that all on-site equipment, such as forklifts and yard trucks, to be electric, propane or natural gas with the necessary electrical charging stations provided. The recommendation to limit truck turnaround time to 30 minutes will be forwarded to County decisionmakers for consideration. This comment does not identify specific issues with the adequacy of the Draft EIR. Therefore, no further response is required.

Comment O6.26: This comment states that Mitigation Measure AQ-4 (Energy Efficient Vendor Trucks) lacks enforceability. We agree that the Project plans and specifications should call for vendor trucks to include energy efficiency improvement features to reduce fuel consumption. However, the Draft EIR is unclear regarding whether Carl Moyer grant funding has already been awarded. If grant funding has not been secured, the measure should include "or similar funding programs" and specify that the Project should still include the Carl Moyer Program requirements, such as truck modernization, retrofits, and/or aerodynamic kits and low rolling resistance tires.

Response O6.26: Mitigation Measure AQ-4 requires that Project plans and specifications shall include requirements (by contract specifications) that vendor trucks for the industrial buildings include energy efficiency improvement features through the Carl Moyer Program—including truck modernization, retrofits, and/or aerodynamic kits and low rolling resistance tires—to reduce fuel consumption. As shown in Chapter 4 of this Final EIR, the MMRP, the measure would be required to be shown in the operational plans, specifications, and permits and the County of San Bernadino Building and Safety Division would verify compliance during typical occupancy permitting reviews. Inclusion in the MMRP and verification of implementation by the County of San Bernadino Building and Safety Division provides enforceability for this measure. Therefore, no further response is required or provided.

Comment O6.27: This comment recommends that both Mitigation Measure AQ-5 (Electric Vehicle Charging Stations and Carpool Parking) and Mitigation Measure AQ-6 (Electric Interior Vehicles), be strengthened by electrifying operations to the maximum extent possible. The comment states that where access to the power grid is not possible, on-site generators should meet the equivalent current off-road standards for NOx and be equipped with Best Available Control Technology (BACT) for emissions reductions of PM. Where access to the power grid is possible, these measures should be established instead of using stationary or mobile power generators. All cranes, forklifts and equipment that can be electrified, should

be. The comment also suggest Mitigation Measure AQ-6 quantify its requirements for infrastructure, much like Mitigation Measure AQ-5 says at a minimum of 5 carpool parking spaces.

Response O6.27: Project Design Features of the Project (such as PDF AQ-11) include electrification of onsite equipment and use of propane or natural gas. The Project would install and include infrastructure (PDF AQ-13) to support future tenants that desire electrifying operations. Any generators would require an air permit from SCAQMD and would be required to meet the current emission standards and BACT as applicable in order for a permit to be issued. Therefore, no further response is required or provided.

Comment O6.28: This comment states that the Draft EIR should be clearer regarding what incentive programs will be offered and how the Project will proactively encourage participation of Mitigation Measure AQ-7 also states that "[t]he Project plans and specifications for the industrial buildings shall require that a Transportation Management Association (TMA) or similar mechanism shall be established by the Project to encourage and coordinate carpooling," but does not clarify what requirements would be necessary in a "similar mechanism." The County should also set compliance dates for this measure, including by when the Project plans must incorporate its transportation management program. The measure should include recordkeeping provisions.

Response O6.28: The mitigation measure is a requirement, and incentive programs to participate are not needed, as the measure would be required during the County's conditions of approval and the occupation permitting process. The Transportation Management Association (TMA) would be reviewed and approved by the County to ensure that applicable and most up-to-date transit incentives would be provided to employees. As detailed in Mitigation Measure AQ-7 (Draft EIR Page 5.3-60), a "similar mechanism" consists of shuttle service to and from public transit, should a minimum of 5 employees request and use such service from a transit stop at the same drop-off and/or pickup time. The TMA shall distribute public transportation information to its employees and provide an electronic message board space for coordination rides.

Regarding compliance dates for measure implementation, the proposed Project is a Specific Plan for development of the Project area that would occur through 2040. This measure would be implemented during occupation permitting for the future tenants of the Project site, which are currently unknown. The recommendation for this measure to be included in recordkeeping provisions has been provided for decisionmakers consideration.

Comment O6.29: This comment states that the Draft EIR misreads the requirements of Appendix F of CEQA. The comment states that the Draft EIR provides a barebones analysis and then claims "[t]his use of energy is typical for urban development, and no operational activities or land uses would occur that would result in extraordinary energy consumption" The comment states this violates CEQA.

Response O6.29: CEQA Guidelines Appendix F describes the goals and methods of conserving energy and the efficient use of energy. CEQA Guidelines Appendix G provides the thresholds related to energy, which determine if a project has the potential to impact energy. As detailed in CEQA Guidelines Appendix G, Section VI, potential impacts related to energy could occur if the Project results in wasteful, inefficient, or unnecessary consumption of energy resources or if the Project conflicts with or obstructs a state or local plan for renewable energy or energy efficiency.

As detailed in Draft EIR Section 5.6, *Energy*, the amount of energy that the Project would use is identified for both construction and operation, and methods and requirements of the Project to not waste, be inefficient, or unnecessarily consume energy are detailed along with the Project's compliance to energy regulations. Thus, the Draft EIR provides the quantitative data and provides a qualitative analysis of the Project's less than significant impact, and mitigation measures are not required.

Comment O6.30: This comment states that neither the Draft EIR nor any of the technical appendices identify what is a normal energy footprint for an "urban development." Thus, this standard is meaningless. The comment states that the legislature wanted agencies to figure out how to reduce fossil fuel use and maximize energy efficiency. The comment also states that a significance standard of "extraordinary" energy consumption is not founded in Appendix F or the caselaw and makes no sense. The comment states that Appendix F clearly states its goals as conserving energy that implies the wise and efficient use of energy. The comment states that the Draft EIR misses the point of these provisions, which are there to have developers think about whether to power their buildings with natural gas or whether to install solar panels to reduce impacts. The comment also states that the energy analysis is incorrect because the traffic inputs were wrong.

Response O6.30: As detailed in Response O6.29, CEQA Guidelines Appendix G, Section VI, identifies that potential impacts related to energy could occur if the Project results in wasteful, inefficient, or unnecessary consumption of energy resources; or if the Project conflicts with or obstructs a state or local plan for renewable energy or energy efficiency, which is evaluated in Draft EIR Section 5.6, *Energy*. As detailed in the Draft EIR and Energy Analysis, the normal energy footprint for development would relate to developments of similar uses that comply with applicable building and energy codes. As detailed throughout the Draft EIR, the Project includes numerous provisions to conserve energy and utilize energy efficiently. This includes 27 PDFs that are listed in the Draft EIR Section 5.3 on page 5.3-57 that involve various methods of efficient use of energy and Mitigation Measures AQ-3 through AQ-7 the provide for energy efficiency. Regarding solar use, PDF AQ-5 provides that the Project would install all necessary infrastructure (i.e., wiring, reinforced roofs) to allow solar photovoltaic systems on the Project site to be installed in the future, with a specified electrical generation capacity, such as equal to the building's projected energy needs. In addition, PDF AQ-20 provides that the Project will achieve certification of compliance or demonstrate equivalency with LEED green building standards. Thus, the Project would provide for the wise and efficient use of energy.

Refer to Response O6.20 that describes that the Draft EIR appropriately analyzed the number of truck trips that would be generated by the proposed Project. Thus, the energy demands that were estimated from those trips are also appropriate.

Comment O6.31: This comment states that usage of zero-emission Class 7 and 8 semi-trucks in lieu of diesel semi-trucks is an effective mitigation measure under CEQA for air quality because these vehicles have no tailpipe emissions, and much lower life-cycle GHG emissions. The comment states that this would greatly reduce the significant air quality impacts associated with the Project and is therefore effective mitigation under CEQA.

Response O6.31: Currently, the use of zero-emissions light- and medium-duty trucks is limited and an infrastructure network to support their use, such as charging infrastructure off major thoroughfares, is limited throughout southern California. Thus, commercial use and availability throughout the State is currently limited and restricting the trucks that may access the Project site to zero-emission vehicles only is not economically feasible. However, CARB passed its updated Advanced Clean Truck Rule on July 1, 2020 that requires medium-and heavy-duty truck manufacturers to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales are required to be 55% of Class 2b – 3 truck sales, 75% of Class 4 – 8 straight truck sales, and 40% of truck tractor sales[9]. The rule begins in 2024, at which point an infrastructure network to support zero-emission trucks throughout southern California is anticipated to begin to become available. CARB estimates

[9] https://ww2.arb.ca.gov/resources/fact-sheets/advanced-clean-trucks-fact-sheet

that by 2030, nearly one in three new trucks will be zero-emissions[10]. However, the proposed Project would incorporate electric vehicle charging stations and would provide infrastructure to support the use of electric-powered interior vehicles. Additionally, the proposed Project would include PDF AQ-13, which would require infrastructure to support future installation of truck charging stations, when such trucks are commercially available, and PDF AQ-14, which would require electric light-duty charging infrastructure for one charging station for every five light-duty truck parking spaces onsite. Additionally, the operator of the proposed Project would be required to encourage vendor trucks to incorporate energy efficiency improvement features through the Carl Moyer Program to reduce fuel consumption and emissions. Furthermore, SCAQMD Rule 2305 would be applicable to the proposed buildings, once operational and leased, and compliance with the rule would reduce emissions by implementing measures listed on the WAIRE Menu, or by implementing a custom WAIRE Plan approved by the SCAQMD.

Comment O6.32: This comment states that Requiring the usage of Class 7 and 8 battery-electric site at the Project site is a feasible mitigation measure under CEQA for a multitude of factors. First, numerous studies show that the current total cost of ownership for a large battery-electric semi-truck is less than a diesel equivalent. As the decade progresses, the cost of battery-electric semi-trucks will drop even lower, whereas diesel trucks are expected to increase in cost, or remain stagnant. Second, the two largest technological barriers to widespread usage of battery-electric semi-trucks, which are the existence of cheap batteries that can sustain long range freight movement, and sufficient charging infrastructure to support battery-electric semi-trucks, have been overcome with immense public and private investment. Third, there are currently numerous Class 7 and 8 battery-electric truck models available for purchase, and many freight facilities have already committed to utilizing these trucks. Finally, government agencies in California are aggressively pushing for widespread usage of large battery-electric semi-trucks, through regulatory mandates, grant programs, and financial incentives.

Response O6.32: As described in Response O6.31, zero-emission trucks are not currently commercially available, and it would not be feasible at this time to restrict the trucks that may access the Project site to zero-emission vehicles only. The information provided in the comment regarding the current cost-effectiveness and availability of zero-emission trucks is largely hypothetical and based on significant needed improvements toward electrification. As stated by the Department of Energy, light-duty trucks are not expected to become cost-competitive until 2030 and medium-duty to heavy-duty trucks are not expected to be cost-competitive until 2035.[11] However, the proposed Project would incorporate electric vehicle charging stations and would provide infrastructure to support the use of electric-powered interior vehicles. Additionally, the operator of the proposed Project would be required to encourage vendor trucks to incorporate energy efficiency improvement features through the Carl Moyer Program to reduce fuel consumption and emissions.

Comment O6.33: This comment states that the price of battery packs for semi-trucks, and all heavy-duty vehicles, has significantly declined over the past decade, and is expected to continue declining over the next decade. The comment also states that it is technologically feasible for battery-electric semi-trucks to operate effectively over the long ranges necessary for some kinds of freight movement.

Response O6.33: As described in Responses O6.31, zero-emission trucks are not currently commercially available, and it would not be feasible at this time to restrict the trucks that may access the Project site to zero-emission vehicles only. However, the proposed Project would incorporate electric vehicle charging stations and would provide infrastructure to support the use of electric-powered interior vehicles.

[10] https://ww2.arb.ca.gov/rulemaking/2019/advancedcleantrucks

[11] Department of Energy. March 7, 2022. https://www.energy.gov/articles/doe-projects-zero-emissions-medium-and-heavy-duty-electric-trucks-will-be-cheaper-diesel

Additionally, the operator of the proposed Project would be required to encourage vendor trucks to incorporate energy efficiency improvement features through the Carl Moyer Program to reduce fuel consumption and emissions. This comment does not provide a specific concern about the EIR. Thus, no additional response is required.

Comment O6.34: This comment states that although charging infrastructure is a significant barrier to widespread usage of heavy-duty vehicles, there has been significant investment by California public utilities in medium and heavy-duty charging infrastructure.

Response O6.34: As described in Response O6.31, zero-emission trucks are not currently commercially available. However, the proposed Project would incorporate electric vehicle charging stations for trucks and vehicles. This comment does not provide a specific concern about the EIR. Thus, no additional response is required.

Comment O6.35: This comment states that with these investments by California's utilities, the cost of charging infrastructure is no longer an obstacle to the widespread usage of Class 7 and 8 battery-electric semi-trucks at freight facilities.

Response O6.35: As described in Response O6.31, zero-emission trucks are not currently commercially available, and it would not be feasible at this time to restrict the trucks that may access the Project site to zero-emission vehicles only. However, the proposed Project would incorporate vehicle charging stations. This comment does not provide a specific concern about the EIR. Thus, no additional response is required.

Comment O6.36: This comment states that there are numerous models of Class 7 and 8 Battery-Electric semi-trucks that are currently available for purchase and are already in operation across the nation. Based on company announcements, there are at least ten Class 7 or 8 models with ranges up to 550 miles that are slated for commercial deployment by 2021.

Response O6.36: As described in Response O6.31, it would not be feasible at this time to restrict the trucks that may access the Project site to zero-emission vehicles only. However, the proposed Project would incorporate vehicle charging stations. This comment does not provide a specific concern about the EIR. Thus, no additional response is required.

Comment O6.37: This comment states that Multiple government agencies within California are attempting to increase the number of battery-electric semi-trucks on the road, through regulatory mandates, grant programs, and incentive programs.

Response O6.37: As described in Response O6.31, it would not be feasible at this time to restrict the trucks that may access the Project site to zero-emission vehicles only. However, the proposed Project would incorporate vehicle charging stations. This comment does not provide a specific concern about the EIR. Thus, no additional response is required.

Comment O6.38: This comment states that operation of Class 7 and 8 diesel semi-trucks results in air quality impacts and that use of zero-emission semi-trucks almost fully eliminate these pollutants.

Response O6.38: As described in Response O6.31, it would not be feasible at this time to restrict the trucks that may access the Project site to zero-emission vehicles only. However, the proposed Project would incorporate vehicle charging stations. This comment does not provide a specific concern about the EIR. Thus, no additional response is required.

Comment O6.39: This comment states that electrification of semi-trucks would aid in California reaching its greenhouse gas and air quality pollutant reduction goals.

Response O6.39: As described in Response O6.31, it would not be feasible at this time to restrict the trucks that may access the Project site to zero-emission vehicles only. However, the proposed Project would incorporate vehicle charging stations. This comment does not provide a specific concern about the EIR. Thus, no additional response is required.

Comment O6.40: This comment states that there are multiple flaws in the Draft EIR that must be fixed if the County wants to proceed with the Project. The comment states that Earthjustice appreciates the County's consideration of the above comments and to contact them with any questions regarding the comment letter.

Response O6.40: The comment is conclusionary in nature and does not raise any specific concerns with the adequacy of the Draft EIR or raise any other CEQA issue. Based on the responses above, the County believes that the Draft EIR is not flawed and no further revisions to the Draft EIR or supporting technical studies are required. Therefore, no further response is required.

The following are in response to Appendix A, C*omments on Selected Aspects of the Bloomington Business Park Specific Plan, Draft Environmental Impact Report (DEIR), County of San Bernardino, California, State Clearinghouse No. 2020120545, September 2021*, by Renajit (Ron) Sahu, Consultant.

Comment O6.41: This comment states that the supplemental comment letter (Appendix A of the letter) by Dr. Ranajit Sahu addresses the air quality, greenhouse gas, traffic, and health risk assessment aspects of the Draft EIR. The comment additionally states that Dr. Sahu reviewed Appendix C5 which addresses air quality and greenhouse gas emissions impacts from the Upzone Site, which the comment states is not included in the Draft EIR project description.

Response O6.41: The comment is introductory stating what sections of the Draft EIR were reviewed. The comment incorrectly states that Appendix C5, *Residential Upzone Project Focused Air Quality & Greenhouse Gas Memo,* was not addressed in the project description section of the DEIR. The commenter is referred to Section 3.4.6, *Upzone,* of the Draft EIR's Project Description chapter, which discusses the proposed upzone of the Upzone Site pursuant to SB 330. The comment is introductory in nature and does not raise any specific concerns with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment O6.42: This comment provides a summary of the Project Description included in the Draft EIR and states that Opening Year Development – Option 1 and Opening Year Development – Option 2 are the largest portion of the Project and would include high-cube warehouse use. The comment further states that in the following comments, the commenter will provide examples of deficiencies using the Opening Year Development – Option 1, Opening Year Development – Option 2, or Specific Plan Buildout scenarios and states that the deficiencies apply to all scenarios and not just the scenario uses as an example.

Response O6.42: The comment is introductory in nature and does not raise any specific concerns with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment O6.43: This comment provides a summary of the Project location and states that the Project are consists of lower density, large lot residential uses, commercial nurseries, trucking operations, and vacant and undeveloped parcels. It further states that there are residential uses, churches, schools, and one park in the Project's vicinity.

Response O6.43: The comment summarizes the Project's environmental setting, which is included in Section 3.0, *Project Description,* and Section 4.0, *Environmental Setting,* of the Draft EIR, and each environmental

topic section of the Draft EIR. The comment is introductory in nature and does not raise any specific concerns with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment O6.44: This comment states that the Draft EIR does not make clear the inter-relationships and dependencies of the various analyses and does not discuss how assumptions underlying one set of analyses (for example traffic) carry over to other analyses (for example air quality, greenhouse gas emissions, VMT analysis and the health risk assessment). The comment also states that the Draft EIR fails in properly communicating the dependencies of inputs and assumptions of one set of analyses on other analyses.

Response O6.44: This comment is inaccurate. Each Draft EIR analysis section and related technical study provides clear descriptions of the methodology, data sets, modeling and provides clear inter-relationships between the analyses. As an example, the Air Quality Analysis, Mobile Health Risk Assessment, and Noise Impact Analysis (provided in Draft EIR Appendices C and J) include the assumptions of the Traffic Impact Assessment, such as the number of vehicle and truck trips and their distribution into modeling to determine if the Project would have the potential to result in substantial impacts. Each of the inputs are identified within each of the technical studies and methodology sections of the Draft EIR. In addition, Section 1.0, *Executive Summary,* contains a summary of each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect; areas of controversy known to the Lead Agency including issues raised by agencies and the public; and issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects consistent with CEQA Guidelines §15123. The comment The comment does not provide any substantial evidence supporting this assertion, therefore, no further response is required.

Comment O6.45: This comment states that there is no way to properly locate, much less understand all of the critical assumptions and inputs, some of which are haphazardly discussed in various locations of the Draft EIR while others are buried deep in the technical attachments such as the model outputs used for traffic, air quality, and health risk assessments. The comment recommends that all critical inputs and assumptions associated with each analysis be clearly enumerated in the summary section for that analysis in the Final EIR along with each related Appendix. This should be done in tabular form so that the reader can, at a glance, understand each of the critical inputs and assumptions associated with each respective analysis. Where a specific input or assumption is a numerical quantity, the choice of value for that quantity should be explained and where an assumption is qualitative and not numerical, the basis for that qualitative choice should also be described and supported.

Response O6.45: The Draft EIR includes a Table of Contents that lists all of the Draft EIR Sections, Tables, Figures, and Appendices. The Draft EIR text of each analysis section includes methodology and references the technical study where data (such as modeling outputs) are located (such as Appendix C). The technical studies within the Draft EIR appendix also have Table of Contents that list the locations of analysis methodology, data outputs, and other information. Also, the information within both the Draft EIR and technical studies, are organized by numbered and/or bolded, underlined, or italicized text. Thus, the information within the Draft EIR is logically organized for ease of review. Therefore, the recommended reorganization of data is not required. In addition, each of the topical sections within the Draft EIR provides a description of thresholds, methodology, both numerical or qualitative to provide the basis to support the significance determination findings. This comment does not provide any specific examples of the concerns it raises and asserts primarily speculative opinion; hence, no additional response is required.

Comment O6.46: This comment states that the results of the Draft EIR's analyses are provided as single-point values, including emissions estimates for various air pollutants, including greenhouse gases, the congestion parameters associated with traffic impacts, the results of the VMT analyses, and finally the results of the incremental cancer and non-cancer risks to specific receptors as a result of the Project. Often

these results are stated to high levels of precision such as the number of significant digits, falsely indicating the level of confidence in the analyses.

The comment states that the results of any analysis presented in the Draft EIR rely on a large set of inputs, almost all of which are not firm but are, in fact, the results of assumptions and choices. Even when the analysis relies on authoritative references, such as the ITE manual for trip generation, as example, the inputs are not firm and fixed and the uncertainty associated with them is often clear when reviewing the source documents. In the case of the ITE trip generation estimates, they are based on data collected by ITE for "similar" applications and there is significant scatter in the data for trip generation associated with any specific land use. Yet, by using just a mean or average value, the analysis effectively pretends that the underlying data have no uncertainty, and that is simply false.

The comment states that a proper analysis should include the uncertainties associated with critical input values for each analysis and present the results as a range, along with a confidence interval.

Response O6.46: The proposed Project consists of a Specific Plan that would regulate and coordinate long-term buildout of the Project through 2040 and operation of the uses developed within the site. Like most Specific Plans and other land use planning projects, exact timing of build out and the specific onsite tenants are unknown, as detailed in the Draft EIR. It should also be noted that the Specific Plan includes regulations and guidelines related to development and operation of future uses within the site. As detailed within each topical EIR section, specific methodology, use of modeling, and thresholds of criteria are used to determine if significant impacts would occur. For example, the trip generation was determined by utilizing rates from the Institute of Transportation Engineers *Trip Generation Manual* 10th Edition and TUMF High-Cube Warehouse Trip Generation Study, WSP, January 29, 2019, the trip distribution used existing traffic flow patterns and consultation with the County of San Bernardino Public Works Department, the VMT analysis used the San Bernardino County Transportation Demand Model, the Air Quality, Energy, and Greenhouse Gas analysis used CalEEMod, EMFAC, SCAQMD provided meteorological data, and AERMOD. These sources are commonly used for planning level analysis, each with ranges and confidence intervals available.

Based on standard methodology for modeling impacts for various topic areas in a Draft EIR, CEQA analysis is largely based on fixed numeric thresholds and numeric inputs and outputs. For example, impacts related to air quality are analyzed against fixed numeric thresholds, and modeling of air quality emissions is based on fixed numeric inputs of data related to proposed uses or equipment and fixed numeric outputs of emissions levels, based on the degree of specificity that is known for each project. Providing a range of results for numeric outputs would not provide adequate disclosure of potential impacts and would be inaccurate. Therefore, the modeling conducted for the Draft EIR utilizes the proper methodology for disclosure of impacts based on regulatory thresholds and standard modeling procedures.

Comment O6.47: This comment provides disagreement with the parameters that were input for the HRA analysis including truck idling, wind, volume sources and states that the highly precise modeling information provides no discussion of uncertainty; and therefore, the comment asserts that the Draft EIR is misleading.

Response O6.47: According to the US EPA (https://www.epa.gov/scram/air-quality-models) air quality models use mathematical and numerical techniques to simulate the physical and chemical processes that affect air pollutants as they disperse and react in the atmosphere. Based on inputs of meteorological data and source information like emission rates and stack height, these models are designed to characterize primary pollutants that are emitted directly into the atmosphere and, in some cases, secondary pollutants that are formed as a result of complex chemical reactions within the atmosphere. These models are important to our air quality management system because they are widely used by agencies tasked with controlling air pollution to both identify source contributions to air quality problems and assist in the design

of effective strategies to reduce harmful air pollutants. For example, air quality models can be used during the permitting process to verify that a new source will not exceed ambient air quality standards or, if necessary, determine appropriate additional control requirements. In addition, air quality models can also be used to predict future pollutant concentrations from multiple sources after the implementation of a new regulatory program, in order to estimate the effectiveness of the program in reducing harmful exposures to humans and the environment. As such, single point values are the standard output and appropriate for use in CEQA, analysis contrary to the commenters assertion that single point values are not accurate representations of the degree of impact.

The parameters chosen for the HRA analyses were based on guidance from SCAQMD and OEHHA and represent reasonable assumptions based on studies of similar sites. Under CARB requirements, trucks may not idle for more than 5 minutes (a restriction that is enforceable); however, the analysis conservatively assumes that trucks will idle for 15 minutes. DPM emission rates are based on data published by CARB as part of the EMFAC 2017 model. Release parameters, such as the release height and initial vertical and lateral dimensions are based on guidance published by SCAQMD. Cancer risks presented in the report represent estimated values as calculated by AERMOD (the approved model) using input parameters recommended by CARB and OEHHA. Given the large number of variables there is no way to precisely calculate the risk from any given project. However, regulatory agencies have provided the tools and guidance needed to provide a conservative best estimate in order to aid in the determination as to whether a proposed action would exceed thresholds and result in a significant health impact. This comment does not provide any specific examples of the concerns it raises and asserts primarily speculative opinion; hence, no additional response is required.

Comment O6.48: This comment states that in the following section of the comment letter, the commenter discusses specific comments for the analysis they have reviewed.

Response O6.48: The comment is introductory in nature and does not raise any specific concerns with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required.

Comment O6.49: This comment states that the Draft EIR underestimates traffic impacts such as based on the choice of the truck share as a result of the Project assumed in the analysis. The comment states that the Draft EIR should not have used the 2003 Fontana Truck Study.

Response O6.49: The commenter is referred to Response to Comment O6.14. Therefore, no further response is required.

Comment O6.50: The comment states that SCAQMD concluded 7 years ago that the Fontana Study which uses a 20% truck fleet mix "is not characteristic of high cube warehouses," which comprise the single largest portion of this proposed Project as I have pointed out previously. Thus, the comment states the use of the 20% truck fleet mix is improper and serves to underestimate not only traffic impacts but also all subsequent impacts such as air quality, greenhouse gas emissions, and the health risk assessment.

Response O6.50: The commenter is referred to Response to Comment O6.14. Therefore, no further response is required.

Comment O6.51: This comment states that the truck share assumption is not the only wrong assumption in the traffic analysis. There is no justification provided or discussed for the assumed trip lengths and the trip distributions to and from the Project as used in the analysis. While these may not be known with certainty and assumptions may be unavoidable, the sensitivity of these assumptions (i.e., effects of these assumptions if they were to be different than what is assumed) can and should be done and presented.

Response O6.51: The portion of this comment pertaining to trip lengths was addressed in Response to Comment O6.15. The Project trip distribution was based on the previously approved trip distribution of similar nearby projects which local modifications to account for project access and the location of truck routes. The trip distribution was reviewed for reasonableness by County staff and approved by same prior to initiation of the project impact analysis. This comment asserts primarily speculative opinion; hence, no additional response is required.

Comment O6.52: This comment states that the proposed air quality mitigation measures for both construction and operations are not enforceable as a practical matter.

Response O6.52: The construction and operational related air quality related mitigation measures would be implemented through the County's construction and/or operational permitting process. As shown in Chapter 4 of this Final EIR, the MMRP, the required measures would be required to be shown in the applicable construction, occupancy, or operational plans and permits and the County of San Bernadino (most often the Building and Safety Division, as detailed in the MMRP) would verify compliance during typical construction or operational, development reviews, site visits, and permitting reviews. All of the measures within the MMRP are enforceable by the Lead Agency (the County). This comment does not provide any specific examples of the concerns it raises and asserts primarily speculative opinion; hence, no additional response is required.

Comment O6.53: This comment states that Mitigation Measure AQ-1, for use of "Super-Compliant" low VOC paints, does not include discussion about how this would be enforceable. The comment states that there is no authority or permit cited that will ensure oversight by a regulatory or similar body.

Response O6.53: Mitigation Measure AQ-1 requires that construction plans and specifications state that the Project shall utilize "Super-Compliant" low VOC paint. The inclusion of this information on the construction plans would be verified by the County Building and Safety Division prior to issuance of construction permit. In addition, the measure would be verified by the County along with all other construction measures during typical construction site visits and permitting reviews pursuant to the County's existing process. This comment asserts primarily speculative opinion; hence, no additional response is required.

Comment O6.54: This comment states that Mitigation Measure AQ-2, related to use of Tier 4 Final construction equipment that is over 50 horsepower (hp) is nothing more than an aspirational goal, unlikely to be implemented as used in the analysis, which takes credit for its implementation, who will verify that this is actually going to occur and be documented as such for each such piece of equipment. This comment asserts primarily speculative opinion; hence, no additional response is required.

Response O6.54: Mitigation Measure AQ-2 requires that construction plans and specifications include the requirements related to use of Tier 4 Final construction equipment. Also, the text of the measure states that the Lead Agency shall conduct an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts. As detailed in Response O6.53, inclusion of this information on the construction plans would be verified by the County Building and Safety Division prior to issuance of construction permit. In addition, the measure would be verified by the County along with all other construction measures during typical construction site visits and permitting reviews pursuant to the County's existing process.

Comment O6.55: This comment states the Draft EIR admits that there is no way to quantify if Mitigation Measures AQ-3 through AQ-7 will actually ensure any reductions for operational emissions.

Response O6.55: This comment inaccurately states that implementation of Mitigation Measures AQ-3 through AQ-7 would not result in a reduction of emissions. Mitigation Measure AQ-3 provides for signage

for enforcement of existing idling regulations, compliance of which would reduce emissions over non-compliance. It should be noted that although CARB's idling limit is 5 minutes, SCAQMD recommends that the on-site idling emissions should be estimated for 15 minutes of truck idling, which takes into account on-site idling that occurs while the trucks are waiting to pull up to the truck bays, idling at the bays, idling at check-in and check-out, etc. As such, the Draft EIR analysis estimated truck idling at 15 minutes, consistent with SCAQMD's recommendation. Hence, implementation of a 5-minute idling maximum would reduce emissions over those estimated for the Project. Similarly, Mitigation Measures AQ-4 through AQ 7 provide for energy efficient vendor trucks, electric vehicle charging stations, electric interior vehicles and implementation of a Transportation Management Association (TMA) or similar mechanism would reduce emissions over those estimated for the Project as detailed in Draft EIR Section 5.3, *Air Quality*.

Comment O6.56: This comment states that reductions assumed by implementation of Mitigation Measure AQ-1 and Mitigation Measure AQ-2, which are unenforceable, should not be assumed and that construction emissions are likely to be significantly greater than estimated and the results of these greater construction emissions have not therefore been properly assessed in the health risk analysis – which therefore underestimates the health impacts from the construction emissions.

Response O6.56: Refer to Responses O6.53 and O6.54 regarding enforceability of Mitigation Measures AQ-1 and AQ-2. In addition, Draft EIR Section 5.3, *Air Quality,* provides the maximum peak emissions from both without (Table 5.3-7) and with (5.3-8) implementation of these measures for regional significance levels and Table 5.3-15 through 5.3-18 for localized significance thresholds. The Draft EIR evaluation provides the maximum peak modeled emissions based on conservative construction assumptions (detailed in Draft EIR Section 3.0, *Project Description*) and pursuant to SCAQMD methodology. Thus, impacts from the construction emissions were properly evaluated. This comment asserts primarily speculative opinion; hence, no additional response is required.

Comment O6.57: This comment states that the assumptions used in the construction equipment tables are unenforceable. The comment states that what if additional graders were used or what if equipment was used more than 8-hours per day. The comment asks how the construction assumptions are tracked.

Response O6.57: Consistent with previous responses, the construction activities, including equipment, hours per day, time of day, and other considerations are provided by the County Building and Safety Division at the time of construction permitting to be specific and most effective for each development project. Also, PDF AQ-2 states that the amount of daily grading disturbance area shall be limited to not exceed the assumptions specified in the Draft EIR Air Quality Impact Analysis. Construction equipment would be verified by the County along with all other construction permitting measures during typical construction site visits and permitting reviews pursuant to the County's existing process. This comment does not provide any specific examples of the concerns it raises and asserts primarily speculative opinion; hence, no additional response is required.

Comment O6.58: This comment states that the VMT analysis uses numerous unsupported assumptions and is unreliable. The comment states that the VMT analysis relies on a comparison of Project VMT on an employee/person as compared to the existing VMT per employee/person for the "unincorporated County." In doing this analysis, the analysis used the VMT/employee metric for "only home-based work" trip purposes. The comment states that San Bernardino County is the largest County in the U.S. and it is not clear how the TAM for the County estimates both the HBW VMT and/or the number of employees in the entire unincorporated portion of this County with any sort of precision. The comment states that it is ridiculous to presume that, given the undoubtedly wide assumptions made in this analysis, that comparing the two metrics and determining if one is lower than 96% of the other is meaningless. It would be meaningful if the uncertainties in the metrics were also discussed. Otherwise, the comment states that the

difference of VMT has no statistical significance at all. Thus, the comment concludes that the VMT analyses and their conclusions are meaningless and unreliable.

Response O6.58: This comment does not provide any specific examples of the concerns it raises and asserts primarily speculative opinion. A detailed documentation of the methodology and data used for *SBTAM is provided in the SBTAM Development and Validation Report and User's Guide*. The report is inclusive of socio-economic data utilized in SBTAM, mode choice, trip distribution, trip assignment and post processing specific to the County of San Bernardino.

For validation purposes the difference between model-estimated traffic volumes and ground counts are evaluated against the maximum allowable deviation prescribed by Federal Highway Administration (FHWA) and National Cooperative Highway Research Program (NCHRP) 255 guidelines.

All screen lines fall within acceptable local and industry standards as prescribed by NCHRP 255 guidelines. Vehicle miles travelled (VMT) from SBTAM has been compared against the VMT reported from the Highway Performance Monitoring System (HPMS) and the SCAG V5 model and the percentage difference falls within 5% which is the maximum desired threshold defined by SANBAG.

The VMT analysis provided is of statistical significance at a planning level as the SBTAM model is thoroughly validated and within allowable percentage difference threshold in comparison to Federal and State approved VMT models which is backed by statistically significant technical data.

Comment O6.59: This comment states that NOx emissions related to buildout of the Upzone Site, which are 43.5 lb/day and 44.58 lb/day for summer and winter, are under the significance threshold is 55 lb/day; however, given the numerous assumptions inherent in the emissions estimates for these operation emissions, including uncertainties in emissions factors and emissions estimation methods, without strict enforceability and actual verifiability of each of the inputs used in arriving at the summer and winter lb/day estimates the threshold of 55 lb/day is at risk of being exceeded. The comment states that the Draft EIR should discuss how the NOx estimate inputs would be enforced.

Response O6.59: The proposed Project provides for direction of land development and does not include a specific development proposal. Thus, the evaluation of the Upzone Site is based on buildout of the site, and the change from the existing zoning to the proposed zoning. At the time when the County receives a development application, the County would go through the standard development review that includes technical studies and information as necessary. As the comment is referring to operational emissions that would occur from buildout of the Upzone Site, any proposed development that is greater or more intense would be required to verify to the County through technical documentation that increased emissions that could exceed thresholds would not occur, prior to permitting approval. This comment does not provide any specific examples of the concerns it raises and asserts primarily speculative opinion; hence, no additional response is required.

Comment O6.60: This comment states that it is not clear which Global Warming Potential (GWP) values are used in the GHG analysis. The comment states Table 2-2 from the Greenhouse Gas Analysis (Draft EIR Appendix C3) provides, correctly the GWP values for selected GHG from an earlier Intergovernmental Panel on Climate Change (IPCC) 2nd Assessment Report as well as a more recent 5th Assessment Report. The comment states that it is not clear which of these two sets of GWP values was used in the Draft EIR's GHG estimates. The comment states that Draft EIR should have used the more recent GWP values.

Response O6.60: The CalEEMod model was utilized to calculate Project GHG emissions, and the GWP values are built into the model. The GWP values utilized in the model are based on the 2007 IPCC's Fourth Assessment Report and are consistent with CARB's Scoping Plan Update. These values are a GWP of 25 for CH4 and a GWP of 298 for N2O.

Comment O6.61: This comment states that two of the more important GHG gases that are or can be emitted from combustion equipment are methane and nitrous oxide (N_2O), but the Draft EIR does not discuss the basis for the emission factors for these two pollutants which are used in the calculations for the specific equipment engine types considered. The comment states that the Draft EIR should provide a more thorough discussion of these emission factors.

Response O6.61: Emissions of CH4 and N2O were calculated using the CalEEMod model, which was developed by air districts throughout California. CalEEMod uses emission factors from CARB's EMFAC model to calculate GHG and criteria pollutant emissions.

Comment O6.62: This comment states that the enforceability of the San Bernardino County GHG approach to mitigating significant GHG Emissions is not clear. The comment asks how any commitments associated with these point determinations are made enforceable in the Draft EIR and states that this should be discussed more thoroughly.

Response O6.62: As detailed on Draft EIR page 5.8-39, Mitigation Measure GHG-1 requires that prior to issuance of building permits for each building, the Project applicant shall provide documentation to the County of San Bernardino Building Department demonstrating that the improvements and/or buildings subject to the building permit application include measures from the Greenhouse Gas Reduction Plan Screening Tables, as needed to achieve a minimum of 100 points. Specific measures may be substituted for other measures that achieve an equivalent amount of GHG reduction, subject to the County of San Bernardino Building Department approval. Thus, Mitigation Measure GHG-1would be enforced during the permitting review for each development.

Comment O6.Attachment A: Attachment A provides the experience summary and resume for Dr. Ranajit Sahu.

Response O6.Attachment A: The attachment provides the qualifications for the commenter and does not raise any specific concerns with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required or provided.

LETTER O7: Law Office of Abigail Smith on behalf of the Sierra Club-San Gorgonio Chapter (9 pages)

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VIA E-MAIL ONLY

December 15, 2021

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Re: Public Comments—Bloomington Business Park Specific Plan Draft Environmental Impact Report

Dear County of San Bernardino:

Please accept these comments on behalf of the Sierra Club-San Gorgonio Chapter regarding the Draft Environmental Impact Report ("EIR") prepared for the Bloomington Business Park Specific Plan.

The Project proposes the development of a 213-acre site with a total of 3,235,836 square feet of industrial development. The Project will replace low density residential zoning with "Specific Plan" zoning to allow for the construction and operation of "fulfillment center," "high cube warehouse," and "trailer parking" uses at the Project site. The Project would also include the rezoning of a separate 24-acre property from low density residential to "residential multiple" to allow 480 multi-family residential units, whereas the site's current zoning would allow no more than 52 residential units. Development of the Upzone site would also involve the demolition of existing homes. O7.1

The Specific Plan Project site is ill-suited for the proposed land use changes and industrial development plan that would radically alter the character of the area. Surrounding uses include predominately single-family homes, schools, and parks. Some homes are located less than 20 feet from the Project site. At least three schools are located within immediate proximity of the site. As such, residents, children, and other sensitive receptors will be exposed to the Project's relentless operations. In addition, because the O7.2

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Project is expected to generate 8,555 daily vehicle trips, the effects of the intense industrial development will be deeply felt insofar as Project trucks and vehicles will use local roadways, thereby bringing air pollution and noise to the community at large. O7.2 cont.

I. The Project Must Be Designed and Conditioned to Avoid Impacts to Sensitive Receptors to the Greatest Extent Feasible

When locating and designing projects such as industrial warehouse projects that bring significant air quality impacts, Sierra Club strongly encourages the County to follow the recommendation of the California Air Resources Board ("CARB") that any warehouse land uses should not be located within 1,000 feet of residential uses or areas designated for residential development.[1] Here, existing single-family residences are located within less than 20 feet of the site. Site design changes—including increasing the distance between the Project buildings and sensitive receptors —should be imposed. Changes to the site design to avoid placement of buildings near sensitive receptors should also be considered feasible mitigation for the Project's significant environmental impacts to include air quality impacts. **At the least, appropriate buffering—i.e., increasing the distance between Project operations by shrinking or eliminating building space—must be incorporated into the Project's site design** to minimize the Project's adverse impacts to sensitive receptors to the extent feasible. According to CARB [2], individuals most likely to be affected by air pollution include children under 14. Land uses considered **sensitive receptors include residences and schools**. The Project could be reduced in terms of its size, scale, and intensity of use to reduce impacts to sensitive receptors. O7.3

In addition, the Draft EIR assumes that Project-related trucks will follow a particular route avoiding Santa Ana Avenue and other local roadways. This assumption is erroneous where the Project does not restrict vehicle traffic. Accordingly, the Project must be conditioned such that Project trucks will only use prescribed truck routes and routes consistent with the assumptions of the Draft EIR. O7.4

II. The Project Is Inconsistent with Policies of the San Bernardino Countywide Plan

The Project conflicts with the San Bernardino Countywide Plan ("Countywide Plan") including, but not limited to: Policies LU-2.1, LU-2.2, LU 2.3, LU-4.5, V/H-1.1, and NR-7.1. The Project is not consistent or compatible with surrounding uses. It would introduce a massive industrial complex in an area typified by low density residential uses. O7.5

[1] www.arb.ca.gov/ch/handbook.pdf
This hyperlink reference to a distinct document and its contents, and all hyperlinks providing links to distinct webpages and/or documents, and their contents, that are cited in this letter are fully incorporated herein by reference.
[2] https://ww3.arb.ca.gov/ch/handbook.pdf

schools, and parks. Most notably, the Project directly conflicts with Policy LU-6.4 which states: "[w]e approve Land Use amendments for new industrial development only if they are at least one-half mile from an existing … primary or secondary school or public park." There is no justification for waiving this requirement here. For instance, there are no overriding benefits of the proposed specific plan zoning such as provisions for open space, parks, community amenities such as community centers, horse trails, etc. Commonly these types of features are included within specific plan zoning to offset increases in density, changes in use, or likewise. Here none of those principles apply as the Project constitutes a basic industrial development complex with no community features or benefits. As the Draft EIR recognizes, there are three schools located within ¼ mile of the Specific Plan site and a park at the southeastern boundary of the Specific Plan site. This Project represents a blatant disregard for Policy LU-6.4 as well as the principle behind the policy that sensitive uses such as schools shall not be located near sources of pollution and noise. **O7.5 cont.**

III. The Draft EIR Does Not Comply with CEQA and Additional Mitigation is Required

The Draft EIR does not comply with the requirements of the California Environmental Quality Act ("CEQA") and additional mitigation must be imposed. **O7.6**

A. Aesthetic Impacts

Contrary to the Draft EIR's conclusions, impacts with respect to visual resources are potentially significant and mitigation is required under Impact AE-3. The Project's scale, size, and operational characteristics are inconsistent with the policies of the Countywide Plan, including, but not limited to, Policies LU-2.1, LU-2.4, and LU-4.5. **O7.7**

B. Agricultural Impacts

The Project conflicts with Countywide Plan Policy NR-7.1 in that it does not protect economically viable and productive agricultural lands from the adverse effects of urban encroachment and non-agricultural land development. The Project removes the Agricultural Overlay that is "intended to create, preserve, and improve areas for small-scale and medium-scale agricultural uses" including land "for the sale of plant crops". According to the EIR certified for the Countywide Plan, "the preservation of agricultural land uses is essential to the economic wellbeing of the County." **O7.8**

The Project site is currently occupied by four commercial nurseries including a palm tree nursery. The Upzone site also is occupied by a small nursery. According to the Draft EIR, the Project site contains .04 acres of prime farmland and 23.55 acres of farmland of statewide importance. Because the Project will remove this farmland and not replace it, the Project results in adverse impacts to agricultural resources in terms of Impacts AG-1 and

AG-5 as well as Policy NR-7.1 Additionally, it is clear that the Project results in potentially significant cumulative impacts where it will convert a sizeable portion the existing farmland of statewide importance with no corresponding mitigation. The Draft EIR acknowledges that the loss of farmland would contribute to the loss of agricultural land within the County, but it claims that *other* projects would mitigate the impact. This is improper. The Project must mitigate its cumulative impact pursuant to NR Policy 7.2. According to the EIR for the Countywide Plan, in 2014, there was 2,639 areas of agricultural uses in Unincorporated Areas within the Valley region of the County; roughly half of the total land mapped as "important farmland" is in the Valley Region; and roughly half of that land is farmland of statewide importance. In light of this information, the loss of 23.55 acres of farmland of statewide importance due to the Project must be considered cumulatively significant. O7.8 cont.

C. Air Quality Impacts

Draft EIR Figures 5.3-4 and 5.3-5 purport to describe the path of truck travel to and from the Project site. It does not appear that the Project is conditioned so that trucks are prohibited on other roadways consistent with the Draft EIR's assumptions. If not, air quality and traffic impacts will be greater or different than assumed by the Draft EIR. In particular, impacts to be sensitive receptors will be much greater.

An EIR's central purpose is to identify a project's significant environmental effects and then evaluate ways of avoiding or minimizing them. Pub. Res. Code §§ 21002.1(a), 21061. The County must adopt *any* feasible mitigation measure that can substantially lessen the project's significant air quality environmental impacts. Pub. Res. C. § 21002; Guidelines, § 15002(a)(3). First, any measure intended to benefit the environment or to lessen the environmental impact of the Project must be adopted through the CEQA mitigation program to ensure it is fully enforceable and carried forward. Thus, the so-called "Project Design Features" related to air quality impacts must be adopted through the CEQA mitigation program. O7.9

The Project should adopt further sustainability measures, including:

- Constructing building roofs with "light colored roofing materials." Cool roofs retain less heat and reflect more sunlight, thus lowering energy demand and reducing the "heat island" effect of a building. The Project must be conditioned to use roofing materials with a solar reflectance index ("SRI") of 78 for at least 75% of the roof surface (portions not covered in solar), consistent with USGBC standards. To provide measurable environmental benefit, the roofing material must be at the highest possible rating. *See*, [3].

[3] https://www.energy.gov/sites/prod/files/2013/10/f3/coolroofguide.pdf

- Obtaining LEED certification to the most current USGBC rating system, where such certification would require the applicant to implement sustainability measures that provide environmental benefits and off-set impacts.
- Installing concrete, preferably white concrete, in all parking areas. Light-colored concrete is more reflective sunlight, thus employing concrete in all parking areas will further reduce the "heat island" effect of the Project[4] [5]. Among other benefits, cooler surfaces and air reduce the need for air conditioning in vehicles.
- Installing and utilizing solar power for 100% of the facility's total electricounty demand including in parking areas. Solar power is entirely feasible and is particularly appropriate for a Project of this size and location. Solar power is feasible.
- Establishing a homeowner fund for installation of air filtration units to benefit local residents adjacent to and near the Project site.

O7.9 cont.

D. Energy Impacts

State CEQA Guidelines Appendix F provides that "[t]he goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include: (1) decreasing overall per capita energy consumption; (2) *decreasing* reliance on fossil fuels such as coal, natural gas and oil, and (3) *increasing* reliance on renewable energy sources." (emphasis added) Appendix F puts "particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy." The Draft EIR's finding of less-than-significant with respect to energy resources is not supported.

First, the Draft EIR discloses that the Project will consume approximately 1.5 million gallons of fuel under Option 1 or approximately 2 million gallons of fuel under Option 2. The Draft EIR concludes that impacts are less-than-significant with respect to transportation energy resources because it states the Project will comply with CARB's idling restrictions (*i.e.*, on-site truck idling is limited to no more than 5 minutes). However, compliance with idling restrictions does not reduce on-road fuel usage. The finding of less-than-significant is not supported. Similarly, compliance with regulations such as CalGreen/Title 24 is not sufficient to reduce electricity demand to a level of less-than-significant. The Project creates a massive demand for electricity, but does not, for instance, "increase reliance on renewable energy sources." *See*, CEQA Guidelines Appendix F. The Draft EIR merely claims the Project's energy usage is "typical for urban development." This statement does not support a finding of less-than-significant.

O7.10

It is also inconceivable that a development scenario involving more than 3 million square feet of industrial warehouse space will result in a less than significant cumulative

[4] https://coolcalifornia.arb.ca.gov/cool-pave-how
[5] https://heatisland.lbl.gov/coolscience/cool-pavements

impact to energy resources as claimed by the Draft EIR. The Draft EIR provides neither a qualitative nor quantitative analysis of the Project's cumulative energy impacts. Rather it vaguely claims that "some of the [other cumulative] developments could provide for additional reductions in energy consumption by use of solar panels, sky lights, or other LEED type energy efficiency infrastructure." This is inadequate. This Project must mitigate its energy impacts. The installation and utilization of a solar energy system for even half of the facility's energy demand could vastly reduce the Project's energy impacts consistent with Guidelines Appendix F. The County must impose measures on the Project to ensure compliance with Guidelines, Appendix F and to advance the policies and goals of Senate Bill 100 which commits to 100% clean energy in California by 2045 [6]. O7.10 cont.

E. Land Use Impacts

As discussed throughout this letter, the Project conflicts with policies and goals of the San Bernardino Countywide Plan, including but not limited to, Policies LU-2.1, NR-7.1, NR-7.2, NR-1.7, LU-2.7, LU-4.5, LU-6.4, NR-3.1, HZ-3.18, HZ-2.7, and HW-2.2. To the extent the Project conflicts with an adopted land use plan, *i.e.*, the Countywide Plan, there are potentially significant CEQA land use impacts and mitigation is required. Mitigation would include eliminating industrial uses, shrinking buildings, increasing setbacks, providing open space, and otherwise reducing the size and scale of the Project to reduce impacts to adjacent and nearby sensitive uses such as residences and schools. O7.11

F. Noise Impacts

There are major flaws in the EIR's noise analysis. The analysis must be revised. Construction and operational noise impacts are potentially significant and additional mitigation is required.

By way of example, existing, ambient noise measurements were apparently taken at "receiver locations" (*i.e.*, adjacent residences) over a 24-hour period and the Draft EIR presents an "average" noise level at these locations. Ambient noise measurements must be taken at nighttime and daytime, given that different noise standards apply in each scenario. Using an "average" noise level over a period of 24 hours does not account for the fact that ambient noise is likely to be less during nighttime hours, and therefore Project-related noise generating activities are likely to be more pronounced when measured against the existing nighttime noise environment. Since the Project will be operational 24-hours per day, it is important that background noise measurements be taken during nighttime hours to compare against Project-related noise during nighttime hours. Using "average" noise levels presents a skewed view of the Project's contribution and adverse change to the noise environment. O7.12

[6] https://www.energy.ca.gov/sb100

By way of further example, it is unclear why noise measurements were taken at the receiver location (at structures/homes), rather than at the residential property line. The assumption that residents do not use their backyards is presumptuous and unreasonable[7]. In fact, the Draft EIR assumes that none of the adjacent residences have a backyard or outside space that is utilized. Measurements must be taken at the residential property line in accordance with Development Code section 83.01.080 (a)(1) which states, "noise shall be measured at the property line of the nearest site that is occupied by and/or zoned or designated to allow the development of noise-sensitive land uses." If measurements are taken at the property line as required, noise impacts are likely to be greater. For instance, with respect to construction noise at Receiver Location SP-R6, the "highest noise level" is 79.6 dBA Leq.; and the distance between the construction activity and the "receiver location" is a mere 13 feet. If measured at the property line as appropriate, construction noise levels are likely to exceed the adopted construction noise threshold of 80 dBA. **O7.13**

Again for instance, operational noise levels must be disclosed in the "mitigated" and "unmitigated" scenarios. For instance, Table 5.12-8 shows Opening Year – Option 1 Daytime Operational Noise Levels *with mitigation*, namely the analysis assumes the implementation of Mitigation Measure NOI-1. The Draft EIR must disclose operational noise levels *without mitigation*, to fully disclose the Project's noise impacts, to determine if noise levels exceed thresholds of significance, and to determine the effectiveness of mitigation. And, if impacts are significant prior to mitigation, the lead agency must adopt *all* feasible mitigation per CEQA, which may go beyond NOI-1. **O7.14**

Further for instance, Tables 5.12-9 and 5.12-12 indicate a potentially significant noise impact during nighttime hours. Operational noise impacts at nighttime exceed the nighttime noise threshold of 45 dbA. The Draft EIR finds impacts to be less than significant because the standards have been "adjusted to reflect the ambient noise levels at all nearby receiver locations." This "adjustment" of the applicable noise standards is not shown to be appropriate. Overall, the Project exceeds the threshold of significance established in NOI-1 in that it generates noise in excess of standards established in the Countywide Plan and Development Code/noise ordinance. **O7.15**

Finally, RR-NOI-1 represents deferred mitigation in violation of CEQA. The EIR must propose enforceable and certain mitigation and may not be rely on future studies to **O7.16**

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[7]For instance, the Draft EIR's noise section states: "Location SP-R6 represents the existing residence at 11198 Locust Avenue, approximately 13 feet south of the site. Since there are no private outdoor living areas (backyards) facing the site, SP-R6 is placed at the building façade. A 24-hour noise measurement was taken near this location, SP-L6, to describe the existing ambient noise environment."

determine the level of impact. Also, as discussed, the impact level must be assessed and disclosed prior to the implementation of any purported mitigation. **O7.16 cont.**

G. The EIR's List of Project Objectives Is Unduly Narrow, the Alternatives Analysis is Faulty, and the County Must Adopt the Environmentally Superior Alternative

CEQA requires that an EIR include a list of "project objectives" setting forth the goals of the Project, and it is against the list of "project objectives" that the alternatives to the proposed project are evaluated. *See, North Coast Rivers Alliance v. Kawamura* (2016) 243 Cal.App.4th 666-667. Thus the list of project objectives must be flexible enough to accommodate reasonable alternatives to the proposed project to allow decisionmakers to meaningfully consider alternatives that reduce project impacts. Here the EIR's list of project objectives is unduly narrow, thereby precluding the meaningful consideration of environmentally superior alternatives. *See, id.* at 668. The Draft EIR's "Project Objectives" include four objectives involving the implementation of a "master-planned" development inclusive of "guidelines and standards for building and site-development", *i.e.*, specific plan zoning. Since Alternative 3 would eliminate the Specific Plan zoning aspect of the Project, it is easily dismissed by decision-makers despite providing demonstrated environmental benefits. The Project Objectives must be revised to be more inclusive of objectives related to the Project's goal to develop "industrial business park" uses apart from "specific plan" zoning. **O7.17**

CEQA requires that an EIR describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant effects of the project." Guidelines, § 15126.6 (a). The EIR must also evaluate a "no project" alternative. Guidelines, § 15126.6 (e). The Project's Draft EIR evaluates only *one* alternative apart from the "no project" alternative (the EIR deems Alternatives 1 and 2 "no project" alternatives). The evaluation of one development alternative that arguably meets basic "project objectives" does not constitute a "reasonable range" of project alternatives as required by CEQA. The EIR must consider other alternatives. This should include the development of business park uses with smaller office and professional buildings, consistent with the goals of the Countywide Plan (*e.g.*, LU-2.7) to provide a balance of jobs and housing to reduce VMT. A business park is also consistent with the "fundamental goal of the Project" to develop a "industrial business park" per the EIR. The Draft EIR should also evaluate an alternative that provides "guidelines" and or "master planning" consistent with *four* of the Project Objectives relating to these concepts. In short, by itself, Alternative 3 does not give decisionmakers a *range* of choices among alternatives that meet basic project objectives. **O7.18**

Alternative 3, the Reduced Project/No Specific Plan Alternative, would develop only Planning Area A resulting in a reduction of 1,122,196 square feet of building space. Alternative 3 is shown to be environmentally superior to the proposed Project with respect to the Project's significant impacts. To ensure that alternatives are properly assessed and considered, CEQA "contains a `substantive mandate' requiring public agencies to refrain from approving projects with significant environmental effects if 'there are feasible alternatives or mitigation measures' that can substantially lessen or avoid those effects'." *County of San Diego v. Grossmont-Cuyamaca Community College Dist.* (2006) 141 Cal.App.4th 86, 98; Pub. Res. Code § 21002. A lead agency may not reject an alternative unless the agency makes findings supported by substantial evidence showing that the alternative is infeasible. Public Resources Code §§ 21081 (a), 21081.5; Guidelines, §§ 15091 (a)(3), 15092. Rejected alternatives must be "truly infeasible." *County of Marina v. Bd of Trustees of Calif. State Univ.* (2006) 39 Cal.4th 341, 369 ("*County of Marina*"); *see*, Guidelines § 15364 (defining "feasible"). Accordingly, absent findings of infeasibility supported by substantial evidence, the County must adopt Alternative 3. **O7.18 cont.**

IV. Conclusion

For these reasons we urge the County to reconsider the size and scope of the overall development; to revise the analysis in the Draft EIR; and to adopt further mitigation. **O7.19**

Thank you for the opportunity to comment on this project.

Sincerely,

Abigail Smith

Abigail Smith
Attorney for Sierra Club – San Gorgonio Chapter

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Response to Letter O7: Law Office of Abigail Smith on Behalf of the Sierra Club-San Gorgonio Chapter (dated December 15, 2021)

Comment O7.1: This comment provides an introduction to the comment letter and a summary of the Project description.

Response O7.1: The comment is general and introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is provided.

Comment O7.2: This comment states that the Specific Plan Area is not suited for the proposed land use changes and that the Project would alter the character of the area, which contains single-family homes, schools, and parks within the immediate vicinity of the Project site. It further states that sensitive receptors within the Project vicinity would be exposed to operational traffic, noise, and air pollutant emissions from the Project.

Response O7.2: The comment does not provide any substantial evidence concerning any environmental impact. Due to the existing limited low-density development and vacancies within the Specific Plan area, buildout and operation of the proposed Specific Plan would increase traffic, noise, and air quality emissions generated from the area.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, while the comment is correct in stating that the Project would result in 8,555 daily vehicle trips, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools.

As detailed in the Impact NOI-1 discussion that begins on page 5.12-26 of the Draft EIR, each of the Project scenarios would implement PDF NOI-2, which would require 12- to 14-foot-high cement block walls at Sites 1 and 2 and 9-foot-high cement walls at Site 4. With implementation of PDF NOI-2, operational noise levels for all scenarios would not exceed the County's exterior noise level standards, as adjusted to reflect the ambient noise levels at all nearby sensitive receiver locations. Additionally, the increase in ambient noise levels would range from 0.1 to 3.0 dBA Leq with the implementation of PDF NOI-2, which would not generate a significant daytime or nighttime operational noise level increase at nearby receiver locations. Additionally, as shown on Draft EIR Figures 3-8 and 3-24, loading dock areas and truck yards are screened and directed away from surrounding sensitive receptors to the greatest extent feasible.

As detailed in the Draft EIR in Section 5.12, *Noise,* starting on page 5.12-48, the proposed Project would generate traffic related noise from operation. As described in Section 3.0, *Project Description*, of the Draft EIR, the proposed Specific Plan buildings would be accessed from Laurel Avenue, Locust Avenue, and Maple Avenue. Tables 5.12-23 through 5.12-24 show that both the Opening Year with Project and

General Plan Buildout with Project conditions would result in increases less than the 1.5 dBA CNEL threshold. Thus, off-site traffic noise impacts from the Project would be less than significant.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment O7.3: This comment states that the Project should follow the recommendation of the California Air Resources Board (CARB) that any warehouse land uses should not be located within 1,000 feet of residential uses or areas designated for residential development. The comment states that site design changes—including increasing the distance between the Project buildings and sensitive receptors —should be imposed to avoid placement of buildings near sensitive receptors and be considered feasible mitigation for the Project's significant environmental impacts to include air quality impacts. The comment also states that the Project could be reduced in terms of its size, scale, and intensity of use to reduce impacts to sensitive receptors.

Response O7.3: The comment does not provide any substantial evidence concerning any environmental impact. The proposed Project would not result in any significant impacts related to sensitive receptors and a buffer of 1,000 feet is not required to reduce impacts. As detailed beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate Project health risk impacts to residents, schools, and workers as a result of exposure to Diesel Particulate Matter (DPM) from heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The maximum non-cancer risks to nearby residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million; and the maximum non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0. As such, operation of the Specific Plan at buildout would not cause a significant human health or cancer risk related to DPM emissions and sensitive receptors, and impacts would be less than significant. Additionally, as substantiated in the Supplemental Air Quality Analysis Memorandum, provided as Appendix A to this Final EIR, the Project would also not result in a cumulative health risk based on the Project's emissions combined with other industrial projects in the vicinity.

In addition, the Draft EIR evaluates the potential of the Project to expose local sensitive receptors, such as residences and schools with substantial pollutant concentrations. As detailed in Draft EIR Tables 5.3-15 through 5.3-18, after implementation of Mitigation Measure AQ-2 (use of Tier 4 Final construction equipment), emissions during construction activities would not exceed the SCAQMD's localized significance thresholds. Also, as detailed in Draft EIR Tables 5.3-19 through 5.3-21, emissions from operation of the Specific Plan would not exceed the SCAQMD's localized significance thresholds for any criteria pollutant at the nearest sensitive receptors. Therefore, impacts related to localized emissions would be less than significant impact. Because the Project would not exceed thresholds for either DPM or localized significance thresholds, the Project would not result in impacts to nearby sensitive receptors and additional buffering is not required.

Comment O7.4: This comment states that the assumption in the Draft EIR assuming that trucks would follow a route avoiding Santa Ana Avenue and other local roadways is erroneous as the Project does not restrict vehicle traffic. Additionally, the comment states that the Project must be conditioned so that Project trucks would only use prescribed truck routes.

Response O7.4: The comment does not provide any substantial evidence concerning any environmental impact. As shown on Figure 3-4, *Circulation Plan,* of the Draft EIR, trucks would not travel along Santa Ana Avenue as they would follow a route generally south to Jurupa Avenue, where trucks would head east on Jurupa Avenue to Cedar Avenue, where they would travel either north to the I-10 or south to SR-60 pursuant to the Specific Plan's truck route. Additionally, pursuant to existing County guidelines, truck travel on Santa Ana Avenue is largely prohibited due to its adjacency to Bloomington High School. Furthermore, the Project would incorporate PDF AQ-22, which would require the Project Applicant/Developer/Owner to post signs at every truck exit driveway providing directional information to the truck route. With implementation of PDF AQ-22, trucks would only utilize assigned truck routes.

Comment O7.5: The comment states that the Project conflicts with Policies LU-2.1, LU-2.2, LU-2.3, LU-4.5, V/H-1.1, and NR-7.1 and states that the Project is not consistent or compatible with surrounding uses. The comment also states that the Project would introduce a massive industrial complex in an area with low density residential uses, schools, and parks. The comment also mentions that the Project conflicts with Policy LU-6.4 and does not offer the community any features or benefits such as community centers, horse trails, etc. The comment also states that sensitive uses such as schools shall not be located near sources of pollution and noise.

Response O7.5: The comment does not provide any substantial evidence concerning any environmental impact. As discussed on pages 5.11-6 of Section 5.11 *Land Use and Planning*, the Project would be consistent with the surrounding uses on the west, north, and east as they include intermixed small to large scale industrial, commercial, residential, and institutional that are variable in density and orientation. As demonstrated in the table below and Table 5.11-2 of the Draft EIR, the proposed Project would not conflict with Policies LU-2.1, LU-2.2, LU-2.3, LU-4.5, V/H-1.1, or NR-7.1.

General Plan Policy	Consistency Determination
Policy LU-2.1 Compatibility with existing uses. We require that new development is located, scaled, buffered, and designed to minimize negative impacts on existing conforming uses and adjacent neighborhoods. We also require that new residential developments are located, scaled, buffered, and designed so as to not hinder the viability and continuity of existing conforming nonresidential development. Policy	**Consistent.** As described in Section 5.1 of the Draft EIR, Aesthetics, upon approval of the Specific Plan and the rezone of the Upzone Site, future developments within the Project sites, including the Opening Year Development – Options 1 and 2 and, would comply with Policy LU-2.1 and site-specific project-level environmental review for the Future Development Area – Specific Plan Buildout and the Upzone Site would also be conducted when future development is proposed. This EIR provides various mitigation measures to ensure

	that negative impacts on existing conforming uses and adjacent neighborhoods are minimized. The proposed Specific Plan Buildout would be consistent with the development standards of the Specific Plan, which includes setbacks from adjacent roadways and residential uses, screening features such as walls and fencing, decorative block walls, and landscape within buffer areas, and variation and articulation of wall treatments to minimize long block walls. Thus, as the Project would not conflict with the policy and incudes design standards that account for offsite uses, the Project is therefore consistent with Policy LU-2.1.
Policy LU-2.2 Compatibility with planned uses. We require that new residential development is located, scaled, buffered, and designed to minimize negative impacts both on and from adjacent areas designated for nonresidential land uses.	**Consistent.** The Project includes rezoning the Upzone Site with higher density residential development; no residential development is currently proposed. Future residential development in the Upzone Site would comply with Policy LU-2.2.
LU-2.3 Compatibility with natural environment. We require that new development is located, scaled, buffered, and designed for compatibility with the surrounding natural environment and biodiversity.	**Consistent.** As described in Draft EIR Section 5.1, Aesthetics, The Specific Plan Area and Upzone Site are flat, historically developed with agricultural uses, and presently surrounded by a mix of land uses, including residential, commercial, light industrial, institutional. The Specific Plan Area is also near a park, public facilities: a Southern California Edison substation and the Crestmore landfill. The area south of Jurupa at Maple Avenue appears to be in its natural form, but it contains the Crestmore landfill, an area of the future development of the West Valley Logistics Center in the City of Fontana, and a hillside in unincorporated County that is zoned for rural residential use. Neither the Specific Plan Area nor Upzone Site is in a natural undeveloped environment. The proposed Specific Plan is surrounded by a mix of residential, commercial, industrial uses; no natural environment surrounds the proposed development footprint. Thus, the proposed Project is consistent with Policy LU-2.3.
Policy LU-4.5 Community Identity. We require that new development be consistent with and reinforce the physical and historical character and identity of our unincorporated communities, as described in Table LU-3 and in the values section of Community Action Guides. In addition, we consider the aspirations section of Community Action Guides in our review of new development.	**Consistent.** As described in Draft EIR Section 5.1, Aesthetics, The Specific Plan Area and Upzone Site are flat, historically developed with agricultural uses, and presently surrounded by a mix of land uses, including residential, commercial, light industrial, institutional. The area surrounding the Specific Plan area includes a variety of industrial developments such as the West Valley Logistics Center. Furthermore, as described in Table LU-3 of the Countywide Plan, a key characteristic of the Bloomington Community is economic activity that benefits local residents and serves the local government. As discussed throughout the Draft EIR, the proposed Specific Plan would provide for employment and taxes which would benefit the local community. Furthermore, the Project would include a Community Benefits Agreement, which would include provisions for funding for community enhancement such as recreational programming, park operations, and enhanced public safety.

Policy H-1.1 Appropriate Range of Housing. We encourage the production and location of a range of housing types, densities, and affordability levels in a manner that recognizes the unique characteristics, issues, and opportunities for each community.	**Consistent.** As discussed in Section 3.0 of the Draft EIR, the Project would rezone the Specific Plan site from residential to a non-residential land use and result in the loss of residential capacity. In compliance with SB 330, however, the Project applicant proposes to rezone the Upzone Site to a higher residential density to offset the loss of residential capacity at the Specific Plan site and avoid a net loss of residential capacity in Bloomington. Specifically, the Project includes a Policy Plan Amendment that would re-designate the entire Upzone Site from Low Density Residential (LDR) to Medium Density Residential (MDR) and a Zoning Amendment to rezone the Upzone Site from Residential Single with 20,000 SF Lot Minimums (RS-20M) to Residential Multiple (RM). The RS-20M zone would allow the development of up to 52 residential units on the 24-acre Upzone Site. The RM zone would allow the development of up to 480 dwelling units. Accordingly, when accounting for the base density of the existing density (52 dwelling units) and the "transfer" of 213 dwelling units from the rezoning of the Specific Plan Area to nonresidential, the Project would increase the residential development capacity in Bloomington by up to 215 dwelling units.
Policy NR-7.1 Protection of agricultural land. We protect economically viable and productive agricultural lands from the adverse effects of urban encroachment, particularly increased erosion and sedimentation, trespass, and non-agricultural land development	**Consistent.** As discussed in Draft EIR Section 5.2, *Agriculture and Forestry Resources*, Planning Area A includes 0.04 acre of prime farmland and 23.55 acres of farmland of statewide importance. However, the area includes a commercial palm tree nursery that is not considered actively productive agricultural lands. Thus, the proposed Project is consistent with Policy NR-7.1.

Policy LU-6.4 states, "Industrial amendments near schools and parks. We approve Land Use Plan amendments for new industrial development only if they are at least one-half mile from an existing or planned public primary or secondary school or public park. We may waive this requirement for obsolete school or park sites or for industrial amendments submitted through a specific plan." The Project requires an industrial amendment, through the required general plan amendment, and the adoption of the Specific Plan. As discussed in the Draft EIR, the proposed Project would not result in significant impacts to sensitive receptors at local schools or parks. Impact AQ-3 in Section 5.3, *Air Quality* concludes that impacts related to exposing sensitive receptors to air pollutants would be less than significant with mitigation. Impact NOI-1 of Section 5.12, *Noise* indicates that construction and operation of the Project would result in less than significant impacts. Furthermore, the Project would include a Community Benefits Agreement, which would include provisions for funding for community enhancement such as recreational programming, park operations, and enhanced public safety.

Comment O7.6: This comment states the Draft EIR does not comply with the requirements of CEQA and additional mitigation must be required.

Response O7.6: The comment does not provide any substantial evidence concerning any environmental impact. The comment is general and introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is provided.

Comment O7.7: This comment states that impacts to visual resources are potentially significant and mitigation is required under Impact AE-3. The comment also states that the Project is inconsistent with Policy LU-2.1, LU-2.4, and LU-4.5.

Response O7.7: The comment does not provide any substantial evidence concerning any environmental impact. As discussed on pages 5.1-13 through 5.1-15 of Section 5.1, *Aesthetics*, development within the Specific Plan Area would change the 213-acre site's residential character to one of industrial business park, the change would not degrade the visual character or quality of the site. As demonstrated in Response O7.5 and in Draft EIR Table 5.11-2 on page 5.11-10, the Project would not conflict with Policies LU-2.1, LU-2.4, or LU-4.5. Thus, impacts related to aesthetics would be less than significant and would not require mitigation.

Comment O7.8: This comment states that the Project conflicts with Countywide Plan Policy NR-7.1 as it does not protect productive agricultural lands from urban encroachment and non-agricultural development by removing the Agricultural Overlay from the Specific Plan Area. The comment further states the Project would remove Farmland and not replace it, which would result in adverse impacts to agricultural resources related to Impacts AG-1 and AG-5, along with Policy NR-7.1. Additionally, the comment states that the Project results in potentially significant cumulative impacts as it converts a sizeable portion of the existing Farmland of Statewide Importance within the Valley Region of San Bernardino County without corresponding mitigation.

Response O7.8: The comment does not provide any substantial evidence concerning any environmental impact. As discussed in Section 5.2, *Agriculture and Forestry Resources,* in Impact AG-2, the Project would amend the Specific Plan site's two land use zoning districts of RS-1-AA and RS-20M to Specific Plan (SP). However, the AA Overlay, according to the Countywide Plan, is not considered a zoning district that is specifically designation for agriculture use. While the AA Overlay allows for agricultural uses compatible with the primary zone, removal of the Overlay would not constitute a conflict with the existing zoning because the AA Overlay exists only to supplement the primary, underlying residential zoning districts.

As discussed in Section 5.2, *Agriculture and Forestry Resources,* a key clause of Policy NR-7.1 is whether the agricultural land is economically viable and productive. In order to determine whether the mapped agricultural farmland within the Specific Plan Area is economically viable and productive, the Draft EIR utilized the California Agricultural Land Evaluation and Site Assessment (LESA) Model, which is a standard assessment tool for determining agricultural land's functionality. Furthermore, as discussed on page 5.2-8 of the Draft EIR, these nurseries do not constitute an agricultural use set forth by California Civil Code Section 3482.5(e). Therefore, the conversion of this land would not result in a conflict with Policy NR-7.1, which only protects economically viable and productive agricultural lands. Furthermore, as discussed under Impact AG-1, Project implementation would cause the removal of 23.59 acres of mapped farmland and reduce the acreage of farmland in Bloomington to 11.4 acres. Based on the LESA model prepared for the mapped agricultural lands, the mapped area received a LESA score of 43. According to the LESA Model Significance thresholds, sites receiving a score of between 40 and 59 points are considered significant only if both the Land Evaluation and Site Assessment weighted factor subscores are each greater than or equal to 20 points. Since only the Land Evaluation subtotal exceeded 20 points and the Site Assessment score did not, the Project's conversion of the prime farmland and farmland of statewide importance to nonagricultural use is not considered significant.

Furthermore, this conversion of 23.59 acres of mapped farmland would not be cumulatively considerable as the conversion of farmland is analyzed on a project-by-project basis and Project impacts are less than significant. Additionally, San Bernardino Countywide Plan Policy NR-7.2 provides mitigation requirements for individual projects that would result in a significant impact related to the conversion of farmland.

Overall, the conversion of 23.59 acres of mapped farmland from development of the proposed Project would not be cumulatively significant.

Comment O7.9: This comment states that it does not appear that the Project is conditioned so that trucks are prohibited on other roadways consistent with the Draft EIR's assumptions. If not, air quality and traffic impacts will be greater or different than assumed by the Draft EIR. In particular, impacts to be sensitive receptors will be much greater. The comment states that PDFs related to air quality impacts must be adopted through the CEQA mitigation program. The comment also states that Project should adopt further sustainability measures, including:

1. Constructing building roofs with "light colored roofing materials." The Project must be conditioned to use roofing materials with a solar reflectance index (SRI) of 78 for at least 75% of the roof surface (portions not covered in solar), consistent with USGBC standards.
2. Obtaining LEED certification to the most current USGBC rating system.
3. Installing concrete, preferably white concrete, in all parking areas.
4. Installing and utilizing solar power for 100% of the facility's total electricity demand including in parking areas.
5. Establishing a homeowner fund for installation of air filtration units to benefit local residents adjacent to and near the Project site.

Response O7.9: The comment does not provide any substantial evidence concerning any environmental impact. To ensure that the identified truck routes are utilized, PDF AQ-22 provides that the Project Applicant/Developer/Owner shall post signs at every truck exit driveway providing directional information to the truck route. The PDFs are included in the Project's Mitigation Monitoring and Reporting Program (MMRP) to ensure implementation along with the Specific Plan. The following responses address each of the comment's recommended sustainability measures:

1. As described on Draft EIR Table 5.8-6 on page 5.8-14, Project buildings would have greatly enhanced cool roof with a Cool Roof Rating Council (CRRC) rating of 0.35 for aged solar reflectance and 0.75 thermal emittance. CRRC is a nonprofit, like USGBC, that provides rating programs for sustainable roofing.
2. As included by PDF AQ-20, the Project will achieve certification of compliance or demonstrate equivalency with LEED green building standards. Additionally, proposed buildings would be constructed in accordance with CalGreen building standards, which would be verified through the County's plan check process.
4. As included by PDF AQ-15, the Project Applicant/Developer shall install all necessary infrastructure (i.e., wiring, reinforced roofs) to allow solar photovoltaic systems on the project site to be installed in the future, with a specified electrical generation capacity, such as equal to the building's projected energy needs. However, provision of solar would not reduce the Project's significant and unavoidable air quality emissions to a less than significant level as these emissions are predominantly driven by vehicle emissions.
5. As described in Response O7.3, based on the Health Risk Assessment and Localized Significance Threshold analysis, the proposed Project would not result in significant impacts related to sensitive receptors and therefore there is no nexus, or connection, to require air filtration units for nearby residential units.

Comment O7.10: This comment describes CEQA Guidelines Appendix F regarding energy and states that the Draft EIR's finding is not supported. The comment states that compliance with regulations such as

CalGreen/Title 24 is not sufficient to reduce electricity demand to a level of less-than-significant. The comment also states that the Draft EIR does not provide either a qualitative or quantitative analysis of the Project's cumulative energy impacts. The comment states that the Project must mitigate its energy impacts, and that installation and utilization of a solar energy system for even half of the facility's energy demand could vastly reduce the Project's energy impacts. The comment further states that the County must impose measures on the Project to advance the state policies that commit to 100% clean energy in California by 2045.

Response O7.10: The comment does not provide any substantial evidence concerning any environmental impact. CEQA Guidelines Appendix F describes the goals and methods of conserving energy and the efficient use of energy. CEQA Guidelines Appendix G provides the thresholds related to energy, which determine if a project has the potential to impact energy. As detailed in CEQA Guidelines Appendix G, Section VI, potential impacts related to energy would occur if the Project would result in a potential impact due to wasteful, inefficient, or unnecessary consumption of energy resources; or if the Project would conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

As detailed in Draft EIR Section 5.6, Energy, the volume of energy supplies that would be used by the Project is identified for both construction and operation and methods and requirements of the Project to not waste, be inefficient, or unnecessarily consume energy are detailed along with the Project's compliance to energy regulations. Additionally, the proposed Project would comply with Thus, the Draft EIR provides the quantitative data and provides a qualitative analysis of the Project's less than significant impact, and mitigation measures are not required. The cumulative analysis on Draft EIR page 5.6-17, details how other development projects would also be ensured to not waste, be inefficient, or unnecessarily consume energy; and thus, cumulative impacts would also be less than significant. Furthermore, as Project-specific impacts related to energy are less than significant, impacts are not cumulatively considerable.

Regarding solar use, PDF AQ-5 provides that the Project would install all necessary infrastructure (i.e., wiring, reinforced roofs) to allow solar photovoltaic systems on the Project site to be installed in the future, with a specified electrical generation capacity, such as equal to the building's projected energy needs. The commenter provides no substantial evidence that installation of solar panels is needed to minimize waste or inefficiency of energy consumption. In addition, PDF AQ-20 provides that the Project will achieve certification of compliance or demonstrate equivalency with LEED green building standards. Furthermore, as detailed in Draft EIR Section 5.6, Energy, impacts related to energy usage would be less than significant. As such, there is no nexus for requiring photovoltaic systems as mitigation, since impacts are not significant.

Also, as described on page 5.8-13 of the Draft EIR, any project that adopts at least 100 points of GHG performance standards listed in the 2021 Screening Tables, would be consistent with the County's GHG Emissions Reduction Plan Update to reduce emissions to 40 percent below 2007 levels, which would be consistent with the State's long-term goal to achieve statewide carbon neutrality (zero net emissions) by 2045. Tables 5.8-6 and 5.8-7 (beginning on page 5.8-14), show that the proposed Specific Plan Project (including all three development scenarios) would earn 171 points and the Upzone Site would earn 104 points on the County's 2021 GHG Screening Tables, which would both exceed 100 points and exceed a 40 percent reduction below 2007 levels, and therefore, would be consistent with the State's goal of carbon neutrality (zero net emissions) by 2045. Mandatory inclusion of these performance standards will reduce the Project's energy consumption.

Comment O7.11: This comment states that the Project conflicts with policies and goals of the Countywide Plan, including but not limited to, Policies LU-2.1, NR-7.1, NR-7.2, LU-2.7, LU-4.5, LU-6.4, NR-3.1, HZ-3.18,

HZ-2.7, and HW-2.2. The comment also states that there are potentially significant CEQA land use impacts and mitigation is required including eliminating industrial uses, shrinking buildings, increasing setbacks, providing open space, and reducing the size and scale of the Project

Response O7.11: The comment does not provide any substantial evidence concerning any environmental impact. Refer to response O7.5 above. As discussed in Table 5.1-1 in Section 5.1, *Aesthetics* and Table 5.11-1 in Section 5.11, *Land Use and Planning*, the Project provides a consistency analysis for the policies discussed above. As shown in Table 5.11-1 of the Draft EIR, the Project would be consistent with the aforementioned policies upon approval of the Specific Plan and would not require mitigation to reduce impacts as impacts are less than significant. Additionally, proposed buildings would be required to comply with setbacks, open space provisions, and other design guidelines set forth by the Specific Plan and the County Code, which would be verified through the County's plan check process.

Comment O7.12: This comment states that there are flaws in the Draft EIR's noise analysis and construction and operational noise impacts are potentially significant. The comment further states that noise measurements were averaged over a 24-hour period and that ambient noise measurements must be taken at nighttime and daytime. According to the comment, using average noise levels presents a skewed view of the Project's noise impacts.

Response O7.12: The comment does not provide any substantial evidence concerning any environmental impact. The comment falsely suggests that all the measurements were combined using "average" noise levels to present a skewed view of the Project contributions. As discussed in Section 5, existing ambient noise level measurements were collected over a 24-hour period at 14 locations. The 24-hour measurement period includes the hourly equivalent noise levels for each hour of the day. A total of 1,440 individual one-minute noise level measurements were collected at each location. The 60 one-minute noise level measurements were combined to describe the equivalent noise level for each of the daytime hours from 7:00 a.m. to 7:00 p.m. and each the nighttime hours from 7:00 p.m. to 7:00 a.m. The individual equivalent hourly noise level measurement summaries at each of the 14 locations are included in Appendix 5.2. By collecting individual hourly noise level measurements, it is possible to describe the typical daytime and nighttime noise levels and calculate the 24-hour CNEL.

Comment O7.13: This comment states that noise measurements should have been taken at the property lines of sensitive receiver locations instead of at the location itself. It further states that if measurements were taken at the property line, noise levels would likely exceed the adopted construction noise threshold of 80 dBA.

Response O7.13: The comment does not provide any substantial evidence concerning any environmental impact. The comment appears to conflate the noise level measurement locations used to describe the existing ambient noise level in Section 5 with the sensitive receiver locations in Section 8 used to estimate the long-term operational and short-term construction noise impacts. The noise study does not assume that residents do not use their backyards. Noise level measurements are generally not collected on private property that requires access to individual backyard areas. The comment suggests that measurements must be taken at the property line in accordance with Development Code Section 83.01.080[a][1]. The comment is trying to apply provisions in the County Development Code but fails to acknowledge that Section 83.01.080(g)(3) considers noise sources associated with construction activities as exempt if activities do not take place between the hours of 7:00 p.m. of any one day and to 7:00 a.m. of the next day, or on Sundays or federal holidays.

Comment O7.14: This comment states that operational noise levels must be disclosed in the mitigated and unmitigated scenarios. The Draft EIR must disclose operational noise levels without mitigation to fully disclose noise impacts. If impacts are significant prior to mitigation, the County of San Bernardino must adopt all feasible mitigation.

Response O7.14: The comment does not provide any substantial evidence concerning any environmental impact. Within the Draft EIR, Mitigation Measure NOI-1 represents a Project Design Feature (PDF) as these walls are already incorporated in the Project's design based on the Project's plans and Specific Plan design guidelines. As such, in order to clarify the discussion, Mitigation Measure NOI-1 has been revised throughout Section 5.12 to PDF NOI-2, as demonstrated in Chapter 3 Errata and below.

PDF NOI-2: Industrial/Warehousing Operational Noise: Construction Plans, specifications, and permits for development of Development Sites 1, 2, and 4 shall include development of the following walls that shall be completed prior to receipt of certificates of occupancy or operational permits for industrial/warehousing uses on Development Sites 1, 2, and 4:

- Development Site 1: a 12-foot-tall masonry wall shall be constructed along the entire northern perimeter of Development Site 1.
    - Development Site 2: a 12-foot-tall masonry wall shall be constructed along the entire northern perimeter of Development Site 2, and 14-foot-high masonry walls shall be constructed along Locust Avenue and Maple Avenue to screen the truck trailer parking and loading dock areas.
    - Development Site 4: a 9-foot-high masonry wall shall be constructed along the perimeter of the truck trailer lot to screen the truck trailer parking lot.

Based on the CEQA thresholds of significance outlined in Section 5.12, *Noise*, all the Project related operational noise levels impacts are considered less than significant before mitigation with implementation of PDF NOI-2. Therefore, a comparison of the noise level without mitigation and with mitigation is not needed.

Comment O7.15: This comment states that the operational noise impacts at nighttime exceed the nighttime noise threshold of 45 dBA. The comment states that the Draft EIR finds impacts to be less than significant as standards have been adjusted to reflect the ambient noise levels at nearby receiver locations. However, the comment states that the adjustment of the applicable noise thresholds is not appropriate.

Response O7.15: The comment does not provide any substantial evidence concerning any environmental impact. The comment suggests that adjusting the nighttime noise threshold of 45 dBA L_{eq} to reflect the ambient noise levels is not shown to be appropriate. This statement is inconsistent with the County of San Bernardino Development Code Section 83.01.080(e) that if the existing ambient noise level already exceeds any of the exterior noise level limit categories, then the standard shall be adjusted to reflect the ambient conditions. In addition, a review Table 5-1 shows that existing ambient nighttime noise levels are much higher than 45 dBA L_{eq}.

Comment O7.16: This comment states that RR-NOI-1 represents deferred mitigation in violation of CEQA. The EIR must propose enforceable and certain mitigation and may not be rely on future studies to determine the level of impact. Also, as discussed, the impact level must be assessed and disclosed prior to the implementation of any purported mitigation.

Response O7.16: The comment does not provide any substantial evidence concerning any environmental impact. RR-NOI-1 as listed on Draft EIR page 5.12-53 is an existing regulation. RR-NOI-1 lists the requirements of the Building Code (CBC), Title 24 and the California Green Building Standards Code. These are not mitigation measures; these are existing regulations that provide building techniques to

reduce noise levels. As RR-NOI-1 is regulatory requirement that would be implemented by the Project and verified through the County's plan check process, it does not constitute deferred mitigation. As detailed on Draft EIR pages 5.12-35 through 5.12-49 the potential impacts of the Project are identified prior to implementation of mitigation. As discussed, impacts from operational noise would be less than significant with implementation of PDF NOI-2. As such, there is no nexus for mitigation to reduce operational noise impacts onsite.

Comment O7.17: This comment states that Draft EIR's list of Project objectives is unduly narrow, which precludes the meaningful consideration of alternatives that reduce impacts. The comment states that the list of Project Objectives includes four objectives involving the implementation of a master-planned development with guidelines and standards for building and site development. The comment concludes that these objectives render Alternative 3 easily dismissible, and the objectives must be revised to be more inclusive of objectives related to the Project's goal to develop an industrial business park apart from specific plan zoning.

Response O7.17: The comment does not provide any substantial evidence concerning any environmental impact. As outlined in Section 3.3, *Project Objectives,* starting on page 3-2, the Draft EIR provides a list of eight Project objectives to provide the orderly development of an industrial business park. Pursuant to CEQA Guidelines Section 15124(b), there is no specific requirement for the range or amount of Project objectives that are required to be included in the Project Description within the Draft EIR, so long as the Project Description provide a summary of Project objectives. One of the main Project objectives is to provide for orderly development of a master-planned industrial business park. As such, there is no requirement or need to remove Project objectives related to development of a specific plan.

Comment O7.18: This comment states that the Draft EIR only evaluates one alternative apart from the no project alternative and that the Draft EIR deems alternatives 1 and 2 No Project Alternatives. The comment states that the evaluation of one alternative that meets the basic Project objectives does not constitute a reasonable range of Project alternatives pursuant to CEQA Guidelines Section 15126.6. The comment states that the EIR should consider other alternatives such as development of business park uses with smaller office and professional buildings and concludes by stating that by itself, Alternative 3 does not give County decisionmakers a range of choices among alternatives that meet basic Project objectives.

Furthermore, the comment discusses that Alternative 3 would develop only Planning Area A and is shown to be environmentally superior to the proposed Project. A lead agency may not reject an alternative unless the agency makes findings supported by substantial evidence showing that the alternative is infeasible. Public Resources Code §§ 21081 (a), 21081.5; Guidelines, §§ 15091 (a)(3), 15092. As such, the comment states that the County must adopt Alternative 3 absent findings of infeasibility supported by substantial evidence.

Response O7.18: The comment does not provide any substantial evidence concerning any environmental impact. Pursuant to CEQA Guidelines Section 15126.6(a), "an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation." Neither the CEQA statute, the State CEQA Guidelines, nor recent court cases specify a specific number of alternatives to be evaluated in an EIR. Rather, "the range of alternatives required in an EIR is governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice" (State CEQA Guidelines 15126(f)).

As discussed in Section 7.0, *Alternatives,* the Draft EIR provides three alternatives for consideration. While Alternative 2 is titled No Project/Buildout of Existing Zoning Alternative, Alternative 2 would result in development of the Project site pursuant to its existing alternative and provides a development alternative to the proposed Project for the decisionmaker's consideration. Pursuant to State CEQA Guidelines Section

15126.6(e), Alternative 2 does not constitute a No Project Alternative as it would result in a change of onsite conditions. As such, the Draft EIR provides two alternatives beyond the No Project Alternative required pursuant to Guidelines Section 15126.6(e) and provides a reasonable range of alternatives for decisionmakers.

As stated within the comment, pursuant to Public Resources Code Section 21081(a)(3), the County of San Bernardino would be required to make findings that specific economic, legal, social, technological, or other considerations make infeasible the alternatives identified in the Draft EIR related to significant environmental effects. As such, the County shall prepare Findings and Statement of Overriding Considerations, which would be included as part of the administrative record.

Comment O7.19: This comment states that the Sierra Club urges the County to reconsider the size and scope of the Project, revise the Draft EIR, and provide additional mitigation.

Response O7.19: The comment does not provide any substantial evidence concerning any environmental impact. The commenter is referred back to Responses O7.1 through O7.18 for responses regarding needed revisions to the Draft EIR and need for further mitigation. The comment is general in nature and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is provided.

LETTER O8: Public Interest Law Project (5 pages)

PUBLIC INTEREST LAW PROJECT

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December 15, 2021

SENT VIA EMAIL ONLY: Aron.Liang@lus.sbcounty.gov.

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Re: **Comments on Draft Environmental Impact Report (DEIR) for Bloomington Business Park Specific Plan Project (SCH No. 2020120545)**

Dear Aron Liang:

The Public Interest Law Project (PILP) writes to comment on the Draft Environmental Impact Report (DEIR) for the Bloomington Business Park Specific Plan Project. PILP is a California statewide organization that advances justice for low-income people and communities by building the capacity of legal services organizations through impact litigation, trainings, and publications, and by advocating for low-income community groups and individuals. Much of our work focuses on systemic housing issues impacting low-income communities and communities of color, including enforcement of state and federal laws that require local governments to adequately plan for the community's affordable housing needs and to promote fair housing choice. Accordingly, these comments focus on the proposed Project's impacts on displacement, fair housing, and the County's long-term housing planning obligations under state Housing Element Law. O8.1

1. The Project will displace substantial numbers of people and housing, but the DEIR does not analyze the impacts of that displacement.

In summarizing Impact POP-2 ("The Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.") the DEIR indicates that the displacement impacts of the Project are "less than significant" and requires zero mitigation measures. DEIR, pp. 1-52, 5.13-9. However, the Project will cause the direct displacement of over 117 housing units and has the potential to displace many more, in turn displacing the individuals and families who live in those homes. DEIR, p. 5.13-10. Accordingly, the EIR must assess the impacts of that displacement, as well as planned and potential measures to mitigate the harms caused by that displacement. " Cal. Code Regs., tit. 2, § 15000 et seq., appen. G, § XIV. O8.2

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The DEIR acknowledges that the Specific Plan Area includes somewhere between 117 and 213 existing housing units and that the Project will require the demolition of at least 117 homes. DEIR, pp. 3-18, 4-37, 5.13-10. The residents of those housing units will necessarily be displaced by the project. The DEIR predicts that property owners within the Specific Plan Area will "voluntarily" sell their property to the developer, but the DEIR does not acknowledge that the zoning change will make residential uses in the Specific Plan Area nonconforming, which will, in turn, constrain homeowners' ongoing residential use of their property. DEIR, p. 5.13-10. Similarly, the DEIR acknowledges that the Upzone Site contains 21 existing housing units that could be displaced if the some or all of the Upzone Site redevelops. DEIR, p. 5.13-10. **O8.2 cont.**

Further, the DEIR does not discuss how many people live in the homes to be displaced or whether those people own or rent their homes. Nearly a third of Bloomington households rent their homes, and HUD data indicates that between 20 and 40 percent of households in the Census tracts where the Specific Plan Area is located live in renter-occupied units.[1] But the DEIR includes no discussion of the Project's impact on renter households. The DEIR also does not include any discussion of the income or resources of displaced residents, how far residents will need to move to obtain comparable housing, or the environmental impacts of such relocations. It does not provide for relocation of displaced residents or other mitigation measures. These deficiencies, among others, render the DEIR inadequate. **O8.3**

2. The Project raises serious fair housing concerns.

Siting the Project in its proposed location raises serious environmental justice issues, addressed in detail by other commenters, as well as likely violations of the County's obligations under state and federal fair housing laws. See 42 U.S.C. § 3604; Gov. Code, §§ 8899.50, 12955(l), 65008.

Illegal housing discrimination includes land use decisions that have a discriminatory effect, without legally sufficient justification, that "[result] in the location of toxic, polluting, and/or hazardous land uses in a manner that denies, restricts, conditions, adversely impacts, or renders infeasible the enjoyment of residence, land ownership, tenancy, or any other land use benefit related to residential use, or in connection with housing opportunities or existing or proposed dwellings." Cal. Code Regs., tit. 2, § 12161. And, in addition to its duty to refrain from discriminatory land use decisions, the County also has a duty to *affirmatively* further fair housing, and to refrain from actions that are materially inconsistent with that duty. Gov. Code, § 8899.50. Affirmatively furthering fair housing ". . . means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially **O8.4**

[1] Census data at: https://www.census.gov/quickfacts/bloomingtoncdpcalifornia?; HUD data obtained at https://affh-data-resources-cahcd.hub.arcgis.com/.

and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws." Gov. Code, § 8899.50(a)(1). This "obligation [to affirmatively further fair housing] is not limited to investment, planning, and outreach related to housing, but also broader community development, such as infrastructure, public schools, parks and recreation, and other capital improvements." California Department of Housing and Community Development, Affirmatively Furthering Fair Housing: Guidance for All Public Entities and for Housing Elements (April 2021 Update), 17, available at https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf#page=16. Safety from environmental hazards is a key component of access to opportunity for purposes of the affirmatively furthering fair housing obligation. *Id.* at 34.

Bloomington is a disproportionately Latinx, disproportionately poor community that is already disproportionately impacted by environmental hazards, including those created by industrial uses. Bloomington's residents are 83% Latinx; its median household income is $52,085 per year; and 19.5% of its residents are in poverty.[2] Between 20 and 30 percent of residents in the Census tracts where the Specific Plan Area is located are in poverty.[3] In contrast, the County's general population is 54.4% Latinx, and 13.3% are in poverty; the County's median household income is over $63,000 per year.[4] Bloomington already "has high levels of air pollution and drinking water contamination concerns. Other pollution exposure issues include traffic density, toxic releases form industry, hazardous waste and cleanup sites from military and industrial land uses." San Bernardino County, Countywide Policy Plan (adopted Oct. 27, 2020), 59. The Census tract where most of the Specific Plan Area is located has one of the County's highest (i.e., worst) scores on the CDC's Social Vulnerability Index (.88), and a Cal EnviroScreen score of 95.44, indicating severe negative impacts from pollution and other environmental factors.[5]

O8.4 cont.

The Project will displace Bloomington residents whose homes are within the Project areas and will reduce both the housing stock and housing choice within Bloomington. It will also exacerbate air pollution and other unhealthy living conditions within Bloomington, impacting residents whose homes are near the Specific Plan Area and along the routes that trucks will travel to and from the distribution center. These harms will fall disproportionately on lower-income Latinx households, resulting in a discriminatory effect based on race. Accordingly, approval of the Project will likely violate the County's fair housing obligations under state and federal fair housing laws.

O8.5

[2] https://www.census.gov/quickfacts/bloomingtoncdpcalifornia
[3] Information obtained at https://affh-data-resources-cahcd.hub.arcgis.com/.
[4] https://www.census.gov/quickfacts/fact/table/sanbernardinocountycalifornia/AFN12021.
[5] Information obtained at https://affh-data-resources-cahcd.hub.arcgis.com/; see also https://www.atsdr.cdc.gov/placeandhealth/svi/index.html.

3. The Project is *per se* inconsistent with the General Plan because the County's Housing Element is invalid.

Both the DEIR and the Draft Bloomington Business Park Specific Plan assert that the Project is consistent with the applicable elements of the County's General Plan. DEIR, p. 5.11-10; Draft Bloomington Business Park Specific Plan (Sept. 2021), 8. However, the County does not have a valid Housing Element, and approval of the Project would be *per se* inconsistent with the General Plan on that basis.

Acknowledging that "[t]he availability of housing is of vital statewide importance" state Housing Element Law mandates that local governments "use the powers vested in them to facilitate the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community," including through the adoption and regular revision of the Housing Elements of their General Plans. Gov. Code, §§ 65580, 65588. The County was required to have adopted a Housing Element for the Sixth Cycle by October 15, 2021—two months ago.[6] The County's Fifth Cycle Housing Element, adopted in 2014, does not comply with current law, does not include an assessment of fair housing, and does not address the County's Regional Housing Needs Allocation for the Sixth Cycle planning period. See Gov. Code, §§ 65583, 65583.2, 65588. It is, therefore, invalid. O8.6

Because the County does not have a valid Housing Element, land use and zoning changes that impact housing are *per se* inconsistent with the General Plan and are, therefore, also invalid. See *Neighborhood Action Group v. County of Calaveras* (1984) 156 Cal.App.3d 1176, 1184 ("Since consistency with the general plan is required, absence of a valid general plan, or valid relevant elements or components thereof, precludes enactment of zoning ordinances, and the like.")(internal citations and quotation marks omitted). The Project will directly displace over a hundred units of existing housing, rezone over 200 acres of residential land to a non-residential use, and increase allowable densities on sites that have existing housing. Approving this Project without a valid Housing Element in place would undermine the purposes of Housing Element Law and compound the County's ongoing violation obligations under that statute. See Gov. Code, §§ 65580-65581.

[6] See https://www.hcd.ca.gov/community-development/housing-element/docs/6th-web-he-duedate.pdf.

4. Conclusion and request for notice.

PILP encourages the County not to approve the Project. We also request that the County send future notices regarding this Project to our office. If possible, please send such notices to me via email at mmorris@pilpea.org. O8.7

Sincerely,

Melissa A. Morris
Staff Attorney

cc: Concerned Neighbors of Bloomington
People's Collective for Environmental Justice

Response to Letter O8: Public Interest Law Project, dated December 15, 2021

Comment O8.1: This comment provides an introduction to the comment letter and states that the comment is submitted on behalf of the Public Interest Law Project (PILP) and discusses the nature of the comments provided.

Response O8.1: The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required or provided.

Comment O8.2: The comment states that the Project will displace over 117 housing units and has the potential to displace many more. The discussion under Impact Pop-2 of the Draft EIR indicated displacement impacts of the Project to be "less than significant", and further, does not require mitigation. The EIR must assess impacts of displacement, as well as planned and potential measures to mitigate displacement impacts, as a result of the Project, as indicated in Section XIV of Appendix G (Environmental Checklist Form). The Draft EIR does not include discussion regarding the nonconforming residential uses that would result from Project rezoning and could potentially constrain homeowners' ongoing use of the property. In addition to the Specific Plan Area, 21 residences could be displaced within the Upzone Site.

Response O8.2: Under POP-2 of Section XIV of Appendix G (Environmental Checklist Form), requires the determination "would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?" The Draft EIR, beginning on page 5.13-9, states that property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant at or above market value. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020).

There are 117 existing residential units that could be displaced from the Specific Plan Area, including 78 dwelling units in Planning Area A and 39 dwellings in Planning Area B, as a result of the Project. However, sufficient replacement housing was identified within the community of Bloomington and adjoining cities. Additionally, in compliance to SB 330, the Project would offset the loss of zoned residential capacity by upzoning another site. Potential environmental impacts that could result from the upzoning of the Upzone Site were evaluated as part of the Project and are independently discussed under each environmental topic section of the Draft EIR. Nonconforming residential uses, due to Project rezoning, would be allowed to remain onsite following Project completion and would not necessitate the construction of replacement housing elsewhere.. The Upzone Site would result in an increase of housing availability and would not necessitate the construction of replacement housing elsewhere. Therefore, environmental impacts related to construction of replacement housing elsewhere would be considered less than significant. The comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue Further discussion of this topic is not required

Comment O8.3: The comment states that the Draft EIR doesn't discuss the number of people being displaced within the homes or whether the residences are rented or owned. Census information is provided regarding the Bloomington community, indicating 20 to 40 percent of households live in renter-occupied units. The Draft EIR does not include discussion of Project's impacts on renter households, income or resources of displaced persons, how far residents will need to move to find comparable replacement housing, or environmental impacts of such relocations. Mitigation measures regarding displacement are not included.

Response O8.3: Impacts analyzed under the Draft EIR regarding housing and population include whether the Project would induce substantial unplanned population growth (POP-1) or displacement of substantial numbers of existing people or housing (POP-2), and the environmental effects of such events. The Draft EIR, beginning on page 5.13-9, states 668 single-family properties listed for sale in the community of Bloomington and adjoining cities, indicating sufficient replacement housing supply in the area. This analysis is conservative in assuming all displacements would be owner-occupied housing since owner-occupied housing is generally scarcer in the area than rental housing.

As of mid-January 2022, Apartments.com—an online real estate and rental marketplace—reported 991 rental properties listed for rent in the community of Bloomington and adjoining cities (10 units in Bloomington, 179 units in the City of Rialto, 456 units in the City of Fontana, and 346 units in the City of Jurupa Valley, which is in Riverside County). In addition to the housing stock available for purchase, there is an even greater stock of local rental properties available. Therefore, consideration of impacts on displaced rental populations would not result in any new or greater significant impacts than previously analyzed.

Additionally, in compliance to SB 330, the Project would offset the loss of zoned residential capacity in the Specific Plan area by upzoning another site (i.e., Upzone Site). The Upzone Site would result in the potential displacement of 21 single-family dwellings and new construction of up to 480 multifamily residential units (as stated on page 5.13-10 of the Draft EIR). Therefore, the Upzone site would offset residential capacity loss within the Specific Plan site by providing additional residential capacity within a nearby site.

Property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant at or above market value. The available housing and rental replacement options mentioned above include hundreds of housing options, varying in cost and quality. Bloomington and adjoining cities are anticipated to have comparable housing options of similar quality and cost. Therefore, housing replacement options would be sufficient. Additionally, the housing and rental replacement options provided are within Bloomington and adjoining cities. Therefore, indirect impacts regarding the length of distance between existing residences to comparable replacement housing is considered less than significant. Therefore, no further response is required or required.

Comment O8.4: The comment states that the proposed Project location raises serious environmental justice issues as indicated by other commenters and is likely in violation of the County's obligations under fair housing laws. The comment directs attention to 42 U.S.C. Section 3604; Government Code Section 8899.50, 12955(1), and 65008.

The comment provides information from several sources, including the California Code of Regulations, Title 2 Section 12161; Government Code Section 8899.50; and the California Department of Housing and Community Development, Affirmatively Furthering Fair Housing: Guidance for All Public Entities and for Housing Elements, regarding land use decisions that have a discriminatory effect without legally sufficient justification.

Information is provided on the demographics of the Specific Plan area, indicating that the area is disproportionately Latinx and low income. Additionally, the comment references information provided by the San Bernardino County, Countywide Policy Plan and Cal EnviroScreen that identifies the Specific Plan area as severely impacted by pollution and other environmental factors.

Response O8.4: This comment is informational in nature. Concerning the commenter's unsupported assertion that development of the Project raises environmental justice issues and violates the County's obligation under states and federal fair housing laws, the commenter provides no substantial evidence to support this. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project

scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOX emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Therefore, the proposed Project would not result in significant health risks to the existing community. Refer to Master Response 4 for a discussion of environmental justice.

Comment O8.5: The comment states that the Project will displace Bloomington residents within the Project areas and will reduce housing stock and housing choice. The Project will exacerbate air pollution and other unhealthy living conditions for residents living near the Specific Plan Area along future truck routes travelling to and from the proposed distribution center. The Project will disproportionately impact low-income, Latinx households, resulting in discriminatory effect based on race. Approval of the Project would be in violation of the County's fair housing obligations under state and federal fair housing law.

Response O8.5: The comment does not provide substantial evidence of any environmental impact. As discussed under Response O8.3, displaced residents would be anticipated to have sufficient replacement housing options. Additionally, the proposed Upzone Site would offset the loss of zoned residential capacity of the Specific Plan area.

Refer to Master Response 4. In addition, potential Project air quality impacts on regional and local populations are analyzed. Short-term (i.e., construction) and long-term (i.e., operational) emissions of criteria air pollutants and precursors, including mobile- and area-source emissions from the Project (under all scenarios), were quantified using the CalEEMod computer model. Implementation of the Project would result in long-term emissions of criteria air pollutants from area sources generated by the proposed industrial, warehousing, and office uses, such as vehicular emissions, natural gas consumption, landscaping, and use of consumer products. As described on page 5.3-15 of the Draft EIR, residential uses are considered more sensitive to air quality conditions than commercial and industrial uses, because people generally spend longer periods of time at their residences, resulting in greater exposure to ambient air quality conditions. The closest sensitive receptors are listed for each scenario on page 5.3-16 of the Draft EIR.

As shown in Tables 5.3-7 through 5.3-8, with implementation of Mitigation Measures AQ-1 and AQ-2, which require construction activities to utilize low VOC paints and require construction equipment greater than 50 horsepower to be CARB certified tier 4 or higher, emissions from construction activities would be below SCAQMD significance thresholds.

As shown in *Table 5.3-9: Summary of Peak Summer Operational Emissions* and *Table 5.3-10: Summary of Peak Winter Operational Emissions*, operational activities would exceed the numerical thresholds of significance established by the South Coast Air Quality Management District (SCAQMD) for regional

emissions of both VOC and NO_X under Opening Year – Option 1 and Opening Year – Option 2. As a result, Mitigation Measure AQ-3 would be implemented to install signs at loading dock facilities that restrict idling to no more than 5 minutes pursuant to Title 13 of the California Code of Regulations, Section 2485. Mitigation Measure AQ-4 would incorporate energy efficient vendor trucks. Mitigation Measure AQ-5 requires electric vehicle charging stations and a minimum of 5 carpool parking spaces at each building. Mitigation Measure AQ-6 requires all buildings to be designed to provide infrastructure to support use of electric-powered forklifts and/or other interior vehicles. Mitigation Measure AQ-7 requires that a Transportation Management Association (TMA) or similar mechanism shall be established by the Project to encourage and coordinate carpooling. However, with compliance with existing rules, and implementation of the mitigation measures, emissions would continue to exceed regional thresholds of significance established by the SCAQMD for emissions of VOC and NOx. Although the Project could result in a significant and unavoidable impact on regional VOC and NOx emissions, regional emissions are evaluated at the basin-wide level and are not specific to the Project area. The Project is in the South Coast Air Basin, a 6,745-square mile subregion of the SCAQMD, which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Therefore, low-income, Latinx households within the Project area would not be disproportionately impacted as a result of regional emissions based on the current methodology used by SCAQMD.

Further, shown on Table 5.3-19: Localized Significance Emissions from Operation of Opening Year – Option 1, Table 5.3-20: Localized Significance Emissions from Operation of Opening Year – Option 2, and Table 5.3-21: Localized Significance Emissions from Operation of the Future Development Area - Specific Plan Buildout emissions from operation of the Project would not exceed the SCAQMD's localized significance thresholds for any criteria pollutant at the nearest sensitive receptor. Therefore, operation of the Project would result in a less than significant impact related to localized operational emissions. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible.

Comment O8.6: The comment states that the County's General Plan Housing Element is not valid; therefore, the Project would be *per se* inconsistent with the General Plan. The County was required to adopt a 6th Cycle Housing Element by October 15th, 2021. The 2014 Housing Element evaluated under the Draft EIR does not include an assessment of fair housing or address the County's Regional Housing Needs Allocation (RHNA) for the Sixth Cycle planning period. The comment states that the Project will directly displace over a hundred units of existing housing, rezone over 200 acres of residential land to non-residential use and increase allowable densities on sites that have existing housing. Approval of the Project without a valid Housing Element would undermine Housing Element Law and compound the County's violation under statue Government Code Sections 65580-65581.

Response O8.6: The comment does not provide substantial evidence of any environmental impact. In accordance with Senate Bill 375, a jurisdiction may adopt the housing element within 120 days from the statutory due date. The Draft EIR for the Project was submitted within the 120 days of the Housing Element statutory due date, and therefore, was not in violation of state housing law at the time of submittal. Additionally, the Draft 6th Cycle Housing Element, posted November 2021, does not identify the Project area as a site designated for future housing to meet the County's RHNA objectives. Additionally, future

housing developed within the proposed Upzone Site would undergo independent environmental analysis as housing projects are proposed and would be reviewed for consistency with applicable County plans and policies at that time. The Final EIR will be updated as appropriate with any new impacts that result from updates to the County's 6th Cycle Housing Element.

Comment O8.7: This comment encourages the County to not approve the Project. The comment also requests future notices regarding the Project be sent to the PILP's office in writing, or if possible, via email. at the comment is submitted on behalf of the Public Interest Law Project (PILP) and discusses the nature of the comments provided.

Response O8.7: The comment does not provide substantial evidence of any environmental impact. Notices will be sent to the commenter as requested. The comment does not identify concerns with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required or provided.

LETTER O9: Concerned Neighbors of Bloomington (2 pages)



December 14, 2021

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

Dear County of San Bernardino,

On behalf of Concerned Neighbors of Bloomington, a community group, we write this letter in opposition to the 'Bloomington Business Park Specific Plan Project' (BBPSP). **We believe that this proposed project's significant and unavoidable impacts cannot be mitigated nor justified with an overriding consideration**. O9.1

Background

The residents of the unincorporated community of Bloomington have experienced a massive influx of warehouse development and diesel trucks over the past decade. There has been public opposition by community members, small businesses, workers, elected officials, and even nearby cities over the unsustainable and dangerous growth of warehouse development near homes, schools, and parks in the Bloomington community. The County of San Bernardino even sued over the approval of a warehouse in Bloomington (the West Valley Logistics Center, a 3.5 million sq. ft. warehouse within the City of Fontana limits but is directly impacting the residents of Bloomington). We believe the County of San Bernardino should continue to look out for its residents and protect them from encroaching warehouse development. Principally, because community members have participated in their General Plan process (through the Bloomington Community Plan and the Environmental Justice Element) and overwhelmingly have shown the need to monitor the air quality, bring in more recreational resources and investments into Bloomington, instead of warehouse development that increases pollution, traffic and health risks. O9.2

However, the County of San Bernardino is ignoring their residents and the plan they wanted for their future. Instead, they have allowed a developer to come in and have given them the green light to buy out families, harass resistant homeowners, kick out tenants and displace hundreds of people throughout the Bloomington Business Park Specific Plan Project.

Project Specs

- This project would rezone 213 acres of residential and agricultural land to industrial zoning - creating legally nonconforming uses in that area O9.3
- This project would be less than 100 ft. to three public schools (Bloomington High School, Ruth O Harris Middle School and Walter Zimmerman Elementary School). O9.4
- This project would bring in over 9,000 vehicle and truck trips on roads adjacent to homes, schools, and parks. O9.5
- This project would create additional traffic, noise, poorer air quality, deterioration of commercial and residential roads, unsafe pedestrian and bicycle safety and other impacts in an area that is considered in the 90th% - 95% on CalEnviroScreen. O9.6
- This project would be in a community that is over 80% Hispanic.
- This project would have significant and unavoidable impacts for
    - obstructing the implementation of the air quality plan
    - net increase of criteria pollutants
    - cumulative impacts O9.7

Concerns

- There are higher-than-normal risks that come from living in a highly polluted environment. Public health is at stake when we continue to increase pollution in residential communities. **O9.8**
- There are unavoidable cumulative impacts - an entire residential community will be disrupted. **O9.9**
- Community members have brought up the fear of being displaced or harassed out of their homes, despite stating that they do not want to sell or rezone their home **O9.10**
- This community is over 80% Hispanic, with 20% of the community experiencing poverty - this is a common practice of environmental racism. **O9.11**
- This region deals with some of the worst traffic in the city - idling cars double the negative impact of pollution on the nearby communities. **O9.12**
- The region for the proposed development is in an area that is a fire risk and with the increasing dangers of climate change and wildfires. The County should focus its efforts on wildfire mitigation. **O9.13**
- The Municipal Advisory Council (MAC) and developer, Tim Howard has not provided adequate translation, even when requested for its constituents. In Bloomington, 66.5% of the community speaks a language other than English. **O9.14**
- The Municipal Advisory Council (MAC) has silenced voices during meetings when community members have brought up concerns.
- The Municipal Advisory Council (MAC) and County of San Bernardino have not released all minutes for their meetings.

Conclusion

We request that the County of San Bernardino Supervisors, Planning Commissioners, and Municipal Advisory Council Members oppose the Bloomington Business Park Specific Plan and honor the community's plans for residential, healthy, and thriving development. We believe that there can be no overriding consideration for the physical impact and disruption this development will have. **O9.15**

Sincerely,
Ana Carlos
on behalf of
Concerned Neighbors of Bloomington

Response to Letter O9: Concerned Neighbors of Bloomington (dated December 15, 2021)

Comment O9.1: This comment provides an introduction to the comment letter and states that the Concerned Neighbors of Bloomington believe that the Project's significant and unavoidable impacts cannot be mitigated or justified with an overriding consideration.

Response O9.1: The comment is correct by stating that the proposed Project's significant and unavoidable impacts cannot be mitigated to a less than significant level. State CEQA Guidelines Section 15126.2(c) requires an EIR to describe "any significant impacts, including those which can be mitigated but not reduced to a level of insignificance." As discussed in Section 6, *Other CEQA Considerations,* emissions from operation of the Project would exceed SCAQMD's thresholds for VOC and NOx after implementation of regulatory requirements and mitigation measures. Because a majority of operational-source NOx emissions (by weight) would be generated by Project vehicles, and the VOC emissions would be generated by consumer products, neither the Project applicant nor the County have the ability to reduce these emissions. Therefore, despite the inclusion of Mitigation Measures AQ-1 through AQ-7, operational-source VOC and NOx emissions would be significant on a project-level and a cumulative basis. Additionally, as the Project would not result in an exceedance of SCAG's growth projections, but the Project would result in an increase of criteria pollutants that would exceed regional thresholds after implementation of mitigation measures. Therefore, the Project would result in a conflict with, or obstruct, implementation of the applicable Air Quality Management Plan.

In accordance with CEQA Section 21081(b) and CEQA Guideline Section 15093, in order to approve the Project would be required to determine that the unavoidable adverse environmental impacts identified above may be considered acceptable due to specific considerations which outweigh the unavoidable, adverse environmental impacts of the Project. The comment offers an opinion that unavoidable impacts cannot be mitigated or justified with an overriding consideration but does not raise a specific issue with the adequacy of the Draft EIR. Therefore, no further response is provided.

Comment O9.2: This comment states that the Bloomington community has experienced an influx of warehouse development over the past decade, along with associated diesel trucks, which has been publicly opposed. The comment states that the County sued the City of Fontana over the West Valley Logistics Center. The comment states that the County of San Bernardino is not listening to residents' desires for the community, which include adding more recreational resources and investments and instead allow warehouse development that increase pollution, traffic, and health risks. The comment further states that the County has allowed a developer to buy out families, harass homeowners, kick out tenants, and displace individuals within the Specific Plan Area.

Response O9.2: The comment does not include any substantial evidence relating to any environmental impact. Due to the existing limited low-density development and vacancies within the Specific Plan area, buildout and operation of the proposed Specific Plan would increase traffic and air quality emissions generated from the area.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, the Draft EIR is not required to analyze impacts related to traffic congestion.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOX emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be reduced below applicable SCQMD thresholds. Additionally, the majority of the Project's NOX emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

Concerning the commenter's unsupported assertion that development of the Project would lead to displacement, the commenter provides no substantial evidence to support this. CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)) (*San Franciscans for Reasonable Growth v City & County of San Francisco* (1989) 209 Cal.App.3d 1502). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of displacement. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to displacement is not provided. As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-February 2022, Zillow.com—an online real estate and rental marketplace—reported 246 single-family properties listed for sale in the community of Bloomington and adjoining cities (11 units in Bloomington, 37 units in the City of Rialto, 149 units in the City of Fontana, and 49 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, in compliance to SB 330, the Project would offset the loss of zoned residential capacity by upzoning another site (i.e., Upzone Site). Therefore, implementation of the Project would not displace people or housing and necessitate the construction of replacement housing elsewhere, and impacts would be less than significant. The commenter is referred to Master Response 1 for a response to the other comments, such as those related to the Applicant purchasing homes within the Specific Plan Area, within Comment O9.2. The comment does not

raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment O9.3: This comment states that the Project would rezone 213 acres of residential and agricultural land to industrial zoning, which would create legally nonconforming uses.

Response O9.3: The comment is correct in stating that the Project would rezone approximately 213 acres of land from Residential Single 1-Acre Minimum with Additional Agriculture Overlay (RS-1-AA) and Residential Single (RS-20M) to Specific Plan (SP). Within the SP zoning, the Specific Plan would apply the I/BP designation to the entire Specific Plan Area. The existing residences and agricultural uses would become legal non-conforming uses within the Specific Plan. Proposed changes to these uses and structures shall be subject to the provisions of Chapter 84.17, Non-Conforming Uses and Structures, of the County Development Code. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment O9.4: This comment states that the Project would be less than 100 feet from three public schools (Bloomington High School, Ruth O. Harris Middle School, and Walter Zimmerman Elementary School).

Response O9.4: This comment is accurate in stating that the Specific Plan Area is adjacent to Bloomington High School, Walter Zimmerman Elementary School, and Ruth O. Harris Middle School. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment O9.5: This comment states that the Project would result in approximately 9,000 vehicle trips each day in the Project Area.

Response O9.5: This comment is inaccurate. As discussed in K1, Traffic Impact Analysis, to the Draft EIR, the Project would result in 8,555 daily vehicle trips, including truck trips. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment O9.6: This comment states that the Project would create additional traffic, noise, air quality emissions, deterioration of residential road, unsafe pedestrian/bicycle safety in an area that ranks within the 90 to 95th percentile on CalEnviroScreen.

Response O9.6: In regard to traffic and air quality, the commenter is referred to Response O9.2.

The comment does not provide any substantial evidence supporting the assertions in the comment. In regard to noise, as detailed in the Impact NOI-1 discussion that begins on page 5.12-26 of the Draft EIR, construction noise from development of all of the Specific Plan scenarios would not exceed the 80 dBA Leq daytime construction noise level threshold at nearby sensitive receptors. Furthermore, the Project would implement PDF NOI-1, which would implement construction best management practices, to ensure that construction noise impacts to sensitive uses would be reduced to the maximum extent feasible. Each of the Project scenarios would implement PDF NOI-2, which would require 12-foot-high to 14-foot-high cement block walls at Sites 1 and 2 and 9-foot-high cement walls at Site 4, pursuant to Specific Plan design guidelines and Project plans. With implementation of PDF NOI-2, operational noise levels for all scenarios would not exceed the County's exterior noise level standards, as adjusted to reflect the ambient noise levels at all nearby sensitive receiver locations. Additionally, the increase in ambient noise levels would range from 0.1 to 3.0 with the implementation of PDF NOI-2, which would not generate a significant daytime or nighttime operational noise level increase at nearby receiver locations.

As detailed in the Draft EIR in Section 5.12, *Noise,* starting on page 5.12-48, the proposed Project would generate traffic related noise from operation. As described in Section 3.0, *Project Description*, of the Draft EIR, the proposed Specific Plan buildings would be accessed from Laurel Avenue, Jurupa Avenue, Locust Avenue, and Maple Avenue. Tables 5.12-23 through 5.12-24 show that both the Opening Year with Project and General Plan Buildout with Project conditions would result in increases less than the 1.5 dBA CNEL threshold. Thus, off-site traffic noise impacts from the Project would be less than significant.

Related to bicycle and pedestrian safety, as detailed in the Draft EIR for Impact TR-1, starting on page 5.15-6, sidewalks currently exist on Cedar Avenue intermittently on both side of the roadway, on Santa Ana Avenue intermittently on the north side of the roadway, on Jurupa Avenue on the north side east of Linden Avenue. Implementation of the Specific Plan would include roadway improvements within the Specific Plan area that would provide for new sidewalks where none exist currently, thereby improving pedestrian facilities and the sidewalk network. Therefore, the proposed Specific Plan would also not conflict with pedestrian facilities, but instead would provide additional facilities. Sierra Avenue has a bike lane on the east side between Santa Ana Avenue and Technology Street. The Countywide Plan Transportation & Mobility Element identifies Cedar Avenue, Jurupa Avenue, Santa Ana Avenue, and Locust Avenue for planned Class II bike lanes. Class II bike lanes are striped lanes that provide bike travel and can be next to a curb or parking lane. Implementation of the Specific Plan would not alter or conflict with existing or planned bike lanes or bicycle transportation. Overall, impacts related to transit, bicycle, and pedestrian facilities were determined to be less than significant. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment O9.7: This comment states that the Project would have significant and unavoidable impacts for obstructing the implementation of the air quality plan, net increase of criteria pollutants, and cumulative impacts.

Response O9.7: The comment does not provide any substantial evidence supporting the assertions in the comment. As stated by the comment and analyzed in the Draft EIR in Section 5.3, *Air Quality,* the Project would result in significant and unavoidable impacts related to conflict with the air quality management plan, Project-level operational emissions, and cumulative operational emissions. Land use changes of the Project would not result in an exceedance of SCAG's growth projections, but the Project would result in an increase of criteria pollutants that would exceed regional thresholds after implementation of mitigation measures. Therefore, the Project would result in a conflict with, or obstruct, implementation of the applicable Air Quality Management Plan. Emissions from operation of the Project would exceed SCAQMD's thresholds for VOC and NOx after implementation of regulatory requirements and mitigation measures. Because a majority of operational-source NOx emissions (by weight) would be generated by Project vehicles, and the VOC emissions would be generated by consumer products. Neither the Project applicant nor the County have the ability to reduce these emissions. Therefore, operational-source VOC and NOx emissions would be significant on a project-level and a cumulative basis. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment O9.8: This comment states that there are high health risks that come from living in a highly polluted environment and increased pollution in residential communities puts public health at risk.

Response O9.8: The comment does not provide any substantial evidence supporting the assertions in the comment. As discussed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance

thresholds. Also, as detailed in Master Responses 2 and 3, in response to comments received to the public review Draft EIR additional DPM and LST AERMOD dispersion modeling was completed (and is included as Appendix A of this Final EIR) to identify worst-case conditions, which is the highest daily peak on-site emissions resulting from overlapping operational and construction activity at the nearest land use to the Project site where an individual could remain. This additional modeling shows that neither DPM emissions or localized significance emissions would not exceed the applicable AQMD thresholds. As such, operation of the Specific Plan at buildout would not cause a significant human health or cancer risk related to DPM emissions and impacts would be less than significant. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment O9.9: This comment states that there are unavoidable cumulative impacts, and an entire residential community would be disrupted.

Response O9.9: The comment does not provide any substantial evidence supporting the assertions in the comment. The significant and unavoidable impacts resulting from the proposed Project are discussed in Response O9.7. The comment vaguely claims that the proposed Project would result in the disruption of an entire residential community; however, it does not point to an environmental issue. The commenter is referred to Master Response 1 for a discussion of how the social disruption of a residential community is not a physical impact requiring analysis in the Draft EIR pursuant to CEQA. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment O9.10: This comment states that community members have discussed fearing being displaced or harassed out of their homes, despite stating that they do not want to sell or rezone their home.

Response O9.10: The comment does not provide any substantial evidence supporting the assertions in the comment. CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)) (*San Franciscans for Reasonable Growth v City & County of San Francisco* (1989) 209 Cal.App.3d 1502). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of displacement. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to access to displacement is not provided., As discussed in Section 5.13, *Population and Housing*, property owners within the development footprint would voluntarily sell their property and would be compensated by the Applicant. At the time future development is proposed in Planning Area B, property owners have the option to voluntarily sell their property and would be compensated by the future development's applicants. Property owners would not be forced to sell their properties, either through harassment or eminent domain. However, should the County approve the proposed Project, the entire Specific Plan Area would be rezoned to Specific Plan. As stated in Response O9.3, existing residences could continue to exist as legal non-conforming uses after the rezone. The comment does not raise any specific concerns with the adequacy of the Draft EIR. The comment will be forwarded to County decisionmakers as part of the Final EIR. Therefore, no further response is required or provided.

Comment O9.11: This comment states that the community is over 80 percent Hispanic and over 20 percent of the community experiencing poverty. This comment states that this is a common practice of environmental racism.

Response O9.11: The comment does not provide any substantial evidence supporting the assertions in the comment. The comment correctly states that the community is over 80 percent Hispanic, with approximately 19.5 percent living under the poverty line. CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of environmental racism. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to environmental racism is not provided. The comment does not raise any specific concerns with the adequacy of the Draft EIR. The comment will be forwarded to County decisionmakers as part of the Final EIR. Therefore, no further response is required or provided.

Comment O9.12: This comment states that the region deals with some of the worst traffic and idling cars double the negative impact of pollution to nearby communities.

Response O9.12: The comment does not provide any substantial evidence supporting the assertions in the comment. The commenter is referred to Response O9.2 for a response regarding traffic and pollution. In regard to trucks and cars idling in traffic, impacts related to idling at congested intersections was analyzed in Appendices C1 and C2. As discussed on page 5.3-34 of the Draft EIR, the Project's NO_X emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less-than-significant.

Furthermore, the Project would implement PDF AQ-1 and MM AQ-3, which would require the Project Applicant/Developer/Operator to post interior and exterior facing signs identifying idling restrictions and contact information to report violations to CARB, SCAQMD, and the building manager. Pursuant to California Code of Regulations (CCR) Title 13, Motor Vehicles, Section 2449(d)(3), no truck may idle for longer than five minutes, which would reduce pollution from trucks onsite. The comment does not raise any specific concerns with the adequacy of the Draft EIR. The comment will be forwarded to County decisionmakers as part of the Final EIR. Therefore, no further response is required or provided.

Comment O9.13: This comment states that the Valley Region is in a fire risk area and that the County should focus efforts on wildfire mitigation.

Response O9.13: The comment does not provide any substantial evidence supporting the assertions in the comment. As discussed on page 6.0-5 of the Draft EIR, the Specific Plan area and Upzone Site areas are located within an urban developed area and are not located within an identified wildland fire hazard area according to CalFire (CalFire, 2022). Therefore, the site is not in a wildfire risk area and no mitigation measures are required.

Comment O9.14: This comment states that the Municipal Advisory Council (MAC) and developer have not provided adequate translation, the MAC has silenced voices during meetings, and the MAC and County of San Bernardino have not released all minutes for their meetings.

Response O9.14: CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to the MAC meetings is not provided. In order to provide additional access to the notification process, the County provided the Notice of Preparation and

Notice of Availability in Spanish and English. Furthermore, the Public Scoping Meeting conducted on January 14, 2021 was provided in Spanish translation. The comment does not raise any specific concerns with the adequacy of the Draft EIR. The comment will be forwarded to County decisionmakers as part of the Final EIR. Therefore, no further response is required or provided.

Comment O9.15: This comment provides a conclusion to the group's comment letter and states that Concerned Neighbors of Bloomington requests the County oppose the Project and honor the community's plans for the Bloomington area. The comment further states that the Concerned Neighbors of Bloomington believe there could be no overriding consideration for the Project's environmental impacts.

Response O9.15: Pursuant to Public Resources Code Section 21081(a)(3), the County of San Bernardino would be required to make findings that specific economic, legal, social, technological, or other considerations make infeasible the alternatives identified in the Draft EIR related to significant environmental effects. As such, the County shall prepare a Findings of Fact, which would be included as part of the administrative record. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

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LETTER O10: Center for Community Action and Environmental Justice (4 pages)

CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE
"Bringing People Together to Improve Our Social and Natural Environment"

Bloomington County Planning Department
San Bernardino County Supervisors, 5th Supervisorial District
385 N. Arrowhead Ave.
San Bernardino, CA 92415

Re: Comments on Draft Environmental Impact Report

Dear San Bernardino County Planning Department:

We are writing to raise concerns with the draft environmental impact review submitted for the Bloomington Specific Business Park Project. We are concerned about the cumulative environmental impacts that are not adequately addressed by any proper mitigation measures. Further, the development of that project is in violation of several different policies which were adopted by the County in the most recent General Plan update, especially those focused on improving the treatment of and quality of life in environmental justice communities. Our organization was one of many which were heavily involved in the development of the General Plan, including the land use policies, expressly because the community is increasingly concerned about the onslaught of industrial uses which are intruding into this quiet community and lowering the quality of life. This Project would result in or contribute to the following irreversible environmental changes. Lands in the Specific Plan Area would be committed to light industrial, business park, warehousing, distribution, and e-commerce uses once the proposed buildings are constructed. Upon reviewing the Draft Environmental Impact Report, we wanted to highlight key areas that were not adequately addressed within the report, including:

- Impact AQ-1 would conflict with implementation of applicable air quality plan
- Impact AQ-2: The Project would result in a cumulatively considerable net increase of a criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard
- Impact AQ-3: Sensitive receptors would not be exposed to increased emissions
- Impact LU-1: The Project would not physically divide an established community.
- Impact POP-2: The Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.
- Impact TR-3: The Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses.

O10.1

We believe that these impacts require mitigation measures and ultimately are unavoidable products of the presence of this project.

Impact AQ-1: The Project would conflict with or obstruct implementation of the applicable air quality plan. - The lack of conformity with the air quality plan is a giant issue with this Project, particularly in consideration of the CalEnviroScreen score of the community which identifies it as one of the most impacted in the state. Additionally, the lack of conformity with the site quality

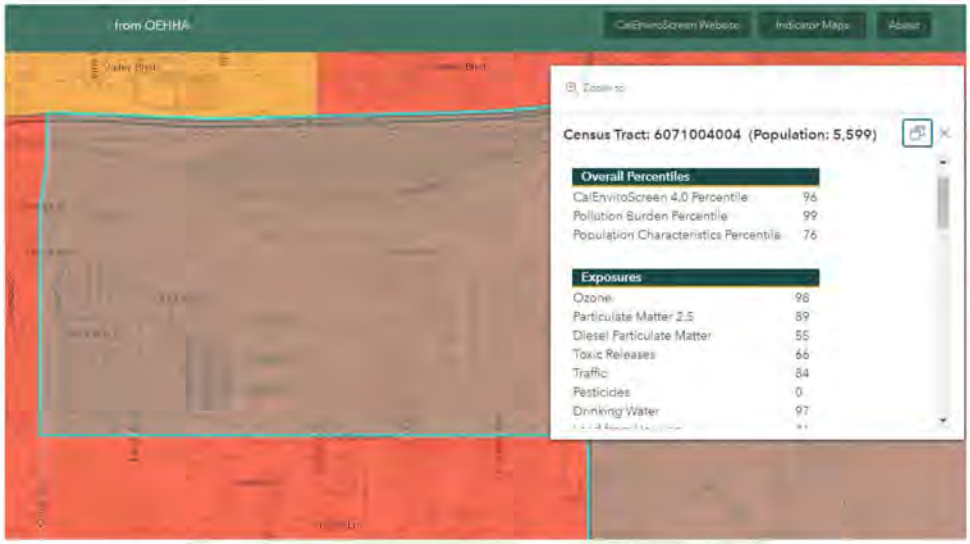
O10.2

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O10.2 cont.

Impact AQ-2: The Project would result in a cumulatively considerable net increase of a criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. - Again, AB197 (Garcia, 2016) requires direct emissions reductions in disadvantaged communities but this Project goes in the exact opposite direction. That is also at odds with case law of the Tejon Ranch development (Center for Biological Diversity and Wildlife v. California Department of Fish and Wildlife & Newhall Land and Farming Company) which established that projects need to fully mitigate impacts and provide no net increase in emissions.

O10.3

Impact AQ-3: Sensitive receptors would not be exposed to increased emissions. - Impacts AQ-1 & AQ-2 are acknowledged to be significant even after mitigation, including the increase in criteria pollutants, and the project would be located directly next to sensitive receptor locations such as homes, schools, and Kessler Park. Thus, that is a logical inconsistency. How are sensitive receptors not exposed to increased emissions if there is an increase in pollutants in the area where they are? What mechanism is preventing that increase from reaching the sensitive receptors located at sites directly adjacent to or within the Project boundaries? Under Option 1, trucks would be idling directly across from Kessler Park and under Option 2, directly adjacent to the elementary school.

O10.4

Impact LU-1: The Project would not physically divide an established community. - Bloomington is an established community, so the idea that a Project which will directly replace existing homes with monstrous warehouses & cut off the community from Kessler Park and various schools somehow "would not physically divide" the Bloomington community is patently absurd. This Project represents a direct affront and existential threat to the community by cutting off people from each other and existing amenities with a marked increase in truck traffic as well as

O10.5

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physical walls replacing the existing homes & small businesses, destroying the fabric of the community in the process. Avoiding precisely this type of scenario of uprooting entire communities is why the County included policies requiring that the types of uses of the proposed Project be kept at least half mile away from places like schools, parks, and other sensitive receptors. Unfortunately, a loophole was left in that policy which is being exploited by this Project of the exception for specific plans. However, the County and Project applicant have **not** followed the process for developing such a specific plan as set out in the General Plan, including the lack of involving the community in the process via noticed public meetings *about the Specific Plan and Project itself*. **O10.5 cont.**

Further, We are dismayed to see that the County is using a loophole in Policy LU-6.4 to advance this Project over the clear direction from the community. Through that policy, the community expressed a strong desire to keep the worst and most impactful uses away from the most precious and sensitive members of society—our children. While not expressly stated as part of LU-6.4, the exception for specific plans is presumably because the idea would be that the development of such a plan would be undertaken via strong and robust community involvement per Policy HZ-3.18 and through that process, a workable compromise would be identified. However, instead of going through the development of the Bloomington Business Park Specific Plan in an open and transparent manner that would involve the residents, the County has sprung this project on the community without even so much as at least adhering to the notification requirements set forth in Policy HZ-3.16. No community involvement was solicited in developing this Specific Plan and there initially was not even outreach in Spanish despite a majority of Bloomington residents being of Hispanic or Latino and speaking a language other than English at home. **O10.6**

Impact POP-2: The Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. - An upzone site is identified, but no mention is made of how the actual homes that the Project will demolish will be replaced. SB330 does not just require rezoning, it also requires relocation for occupants. How that will be accomplished has not been detailed anywhere in the documents. **O10.7**

Impact TR-3: The Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). - Although Figure 3-4 in the DEIR shows various truck routes and access points to the Project site, nowhere is any mention made of what mechanism would be used to keep trucks from using Santa Ana Avenue to access the Project site, the absence of which will lead to their use of that thoroughfare. Additionally, the potential increase of auto traffic on Santa Ana Avenue will still have a negative impact on safety for the community even if the trucks somehow miraculously do not use it. But as has been seen in many previous instances, trucks will go everywhere that they can physically reach, regardless of what routes are set for any individual project. **O10.8**

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Figure 1. Figure 3-4 Circulation Plan from the Bloomington Business Park Specific Plan Project Draft EIR showing truck routes and truck access points. However, it does not identify what actual steps are being taken to ensure that trucks cannot use Santa Ana Avenue.

O10.8 cont.

We are extremely concerned about these environmental issues which are not mitigated in the draft environmental impact report and further want to raise these as potential cumulative impacts whose scope within the existing DEIR is not thoroughly elaborated. We highly recommend that these issues be addressed in ways that help community members.

O10.9

Faraz Rizvi

Faraz Rizvi
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Response to Letter O10: Center for Community Action and Environmental Justice (dated December 15, 2021)

Comment O10.1: This comment provides an introduction to the comment letter and states that Center for Community Action and Environmental Justice is concerned that cumulative environmental impacts are not adequately addressed by any mitigation. The comment further states that the organization was heavily involved in the development of the Countywide Plan since the community is concerned about the industrialization of the Bloomington community. Additionally, the comment states that the Project violates several policies within the Countywide Plan, including those related to improving the treatment of environmental justice communities. The comment states that the organization believes that Impact AQ-1, Impact AQ-2, Impact AQ-3, Impact LU-1, Impact POP-2, and Impact TR-3 were not adequately addressed in the Draft EIR and that these impacts require mitigation measures and are ultimately unavoidable impacts of the Project.

Response O10.1: The comment does not provide any substantial evidence concerning any environmental impact. This comment is introductory in nature and does not provide detailed concerns related to the analysis within the Draft EIR related to Impact AQ-1, Impact AQ-2, Impact AQ-3, Impact LU-1, Impact POP-2, and Impact TR-3. Therefore, no further response is required or provided.

Comment O10.2: The comment states that the Project would conflict with or obstruct implementation of the applicable air quality plan and the lack of conformity with the air quality plan is a giant issue with this Project, particularly in consideration of the CalEnviroScreen score of the community which identifies it as one of the most impacted in the state. The last sentence of the first page states "Additionally, the lack of conformity with the site quality…". This sentence is incomplete. Following this incomplete sentence, a screenshot of CalEnviroScreen for Census Tract 6071004004 is provided which shows the pollution burden for the subject census tract.

Response O10.2: The comment does not provide any substantial evidence concerning any environmental impact. A response to the incomplete sentence is not provided because it would require speculation as to the commenter's intent. While CalEnviroScreen is an important tool in the efforts to reduce pollution in environmental justice communities, the percentile scores for pollution burden contained in CalEnviroScreen are not the basis for a consistency determination with the SCAQMD's Air Quality Management Plan (AQMP). As detailed in the Impact AQ-1 discussion that begins on page 5.3-27 of the Draft EIR, SCAQMD's CEQA Handbook suggests an evaluation of the following two criteria to determine whether a project involving a legislative land use action (such as the proposed Specific Plan) would be consistent or in conflict with the AQMP:

1. The project would not generate population and employment growth that would be inconsistent with SCAG's growth forecasts.

2. The project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

As detailed on page 5.3.7 of the Draft EIR, the purpose of the AQMP is to set forth a comprehensive and integrated program that will lead the region into compliance with the federal 24-hour PM2.5 air quality standard, and to provide an update to the Basin's commitment towards meeting the federal 8-hour ozone standards. The AQMP would also serve to satisfy recent USEPA requirements for a new attainment demonstration of the revoked 1-hour ozone standard, as well as a vehicle miles travelled (VMT) emissions offset demonstration. The 2012 AQMP, as approved by CARB, serves as the official SIP submittal for the federal 2006 24-hour PM2.5 standard. In addition, the AQMP updates specific new control measures and commitments for emissions reductions to implement the attainment strategy for the 8-hour ozone SIP. The

2012 AQMP set forth programs which require integrated planning efforts and the cooperation of all levels of government: local, regional, state, and federal.

In March 2017 AQMD finalized the 2016 AQMP, which continues to evaluate integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. Similar to the 2012 AQMP, the 2016 AQMP incorporates scientific and technological information and planning assumptions, including the 2016 RTP/SCS and updated emission inventory methodologies for various source categories. The comment does not identify any specific deficiencies in the analysis for determining consistency with the AQMP as disclosed in the Draft EIR. Therefore, no further response is required or provided.

Comment O10.3: The comment states that the Project would result in a cumulatively considerable net increase of a criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. The comment states that AB197 (Garcia, 2016) requires direct emissions reductions in disadvantaged communities but this Project goes in the exact opposite direction, which is also at odds with case law of the Tejon Ranch development that established that projects need to fully mitigate impacts and provide no net increase in emissions.

Response O10.3: The comment does not provide any substantial evidence concerning any environmental impact. The comment specifically addresses "criteria pollutants", which are identified by the US EPA, Cal EPA, as pollutants causing human health impacts due to their release from numerous sources. The following criteria pollutants have been identified: ozone, particulate matter (PM10), carbon monoxide, lead, nitrogen dioxide, and sulfur dioxide.

The comment cites AB197 (Garcia, 2016) in asserting that the project fails to reduce criteria pollutant emissions in disadvantaged communities. The AB 197 legislation is directed at greenhouse gas emissions, and not criteria pollutants. According to the California Legislative Information Webpage (https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160AB197), AB 197, as it directly applies to disadvantaged communities, would require the state board, when adopting rules and regulations to achieve greenhouse gas emissions reductions beyond the statewide greenhouse gas emissions limit and to protect the state's most impacted and disadvantaged communities, to follow specified requirements, consider the social costs of the emissions of greenhouse gases, and prioritize specified emission reduction rules and regulations.

The comment also assets that the project does not "fully mitigate" criteria pollutants that result in no net increase in such emissions. The Tejon Ranch case cited by the commenter is in reference to *Climate Resolve v. County of Los Angeles, et al. (Case No. 19STCP01917)*. The Tejon Ranch case involved a net zero increase in GHG emissions, and not criteria pollutants. Therefore, the citation here is out of context. The comment does not identify any specific deficiencies in the analysis related to criteria pollutants. Therefore, no further response is required or provided.

Comment O10.4: The comment states that Impacts AQ-1 and AQ-2 are acknowledged to be significant after mitigation, including the increase in criteria pollutants, and the Project would be near to sensitive receptor locations such as homes, schools, and Kessler Park. The comment states that is a logical inconsistency. The comment asks, how are sensitive receptors not exposed to increased emissions if there is an increase in pollutants in the area where they are and what mechanism is preventing that increase from reaching the sensitive receptors.

Response O10.4: The comment does not provide any substantial evidence concerning any environmental impact.

As described in Responses O10.2, the AQ-1 Impact discussion that begins on page 5.3-27 of the Draft EIR, discloses that the net increase in criteria pollutants would be related to regional emissions of VOC and NOx, and localized emissions and DPM emissions that impact sensitive receptors would be less than significant. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. Due to these regional threshold exceedances, the Project would conflict with the air quality plan, as detailed on Draft EIR page 5.3-29. However, as described on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate Project health risk impacts to residents, schools, and workers as a result of exposure to Diesel Particulate Matter (DPM) from heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The maximum non-cancer risks to nearby residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million; and the maximum non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0. As such, operation of the Specific Plan at buildout would not cause a significant DPM emissions impact on nearby sensitive receptors.

In addition, the Draft EIR evaluates the potential of the Project to expose local sensitive receptors, such as residences and schools, with substantial pollutant concentrations. As detailed in Draft EIR Tables 5.3-15 through 5.3-18, after implementation of Mitigation Measure AQ-2 (use of Tier 4 Final construction equipment), emissions during construction activities would not exceed the SCAQMD's localized significance thresholds. Also, as detailed in Draft EIR Tables 5.3-19 through 5.3-21, emissions from operation of the Specific Plan would not exceed the SCAQMD's localized significance thresholds for any criteria pollutant at the nearest sensitive receptors. Therefore, impacts related to localized emission would be a less than significant impact.

Comment O10.5: The comment states that the Project would divide an established community. The comment also states that the Project represents a threat to the community by cutting people off from each other and existing amenities with an increase in truck traffic and walls. The comment states that the loophole in the land use policy is being exploited by the Project through the use of a Specific Plan.

Response O10.5: The comment does not provide any substantial evidence concerning any environmental impact. As discussed on page 5.11-6 of Section 5.11 *Land Use and Planning*, the physical division of an established community could occur if a major road (expressway or freeway, for example) were built through an existing community or neighborhood, or if a major development were built which was inconsistent with the land uses in the community such that it divided the community. Similar to the Specific Plan Area, surrounding uses on the west, north, and east include intermixed small to large scale industrial, commercial, residential, and institutional that are variable in density and orientation. South of the site is a park and open space that are underlain by the former Crestmore disposal site. The landfill remains passively vented for methane buildup. Although it is identified as not being a health risk to existing or proposed surrounding uses, its historic operations contribute volatile organic compounds to the groundwater

(see Impact Haz-2), and it continues to be monitored by the San Bernardino County Local Enforcement Agency (SBCLEA). Project implementation would remove adjacent sensitive residential uses proximate to the landfill and develop the Specific Plan Area between the former landfill and uses north of the Specific Plan Area. In addition, as mentioned above, there is an existing industrial building located directly east of the Project site on 34.53 acres. Moreover, truck trips generated by the Project would not enter the community north of the Specific Plan Area; truck trips would access the Specific Plan Area from existing public roads, including directly from Jurupa Avenue via Cedar Avenue, which is a designated local truck route and has access to Interstate-10 on the north and State Route-60 on the south. As the Project would be developed along the edge of a community, its development and operation would not physically divide it.

The comment also states that "…the County and Project applicant have not followed the process for developing such a specific plan as set out in the General Plan, including the lack of involving the community in the process via noticed public meetings about the *Specific Plan and Project itself*. Here again the comment does not raise an issue about the adequacy of the CEQA review process, but rather the level of engagement conducted by the County in the preparation of Specific Plan. This is not an environmental issue. As discussed above, the County has complied with the required public involvement procedures mandated by CEQA.

Notwithstanding, as it relates to the planning process for the preparation of a specific plan, the County conducted community outreach for the Project which included resident meetings and community meetings. Resident meetings were held on December 12, 2018; November 19, 2019; April 10, 2021; and July 28, 2021. A direct mailer regarding the Project was sent to 3,754 approved mailboxes in Bloomington on August 1, 2021. CEQA notices, including the Notice of Preparation and Notice of Availability, were sent to 954 residents within the 1300-foot radius of the Specific Plan along with a 700-foot radius from the Upzone Site. Two community meetings were held on August 5, 2021 and October 6, 2021 which included notices mailed two weeks prior in English and Spanish. A Spanish translator was present during both community meetings. Furthermore, the Project would include a Community Benefits Agreement, which would include provisions for funding for community enhancement such as recreational programming, park operations, and enhanced public safety.

Comment O10.6: The comment states that the County is using a loophole in Policy LU-6.4 to advance the Project and states that the County has not been open and transparent with the residents. The comment also states there was no community involvement per Policy HZ-3.18 and notification procedures were not adhered to per Policy HZ-3.16. Additionally, the comment states that no community involvement was solicited in preparing the Specific Plan and no outreach occurred in Spanish.

Response O10.6: The comment does not provide any substantial evidence concerning any environmental impact. As discussed in response O10.5 above, through the public hearing process, the decision-makers within the County will take into consideration the environmental impacts caused by the project in considering if the project is consistent with Policy LU-6.4. As noted in Response 010.5, the Draft EIR is not intended to serve as the basis for the approval or denial of the project, but to disclose the environmental consequences of implementing Policy LU-6.4.

Policy LU-6.4 states, "We approve Land Use Plan amendments for new industrial development only if they are at least one-half mile from an existing or planned public primary or secondary school or public park. We may waive this requirement for obsolete school or park sites or for industrial amendments submitted through a specific plan." Per Public Resources Code § 21002.1 (a),"… the purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." Therefore, the Draft EIR is not intended to serve as the basis for the approval or denial of the project, but

to disclose the environmental consequences of implementing Policy LU-6.4. Through the public hearing process, the decision-makers within the County will take into consideration the environmental impacts caused by the project in considering if the project is consistent with Policy LU-6.4.

Pursuant to the requirements of CEQA and Countywide Plan Policy HZ-3.16, the County issued a Notice of Preparation (NOP) for the Project, which was distributed on December 30, 2020, and an NOP in Spanish was distributed on January 8, 2021. The Notice of Preparation was mailed to all residents and business owners within 1,300 feet of the Specific Plan area and 700 feet of the Upzone Site. The NOP comment period was extended to a total of 40 days ending on February 8, 2021. The purpose of the NOP was to solicit early comments from public agencies with expertise in subjects that are discussed in this Draft EIR and to solicit comments from the public regarding potential Project environmental impacts.

Pursuant to §15082(c)(1) of the CEQA Guidelines, the County hosted an EIR public scoping meeting for members of the public and public agencies to provide input as to the scope and content of the environmental information and analysis to be included in the Draft EIR for the Project. The scoping meeting was held on January 14, 2021, at 6:00 p.m. via the online videoconferencing software Zoom due to COVID-19 restrictions.

In addition, pursuant to Countywide Plan Policy HZ-3.18, the County conducted community outreach for the Project which included resident meetings and community meetings. Resident meetings were held on December 12, 2018; November 19, 2019; April 10, 2021; and July 28, 2021. Two community meetings were held on August 5, 2021 and October 6, 2021 which included notices mailed two weeks prior in English and Spanish. A Spanish translator was present during both community meetings.

Comment O10.7: This comment states that an upzone site is identified within the Draft EIR, but the Draft EIR does not mentioned how the homes that the Project would demolish would be replaced. It further states that SB330 requires relocation for occupants, which is not detailed in the Draft EIR.

Response O10.7: The comment does not provide any substantial evidence concerning any environmental impact. The comment is incorrect in stating that "An upzone site is identified, but no mention is made of how the actual homes that the project will be replaced." The EIR identifies an Upzone Site that would be redesignated and rezoned from Low Density Residential (LDR) and Residential Single with 20,000 SF Lot Minimums (RS-20M) to Medium Density Residential (MDR) and Residential Multiple (RM), respectively, to allow for the development of up to 480 dwelling units (20 dwelling units per acre) to offset the loss of residential land use designations and zoning at the Specific Plan area. Furthermore, as discussed under Impact POP-2 starting on page 5.13-9, Construction of either the proposed Opening Year Development – Option 1 or Opening Year Development – Option 2 in Planning Area A would result in the displacement of up to 78 residential structures. Future development of Planning Area B would require the removal of the remaining 39 residences at the time development applications are approved by the County.

In addition, the comment is focused on the relocation procedures for displaced persons under SB 330, and not the actual environmental impacts associated with displacement. SB 330 is part of the Planning and Zoning Law, and prohibits a local agency from disapproving, or conditioning approval in a manner that renders infeasible, a housing development project for very low, low-, or moderate-income households or an emergency shelter unless the local agency makes specified written findings based on a preponderance of the evidence in the record. Under CEQA, a significant impact would occur if the displacement of substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, would result in physical impacts to the environment as a result of implementing SB 330.

The environmental effects of the Upzone Site have been evaluated throughout the EIR under Sections 5.1, Aesthetics, 5.2, Agriculture and Forestry Resources, 5.3, Air Quality, 5.4, Biological Resources, 5.5, Cultural Resources, 5.6, Energy, 5.7, Geology and Soils, 5.8, Greenhouse Gas Emissions, 5.9, Hazards and

Hazardous Materials, 5.10, Hydrology and Water Quality, 5.11, Land Use And Planning, 5.12, Noise, 5.13, Population and Housing, 5.14, Public Services, 5.15, Transportation, 5.16, Tribal Cultural Resources, 5.17, Utilities and Service Systems, 6.0 Other CEQA Considerations, and 7.0 Alternatives.

The comment does not identify any specific deficiencies in the EIR's analysis for the. displacement of substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, no further response is required or provided.

Comment O10.8: This comment states that Figure 3-4 in the Draft EIR shows various truck routes and access points to the Project site, but there is no mention of how trucks would be prevented from using Santa Ana Avenue to access the Project site. Additionally, the comment states that the automobile traffic increase on Santa Ana Avenue would have a negative impact on the safety of the community even if trucks do not utilize Santa Ana Avenue.

Response O10.8: The comment does not provide any substantial evidence that the project proposes a geometric design feature that would substantially increase hazards, or introduce incompatible uses into the area resulting in hazardous traffic conditions. As detailed in the Impact TR-2 discussion that begins on page 5.15-8 of the Draft EIR, access to the Specific Plan area would be provided from driveways along Jurupa Avenue and Linden Avenue, and internal driveways along Laurel Avenue, Locust Avenue, and Maple Avenue would be accessed by Santa Ana Avenue or Jurupa Avenue (except for Laurel Avenue as it does not connect to Jurupa Avenue). A signalized intersection would be constructed on Locust Avenue at Driveway #6 as part of the Circulation Plan and infrastructure improvements to provide access to development sites on the east and west sides of Locust Avenue. Truck access would be limited to Jurupa Avenue as only passenger vehicles would have access to Santa Ana Avenue.

Onsite traffic signing and striping would also be implemented in conjunction with detailed construction plans with implementation of the Specific Plan. Additionally, sight distance at each development site's access point would be reviewed with respect to County standards at the time of final grading, landscape, and street improvement plan reviews. Additionally, roadways adjacent to a development site, site access points, and site-adjacent intersections would be constructed to be consistent with the identified roadway classifications and respective cross-sections in accordance with the Circulation Plan General Plan Circulation (see Figure 3-4 in the Project Description). Compliance with existing regulations would be ensured through the County's construction permitting process. As a result, impacts related to vehicular circulation design features would be less than significant.

The Project would provide signage onsite demonstrating the direction of the truck route, as seen in Project Design Feature (PDF) AQ-22 on Page 5.3-58 of the DEIR. Furthermore, while the County does not have formally designated truck routes in Bloomington, the County limits truck travel on roads adjacent to schools and residences through means such as citation. Additionally, Santa Ana Avenue is not a designated truck route in the Specific Plan, and therefore trucks not accessing local businesses on Santa Ana Avenue would be subject to citation from law enforcement. As such, should trucks travelling to or from the proposed Project utilize Santa Ana Avenue, they would be subject to citation by law enforcement.

The comment also states that increases in passenger car trips on Santa Ana Avenue would negatively affect safety. According to the County General Plan traffic projections, traffic on Santa Ana Avenue would increase substantially in the future, even without the additional trips resulting from the proposed Project.

However, all roadway and pedestrian improvements within the Specific Plan area would be constructed to be consistent with the identified roadway classifications and respective cross-sections in accordance with

the Circulation Plan General Plan Circulation (see Figure 3-4 in the Project Description). Compliance with existing regulations would be ensured through the County's construction permitting process.

Based on the responses above, no further response is required or provided.

Comment O10.9: This comment states that the Center for Community Action and Environmental Justice is extremely concerned about the previous environmental issues which are not mitigated in the Draft EIR and would like to raise these impacts as potentially cumulative impacts, which is not thoroughly elaborated in the Draft EIR. The organization recommends that these issues be addressed in ways that help community members.

Response O10.9: The comment does not provide any substantial evidence concerning any environmental impact. This comment is general in nature and does not provide detailed concerns related to why the organization believes that Impact AQ-1, Impact AQ-2, Impact AQ-3, Impact LU-1, Impact POP-2, and Impact TR-3 are cumulative impacts of the Project. Cumulative impacts related to development of the proposed Project are discussed within each respective impact analysis section of the Draft EIR. The comment does not raise any particular issues with the cumulative analysis within the Draft EIR. This comment will be forwarded to County decisionmakers as part of the Final EIR. Therefore, no further response is required or provided.

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LETTER O11: Concerned Neighbors of Bloomington (1 page)

CONCERNED NEIGHBORS OF BLOOMINGTON
PEOPLE'S COLLECTIVE FOR ENVIRONMENTAL JUSTICE

October 13, 2021

VIA ELECTRONIC MAIL

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

Re: Comment Extension Request – Bloomington Business Park Specific Plan

Dear Mr. Liang:

The undersigned members of the Concerned Neighbors of Bloomington and People's Collective for Environmental Justice write to request a minimum of 30 additional days to comment on the Draft Environmental Impact Report ("EIR") for the Bloomington Business Park Specific Plan. The communities represented by these organizations will be greatly impacted by this project, and it is imperative that your agency provide sufficient time to review the draft EIR for this project. **O11.1**

This 237-acre project presents significant environmental justice concerns for Bloomington residents, who already bear an air pollution burden ranking in the 95th percentile for the state.[1] The large influx of industrial projects—many of which are sited near our homes and schools—has resulted in our community being labeled a "diesel death zone."[2] Worse still, our non-English speaking community members[3] have already once been denied a meaningful opportunity to participate in this decision making. On October 6, 2021, at the Bloomington Municipal Advisory Council presenter, Tim Howard of Howard Industrial Partners presented on the Bloomington Business Park and addressed the public in English. Mr. Howard informed the public that a translator was provided for Spanish translation by the name of Luz, but the translation equipment was not provided by Mr. Tim Howard, Howard Industrial Partners, Bloomington Municipal Advisory Council (MAC), or San Bernardino District 5 Supervisor Joe Baca **O11.2**

[1] https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30

[2] https://www.kvcrnews.org/local-news/2021-02-03/community-members-distribute-petition-to-stop-approval-of-a-new-bloomington-warehouse-district

[3] https://www.census.gov/quickfacts/fact/table/bloomingtoncdpcalifornia,palermocdpcalifornia,ontariocitycalifornia,eurekacitycalifornia,pinolecitycalifornia,ardenarcadecdpcalifornia/PST045219 (reporting 66.5 percent of Bloomington residents as speaking a language other than English at home).

Jr's office. Translation equipment was made available by Inland Coalition for Immigrant Justice and Warehouse Worker Resource Center. In addition, Bloomington MAC Member presiding over the meeting was Ms. Dianne Mendez-Cantu which stated she was not aware of rules for Non-English Speakers during public comment. This lack of understanding resulted in a Spanish-speaking member by the name of Mr. Leopoldo Ayala of the public to be interrupted during public comment by Ms. Mendez-Cantu. While simultaneous English translation was provided during the meeting via audio equipment, consecutive English translations for Spanish speakers at the podium was **not** provided for Spanish speakers Mr. Leopoldo Ayala and Ivan Roque by Mr. Tim Howard, Howard Industrial Partners, Bloomington Municipal Advisory Council (MAC), or San Bernardino District 5 Supervisor Joe Baca Jr's office. With a draft EIR comprising 700 pages, any extension shorter than 30 days will be woefully inadequate to ensure that relevant stakeholders have a sufficient review of this voluminous report.

O11.2 Cont.

We appreciate your consideration. Please respond to this letter to let us know whether you will grant this request, and do not hesitate to contact us if you have questions.

Sincerely,

Ana Carlos and Caitie Towne
Concerned Neighbors of Bloomington

Deyadira Arellano and Andrea Vidaurre
People's Collective for Environmental Justice

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Response to Comment Letter O1: Concerned Neighbors of Bloomington & People's Collective for Environmental Justice, dated October 13, 2021

Comment O11.1: This comment requests that the County of San Bernardino extend the Notice of Availability and Draft EIR public comment period by at least 30 days. The comment further states that the communities represented by Concerned Neighbors of Bloomington and People's Collective for Environmental Justice will be impacted by the Project and the County should provide sufficient time to review the document.

Response O11.1: As requested by the Concerned Neighbors of Bloomington and People's Collective for Environmental Justice, the public review and comment period was extended by 30 days, for a 75-day public review period to allow for additional review and public disclosure. This comment provides the commenter's opinion on the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment O11.2: This comment states that the Project presents significant environmental justice concerns for residents who already bear a pollution burden. Further, the comment states that non-English speaking residents have been denied opportunities to participate in decision making. The comment states that Bloomington Municipal Advisory Council meetings were presented in English, and while a Spanish translator was provided, translation equipment had to be provided during other groups. The comment states that since the Draft EIR is 700 pages, an extension of 30 days should be granted to make sure stakeholders have enough time to review the report.

Response O11.2: This comment does not provide any substantial evidence concerning an environmental impact. A scoping meeting was held on January 14, 2021, and a notice was mailed in English and Spanish two weeks prior to 954 residents within the 1300 foot radius of the Specific Plan along with a 700 foot radius from the Upzone Site. A direct mailer was sent to 3,754 approved mailboxes in Bloomington on August 1, 2021. Two community meetings were held on August 5, 2021 and October 6, 2021 which included notices mailed two weeks prior in English and Spanish.

CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The project's merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of environmental justice effects. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to environmental justice issues is not provided.

As requested by the Concerned Neighbors of Bloomington, the public review and comment period was extended by 30 days, for a 75-day public review period to allow for additional review and public disclosure. Subsequent to receipt of this comment, the end of the public comment period was extended from November 15, 2021 to December 15, 2021. Furthermore, an additional notice regarding the extension was mailed to residents and business owners within a 1,300-foot radius of the Specific Plan Area and 700-foot radius of the Upzone Site in English and Spanish on October 25, 2021. The notice of extension was also posted to the County's website. The comment does not raise a specific issue with the adequacy of the Draft EIR. Therefore, no further response is provided.

LETTER I1: Emmanuel Rodriguez (2 pages)

From: Emmanuel Rodriguez
To: Liang, Aron; Liang_ar@sbcity.org
Subject: Good Job Aron, What do you think about this?
Date: Thursday, November 18, 2021 11:02:38 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello Aron Liang,

I am a concerned resident of Bloomington in the development of this new Business Park
As a long-time resident pretty much growing up here with my community, we all ask.....

I1.1

Why a business park in the middle of an already populated community with busy & traffic-congested roads.

The community has asked for more resources, shops, grocery stores, retail.. Literally, anything that the community can use. NOT a Business Park.
Especially in very close proximity to an elementary & High school.

I1.2

Not only would it bring negative environmental effects and traffic, but it will also bring a lot of dangerous people along. The roads are already busy with all these new warehouses opening up, this will just make living here a nightmare.
I live on Santa Ana Avenue so I first-hand see there are so many dangerous crimes happening near the warehouses like prostitution, public intoxication, drug use, and just overall sketchy areas that are not watched by police.
It will just drive that negative environment closer to the schools and the main street.

I1.3

Our Community leaders have openly disagreed with this planned initiative. Why not take that voice and protect the community that lives here.

I ask that you please take into consideration the people who actually live in Bloomington and not the consideration of the outsiders who want to buy the land.

I1.4

Aron.....Are you 100% ok with taking lead as the Senior Planner in something the community as a whole agrees DOES NOT want?

Would you like it to be a "Good Job, Aron" from the business owners? or an "Amazing Job, Aron!" from the community?

Do the right thing, Aron.

I know it is your job and you may have to do what you gotta do but just think about the many kids, families, and already established communities that are going to be affected by this. We need some humanity, community, and love especially in an already negative-dominant world we live in. Bringing that Business park would only divide and make our already small town even smaller.

I1.5

That is all.

Thank you, Aron

I1.5
cont.

Emmanuel Rodriguez
Student at Cal Poly Pomona
Bloomington Resident | Erodriguez7777@gmail.com

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Response to Comment Letter I1: Emmanuel Rodriguez, dated November 18, 2021

Comment I1.1: This comment states that the commenter is concerned about the proposed Project and questions why a business park would be placed in the middle of a community with congested roads.

Response I1.1: The comment does not provide substantial evidence concerning the claims raised in the comment. Due to the existing limited low-density development and vacancies within the Specific Plan area, buildout and operation of the proposed Specific Plan would increase traffic generated from the area.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, while the comment is correct in stating that the Project would result in 8,555 daily vehicle trips, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I1.2: This comment states that the community has asked for more resources such as shops, grocery stores, and retail and has not asked for a business park, especially one in close proximity to an elementary and high school.

Response I1.2: The comment expresses opposition to the Project and expresses a community desire for additional resources in Bloomington. As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds and the Project would not expose sensitive receptors to substantial health risks. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors, included schools, is limited as much as possible. The comment does not raise a specific issue with the adequacy of the Draft EIR evaluation or raise any other CEQA issue. Therefore, no further response is required or provided.

Comment I1.3: This comment states that the Project would result in negative environmental impacts, traffic, and dangerous people. The commenter states that living on Santa Ana Avenue, he sees crimes happening such as prostitution, public intoxication, and drug use and areas that are not watched by police. The comment further states that the Project would drive that negative environment closer to schools and the main street.

Response I1.3: The comment does not provide substantial evidence concerning the claims raised in the comment. As summarized within Section 5 of the Draft EIR, all impacts with the exception of air quality would be mitigated to a less than significant level. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the regional thresholds of significance for VOC and NOX emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. This would result in a

significant and unavoidable impact related to the air quality management plan and cumulative regional emissions of criteria pollutants. The Draft EIR described (page 5.3-34) that the majority of the Project's VOC emissions are derived from the use of consumer products and the majority of NOX emissions are derived from vehicle usage; neither of which can be controlled by the Project Applicant or County.

In regard to crime within the community, the commenter refers to an existing condition of the environment. CEQA does not require analysis of the impact of existing environmental conditions on the Project. *Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560. As discussed in Section 5.14, *Public Services,* the San Bernardino County Sheriff Fontana Patrol Station would serve the Project Area and the existing Bloomington Community. Impacts to police services are considered significant if Project implementation would result in inadequate staffing levels, response times, and/or increased demand for services that would require the construction of new or expansion of existing police facilities. As stated on page 5.14-9, the Project would include the funding of an additional Sheriff Deputy for the Bloomington Community. Therefore, while the commenter alludes to existing crime within the community, the comment has not provided evidence that the Project would exacerbate crime or result in inadequate staffing levels, response times, and/or increased demand for services that would require the expansion of new or existing sheriff facilities.

Comment I1.4: This comment states that community leaders have openly disagreed with the proposed Project and that the County should take into consideration the people that live in Bloomington over the developers who want to buy the land. This comment further states that the County should do the right thing.

Response I1.4: The comment expresses opposition to the Project and expresses the community's opposition to the Project. The comment does not raise a specific issue with the adequacy of the Draft EIR evaluation or raise any other CEQA issue. Therefore, no further response is required or provided.

Comment I1.5: This comment states that the County is doing their job but asks that they think about the kids, families, and established communities in Bloomington. The comment further states that the Project would only divide and make the town even smaller.

Response I1.5: The comment expresses opposition to the Project. As discussed in Section 5.11, *Land Use and Planning,* under Impact LU-1, the proposed Project would not physically divide an established community as it would be located on the edge of the Bloomington community in an area that is adjacent to the former Crestmore disposal site and would be consistent with surrounding industrial development. The comment does not raise a specific issue with the adequacy of the Draft EIR evaluation or raise any other CEQA issue. Therefore, no further response is required or provided.

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LETTER I2: Teresa Torres (1 page)

Good evening esteemed San Bernardino County Planning Division, my name is Teresa Torres and I have been a resident of Bloomington for 30 years. I am writing in response to the Bloomington Business Park Specific Plan Project EIR- Draft and I wanted to raise my concerns on the following:

I am against any additional warehouses being built in the community of Bloomington. These warehouses have greatly impacted the community in a negative way. We have seen many homes destroyed and families forced to relocate. With each warehouse that is built the community becomes more physically divided. For families wanting to stay and fight for the community they love and have family history in, they are faced with putting their health at risk due to the pollution that these facilities create.The warehouse and logistic boom has directly increased emissions from diesel trucks and trains. The residents of the community are directly inhaling traffic related pollutants like diesel particles. The increased exposure to these particles and other pollutants leads to increased inflammation of the lungs and the development of asthma. Just 2 years ago the American Lung Association's State of the Air report listed the Inland Empire as "home to the most ozone-polluted Cities in the United States". As a result, the children growing up near these warehouses and freeways are more likely to develop asthma and other health risks. I ask myself why anyone would even consider building these warehouses in a community. Is it because of money? The argument one might say is that it will bring jobs, but by putting our health at risk what kind of jobs do these warehouses provide? Research has shown the majority of these jobs do not pay a livable wage. The average pay of a warehouse worker in the Inland Empire is $14.31 per hour. This is a wage with no benefits. We live in one of the most "affordable" areas in Southern California but the average warehouse worker would never be able to own a home based on their income. How are these warehouses any benefit to the community? There are none. They are here to use up our resources. They will use our land, pollute our air, pay an unlivable wage for the labor, destroy the community and damage our infrastructure. The increased traffic flow has led to traffic jams and damage to the roads. The traffic jams are resulting in projects to widen roads and add lanes. Who is paying for this? Not the warehouses, or developers, the tax paying dollars of the residents are paying for these extremely expensive projects. Why is the onus on the community, the tax paying residents, when we don't even want these warehouses.These tax dollars could be going to community programs, schools, parks, centers, etc. We want to see urban developments that benefits the community. We voted in our appointed officials to do what is best for the community and to listen to the needs of the community. Yes we need jobs, but we most importantly need livable wages, and the community should not be asked to trade in good health and vibrant neighborhoods for jobs. Is this the best our officials can do? Provide unlivable wage jobs, and damage the lungs of our children? We want to live and thrive in the community for many generations to come.

I2.1

Response to Comment Letter I2: Teresa Torres, dated December 23, 2021

Comment I2.1: This comment states that warehouses within Bloomington have previously negatively impacted the community and led to homes being destroyed and have physically divided the community. The comment further states that warehouses create pollution and have increased traffic related pollution like diesel particulate matter. The comment further states that the Inland Empire is home to the most ozone-polluted cities in the United States and that children growing up near warehouses face health risks.

This comment also states that the jobs at warehouses do not provide a livable wage and do not provide benefits. It further states that warehouses lead to traffic and damage to roads, which leads to projects to widen roads and add lanes. The comment states that the developers are not paying for these road projects and that the tax burden is placed on the community, who do not want more warehouses and instead want urban developments that benefit the community.

Response to I2.1: The comment does not provide any substantial evidence concerning the Project's environmental impacts. As discussed on pages 5.11-6 and 5.11-7 of Section 5.11 *Land Use and Planning*, the physical division of an established community could occur if a major road were built through an existing community or neighborhood, or if a major development were built which was inconsistent with the land uses in the community such that it divided the community. Surrounding uses to the west, north, and east include intermixed small to large scale industrial, commercial, residential, and institutional that are variable in density and orientation. Furthermore, the West Valley Logistics Center development is planned for the area south of the Specific Plan and would include large scale industrial uses. As discussed, impacts would be less than significant.

As detailed beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate the health risk impacts to residents, schools, and workers as a result of exposure to DPM as a result of heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to residences attributable to TAC source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The non-cancer risks to residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million; and the non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0. As such, operation of the Specific Plan at buildout would not cause a significant human health or cancer risk and impacts would be less than significant.

In addition, the Draft EIR evaluates the potential of the Project to expose sensitive receptors, such as residences and schools with substantial pollutant concentrations. As detailed in Draft EIR Tables 5.3-15 through 5.3-18, after implementation of Mitigation Measure AQ-2, emissions during construction activities would not exceed the SCAQMD's localized significance threshold. Therefore, with implementation of mitigation measures, impacts related to localized significant emissions from construction activity would be less than significant. Also, as detailed in Draft EIR Tables 5.3-19 through 5.3-21, emissions from operation of the Specific Plan at buildout would not exceed the SCAQMD's localized significance thresholds for any criteria pollutant at the nearest sensitive receptors. Therefore, operation of the Specific Plan at buildout would result in a less than significant impact related to localized emissions. Because the Project would not

exceed thresholds for either DPM or localized significance thresholds, the Project would not adversely impact neighboring communities.

As outlined in State CEQA Guidelines Section 15064.3, except as provided for roadway capacity transportation projects, a project's effect on automobile delay shall not constitute a significant environmental impact. Therefore, in order to comply with CEQA Guidelines Section 15064.3, impacts associated with automobile delay and congestion were not analyzed in the Public Draft EIR. The County has established local truck routes to efficiently funnel traffic to freeways while minimizing impacts on residents. The trucks traveling to and from the proposed Project would utilize the existing truck routes established by the County. Furthermore, as provided by Draft EIR Appendix K1, the Project applicant will pay a Development Impact Fee, with these fees to be used to provide offsite infrastructure improvements such as roadway repaving, restriping, and widening to surrounding roadways. Additionally, as described starting on page 3-11 of the Draft EIR, as part of the Project, the Project Applicant/Developer would provide improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue, and Santa Ana Avenue.

The comment states that the proposed warehouses would not provide livable wages. CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The project merits, including any economic and social effects of the project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the project's potentially significant physical impacts on the environment and does not include a discussion of employee wages. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to employee wages is not provided.

Overall, the comment expresses opposition to the Project and expresses a community desire for additional resources in Bloomington. The comment does not raise a specific issue with the adequacy of the Draft EIR evaluation or raise any other CEQA issue. Therefore, no further response is required or provided.

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LETTER I3: Cruz Baca (2 pages)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Re: Bloomington Business Park Specific Plan

Mr. Liang and Board of Supervisors,

I am writing to voice my concerns and questions in regards to the above project and to explain why I am in opposition. I am a resident on Stallion Lane in Bloomington, a very quiet neighborhood, surrounded by 3 schools, Zimmerman Elementary is directly behind my house. Bloomington High School is up the street and Ruth Harris Middle School a few blocks away. I have voiced my concerns before, when the Cedar/Jurupa Street Industrial buildings were developed, but as always, was left to deaf ears. I am hoping that not only myself, but all who are opposed of this project will be heard. **I3.1**

1. **Noise pollution, Air quality and Traffic**, are major factors in my opposition. Also, I believe that a Developer should not just say "I want your property, make room for progress". The Cedar project, that now exists, brings heavy semi truck traffic at all hours of the day and night, and every day. A few days ago there was a traffic accident, a semi truck trying to make a U-turn hit my neighbor's fence, not only bringing down the fence, but knocking down Edison powerlines, we were without power for a day. Originally when this project was being considered we were promised NO TRAFFIC on Linden. But yet, trucks are still going up and down Linden. Students are back in session, they are and will be in the playground when construction is under way, breathing all the pollution, hearing loud noise, and experiencing heavy truck traffic. It is proven and statistics show developments surrounding schools and residential areas, which are mainly in neighborhoods of color, cause a rise in asthma, respiratory and other health problems that lead to cancer. **I3.2**
2. I would like the Supervisors, especially Supervisor Joe Baca, who represents our District, and you Mr. Liang to reconsider "Rezoning" to Commercial. Again, let me state Schools surround this proposed development, children playing or walking home from school will see nothing but concrete buildings instead of "Green Space". The supposedly "Green Space" proposed is not enough...we need more parks!! Our children and residents deserve to stay in a **I3.3**

neighborhood where they can enjoy the outdoors, see horses, chickens and other farm animals, which most of the residents have. Let's improve our children's/resident's quality of life, not make it worse. We are proud of our neighborhoods and want to keep it that way.

I3.3 cont.

I am hopeful you will consider our concerns and remarks and reconsider this project. Are we sacrificing our communities for "warehouses" ?

I am available if any questions or to discuss further.

I3.4

Wishing you a Merry Christmas and Holiday Season.

Cruz Baca
Owner

Sent from Mail for Windows

Response to Comment Letter I3: Cruz Baca, dated December 13, 2021

Comment I3.1: This comment states that the commenter is in opposition to the proposed Project as they are a resident on Stallion Lane and are surrounded by three schools. The commenters states that they previously raised concerns regarding the Cedar/Jurupa Street Industrial project but was not listened to.

Response I3.1: The comment expresses opposition to the Project and is introductory in nature. The comment does not raise a specific issue with the adequacy of the Draft EIR evaluation or raise any other CEQA issue. Therefore, no further response is required or provided.

Comment I3.2: This comment states that noise, air quality, and traffic are major factors in the commenter's opposition to the proposed Project. The comment states that the Cedar project resulted in heavy semi-truck activity during all hours of every day and that a traffic accident occurred recently when a semi-truck tried to attempt a U-turn. The comment further states that when the Cedar project was originally proposed, the community was promised no traffic on Linden, but trucks still utilize Linden.

The comment further states that students at adjacent schools would be on the playground when construction is underway and would be exposed to pollution, noise, and heavy truck traffic. Additionally, the comment states that statistics show developments near schools and residences increase respiratory illness and other chronic illnesses such as cancer.

Response I3.2: The comment does not provide substantial evidence of any environmental impact. The majority of the comment refers to existing conditions, such as traffic, from the existing warehouse on the corner of Cedar Avenue and Jurupa Avenue. The potential for the Project to exacerbate existing traffic conditions from the Cedar Avenue/Jurupa Avenue warehouse was analyzed as part of Appendix K1, Traffic Impact Assessment. However, as part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion.

As summarized within Section 5 of the Draft EIR, all impacts with the exception of air quality would be mitigated to a less than significant level. Consistent with the comment, as detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the regional thresholds of significance for VOC and NOX emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. This would result in a significant and unavoidable impact related to the air quality management plan and cumulative regional emissions of criteria pollutants. The Draft EIR described (page 5.3-34) that the majority of the Project's VOC emissions are derived from the use of consumer products and the majority of NOX emissions are derived from vehicle usage; neither of which can be controlled by the Project Applicant or County.

As detailed in the Impact NOI-1 discussion that begins on page 5.12-26 of the Draft EIR, each of the Project scenarios would require Mitigation Measure NOI-1, which would require 14-foot-high cement block walls at Site 2 and 9-foot-high cement walls at Site 4. With implementation of Mitigation Measure NOI-1, operational noise levels for all scenarios would not exceed the County's exterior noise level standards, as adjusted to reflect the ambient noise levels at all nearby sensitive receiver locations. Additionally, the increase in ambient noise levels would range from 0.1 to 3.0 with the implementation of Mitigation Measure NOI-1, which would not generate a significant daytime or nighttime operational noise level increase at nearby receiver locations. As detailed in the Draft EIR in Section 5.12, *Noise,* starting on page

5.12-48, the proposed Project would generate traffic related noise from operation. As described in Section 3.0, *Project Description*, of the Draft EIR, the proposed Specific Plan buildings would be accessed from Laurel Avenue, Locust Avenue, and Maple Avenue. Tables 5.12-23 through 5.12-24 show that both the Opening Year with Project and General Plan Buildout with Project conditions would result in increases less than the 1.5 dBA CNEL threshold. Thus, off-site traffic noise impacts from the Project would be less than significant.

As detailed beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate the health risk impacts to residents, schools, and workers as a result of exposure to DPM as a result of heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to residences attributable to TAC source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The non-cancer risks to residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million; and the non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0. As such, operation of the Specific Plan at buildout would not cause a significant human health or cancer risk and impacts would be less than significant. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I3.3: This comment states that the commenter would like the County Supervisors and the County Planning Department to reconsider rezoning the proposed Specific Plan Area. The comment states that there are schools surrounding the proposed Specific Plan and children will see nothing but concrete buildings instead of green space and that Bloomington needs more parks. The comment states that residents deserve a neighborhood where they can enjoy the outdoors and see farm animals, which current residents have, and that the County should improve residents' quality of life and not make it worse.

Response I3.3: The comment does not include any substantial evidence of any environmental impact. As discussed in Section 5.1, *Aesthetics,* the Specific Plan Area contains single-family residential properties that vary between one to two stories in height. Many properties also operate additional uses and/or businesses, including horse ranch, plant nurseries and tree services, health services, truck transportation and auto repair, and similar industrial-commercial uses. Some of the properties contain unidentified storage, assorted debris piles, including soil, and trash. There are also vacant lots throughout the planning area. There are no designated scenic viewpoints near the Specific Plan Area and Upzone Site that provide unobstructed viewsheds of the San Bernardino and San Gabriel Mountains and Jurupa Hills. While public views of the ridgelines of these resources at or near the Specific Plan and Upzone Site occur along public roadways, they are mostly obstructed and fragmented by intervening building structures, utility poles, trees, and other elements of the built environment. Therefore, implementation of the proposed Specific Plan, including development of Planning Area A, Opening Year Development – Options 1 and 2 with the proposed industrial business park, future development of Planning Area B, and rezoning of the Upzone Site would not significantly affect scenic views of the San Bernardino and San Gabriel Mountains and Jurupa Hills.

CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna,

ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)) (*San Franciscans for Reasonable Growth v City & County of San Francisco* (1989) 209 Cal.App.3d 1502). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of access to the outdoors and nature. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to access to the outdoors and nature is not provided. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I3.4: This comment states that the commenter is hopeful that the County will consider the community's concerns and reconsider the Project and questions if the County is sacrificing communities for warehouses.

Response I3.4: The comment is conclusionary in nature and does not raise any specific concerns with the adequacy of the Draft EIR or other CEQA concerns. Therefore, no further response is required or provided. This comment will be forwarded to County decisionmakers as part of the Final EIR.

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LETTER I4: Caitlyn Towne (4 pages)

Dear County of San Bernardino,

My name is Caitlin Towne and I write this letter in strong opposition to the 'Bloomington Business Park Specific Plan Project' (BBPSP). **I believe that this proposed project's significant and unavoidable impacts cannot be mitigated nor justified with an overriding consideration**. I4.1

I grew up in the Bloomington community, graduated from both Ruth O. Harris Middle School and Bloomington High School and have been teaching at Joe Baca Middle School for the past 8 years, where I plan to continue teaching for the rest of my career. I care deeply about Bloomington and am writing with my students' futures in mind when I ask that you join me in opposing this project. I feel that as a teacher it is my job to speak out against the Bloomington Business Park Specific Plan because it will have negative impacts on my students' and their families' lives along with thousands more students who live in the area and attend neighboring schools. To give you an understanding of just how many schools and students would be affected by this project I believe it is important to state that this project would be less than 100 ft. from three public schools (Bloomington High School, Ruth O Harris Middle School and Walter Zimmerman Elementary School) and less than one mile from Crestmore Elementary School, Sycamore Hills Elementary School, and Slover Mountain High School, all of which are a part of the Colton Joint Unified School District. Joe Baca Middle School, the school where I teach, is within 3 miles of this project and many of my students live even closer to it. I4.2

Many of my students either walk to school or take the school bus, meaning they wait for the bus close to their own homes, and if their homes are within a couple of miles of even more warehouses, they will be surrounded by dangerous and unhealthy conditions from the moment they leave their house. If this project is approved, that would mean that my students would have to walk or wait along the streets with even more truck pollution and traffic. It is dangerous for my students to have to contend with speeding trucks and even more dangerous for them to have to breathe in the fumes that these trucks emit. I oppose this project because it puts my students in both immediate danger of increased traffic and long lasting risk of countless health issues including asthma and cancer, a point that is not adequately accounted for in the draft Environmental Impact Report for this project. I am asking that you too oppose this project and prioritize the health and safety of our students.

I do not believe there has been enough consideration for the future of Colton Joint Unified School District due to this project. If this project is approved, it will cause hundreds of I4.3

people to lose their home, be displaced, and have to move elsewhere, which will lead to a drop in enrollment of the immediately surrounding schools and cause a ripple effect throughout the schools in all of Bloomington, and CJUSD in general. As a state we have been dealing with dropping enrollment in public schools for years now and I am very concerned that this project will only exacerbate the problem, leading to less funding and loss of jobs at every level of the district. It is important to me that we provide Bloomington with the best public schools possible to ensure that the children and future generations of Bloomington receive a high quality education. If you allow this project to be made, it will cause a loss of community, lead to financial distress to a district who serves majority low socioeconomic students, and lead to further strain on essential funding for our schools in both the average daily attendance (ADA) and tax dollars. **I4.3 cont.**

Speaking of a high quality education, I do not believe there has been enough study or consideration done on the lasting negative effects this project will have on the mental health and self esteem of children who attend these schools, now and in the future. If more and more warehouses are allowed to displace communities, the people who are left surrounded by those buildings will have less opportunity for growth both financially and socially. I fear that the more warehouses my students see taking over their community, the less likely they will be to strive for a better future for themselves. This could lead to even higher rates of depression in youth than we currently have (which is at a staggering high due to the pandemic). I also fear that our children's own self efficacy will be negatively affected by more warehouses, soon it will be the only future they will be able to see for themselves. I am asking that you fight for a better future for my students and the countless others whose mental health is at risk if this project is approved. **I4.4**

I would also like to discuss the negative health impacts this project would bring to the community in general. As someone who spends more than 8 hours a day in Bloomington for 8 to 9 months out of the year, the following statistics are particularly concerning to me: **I4.5**

- There are higher-than-normal risks that come from living and working in a highly polluted environment. Public health is at stake when we continue to increase pollution in residential communities.
- This project would bring in over 9,000 vehicle and truck trips on roads adjacent to homes, schools, and parks. **I4.6**
- This project would create additional traffic, noise, poorer air quality, deterioration of commercial and residential roads, unsafe pedestrian and bicycle safety and other impacts in an area that is considered in the 90th% - 95% on CalEnviroScreen. **I4.7**
- This project would have significant and unavoidable impacts for **I4.8**
    - obstructing the implementation of the air quality plan
    - net increase of criteria pollutants
    - cumulative impacts

This project perpetuates environmental racism that has plagued the entire Inland Empire in the past decade of unheard-of expansion for logistic centers and warehouses, to this point here are several key issues that this project would compund in Bloomington:

- There are unavoidable cumulative impacts - an entire residential community will be disrupted, which will have a ripple effect throughout Bloomington and the surrounding cities. This project would rezone 213 acres of residential and agricultural land to industrial zoning - creating legally nonconforming uses in that area **I4.9**
- Community members have brought up the fear of being displaced or harassed out of their homes, despite stating that they do not want to sell or rezone their home **I4.10**
- This community is over 80% Hispanic, with 20% of the community experiencing poverty
- This region deals with some of the worst traffic in the county - idling cars double the negative impact of pollution on the nearby communities. **I4.11**
- The region for the proposed development is in an area that is a fire risk and with the increasing dangers of climate change and wildfires. The County should focus its efforts on wildfire mitigation. **I4.12**
- Tearing down dozens of homes, bulldozing, and replacing with concrete structures would also disrupt the local ecosystem which includes several species that are endangered: Delhi Sands Flower-loving Fly, Burrowing Owl, Nesting Raptors, and many more species and I believe that this report is not sufficient in its conclusions on how this project will affect the biological diversity of the area. **I4.13**

I also have many issues and concerns with the way that the project and many others have been presented at the Bloomington MAC meetings, and would like to list them here for your information as County Supervisors and to ask that you consider these issues and realize how important it is to listen to the requests of the community and not just the MAC or developers:

- The Municipal Advisory Council (MAC) and developer, Tim Howard has not provided adequate translation, even when requested for its constituents. In Bloomington, 66.5% of the community speaks a language other than English.
- The Municipal Advisory Council (MAC) has silenced voices during meetings when community members have brought up concerns. **I4.14**
- The Municipal Advisory Council (MAC) and County of San Bernardino have not released all minutes for their meetings.

It is important that all public officials be held accountable to the people they serve, and I am asking that you as a County step in and ensure that the Bloomington MAC does its due diligence to ensure the community of Bloomington is represented honestly and in good faith.

I believe it is essential to the future of Bloomington and the surrounding areas of the entire Inland Empire that we stop this project and prioritize the health and happiness of our community. I believe we should be focusing on the health of people and our collective future, not more warehouses, and instead ask that the County consider more diverse infrastructure plans **I4.15**

which will have lasting positive impacts for all residents including: more libraries, community centers, grocery stores, parks, and places for small business to thrive in Bloomington. I believe we can create a more beautiful, fruitful, and healthy future for all of the Inland Empire, and it begins by standing with the people against more logistic centers and warehouses.

In conclusion, I request that the County of San Bernardino Supervisors, Planning Commissioners, and Municipal Advisory Council Members oppose the Bloomington Business Park Specific Plan and honor the community's plans for residential, healthy, and thriving development.

I4.15 cont.

Response to Comment Letter I4: Caitlin Towne, dated December 14, 2021

Comment I4.1: This comment states that the commenter is opposed to the proposed Project and believes that the proposed Project's significant and unavoidable impacts cannot be mitigated or justified with an overriding consideration.

Response I4.1: The comment does not provide substantial evidence of any environmental impact. The proposed Project's significant and unavoidable impacts cannot be mitigated to a less than significant level. State CEQA Guidelines Section 15126.2(c) requires an EIR to describe "any significant impacts, including those which can be mitigated but not reduced to a level of insignificance." As discussed in Section 6, *Other CEQA Considerations,* emissions from operation of the Project would exceed SCAQMD's thresholds for VOC and NOx after implementation of regulatory requirements and mitigation measures. Because a majority of operational-source NOx emissions (by weight) would be generated by Project vehicles, and the VOC emissions would be generated by consumer products, neither the Project applicant nor the County have the ability to reduce these emissions. Therefore, despite the inclusion of Mitigation Measures AQ-1 through AQ-7, operational-source VOC and NOx emissions would be significant on a project-level and a cumulative basis. Additionally, as the Project would not result in an exceedance of SCAG's growth projections, but the Project would result in an increase of criteria pollutants that would exceed regional thresholds after implementation of mitigation measures. Therefore, the Project would result in a conflict with, or obstruct, implementation of the applicable Air Quality Management Plan.

In accordance with CEQA Section 21081(b) and CEQA Guideline Section 15093, in order to approve the Project would be required to determine that the unavoidable adverse environmental impacts identified above may be considered acceptable due to specific considerations which outweigh the unavoidable, adverse environmental impacts of the Project. The comment does not raise a specific issue with the adequacy of the Draft EIR. Therefore, no further response is provided.

Comment I4.2: This comment states that the Project would harm school students and their families because the Project is less than 100 ft. from three public schools (Bloomington High School, Ruth O Harris Middle School and Walter Zimmerman Elementary School) and less than one mile from Crestmore Elementary School,
Sycamore Hills Elementary School, and Slover Mountain High School. The comment states that students would have to walk or wait along the streets with even more truck pollution and traffic, and it is dangerous for my students to have to contend with speeding trucks and even more dangerous for them to have to breathe in the fumes that these trucks emit. The comment states opposition to the Project because it puts students in danger of increased traffic and long-lasting risk of countless health issues including asthma and cancer, a point that is not adequately accounted for in the Draft EIR.

Response I4.2: The comment does not provide substantial evidence of any environmental impact. The proposed Project would not result in significant impacts related to sensitive receptors, including schools and residences. As detailed, beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate Project health risk impacts to residents, schools, and workers as a result of exposure to Diesel Particulate Matter (DPM) from heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The maximum non-cancer risks to nearby residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million; and the

maximum non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0. As such, operation of the Specific Plan at buildout would not cause a significant human health or cancer risk related to DPM emissions and sensitive receptors, and impacts would be less than significant.

As described in Section 3.0, *Project Description,* the Project applicant proposes improvements along Locust Avenue and Jurupa Avenue, improving the safety of increased traffic in the area. In addition, all vehicles would be subject to follow all roadway signals and signs.

In addition, the Draft EIR evaluates the potential of the Project to expose local sensitive receptors, such as residences and schools with substantial pollutant concentrations. As detailed in Draft EIR Tables 5.3-15 through 5.3-18, after implementation of Mitigation Measure AQ-2 (use of Tier 4 Final construction equipment), emissions during construction activities would not exceed the SCAQMD's localized significance thresholds. Also, as detailed in Draft EIR Tables 5.3-19 through 5.3-21, emissions from operation of the Specific Plan would not exceed the SCAQMD's localized significance thresholds for any criteria pollutant at the nearest sensitive receptors. Therefore, impacts related to localized emissions would be less than significant impact. Because the Project would not exceed thresholds for either DPM or localized significance thresholds, the Project would not result in impacts to nearby sensitive receptors, including schools and residences.

Comment I4.3: This comment states that there has not been enough consideration for the future of Colton Joint Unified School District due to this Project. The comment states that if the Project is approved, it will cause hundreds of people to lose their home, be displaced, and have to move elsewhere, which will lead to a drop in enrollment of the schools and the CJUSD in general. The comment states that if the County allows the Project to be made, it will cause a loss of community, lead to financial distress to a district who serves majority low socioeconomic students, and lead to further strain on essential funding for our schools in both the average daily attendance (ADA) and tax dollars.

Response I4.3: The comment does not provide substantial evidence of any environmental impact. As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant at or above current market value. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-February 2022, Zillow.com—an online real estate and rental marketplace—reported 246 single-family properties listed for sale in the community of Bloomington and adjoining cities (11 units in Bloomington, 37 units in the City of Rialto, 149 units in the City of Fontana, and 49 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, in compliance to SB 330, the Project would offset the loss of zoned residential capacity by upzoning another site (i.e., Upzone Site). Therefore, implementation of the Project would not displace people or housing and necessitate the construction of replacement housing elsewhere, and impacts were determined to be less than significant. Furthermore, enrollment at Colton Joint Unified schools has been steadily declining over recent years. For example, enrollment at Walter Zimmerman Elementary has

declined from 753 in 2014 to 578 in 2021.[12] There is no substantial evidence supporting the assertion that development of the Project would decrease enrollment in local schools. Further, even if substantial evidence had been offered, such a decrease in enrollment is not an impact to be analyzed under CEQA.

As discussed on page 5.14-10 of the Draft EIR, under state law, development projects are required to pay school impact fees in accordance with Senate Bill 50 (SB 50) at the time of building permit issuance. The funding program established by SB 50 allows school districts to collect fees from new developments to offset the costs associated with increasing school capacity needs and has been found by the legislature to constitute "full and complete mitigation of the impacts of any legislative or adjudicative act…on the provision of adequate school facilities" (Government Code Section 65995[h]). Mandatory payment of school fees would reduce impacts to District schools to less than significant. Furthermore, any project associated with expanding school facilities, whether related to the construction of new facilities or modernization of existing facilities, would be subject to environmental review and mitigation pursuant to CEQA. As such, with Project payment of fees to Colton Joint Unified School District on a per square foot basis, impacts to school services were determined to be less than significant.

Additionally, as detailed in Master Response 1, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a detailed discussion of socioeconomic issues. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Therefore, no further response is required or provided.

Comment I4.4: This comment states that there has not been enough study or consideration done on the lasting negative effects the Project will have on the mental health and self-esteem of children who attend these schools, now and in the future. If more and more warehouses are allowed to displace communities, the people who are left surrounded by those buildings will have less opportunity for growth both financially and socially. The commenter fears that the more warehouses students see taking over their community, the less likely they will be to strive for a better future for themselves. The comment states that this could lead to higher rates of depression.

Response I4.4: The comment does not provide substantial evidence of any environmental impact. As discussed in Response 14.3, the Project would not result in the displacement of housing, and individuals would not be forced out of their homes. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant at or above market value. Residents would have the ability to relocate based on the availability of the housing stock in the region.

As detailed in Response 14.3, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of mental health and self-esteem.

[12] California Department of Education. DataQuest. https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdYears.aspx?cds=36676866035729&agglevel=school&year=2020-21

Comment I4.5: This comment states that the Project would bring negative health impacts to the community and there are higher-than-normal risks that come from living and working in a highly polluted environment.

Response I4.5: The comment does not provide substantial evidence of any environmental impact. As detailed throughout the Draft EIR, the proposed Project would not result in a highly polluted environment. As described previously in Response 14.2, the proposed Project would not result in significant impacts related to sensitive receptors, including schools and residences. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I4.6: This comment states that the Project would result in over 9,000 vehicle and truck trips on roads near homes, schools, and parks.

Response I4.6: This comment is inaccurate. As discussed in K1, Traffic Impact Analysis, to the Draft EIR, the Project would result in 8,555 daily vehicle trips, including truck trips. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I4.7: This comment states that the Project would create additional traffic, noise, poorer air quality, deterioration of commercial and residential roads, unsafe pedestrian, and bicycle safety and other impacts
in an area that is considered in the 90th% - 95% on CalEnviroScreen.

Response I4.7: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion.

Furthermore, as discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue and Santa Ana. As such, the proposed Project would actually benefit the community by providing road improvements to previously deteriorated roads. Related to bicycle and pedestrian safety, as detailed in the Draft EIR for Impact TR-1, starting on page 5.15-6, sidewalks currently exist on Cedar Avenue intermittently on both side of the roadway, on Santa Ana Avenue intermittently on the north side of the roadway, on Jurupa Avenue on the north side east of Linden Avenue. Implementation of the Specific Plan would include roadway improvements within the Specific Plan area that would provide for new sidewalks where none exist currently, thereby improving pedestrian facilities and the sidewalk network. Therefore, the proposed Specific Plan would also not conflict with pedestrian facilities, but instead would provide additional facilities. Sierra Avenue has a bike lane on the east side between Santa Ana Avenue and Technology Street. The Countywide Plan Transportation & Mobility Element identifies Cedar Avenue, Jurupa Avenue, Santa Ana Avenue, and Locust Avenue for planned Class II bike lanes. Class II bike lanes are striped lanes that provide bike travel and can be next to a curb or parking lane. Implementation of the Specific Plan would not alter or conflict with existing or planned bike lanes or bicycle transportation. Overall, impacts related to transit, bicycle, and pedestrian facilities were determined to be less than significant.

Regarding noise, the Project includes walls that would reduce noise impacts to neighboring areas to a less than significant level, which is detailed on Draft EIR Tables 5.12-8 through 5.12-16. Also, Tables 5.12-7 through 5.12-22 show that noise levels at the closest sensitive receptors would not be impacted. Regarding an increase in ambient noise from vehicles/truck traffic, Draft EIR Tables 5.12-23 and 5.12-24 show that impacts would be less than significant. Furthermore, loading dock and trailer parking areas would be screened with 12-foot walls in order to reduce noise to surrounding sensitive receivers.

As described previously in Response I4.2, the proposed Project would not result in significant air quality related impacts to sensitive receptors, including schools and residences. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I4.8: This comment states that the Project would have significant and unavoidable impacts for obstructing the implementation of the air quality plan, net increase of criteria pollutants, cumulative impacts.

Response I4.8: The comment re-states the significant and unavoidable impacts related to the proposed Project and air quality, which are described in Response 14.1. The comment does not raise a specific issue with the adequacy of the Draft EIR. Therefore, no further response is provided.

Comment I4.9: This comment states that the environmental racism would occur from implementation of the Project by expanding logistic centers and warehouses. The comment states that unavoidable cumulative impacts would occur, the community would be disrupted, and the rezoning of 213 acres would create legally nonconforming uses in the area.

Response to I4.9: The comment does not provide substantial evidence of any environmental impact. As discussed in the Draft EIR on page 5.11-11, a health risk assessment is required by the County in unincorporated environmental justice focus areas. A Mobile Source Health Risk Assessment is included as Appendix C. As discussed on Page 7-4, the Specific Plan area is developed with rural, low density residential on large lots. Many properties have additional nonconforming commercial and light industrial uses. As discussed on page 5.11-7, the Project requires a General Plan Amendment and Zoning Map Amendment that would amend the existing land use category and district zoning to "SD Special Development" and "SP Specific Plan," respectively. Approval of the proposed amendments as well as the adoption of the Bloomington Business Park Specific Plan land use document would resolve the inconsistency with the existing Land Use Map. Thus, impacts would be less than significant.

CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of environmental racism. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to environmental racism is not provided.

Comment I4.10: This comment states that community members have discussed fearing being displaced or harassed out of their homes, despite stating that they do not want to sell or rezone their home. This comment states that the community is over 80 percent Hispanic and over 20 percent of the community experiencing poverty. This comment states that this is a common practice of environmental racism.

Response I4.10: The comment does not provide substantial evidence of any environmental impact. As discussed in Section 5.13, *Population and Housing*, property owners within the development footprint would voluntarily sell their property and would be compensated by the Applicant at or above market value. At the time future development is proposed in Planning Area B, property owners have the option to voluntarily sell their property and would be compensated by the future development's applicants. Property owners would not be forced to sell their properties, either through harassment or eminent domain. However, should the County approve the proposed Project, the entire Specific Plan Area would be rezoned to Specific Plan. Existing residences could continue to exist as legal non-conforming uses after the rezone. Proposed changes to these uses and structures shall be subject to the provisions of Chapter 84.17, Non-Conforming Uses and Structures, of the County Development Code.

CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The project merits, including any economic and social effects of the project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the project's potentially significant physical impacts on the environment and does not include a discussion of environmental racism. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to environmental racism is not provided. The comment does not raise any specific concerns with the adequacy of the Draft EIR. The comment will be forwarded to County decisionmakers as part of the Final EIR. Therefore, no further response is required or provided.

Comment I4.11: This comment states that the region deals with some of the worst traffic and idling cars double the negative impact of pollution to nearby communities.

Response I4.11: The comment does not provide substantial evidence of any environmental impact. The commenter is referred to Response O9.2 for a response regarding traffic and pollution. In regard to trucks and cars idling in traffic, impacts related to idling at congested intersections was analyzed in Appendices C1 and C2. As discussed on page 5.3-34 of the Draft EIR, the Project's NO_X emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less-than-significant.

Furthermore, the Project Applicant would implement PDF AQ-1 and MM AQ-3, which would require the Project Applicant/Developer/Operator to post interior and exterior facing signs identifying idling restrictions and contact information to report violations to CARB, SCAQMD, and the building manager. Pursuant to California Code of Regulations (CCR) Title 13, Motor Vehicles, Section 2449(d)(3), no truck may idle for longer than five minutes, which would reduce pollution from trucks onsite. The comment does not raise any specific concerns with the adequacy of the Draft EIR. The comment will be forwarded to County decisionmakers as part of the Final EIR. Therefore, no further response is required or provided.

Comment I4.12: This comment states that the Valley Region is in a fire risk area and that the County should focus efforts on wildfire mitigation.

Response I4.12: The comment does not provide substantial evidence of any environmental impact. As discussed on page 6.0-5 of the Draft EIR, the Specific Plan area and Upzone Site area located within an urban developed area and are not located within an identified wildland fire hazard area according to CalFire (CalFire, 2022). Therefore, the site is not in a wildfire risk area and no mitigation measures are required.

Comment I4.13: This comment states that the proposed Project would disrupt the local ecosystem which includes species that are endangered such as Delhi Sands Flower-loving Fly, burrowing owl, and nesting raptors. The comment states that the commenter believes the Draft IER is not sufficient in its conclusions on how the Project would impact the biological diversity of the area.

Response I4.13: The comment does not provide substantial evidence of any environmental impact. As discussed in the Draft EIR in Section 5.4, *Biological Resources,* general biological surveys were conducted on December 19, 2017, April 10, 2020, and January 20, 2021 and found that burrowing owl has a low potential to occur on Development Sites 3 and 4; Delhi Sands flower-loving fly has no potential to occur within the Specific Plan Area; San Diego black-tailed jackrabbit has a low potential to occur within the Specific Plan Area; pocketed free-tailed bat has a low potential to occur throughout the Specific Plan Area; and western yellow bat has a moderate potential to occur within the Specific Plan Area.

As discussed in the Draft EIR on page 5.4-18, four breeding season surveys were conducted for Development Site 2 and Development Site 4, which found no signs of burrowing owl occupation. Although no burrowing owls were observed during the focused surveys, take avoidance (pre-construction) surveys would be required prior to the start of construction per MM BIO-2. A Delhi Sands Flower-Loving Fly habitat suitability assessment was prepared for the entire Specific Plan Area and is included in the Draft EIR as Appendix D2. The assessment found that the Delhi Sands mapped within the Specific Plan Area and within the offsite infrastructure areas are either unsuitable or very low-quality Delhi Sands due to mixing with other soils and adverse changes in soil chemistry. Additionally, there have been no Delhi Sands Flower-Loving Fly sightings in the Specific Plan Area. Therefore, the Opening Year Options 1 and 2 Development Areas and offsite infrastructure areas do not contain suitable habitat for Delhi Sands Flower-Loving Fly. San Diego black-tailed jackrabbit is a state SSC that occurs primarily in open habitats including coastal sage scrub, chaparral, grasslands, croplands, and open, disturbed areas if there is at least some shrub cover present. Planning Area A does not support suitable habitat for this species, and the San Diego black-tailed jackrabbit is not expected to occur. These areas consist mostly of existing development, including rural residential homes and plant nurseries. Additionally, no suitable habitat for San Diego black-tailed jackrabbit was identified within the offsite infrastructure areas outside of the Specific Plan Area. Impacts to San Diego Black-tailed Jackrabbit caused by the proposed Opening Year Development Options 1 and 2 would be less than significant. The Opening Year Development Options 1 and 2 areas supports potentially suitable roosting and foraging habitat for pocketed free-tailed bat and western yellow bat. Therefore, MM BIO-3 has been included to require construction and demolition activities to occur outside the bat maternity roosting season when feasible, which is generally defined as April 1 through August 31. If construction/demolition must occur during the maternity roosting season, pre-construction surveys will be conducted as outlined in MM BIO-3. Additional avoidance and minimization measures are required if maternity roosts are identified, as outlined in MM BIO-3. Implementation of MM BIO-3 would reduce potential impacts to sensitive bat species to a less than significant level.

Based on the general biological survey and aerial review, suitable habitat for burrowing owl, pocketed free-tailed bat, western yellow bat, and San Diego black-tailed jackrabbit may be present in the Future Development Area. Habitat assessments will be required to be conducted for future development projects proposed in Planning Area B to confirm suitable habitat. As such, mitigation measures related to burrowing owl and sensitive bats are included and outlined in MMs BIO-2 and BIO-3, respectively. MM BIO-4 has been included to require general biological surveys for sensitive animal species, including San Diego black-tailed jackrabbit, prior to future developments in the Future Development Area. If other sensitive animal species are identified and impacts cannot be avoided, the project-level biological survey report would justify why species-specific mitigation is necessary and propose mitigation to reduce project impacts to a less than significant level.

The Specific Plan Area, offsite infrastructure areas, and the Upzone Site have the potential to support songbird and raptor nests due to the presence of shrubs, ground cover, and trees. Project activities could disturb or destroy active migratory bird nests including eggs and young. Disturbing

or destroying active nests is a violation of the MBTA (16 U.S.C. 703 et seq.). In addition, nests and eggs are protected under Fish and Game Code Section 3503. As such, direct impacts to breeding birds (e.g., through nest removal) or indirect impacts (e.g., by noise causing abandonment of the nest) is considered a potentially significant impact. Therefore, MM BIO-7 would be implemented to reduce impacts to a less than significant level.

Overall, as substantiated above, the Draft EIR adequately analyzes potential impacts to sensitive species from proposed and future development within the Specific Plan Area. No further response is required.

Comment I4.14: This comment states that the Municipal Advisory Council (MAC) and developer have not provided adequate translation, the MAC has silenced voices during meetings, and the MAC and County of San Bernardino have not released all minutes for their meetings. The comment states that public officials should be held accountable to the people they serve and the County should step in to ensure that the Bloomington MAC represents the community properly.

Response I4.14: The comment does not provide substantial evidence of any environmental impact. CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to the MAC meetings is not provided. In order to provide additional access to the notification process, the County provided the Notice of Preparation and Notice of Availability in Spanish and English. Furthermore, the Public Scoping Meeting conducted on January 14, 2021 was provided in Spanish translation. The comment does not raise any specific concerns with the adequacy of the Draft EIR. The comment will be forwarded to County decisionmakers as part of the Final EIR. Therefore, no further response is required or provided.

Comment I4.15: This comment states that it is essential to the community of Bloomington that the County stop the Project and prioritize the health and happiness of the community. The County should not focus on warehouses and should consider more diverse infrastructure plans with positive impacts including libraries, community centers, grocery stores, parks, and places for small businesses to thrive. The comment requests that the County of San Bernardino Board of Supervisors, Planning Commissioners, and Municipal Advisory Council Members oppose the proposed Project.

Response I4.15: The comment does not provide substantial evidence of any environmental impact. The comment expresses opposition to the Project and is introductory in nature. As discussed in Section 5.14, *Public Services*, the proposed Project would provide a development in the Bloomington Community that would be accompanied by a direct increase in property tax revenue assessed explicitly for the Bloomington Park and Recreational District in order to help provide additional parks and recreational facilities. Additionally, the Project would generate new tax revenues that would contribute to and supplement existing revenue sources for the maintenance and enhancement of other public facilities such as libraries. The comment does not raise a specific issue with the adequacy of the Draft EIR evaluation or raise any other CEQA issue. This comment will be forwarded to County decisionmakers as part of the Final EIR. Therefore, no further response is required or provided.

LETTER I5: Alejandra Gonzalez (2 pages)

December 14, 2021

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

Dear County of San Bernardino Supervisors,

As a member of the Bloomington Community, I write this letter in opposition to the 'Bloomington Business Park Specific Plan Project' (BBPSP). This project will completely change the makeup of the Bloomington community and is a threat to the animal keeping lifestyle and quality of life for individuals, like my family and I, whose homes are now threatened by the development. I firmly believe that this proposed project's significant and unavoidable impacts cannot be mitigated nor justified with an overriding consideration and thus I urge you to represent the best interest of the community you serve and stop the proposed development immediately. **I5.1**

As community members in the unincorporated area of Bloomington my family and I have experienced a massive influx of warehouse development and diesel trucks over the past decade. I am tired of time and time again witnessing the open space in Bloomington being reduced to a block of warehouses as my community is consumed by an ever-growing sea of concreate. **I5.2**

There is a reason working class families like my own decided to put down roots in Bloomington; we enjoy the open space, friendly neighbors and rural living in a city atmosphere. It is this sense of community that has fueled the public opposition to the Bloomington Business Park Project by community members, small businesses, community organizations, elected officials, and even nearby cities over the unsustainable and dangerous growth of warehouse development next to our homes, schools, and parks in the Bloomington community. To those of us who truly care about our community and call Bloomington our home the commitment of building a better tomorrow for Bloomington and its future generations does not waiver with the promise of financial gain. If the fate of the Bloomington Business Park Project was at the hands of community members this project would no longer be a topic of discussion as it would have been promptly rejected with the direction to the County Planning Division to focus on developments that meet community needs because warehouses are not what Bloomington residents have requested and certainly not what Bloomington residents deserve. **I5.3**

However, the County of San Bernardino and its leadership do not seem to understand what those needs are and are out of touch with their constituents. They are also not following the outlines proposed in the Bloomington Community Action Guide or in the adopted County Wide Plan. The Bloomington Community Action Guide outlines the following community values:
Personal Safety: Reduced crime and a common public awareness that people are safe from crime in their homes and in public
Clean and Attractive Neighborhoods: Neighborhoods and districts with well-maintained properties and attractive landscaping, streetscapes, and buildings
Community Gathering Places: Town centers with parks, plazas, and civic spaces that provide a location for the community to gather and socialize

New Development: A mix of housing types and densities, and attractive and convenient places for shopping, dining, and entertainment, while maintaining rural areas that foster a small-town feel
Mobility: Reduced traffic congestion, well-constructed and maintained truck routes, and interconnected sidewalk and bike route networks
Healthy Community: Improvement of regional air quality, programs to mitigate the health impacts of air quality, and expanded parks facilities and recreation programs
Economic Development: Businesses and investment that generate jobs and financial resources to support expanded public facilities and services, without degrading residential neighborhoods. I5.3 cont.

Yet, developers in the Bloomington Community are not being asked how they're proposed projects align with the County Wide Plan for Bloomington, instead the promises on paper have been pushed aside as developers have been given a green light to buy out families, harass resistant homeowners, kick out tenants and displace hundreds of people throughout the proposed Bloomington Business Park Specific Plan Project area. The Bloomington Business Park Project will however: I5.4

- Rezone 213 acres of residential and agricultural land to industrial zoning - creating legally nonconforming uses in that area I5.5
- Be less than 100 ft. to three public schools (Bloomington High School, Ruth O Harris Middle School and Walter Zimmerman Elementary School). I5.6
- Bring in over 9,000 vehicle and truck trips on roads adjacent to homes, schools, and parks. I5.7
- Create additional traffic, noise, poorer air quality, deterioration of commercial and residential roads, unsafe pedestrian and bicycle safety and other impacts in an area that is considered in the 90th% - 95% on CalEnviroScreen. I5.8
- Be in a community that is over 80% Hispanic.
- Have significant and unavoidable impacts for obstructing the implementation of the air quality plan, net increase of criteria pollutants and cumulative impacts. I5.9

Therefore, I firmly request the County of San Bernardino Supervisors, Planning Commissioners, and Municipal Advisory Council Members act in the best interest of the community members and Bloomington families they represent and oppose the Bloomington Business Park Specific Plan and through outreach and the civic engagement process collaborate with Bloomington community members to develop plans that will allow Bloomington to keep its rural lifestyle in city atmosphere. #Bloomingtonisnotforsale #Bloomingtonnosevende. I5.10

Thank you,

Alejandra Gonzalez

CC:
San Bernardino County, Board of Supervisors
COB@sbcounty.gov

Response to Comment Letter I5: Alejandra Gonzalez, dated December 14, 2021

Comment I5.1: This comment states that the comment letter is written in opposition to the proposed Project and states that the Project would change the makeup of the Bloomington community. Additionally, the comment states that the Project is a threat to animal keeping and quality of life for residents. The comment states that the commenter believes that the Project's significant and unavoidable impacts cannot be mitigated or justified with an overriding consideration.

Response I5.1: The comment does not raise any substantial evidence regarding any environmental impacts. As discussed in Section 5.13, *Population and Housing*, property owners within the development footprint would voluntarily sell their property and would be compensated by the Applicant. At the time future development is proposed in Planning Area B, property owners have the option to voluntarily sell their property and would be compensated by the future development's applicants. Property owners would not be forced to sell their properties, either through harassment or eminent domain. However, should the County approve the proposed Project, the entire Specific Plan Area would be rezoned to Specific Plan. As such, property owners would willingly have to sell their properties for the proposed warehouses to be developed.

In regard to animal keeping and general quality of life, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of animal keeping and quality of life. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to access to the animal keeping and quality of life is not provided.

The proposed Project's significant and unavoidable impacts cannot be mitigated to a less than significant level. State CEQA Guidelines Section 15126.2(c) requires an EIR to describe "any significant impacts, including those which can be mitigated but not reduced to a level of insignificance." As discussed in Section 6, *Other CEQA Considerations,* emissions from operation of the Project would exceed SCAQMD's thresholds for VOC and NOx after implementation of regulatory requirements and mitigation measures. Because a majority of operational-source NOx emissions (by weight) would be generated by Project vehicles, and the VOC emissions would be generated by consumer products, neither the Project applicant nor the County have the ability to reduce these emissions. Therefore, despite the inclusion of Mitigation Measures AQ-1 through AQ-7, operational-source VOC and NOx emissions would be significant on a project-level and a cumulative basis. Additionally, although the Project would not result in an exceedance of SCAG's growth projections, he Project would result in an increase of criteria pollutants that would exceed regional thresholds after implementation of mitigation measures. Therefore, the Project would result in a conflict with, or obstruct, implementation of the applicable Air Quality Management Plan.

In accordance with CEQA Section 21081(b) and CEQA Guideline Section 15093, in order to approve the Project, the Lead Agency is required to determine that the unavoidable adverse environmental impacts identified above may be considered acceptable due to specific overriding considerations which outweigh the unavoidable, adverse environmental impacts of the Project. The comment offers an opinion that unavoidable impacts cannot be mitigated or justified with an overriding consideration but does not raise a specific issue with the adequacy of the Draft EIR. Therefore, no further response is provided.

Comment I5.2: This comment states that the commenter has experienced an influx of warehouses and diesel trucks in Bloomington over the past decade and is tired of witnessing open space in Bloomington being developed with concrete warehouses.

Response I5.2: The comment does not raise any substantial evidence regarding any environmental impacts. As described in Section 4.0, *Environmental Setting*, the Specific Plan Area is developed with large-lot, low density residences; and commercial and light industrial uses, such as: horse ranch, commercial nurseries, truck transportation, and auto repair. The northern half of the Specific Plan has a Countywide Plan designation of Low Density Residential (LDR) and the southern half of the Specific Plan has a designation of Very Low Density Residential (VLDR). The entire Specific Plan area, but for two parcels in Planning Area A, is zoned RS-1-AA (Single Residential with 1-Acre Minimum Lot and Additional Agriculture Overlay); the two parcels 11048 and 11079 Laurel Avenue are zoned RS-20M (Single Residential with 20,000 square-foot Lot Minimums). There are no parcels within the Specific Plan Area that are designated or zoned Open Space.

As discussed in Section 5.1, *Aesthetics,* of the Draft EIR, the proposed Specific Plan sets forth a land use plan that dictates development standards, including building design and landscape design for the development and operation of industrial business park uses, see Section 3, *Project Description.* All developments proposed within the Specific Plan—including the currently proposed development in Planning Area A and future development(s) in Planning Area B—would be required to adhere to the standards therein. Though development within the Specific Plan Area would change the 213-acre site's residential character to one of industrial business park, the change would not degrade the visual character or quality of the site. The comment offers an opinion that the commenter does not enjoy the development of warehouses in Bloomington but does not raise a specific issue with the adequacy of the Draft EIR. Therefore, no further response is provided.

Comment I5.3: This comment states that the community is opposed to the proposed Project and the growth of warehouse development in the community. Further, the comment states that the County of San Bernardino does not understand the needs of the community and is not following the policies provided by the proposed Bloomington Community Action Guide or the adopted Countywide Plan. The comment further outlines specific community values provided by the Bloomington Community Action Guide.

Response I5.3: The comment does not raise any substantial evidence regarding any environmental impacts. As discussed, starting on page 5.11-7 in Section 5.11, *Land Use and Planning,* the Project has been designed to conform with the goals and policies of the Countywide Plan, which are disclosed throughout this Draft EIR. Applicable policies related to land use are discussed in Table 5.11-2 of the Draft EIR. As demonstrated, the Project would not conflict with any specific objectives, policies, or actions provided in the Countywide Plan's Land Use, Housing, Infrastructure and Utilities, Transportation and Mobility, Natural Resources, Renewable Energy and Conservation, Tribal and Historic Resources, Hazards, Personal and Property Protection, and health and wellness elements that were adopted for the purpose of avoiding or mitigating an environmental effect.

In regard to the Bloomington Community Action Guide policies, these policies are intended to be broad actions or goals that the County of San Bernardino follows to ensure the economic and social well-being of the Bloomington Community. The policies set forth in the Bloomington Community Action Guide do not apply to specific individual projects, such as the proposed Project. As such, an analysis of potential conflicts with the Bloomington Community Action Guide would not be justified. The commenter is further referred to Master Response 1, above. The comment offers an opinion regarding the County's decision-making process, but does not raise a specific issue with the adequacy of the Draft EIR. Therefore, no further response is provided.

Comment I5.4: This comment states that developers are not being asked how proposed projects align with the Countywide Plan and developers have been given the green light to buy out families, harass resistant homeowners, kick out tenants, and displace individuals.

Response I5.4: The comment does not raise any substantial evidence regarding any environmental impacts. As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-May 2021, Zillow.com—an online real estate and rental marketplace—reported 668 single-family properties listed for sale in the community of Bloomington and adjoining cities (25 units in Bloomington, 176 units in the City of Rialto, 329 units in the City of Fontana, and 138 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, in compliance to SB 330, the Project would offset the loss of zoned residential capacity by upzoning another site (i.e., Upzone Site). Therefore, implementation of the Project would not displace people or housing and necessitate the construction of replacement housing elsewhere, and impacts would be less than significant.

Furthermore, property owners within the development footprint would voluntarily sell their property and would be compensated by the Applicant. At the time future development is proposed in Planning Area B, property owners have the option to voluntarily sell their property and would be compensated by the future development's applicants. Property owners would not be forced to sell their properties, either through harassment or eminent domain. CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)) (*San Franciscans for Reasonable Growth v City & County of San Francisco* (1989) 209 Cal.App.3d 1502). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of homeowners selling their homes. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to access to homeowners selling their homes is not provided. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I5.5: This comment states that the Project would rezone 213 acres of residential and agricultural land to industrial zoning, which would create legally nonconforming uses.

Response I5.5: The comment is correct in stating that the Project would rezone approximately 213 acres of land from Residential Single 1-Acre Minimum with Additional Agriculture Overlay (RS-1-AA) and Residential Single (RS-20M) to Specific Plan (SP). Within the SP zoning, the Specific Plan would apply the I/BP designation to the entire Specific Plan Area. The existing residences and agricultural uses would become legal non-conforming uses within the Specific Plan. Proposed changes to these uses and structures shall be subject to the provisions of Chapter 84.17, Non-Conforming Uses and Structures, of the County Development Code. CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air,

water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)) (*San Franciscans for Reasonable Growth v City & County of San Francisco* (1989) 209 Cal.App.3d 1502). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of homeowners selling their homes. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to access to homeowners selling their homes is not provided. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I5.6: This comment states that the Project would be less than 100 feet from three public schools (Bloomington High School, Ruth O. Harris Middle School, and Walter Zimmerman Elementary School).

Response I5.6: This comment is accurate in stating that the Specific Plan Area is adjacent to Bloomington High School, Walter Zimmerman Elementary School, and Ruth O. Harris Middle School. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I5.7: This comment states that the Project would result in approximately 9,000 vehicle trips each day in the Project Area.

Response I5.7: This comment is inaccurate. As discussed in K1, Traffic Impact Analysis, to the Draft EIR, the Project would result in 8,555 daily vehicle trips, including truck trips. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I5.8: This comment states that the Project would create additional traffic, noise, air quality emissions, deterioration of residential road, unsafe pedestrian/bicycle safety in an area that ranks within the 90 to 95th percentile on CalEnviroScreen.

Response I5.8: Consistent with the comment, due to the existing limited low-density development and vacancies within the Specific Plan area, buildout and operation of the proposed Specific Plan would increase traffic and air quality emissions generated from the area.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, while the comment is correct in stating that the Project would result in 8,555 daily vehicle trips, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOX emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds.

Additionally, the majority of the Project's NOX emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

In regard to noise, as detailed in the Impact NOI-1 discussion that begins on page 5.12-26 of the Draft EIR, each of the Project scenarios would require Mitigation Measure NOI-1, which would require 14-foot-high cement block walls at Site 2 and 9-foot-high cement walls at Site 4. With implementation of Mitigation Measure NOI-1, operational noise levels for all scenarios would not exceed the County's exterior noise level standards, as adjusted to reflect the ambient noise levels at all nearby sensitive receiver locations. Additionally, the increase in ambient noise levels would range from 0.1 to 3.0 with the implementation of Mitigation Measure NOI-1, which would not generate a significant daytime or nighttime operational noise level increase at nearby receiver locations.

As detailed in the Draft EIR in Section 5.12, *Noise,* starting on page 5.12-48, the proposed Project would generate traffic related noise from operation. As described in Section 3.0, *Project Description*, of the Draft EIR, the proposed Specific Plan buildings would be accessed from Laurel Avenue, Jurupa Avenue, Locust Avenue, and Maple Avenue. Tables 5.12-23 through 5.12-24 show that both the Opening Year with Project and General Plan Buildout with Project conditions would result in increases less than the 1.5 dBA CNEL threshold. Thus, off-site traffic noise impacts from the Project would be less than significant.

Related to bicycle and pedestrian safety, as detailed in the Draft EIR for Impact TR-1, starting on page 5.15-6, sidewalks currently exist on Cedar Avenue intermittently on both side of the roadway, on Santa Ana Avenue intermittently on the north side of the roadway, on Jurupa Avenue on the north side east of Linden Avenue. Implementation of the Specific Plan would include roadway improvements within the Specific Plan area that would provide for new sidewalks where none exist currently, thereby improving pedestrian facilities and the sidewalk network. Therefore, the proposed Specific Plan would also not conflict with pedestrian facilities, but instead would provide additional facilities. Sierra Avenue has a bike lane on the east side between Santa Ana Avenue and Technology Street. The Countywide Plan Transportation & Mobility Element identifies Cedar Avenue, Jurupa Avenue, Santa Ana Avenue, and Locust Avenue for planned Class II bike lanes. Class II bike lanes are striped lanes that provide bike travel and can be next to a curb or parking lane. Implementation of the Specific Plan would not alter or conflict with existing or planned bike lanes or bicycle transportation. CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)) (*San Franciscans for Reasonable Growth v City & County of San Francisco* (1989) 209 Cal.App.3d 1502). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of bicycle and pedestrian safety. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to bicycle and pedestrian safety is not provided. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I5.9: This comment states that the Project would have significant and unavoidable impacts for obstructing the implementation of the air quality plan, net increase of criteria pollutants, and cumulative impacts.

Response I5.9: The comment does not raise any substantial evidence regarding any environmental impacts. As stated by the comment and analyzed in the Draft EIR in Section 5.3, *Air Quality,* the Project would result in significant and unavoidable impacts related to conflict with the air quality management plan, Project-level operational emissions, and cumulative operational emissions. Land use changes of the Project would not result in an exceedance of SCAG's growth projections, but the Project would result in an increase of criteria pollutants that would exceed regional thresholds after implementation of mitigation measures. Therefore, the Project would result in a conflict with, or obstruct, implementation of the applicable Air Quality Management Plan. Emissions from operation of the Project would exceed SCAQMD's thresholds for VOC and NOx after implementation of regulatory requirements and mitigation measures. Because a majority of operational-source NOx emissions (by weight) would be generated by Project vehicles, and the VOC emissions would be generated by consumer products. Neither the Project applicant nor the County have the ability to reduce these emissions. Therefore, operational-source VOC and NOx emissions would be significant on a project-level and a cumulative basis. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I5.10: This comment requests that the County of San Bernardino Board of Supervisors, Planning Commission, and Municipal Advisory Council act in the best interest of the community and oppose the proposed Project in order to further collaborate with the community to develop plans to allow Bloomington to keep a rural atmosphere.

Response I5.10: The comment is conclusionary in nature, expresses opposition to the Project, and does not raise any specific concerns with the adequacy of the Draft EIR or other CEQA concerns. Therefore, no further response is required or provided. This comment will be forwarded to County decisionmakers as part of the Final EIR.

LETTER I6: Lily Gutierrez (1 page)

December 14, 2021

Lily Gutierrez
17833 Otilla St.
Bloomington, CA 92316
lilygutierrez@ucla.edu

Re: Strong Opposition to Bloomington Business Park Specific Plan (PROJ-2020-00204)

Dear Aron Liang,

I am writing to express my strongest and deepest opposition to the proposed **Bloomington Business Park Specific Plan (PROJ-2020-00204)**. **I6.1**

The Bloomington Business Park Specific Plan will rip a part out of Bloomington and ruin the community. Not only will the proposal destroy an entire neighborhood, but it will also place warehouses right next to Zimmerman Elementary, Ruth O. Harris Middle, and Bloomington High. We do not want the increased air pollution, traffic congestion, and health risks associated with warehouses and trucking. **I6.2**

The residents of Bloomington do not want 213 acres of warehouses and office space. Our community deserves more than warehouses built next to our schools and homes. And if the San Bernardino County Board of Supervisors approve this proposal, they will all be failing the residents of Bloomington. **I6.3**

Thank you for your time and consideration. Please listen to the community and deny Howard Industrial Partners their application to build the Bloomington Business Park Specific Plan.

Response to Comment Letter I6: Lily Gutierrez, dated December 14, 2021

Comment I6.1: This comment states that the commenter is opposed to the proposed Project.

Response I6.1: The comment is introductory in nature, expresses opposition to the Project, and does not raise any specific concerns with the adequacy of the Draft EIR or other CEQA concerns. Therefore, no further response is required or provided. This comment will be forwarded to County decisionmakers as part of the Final EIR.

Comment I6.2: This comment states that the Project would ruin the community, destroy an entire neighborhood, and warehouses next to Zimmerman Elementary, Ruth O. Harris Middle School, and Bloomington High School. The comment states that the community does not want increased air pollution, traffic congestion, and health risks associated with the proposed Project.

Response I6.2: The comment does not provide substantial evidence concerning the claims raised in the comment. CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)) (*San Franciscans for Reasonable Growth v City & County of San Francisco* (1989) 209 Cal.App.3d 1502). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of ruining a community. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to the social changes that would result from the Project is not provided. Due to the existing limited low-density development and vacancies within the Specific Plan area, buildout and operation of the proposed Specific Plan would increase traffic and air quality emissions generated from the area, which has been evaluated pursuant to CEQA in the Draft EIR.

As described on Draft EIR page 5.15-4, Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, while the comment is correct in stating that the Project would result in 8,555 daily vehicle trips, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOX emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be reduced below applicable SCQMD thresholds. Additionally,

the majority of the Project's NOX emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

Comment I6.3: This comments states that the residents of Bloomington oppose the Project and the community deserves more than warehouses next to schools and homes. The comment further states that if the Board of Supervisors approves this proposal, they would be failing the residents. The comment urgers the County to deny the Project.

Response I6.3: The comment is conclusionary in nature, expresses opposition to the Project, and does not raise any specific concerns with the adequacy of the Draft EIR or other CEQA concerns. Therefore, no further response is required or provided. This comment will be forwarded to County decisionmakers as part of the Final EIR.

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LETTER I7: Assemblymember Eloise Gómez Reyes, Majority Leader (3 pages)

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ELOISE GÓMEZ REYES
MAJORITY LEADER
ASSEMBLYMEMBER, FORTY-SEVENTH DISTRICT

COMMITTEES
AGING AND LONG-TERM CARE
BUDGET
JUDICIARY
LABOR AND EMPLOYMENT
UTILITIES AND ENERGY
BUDGET SUBCOMMITTEE NO. 2 ON EDUCATION FINANCE
LEGISLATIVE ETHICS

December 15, 2021

Aron Liang, Senior Planner
County of San Bernardino
Land Use Services Department, Planning Division
385 North Arrowhead Ave, First Floor

RE: Comment on Draft Environmental Impact Report for the Bloomington Business Park Specific Plan Project (BBPSP)

Dear Aron Liang:

In February, I wrote a letter voicing strong concerns regarding the Bloomington Business Park Specific Plan Project proposed for the following areas; Santa Ana Avenue to the north, Maple Avenue and Linden Avenue to the east, Jurupa Avenue to the south, and Alder Avenue to the west, in the southern community of Bloomington. I continue to oppose the proposed project as it negatively impacts the community and urge the County of San Bernardino Supervisors, Planning Commissioners, and Municipal Advisory Councilmembers to **not** approve the BBPSP. The impacts of the BBPSP cannot be mitigated and therefore the project should not be justified with an overriding consideration. I7.1

Bloomington currently ranks in the 95 percentile for the highest pollution according to the state-monitored CalEnviroScreen.[1] The approval of the BBPSP would only worsen the air quality in Bloomington as an increase of truck traffic increases exposure to hazardous air pollutants and diesel particulate matter. If this project is approved, the residents will be burdened with the health impacts of diesel pollution, increased traffic dangers, as well as the noise and disruption of a warehouse operation. This ultimately affects the quality of life of residential communities. I7.2

[1] https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30

It is the role of the County to protect its residents and as stated in the San Bernardino County General Plan, the goal for the community of Bloomington is to maintain great neighborhoods, park and recreation centers, and local services while maintaining a safe, small-town feel.[2] The community has continuously expressed that they would like to see more commercial developments to include restaurants, retail, and other family-friendly amenities for residents to utilize. Instead the proposed project puts the lives of our children in danger by exposing them to traffic congestion given the proposed project is in the middle of three schools and a park. The BBPSP is located less than 2 miles from Walter Zimmerman Elementary School, Ruth Harris Junior High School, Bloomington High School, and Kessler Park. **17.3**

The BBPSP is proposing to rezone 213 acres of residential and agricultural land to industrial zoning. As stated on the DEIR, the BBPSP will have a maximum development potential of up to approximately 3,235,836 Square Feet that could be developed under the Specific Plan[3]. The County should consider utilizing this land to improve the quality of life for its residents and encourage long-term upward economic mobility. Proactive land use planning and more equitable zoning can lead to addressing the racial gap in homeownership and improve outcomes for children, especially children of color.[4] **17.4**

It is clear that the proposed Bloomington Business Park Specific Plan Project (BBPSP) will negatively affect the residential communities surrounding the project site. The BBPSP impacts health equity, school access, economic inclusion. This development will still significantly affect the air quality even after mitigation. **17.5**

The County of San Bernardino Supervisors, Planning Commissioners, and Municipal Advisory Councilmembers should **not** approve the BBPSP. Instead, we should continue to work together to mitigate all increased pollution due to diesel emissions and ensure that warehouses are not built in close proximity to sensitive receptors, especially our schools and neighborhoods.[5] **17.6**
Let us continue to bring progress and development to our communities in Bloomington with the consciousness of the communities surrounding these developments. It is imperative to protect our community's health and quality of life.

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[2] http://countywideplan.com/bloomington/
[3] http://www.sbcounty.gov/uploads/LUS/Environmental/Bloomington_Business_Park_Specific_Plan/3.%20%20Draft%20EIR%20Bloomington%20Business%20Park%20SPecific%20Plan.pdf
[4] https://www.urban.org/research/publication/building-black-homeownership-bridges
[5] The proposed CalGEM definition "Sensitive receptor" means any residence including private homes, condominiums, apartments, and living quarters; education resources such as preschools and kindergarten through grade twelve (K-12) schools; daycare centers; any building housing a business that is open to the public; and health care facilities such as hospitals or retirement and nursing homes. A sensitive receptor includes long term care hospitals, hospices, prisons, and dormitories or similar live-in housing."

I appreciate your consideration of this issue. If you have any questions, please feel free to contact my office at (909) 381-3238. **I7.6 cont.**

Sincerely,



Eloise Gomez Reyes
Assembly Majority Leader, 47th Assembly District

EGR/DA

CC:
Concerned Neighbors of Bloomington
concernedneighborbloomington@gmail.com

San Bernardino County, Board of Supervisors
COB@sbcounty.gov

Robert Swanson
California Department of Justice
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South Coast Air Quality Management District
lsun@aqmd.gov

Response to Comment Letter I7: Assemblymember Eloise Gómez Reyes, Majority Leader, dated December 15, 2021

Comment I7.1: This comment states that the Assemblymember previously wrote a letter voicing strong concerns regarding the proposed Project and continues to oppose the Project as it would negatively impact the Bloomington community. Additionally, the comment urges the County of San Bernardino Board of Supervisors, Planning Commission, and Municipal Advisory Council to deny the Project as the Project impacts cannot be mitigated or justified with an overriding consideration.

Response I7.1: The comment does not provide any substantial evidence concerning the Project's environmental impacts. As discussed in Section 6, *Other CEQA Considerations,* emissions from operation of the Project would exceed SCAQMD's thresholds for VOC and NOx after implementation of regulatory requirements and mitigation measures. Because a majority of operational-source NOx emissions (by weight) would be generated by Project vehicles, and the VOC emissions would be generated by consumer products, neither the Project applicant nor the County have the ability to reduce these emissions. Therefore, despite the inclusion of Mitigation Measures AQ-1 through AQ-7, operational-source VOC and NOx emissions would be significant on a project-level and a cumulative basis. Additionally, as the Project would not result in an exceedance of SCAG's growth projections, but the Project would result in an increase of criteria pollutants that would exceed regional thresholds after implementation of mitigation measures. Therefore, the Project would result in a conflict with, or obstruct, implementation of the applicable Air Quality Management Plan.

In accordance with CEQA Section 21081(b) and CEQA Guideline Section 15093, in order to approve the Project would be required to determine that the unavoidable adverse environmental impacts identified above may be considered acceptable due to specific considerations which outweigh the unavoidable, adverse environmental impacts of the Project. The comment offers an opinion that unavoidable impacts cannot be mitigated or justified with an overriding consideration but does not raise a specific issue with the adequacy of the Draft EIR. Therefore, no further response is provided.

Comment I7.2: This comment states that Bloomington ranks in the 95th percentile for the highest pollution burden according to CalEnviroScreen. The comment states that the approval of the proposed Project would worsen air quality as the increase in truck traffic would increase exposure to hazardous air pollutants and diesel particulate matter. It further states that residents would be burdened with health impacts, increased traffic dangers, and noise from warehouses which would impact the quality of life of residents.

Response I7.2: The comment does not provide any substantial evidence concerning the Project's environmental impacts.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, while the comment is correct in stating that the Project would result in traffic, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be

improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. Additionally, the comment is speculative in regard to the Project resulting in traffic safety issues and does not provide any evidence that the Project would result in any traffic safety issues.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

In regard to noise, as detailed in the Impact NOI-1 discussion that begins on page 5.12-26 of the Draft EIR, each of the Project scenarios would implement PDF NOI-2, which would require 12 to 14-foot-high cement block walls at Sites 1 and 2 and 9-foot-high cement walls at Site 4. With implementation of PDF NOI-2, operational noise levels for all scenarios would not exceed the County's exterior noise level standards, as adjusted to reflect the ambient noise levels at all nearby sensitive receiver locations. Additionally, the increase in ambient noise levels would range from 0.1 to 3.0 with the implementation of PDF NOI-2, which would not generate a significant daytime or nighttime operational noise level increase at nearby receiver locations.

As detailed in the Draft EIR in Section 5.12, *Noise,* starting on page 5.12-48, the proposed Project would generate traffic related noise from operation. As described in Section 3.0, *Project Description*, of the Draft EIR, the proposed Specific Plan buildings would be accessed from Laurel Avenue, Locust Avenue, and Maple Avenue. Tables 5.12-23 through 5.12-24 show that both the Opening Year with Project and General Plan Buildout with Project conditions would result in increases less than the 1.5 dBA CNEL threshold. Thus, off-site traffic noise impacts from the Project would be less than significant. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I7.3: This comment states that it is the County's role to protect its residents and follow the goal of maintaining neighborhoods, parks and recreation centers, local services, and maintaining a safe-small town feel in Bloomington. The comment further states that the community has expressed that they would like more commercial developments including restaurants, retail, and other family-friendly amenities. The comment states that the Project puts children at risk by exposing them to traffic congestion as the proposed Project is less than two miles from Walter Zimmerman Elementary School, Ruth Harris Middle School, Bloomington High School, and Kessler Park.

Response I7.3: The comment does not provide any substantial evidence concerning the Project's environmental impacts. In regard to the County's role for residents and the goals for the Bloomington community, the commenter is referred to Master Response 1, which demonstrates that discussion of the Project's economic and social effects is not required pursuant to CEQA. As stated in Response I7.2, while the Project would result in traffic and the potential for increased traffic congestion, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, as demonstrated by the LOS analysis conducted for the Project, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. In addition, as shown in Draft EIR Figure 3-4, truck routes would be directed away from nearby schools and trucks would not utilize streets adjacent to existing schools. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I7.4: This comment states that the Project proposes to rezone 213 acres of residential and agricultural land to industrial zoning and provides a summary of the Project description. The comment states that the County should consider using the land to improve the quality of life for its residents and encourage long-term economic mobility. It further states that proactive planning and more equitable zoning can lead to addressing the racial gap in homeownership and improve outcomes for children, especially children of color.

Response I7.4: The comment does not provide any substantial evidence concerning the Project's environmental impacts. This comment generally summarizes the proposed Project and states that the County could use the land better to provide economic mobility. As discussed in Master Response 1, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of racial disparities or economic mobility. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. For a discussion of environmental justice, the commenter is referred to Master Response 4. Thus, information related to racial disparities and economic mobility is not provided.

Furthermore, as substantiated in Section 5.13, *Population and Housing,* unincorporated San Bernardino County and the Bloomington community are housing rich, meaning they contain significantly more housing units than jobs. As such, implementation of the Project would provide additional employment opportunities and would contribute toward a more balanced jobs-to-housing ratio.

Comment I7.5: This comment states that the Project would negatively impact residential communities surrounding the Project site by impacting health equity, school access, and economic inclusion. Additionally, the comment states that the Project would significantly impact air quality even after mitigation.

Response I7.5: The comment does not provide any substantial evidence concerning the Project's environmental impacts. As discussed in Master Response 1, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of

health equity, school access, or economic inclusion. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. For a discussion of environmental justice, the commenter is referred to Master Response 4. Thus, information related to health equity, school access, or economic inclusion is not provided.

Although the Project would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8, impacts related to DPM would be less than significant, and impacts related to localized significance thresholds would be less than significant with mitigation. As described in Response I7.2, operation of the Specific Plan at buildout would not exceed thresholds related to human health or cancer risk to local sensitive receptors, such as residences and schools. As described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products that include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, it should be noted that the majority of the Project's NOx emissions are derived from vehicle usage. Neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, and no existing feasible mitigation measures exist that would reduce these emissions to levels that are less-than-significant. However, the PDFs include future use of zero emissions trucks and implementation of future new technologies that incorporate evidence-backed solutions for long-term air quality, including the following:

- PDF AQ-4: The Project shall provide electrical hook ups to the power grid, rather than use diesel-fueled generators, for electric construction tools, such as saws, drills, and compressors, and shall use electric tools whenever feasible.
- PDF AQ-10: The Project Applicant/Developer/Tenant shall require that all heavy-duty trucks entering or operated on the project site to be zero-emission beginning in 2030, if such trucks are commercially available, as reasonably determined by the County Planning Division.
- PDF AQ-11: The Project Applicant/Developer/Tenant shall require all on-site equipment, such as forklifts and yard trucks, to be electric, propane or natural gas with the necessary electrical charging stations provided.
- PDF AQ-12: The Project Applicant/Developer/Owner shall require tenants to use zero-emission light- and medium-duty trucks as part of business operations, if such trucks are commercially available, as reasonably determined by the County Planning Division.
- PDF AQ-13: The Project Applicant/Developer shall construct electric truck charging infrastructure consisting of infrastructure (i.e., conduit) to support future installation of charging stations, when such trucks are commercially available, as reasonably determined by the County Planning Division.
- PDF AQ-14: The Project Applicant/Developer shall construct electric light-duty truck charging infrastructure consisting of infrastructure (i.e., conduit) proportional, i.e., conduit for one charging station for every five light-duty truck parking spaces at the Project.

These PDFs are included in the Project's Mitigation Monitoring and Reporting Program (MMRP) to ensure implementation along with the Specific Plan.

Comment I7.6: This comment states that the County should not approve the proposed Project and that they should work with the community to mitigate all increased pollution from diesel emissions and ensure that warehouses are not built in close proximity to sensitive receptors. The comment states that the County

should continue to bring development into Bloomington but be conscious of the communities surrounding the development.

Response I7.6: The comment does not provide any substantial evidence concerning the Project's environmental impacts. As previously discussed, impacts related to diesel particulate matter would be less than significant and impacts related to localized significance thresholds would be less than significant with mitigation. As described in Response I7.2, operation of the Specific Plan at buildout would not exceed thresholds related to human health or cancer risk to local sensitive receptors, such as residences and schools. As such, the proposed Project would not expose surrounding sensitive receptors to diesel pollution levels above existing thresholds. The comment is conclusionary in nature and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I8: Ana Carlos (9 pages)

I, Ana Carlos, write this letter in opposition to the 'Bloomington Business Park Specific Plan Project' (BBPSP). The County of San Bernardino Supervisors, Planning Commissioners, and Municipal Advisory Councilmembers should not approve the BBPSP. I am submitting the following concerns and questions for review and a response. **I8.1**

- What building, fire, planning, and public works permit applications did Tim Howard and Tim Howard Industrial Partners submit to The County of San Bernardino?
- I would like to request a copy of any and all permits related to the Bloomington Business Specific Plan Project that Tim Howard and Tim Howard Industrial Partners have been approved for and that are pending for approval. **I8.2**
- How was Tim Howard and Tim Howard Industrial Partners allowed to submit an application to rezone other people's properties? Who from the county authorized a decision to rezone residential lots or residential properties in Bloomington?
- How is it legal for ANYONE to go to the county and put in an application to rezone someone else's residential property when they have no right to it? People who do not want to sell to developers are forced to sell by the county and developers. This is not an eminent domain, yet these developments force residents to sell because you can not have families living in the middle of industrial development. There are a lot of residents who WILL NOT sell and do not want their homes rezoned. If their homes are rezoned they will be living in " legal nonconforming use" of their homes and will not be able to take out permits to make home improvements and family homes will not be able to be passed down for residential use from generation to generation. **I8.3**
- This is irresponsible development because you are rezoning a residential/agricultural neighborhood to industrial/commercial. Yet, it still ends up being an "industrial zone" **NOW** in the middle of STILL, a RESIDENTIAL neighborhood with homes, schools (Zimmerman Elementary, Bloomington High School) and parks (Kessler Park, The Dave Jayne Equestrian Arena) bordering it.
- In this DEIR it does not talk about or examine all the existing warehouses and approved warehouses opening soon in Bloomington and in the bordering neighboring cities that will impact Bloomington. The West Valley Logistics center coming soon will direct traffic through Bloomington. The new Agua Mansa warehouses in Rubidoux, the Colton warehouses, the South Fontana Warehouses, all of these developments negatively contribute to Bloomington's poor air quality, traffic, and will need access to the Cedar Ave 10 freeway bridge. There are no mentions of these surrounding developments in the DEIR and how they will negatively add and contribute to even worse air quality and traffic. **I8.4**
- According to Energy Justice Network, environmental racism is the disproportionate impact of environmental hazards on people of color. I am concerned that this development is being proposed for Bloomington, which, according to the 2020 US Census, Hispanic or Latinos account for 83% of the community. **I8.5**

- Rural communities like Bloomington deserve a chance to thrive by reducing air contaminants. **I8.6**
- Home based businesses are mentioned in our community plan as a desire for the community . There are many active home-based businesses that function in the proposed zone. Many home based and small businesses that are located in the projected zone will be forced out of the community. **I8.7**
- I do not believe that the person/group that wrote the DEIR is acting in the interest of the environment because the impacts will be higher than stated in the draft. I do not feel that this DEIR reveals and discloses all true significant environmental effects. Who are all the professionals conducting all of the studies mentioned in the DEIR? The community does not have faith in professionals appointed, hired, or chosen by the county since Howard Industrial Partners have built strong relationships with most of the county staff in San Bernardino County as stated on their website: hipre.net/about **I8.8**
- The county of San Bernardino is not following the Community Plan adopted by the residents of Bloomington. Residents have asked for a rural, small town atmosphere with homes that have large lots.
  2007 Community Plan: BL1.1 PURPOSE OF THE COMMUNITY PLAN The primary purpose of the Bloomington Community Plan is to guide the future use and development of land within the Bloomington Community Plan area in a manner that preserves the character and independent identity of the community. By setting goals and policies for the Bloomington community that are distinct from those applied countywide, the community plan outlines how the County of San Bernardino will manage and address growth while retaining the attributes that make Bloomington unique. https://www.sbcounty.gov/Uploads/lus/CommunityPlans/BloomingtonCP.pdf **I8.9**
  2019
  http://countywideplan.com/wp-content/uploads/2019/05/00_Bloomington_CAG_2019DRAFT.pdf
  From 2007 to 2019 the community plan has stated that the community wants to keep their neighborhood rural so that they can continue to live an equestrian lifestyle with farm animals and large lots, and a small town feel. Even the most current Proposed Land Use map on the county website has not designated or identified this area as Industrial and/or commercial .
  http://countywideplan.com/wp-content/uploads/2017/03/Bloomington_ProposedLUD_20170307.pdf
- The proposed Bloomington Business Park Specific Plan is located in the middle of a residential neighborhood. Even if the site gets rezoned, it is still located in the middle of a residential neighborhood with close proximity to 5 schools (Slover Mountain High School 1 mile away, Crestmore Elementary and Sycamore Hills Elementary both less than one mile away from the proposed site, Zimmerman Elementary only 57 feet away(bordering the site), Bloomington High School 45 feet away (bordering the site), Ruth O. Harris Middle School only 688 ft away, Kessler Park 80 feet away (bordering the site), and The Dave Jayne Equestrian Arena 80 feet away (bordering the site). Bloomington High School and Zimmerman Elementary would directly border the site. The Dave Jayne Equestrian Arena and Kessler Park would directly border the site as well. **I8.10**
- Who are all the professionals conducting all of the studies mentioned in the DEIR and who are they hired by? The community does not have faith in professionals appointed, hired or chosen by the county since Howard Industrial Partners have built strong relationships with most of the county staff in San Bernardino County as stated on their website: hipre.net/about **I8.11**
- Heat Island Effect- This development will contribute to the Heat Island Effect- https://www.epa.gov/heatislands Heat islands are urbanized areas that experience higher temperatures than outlying areas. Structures such as buildings, roads, and other infrastructure absorb and re-emit the sun's heat more than natural landscapes such as forests and water bodies. Urban areas, where these structures are highly concentrated and greenery is limited, **I8.12**

become "islands" of higher temperatures relative to outlying areas. Daytime temperatures in urban areas are about 1–7°F higher than temperatures in outlying areas and nighttime temperatures are about 2-5°F higher. This will negatively impact the community, natural vegetation, and native animals in the area. Many small business nurseries in the area would be negatively impacted as well as community fruit trees and gardens by making things harder to grow in growing temperatures and an already existing drought. **I8.12 cont.**

- I am concerned with this DEIR because there is **No** mentions of the project's bordering schools and parks and that it is in direct contact with homes. Homes and schools would be directly bordering the proposed site. Air pollution is linked to learning disabilities in children, mental illness, depression, bipolar depression and asthma. Families would be at risk. Children in homes and in schools are at risk of learning disabilities in children, mental illness, depression, bipolar depression and asthma. **I8.13**
- **Aesthetics**- This project would have a significant effect on the scenic vista of homes surrounding the project and it would block the view of residents, the high cube warehouses and fulfillment centers would block the views of the Jurupa Hills for a majority of the residents.
  Anyone on the West side of the project would have their San Bernardino mountain views blocked. Bloomington is rural and does **not** perceive warehouse and distribution centers as aesthetically pleasing. Warehouses in the middle of residential neighborhoods are ugly and depressing. We value large lots with 360 degree views of our community, mountains, and hills.
  The people of Bloomington value and appreciate rural Bloomington and acknowledge that the lifestyle adds to our positive mental health. We destress by taking a horse ride, taking walks or bike rides, going outside to tend to our gardens, and to care for our farm animals. "By 2050, close to two-thirds of the global population will live in cities. For people in urban areas, modern living often involves more time spent indoors, on screens and removed from nature. At the same time, worldwide an estimated 450 million people are dealing with a mental or neurological disorder, and many of them live in cities. **I8.14**

  In this confluence, experts agree that contact with nature can reduce risk factors for some mental illnesses, improve people's ability to manage life tasks, and enhance memory and attention. The study's researchers hope their model will be especially useful in considering the possible mental health repercussions of adding – or taking away – nature in underserved communities." https://news.stanford.edu/2019/07/24/building-nature-cities-better-mental-health/

- **Agricultural**- This area is an active "Designated farmland and farmland of statewide importance" and is currently in use by grazing livestock. Destruction of this land would lead to an irreversible loss of land.
- The Project **would** involve changes in the existing environment, which will result in conversion of farmland to nonagricultural use.
- There are many residents who do organic farming in their homes, including myself. How will this development affect the quality of my fruits and vegetables considering all of the air contaminants that will be added with this project? I feed my family this food. Neighbors rely on the food they grow to feed their families since we are a small rural community and do not have a major grocery store that sells organic fresh fruits and organic vegetables in Bloomington, and how will the soil quality in the area change? I would like further analysis on this. **I8.15**
- **Air Quality**-The Project **would** conflict with or obstruct implementation of the applicable air quality plan. The Project would result in a cumulatively considerable net increase of a criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. The Project **would** expose sensitive receptors to substantial pollutant concentrations. Since these are significant and unavoidable, the project has no way of mitigating this and should NOT be approved. The Project CAN result in other emissions (such as **I8.16**

those leading to odors) adversely affecting a substantial number of people because we do not know what types of services these centers will provide. Since this proposed development would border homes and schools it is irresponsible development to approve this project. I8.16 cont.

- **Biological Resources**- Leaving the large residential lots that the homeowners have is the best mitigation. It is **NOT** appropriate mitigation to assess prior to commencement of construction activities. I8.17
- This project should **not** be approved because the area is home to the burrowing owl. If the project goes through, there will be NO attempt to adequately perform habitat assessment, and if there is, the land would eventually still be built upon, which would destroy and demolish the population of burrowing owls in the area. "Relocation" is not natural to the burrowing owl, is dangerous, and is not an appropriate mitigation because it would contribute to the inevitable loss of the owl in its native habitat. I8.18
- The area **is** currently habitat to sensitive bat species. Building the Bloomington Business Park Specific Plan would destroy the active habitat of the sensitive and endangered bat species. Bats need open spaces with native vegetation. The proposed area would build warehouses, distribution centers, and increase traffic and lights in the area that will eventually destroy and demolish the bat population in the area. On page 5.4-27 it states that "If the qualified biologist determines that no sensitive bat maternity roosts are present, the construction activities shall be allowed to proceed without any further requirements." "The pre-construction survey shall be conducted 30 days prior to commencing construction/demolition activities" There is no way that a certified biologist can find that sensitive bat maternity roosts are present within 30 days in an area so large. It is impossible to check every tree, every building, every shed, every possible roosting place. I8.19
- There are a species of birds in the area that nests on the ground including the Meadowlark. Nesting birds are protected pursuant to the MBTA and California Fish and Game Code and it is impossible for a preconstruction clearance survey for nesting birds be done on thousands of trees that would be destroyed. This area is home to the Kangaroo rat, also endangered, this plan would put it at risk of decrease in population. This area is home to wild rabbits and jackrabbits, road-runners, bluejays, squirrels, skunks, racoons, coyotes, toads, snakes and foxes. Relocation as a mitigation plan for these creatures and the ones mentioned in the DEIR is unacceptable since it will eventually decrease and even destroy the population in the area. The community does not have faith in professionals appointed, hired or chosen by the county since Howard Industrial Partners have built strong relationships with most of the county staff in San Bernardino County as stated on their website: hipre.net/about I8.20
- The Project **would** have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service. Impacts to sensitive vegetation can not be avoided therefore can not be mitigated in a natural way so that the native animals and plants would thrive in the area because land would be built upon and the majority of the open land would be covered in cement. This will make it impossible for animals to nest in dens, burrows, or underground and find appropriate food sources. I8.21
- The Project **would** have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. I8.22
- Thousands of mature trees in the proposed sites would be cut down and replaced by a few hundred palm trees and young trees. Since the area already has terrible air quality, this will only add to the deterioration of the resident's air quality. It is significant and unavoidable and therefore should not be approved. If regulated trees will be impacted by a project, a tree removal permit I8.23

must be obtained prior to impacts and will still be removed anyways. Trees are important to the animals native to this area and to air quality. **I8.23 cont.**

- Page 321 Can you clarify and specify regulated trees and plants and when a tree or plant removal permit is required.? **I8.24**
- All types of hawks including the swainson's hawk that reside/migrate to this area need mature trees like Eucalyptus/Eucalyptus woodlands to rest\nest as well as the great horned owl that lives in the area. **I8.25**
- I do not believe that an expert in every type of biological species can be present during the entire phase of construction and therefore anything that is disrupted can be ignored, neglected and covered up by the developer, construction workers, and the county of San Bernardino whose sole purpose is to build as quickly as possible. The public has **NO** confidence in the county or the developers in that they will truly disclose findings of sensitive animals/plants/artifacts if they are found. The community does not have faith in professionals appointed, hired or chosen by the county since Howard Industrial Partners have built strong relationships with most of the county staff in San Bernardino County as stated on their website: hipre.net/about This should be taken seriously because it violates the law. **I8.26**
- **Cultural Resources**- Future development may cause a substantial adverse change in the significance of a historical resource and project construction could cause a substantial adverse change in the significance of an archeological resource. Once the project is approved all archeological resources will be lost. I do not believe your mitigation measures are valid because the sole purpose of the developers and therefore their workers will be to build as quickly as possible. **I8.27**
- The public has **NO** confidence in the county or the developers that they will truly disclose important artifacts if they are found. The community does not have faith in professionals appointed, hired or chosen by the county since Howard Industrial Partners have built strong relationships with most of the county staff in San Bernardino County as stated on their website: hipre.net/about

- **Geology and Soils-** Covering the land/soil with warehouses, distribution centers, parking lots, and cement **WOULD** result in substantial soil erosion and/or the loss of topsoil. Half of the topsoil on the planet has been lost in the last 150 years. These impacts include compaction, loss of soil structure, nutrient degradation, and soil salinity. The effects of soil erosion go beyond the loss of fertile land. It has led to increased pollution and sedimentation in underground water, streams and rivers, clogging these waterways and causing declines in fish and other species. The health of soil is a primary concern to this rural community of farmers and the global community whose livelihoods depend on well managed agriculture that starts with the dirt beneath our feet. https://www.worldwildlife.org If the project is demolished in the future the soil will be deficient in quality and nutrients. **I8.28**
- Landslides are significant in the area and can not be mitigated without destroying and modifying the natural geology therefore are unavoidable. Therefore the plan should NOT be approved. **I8.29**
- **Greenhouse Gases**-The Project **would** generate GHG emissions, directly and indirectly, that may have a **significant** impact on the environment. 9000 vehicle trips a day would have a significant impact on the community that already suffers from bad air quality. **I8.30**
- The mitigation is unacceptable because companies who do not meet the "100 points" with the Greenhouse Gas Reduction Plan will just have to pay a fee $$$ which leaves the impact significant and unavoidable instead of potentially significant. This results in the community's health decline and possible deaths with a bad quality of life.
- The Community Plan for Bloomington and the Bloomington Business Park Specific Plan conflict. The community does not want this type of development because we are a small community and it

would conflict with any way of reducing the emissions of greenhouse gasses. The county of San Bernardino is not following the Community Plan adopted by the residents of Bloomington. Residents have asked for a rural, small town atmosphere with homes that have large lots. 2007 Community Plan: BL1.1 PURPOSE OF THE COMMUNITY PLAN The primary purpose of the Bloomington Community Plan is to guide the future use and development of land within the Bloomington Community Plan area in a manner that preserves the character and independent identity of the community. By setting goals and policies for the Bloomington community that are distinct from those applied countywide, the community plan outlines how the County of San Bernardino will manage and address growth while retaining the attributes that make Bloomington unique. 2007 https://www.sbcounty.gov/Uploads/lus/ComvelopmmunityPlans/BloomingtonCP.pdf No current or past community plans show that the community wanted industrial/commercial zones in the proposed site chosen by developers and or the county. From 2007 to 2019 the community plan has stated that the community wants to keep their neighborhood rural so that they can continue to live an equestrian lifestyle with farm animals and large lots, and a small town feel.

I8.30 cont.

- **Hazards and Hazardous Materials-**The Project **would** create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials. The proposed Bloomington Business Park Specific Plan is located in the middle of a residential neighborhood. Even if the site gets rezoned it is still located in the middle of a residential neighborhood with close proximity to 4 schools and a park. 2 of those schools and the park are directectly bordering the site. Because this project site is located inside a residential neighborhood, trucks that may be transporting hazardous materials must pass homes and/or schools which makes this impact significant and unavoidable and thus MUST NOT be approved.
- The Project could create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment and therefore can not be responsibly mitigated because of its negative impacts to schools, children, and homes located at the borders of the proposed sites.

I8.31

- I believe the Project would violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. I would like to know who conducted this research and who chose this researcher because I do not agree with this finding. The community does not have faith in professionals appointed, hired, or chosen by the county since Howard Industrial Partners have built strong relationships with most of the county staff in San Bernardino County as stated on their website: hipre.net/about
- Since this project has the possibility to decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin, I feel it needs mitigation and needs a professional to conduct a survey first. I do not agree that the mitigation measures or true impacts of WQ1 through WQ-8 are acceptable because the area in the proposed site does contain groundwater. With all the development, rainwater would not be able to naturally drain into the ground and being in a drought I feel that is irresponsible and damaging to the natural flow of the earth and the ecosystem that depends on it.

I8.32

- **Land Use and Planning**- The Project **would** divide an established community. Neighbors would be replaced with cement walls, parking lots, cement, trucks and high cube buildings. The project would be located in the middle of a residential neighborhood. In order for the established equestrian community to flourish and thrive it is necessary to keep the rural community as is. If the majority of the land is rezoned, current residents are at risk of losing the farm/rural/equestrian lifestyle.

I8.33

- The Project **would** cause a significant environmental impact due to a conflict with land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The Community Plan since 2007 and maybe even before, has been to keep Bloomington rural. We do not want industrial development next to homes and schools. Homeowners would be forced to rezone because a developer put in an application with the county to rezone someone else's property. How is this even legal or okay with the San Bernardino planning commission or the County or the Supervisors? People who own those homes would be forced to live in an industrial zone if they do not want to move or sell. Home property values of the people forced to rezone and who have been left "boxed in" by these developments would drop as well as those of surrounding homes left bordering warehouses and parking lots would drop as well. Their quality of life would deteriorate living in their own homes boxed into these developments. The equestrian/farm lifestyle would be at risk in this community who is largely hispanic and has a cultural tie to this type of "ranch" lifestyle. **I8.33 cont.**
- **Noise**- In order for a warehouse or distribution center to function, there has to be trucks. Trucks bring pollution but also noise pollution. Homes and schools located on roads where trucks operate are subject to 24-7 noise as well as deterioration to their homes with cracks in the walls and windows. Homes and schools in close proximity to the proposed building would have constant noise and pollution from trucks idling, entering and exiting 24/7 since the development would border homes and schools. **I8.34**
- This project WOULD generate excessive groundborne vibration or groundborne noise levels. There are native animals who are sensitive to ground vibrations and noise levels including sensitive, endangered and native species.
- The Project **would** expose people going to school in, residing in, or working in the Project area to excessive noise level. It is unavoidable with all the trucks and traffic the proposed project would bring. It would diminish the quality of education for students and the quality of peace and quiet for people in their own homes.
- **Population and Housing**- The Project WOULD displace substantial numbers of existing people or housing. The construction of homes in the upzone area does not mitigate this because people who live in the Bloomington Business Park Specific Plan proposed site would not be able to live in the higher density housing because they have farm animals. They CAN NOT take their horses and chickens to the upzone site. There are few areas in the Inland Empire that have large lots zoned for farm animals. This would displace people and farm animals. Rezoning a residential site ("Upzone Site") to a higher density in compliance with Senate Bill 330 does not mitigate the loss of agricultural land and large lot properties of these homeowners. **I8.35**
- The Project would result in substantial adverse physical impacts associated with school services or the provision of new or physically altered school facilities. The Colton Joint Unified School District has a priority- the students. They will lose student enrollment endangering the future of teachers and employee's jobs and the existence of the area schools. This specific plan project is in close proximity to 4 schools, 2 of those are bordering the project. This project displaces students and families. **I8.36**
- The Project would result in substantial adverse physical impacts associated with park and recreational services or the provision of new or physically altered park facilities such as the Equestrian Center and Kessler Park. With our equestrian community being wiped out by the specific plan the Equestrian Center would be of little use. Kessler Park would also be in danger of continuing with 213 acres of families and homes being replaced with industrial development. **I8.37**
- **Traffic**- The Project would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Bloomington small streets do not have the capacity to take on all the diesel semi truck and vehicle traffic this project would bring. Small streets and big trucks are a disaster for students walking to and from **I8.38**

school, riding bikes, the horse community that rides through the neighborhood, and residential vehicles that commute daily for everyday activities. Widening the streets would only lead to more displacement of homes and families and destruction of property owner's land. 9000 vehicle trips to a small community is not appropriate. The roads are not made for this type of development. Creating sidewalks is a safety concern for our equestrian community because horses are propense to slip on sidewalks. Traffic would be sent through the Cedar Ave off ramp and at the moment is not equipped to handle 9000 extra vehicle trips a day. The off ramp is not even equipped to handle the everyday traffic that passes through already. Signs might be posted on streets stating "no trucks" but trucks still pass through because of shortcuts or to avoid traffic. The true number of vehicle trips through Bloomington is not disclosed considering all the surrounding, proposed, and future warehouses in Bloomington, Fontana, Colton, and Rubidoux that would pass through our small town and one freeway ramp, not equipped to deal with this type of traffic and pollution. **I8.38 cont.**

- The Project WOULD result in inadequate emergency access because of Bloomington only having one freeway offramp, small streets, and because this project would bring an excess amount of vehicle trips a day. **I8.39**
- **Tribal Cultural Resources**-
- To respect the Gabrieleno Band of Mission Indians-Kizh Nation I feel that this development should not go through due to the high importance of the history and culture that the beautiful area brings. **I8.40**
- **Utilities and Service Systems**- I am unclear about this statement: "The Project would not require or result in the construction of new or expanded wastewater facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects." I would like clarification on what the plan is for the wastewater. Where is it going to go? **I8.41**
- And also, I would like to know WHAT the plan is if :The Project would not require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. If the zone is subject to landslides and flooding, and the project is over 3 million square feet shouldn't it require more mitigation? Impact UT-5: states it would cause significant environmental effects, but then on Level of Significance before Mitigation: it states Less than significant. I feel like the person conducting the DEIR for this project is not taking ALL aspects of the project seriously since they are conflicting with their own statement. **I8.42**
- On page 249 Figure 5.2-1 What does the red section "other land" refer to? **I8.43**
- I would like Site Conceptual Visual Simulations of the projects that reflect what the building would really look like in my residential neighborhood instead of the visual presented on all Site Conceptual Visual Simulations that were presented that show nothing in the backgrounds other than empty lots. I am requesting a diagram of all proposed sites with correct visual representations of what is in the surrounding areas including homes, schools, parks, and small streets. **I8.44**
- I would like to know exactly how many trees would have to be cut down in the proposed project site and how many of those would require permits. **I8.45**
- I would like a professional study conducted on the effects of noise pollution on students and teachers. SInce this project borders 2 schools and at least 8000 truck trips will go through the area a day, I am concerned about the quality of education and the stress level that truck and vehicle noise can bring to my children, students, and teachers. To add to the positive mental health of my children, students, and teachers, I would like to add that "experts agree that contact with nature can reduce risk factors for some mental illnesses, improve people's ability to manage life tasks, and enhance memory and attention. The study's researchers hope their model will be **I8.46**

especially useful in considering the possible mental health repercussions of adding – or taking away – nature in underserved communities."
https://news.stanford.edu/2019/07/24/building-nature-cities-better-mental-health/ **I8.46 cont.**

- I would like for you to take into account and conduct a fuller analysis/study on the light pollution that this project would bring and the negative effects on surrounding homes, sensitive bat species, owl species, and sensitive species and all nocturnal animals native to this area. I would also like further analysis on how this project's light pollution would affect the remaining farm animals in the area including the health of my and neighbor's horses. **I8.47**
- Considering the size of the Bloomington Business Park Specific Plan Project, can you tell me what percentage of Bloomington land/Earth would be covered in warehouse/industrial development (including the Bloomington Business Park Specific Plan Project development and existing warehouses, industrial warehouses and distribution centers) and can you compare that to surrounding cities and areas that are not predominantly people of color or low socioeconomic status? This would further strengthen my statement that this development is Environmental Racism. **I8.48**

Response to Comment Letter I8: Ana Carlos, dated December 13, 2021

Comment I8.1: This comment states that the commenter is opposed to the proposed Project and urges the County of San Bernardino Supervisors, Planning Commissioners, and Municipal Advisory Councilmembers to deny the Project.

Response I8.1: The comment expresses opposition to the Project and is introductory in nature. The comment does not raise a specific issue with the adequacy of the Draft EIR evaluation or raise any other CEQA issue. Therefore, no further response is required or provided.

Comment I8.2: This comment asks what permit applications have been filed with the County of San Bernardino and requests a copy of all permits that have been approved or that are pending approval.

Response I8.2: As described in Table 3-8 of the Draft EIR Section 3.0, *Project Description,* starting on page 3-19, the proposed Project would require approval of the Bloomington Business Park Specific Plan, Policy Plan Amendments, Zoning Amendments, Site Plan Approvals, Conditional Use Permits, Vesting Tentative Parcel Maps, Community Benefits Agreement, and Community Facilities District by the County of San Bernardino Board of Supervisors, which has not occurred yet. Prior to the future San Bernardino County Planning Commission and San Bernardino County Board of Supervisors public hearings, residents will be notified of the upcoming hearings. Additionally, the staff report will be made available to the public. No approvals or permits will be issued unless the Board of Supervisors approves the items listed above and certifies the EIR along with appropriate CEQA Findings and Mitigation Monitoring and Reporting Program.

Applications for the Specific Plan, Conditional Use Permits, and Vesting Tentative Parcel Maps have been submitted to the County. Should the commenter want copies of applications and maps, the commenter should submit a public records request via the San Bernardino County Public Records Portal. The comment does not raise a specific issue with the adequacy of the Draft EIR evaluation or raise any other CEQA issue. Therefore, no further response is required or provided.

Comment I8.3: This comment questions how the Applicant was allowed to submit an application to rezone properties owned by other individuals and who at the County authorized a decision to rezone these properties. It additionally questions how it is legal for anyone to rezone someone else's property and that people that don't want to sell are forced to sell by the County and developers as they would be living in a legal nonconforming use and would not be allowed to take out permits to make home improvements or pass down their homes. The comment further states that the Project is an irresponsible development as it is in the middle of residential and school uses.

Response I8.3: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The Applicant or any interested party is permitted to initiate the filing of a Development Code Amendment to rezone the parcels within the Specific Plan Area pursuant to County Code Section 86.12.020(b). Regardless, the Specific Plan, including the Countywide Plan Amendments and Zoning Amendments, were initiated by the County and were not initiated by the Project Applicant.

The comment is correct in stating that the Project would rezone approximately 213 acres of land from Residential Single 1-Acre Minimum with Additional Agriculture Overlay (RS-1-AA) and Residential Single (RS-20M) to Specific Plan (SP). Within the SP zoning, the Specific Plan would apply the Industrial/Business Park (I/BP) designation to the entire Specific Plan Area. The existing residences and agricultural uses would become legal non-conforming uses within the Specific Plan. Proposed changes to these uses and structures shall be subject to the provisions of Chapter 84.17, Non-Conforming Uses and Structures, of the County Development Code. This comment is accurate in stating that the Specific Plan Area is adjacent to Bloomington High School, Walter Zimmerman Elementary School, Ruth O. Harris Middle School, residences,

and Kessler Park. The comment does not raise a specific issue with the adequacy of the Draft EIR's analysis or raise any other CEQA issue. Therefore, no further response is required or provided.

Comment I8.4: This comment states that the Draft EIR does not examine existing warehouses and approved warehouses in Bloomington and neighboring cities, which would also negatively contribute to poor air quality and traffic.

Response I8.4: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As shown on Table 4-8 and Figure 4-10, the Draft EIR's analysis and modeling for the Traffic Impact Assessment, Air Quality Report, and Health Risk Assessment included warehouses that are approved and under construction. Additionally, existing warehouses are included in the existing environmental setting and Project baseline, which are modeled and analyzed in the Draft EIR as part of the cumulative analysis. As discussed on page 5.3-55 of the Draft EIR, per SCAQMD's methodology, if an individual project would result in air emissions of criteria pollutants that exceed the SCAQMD's thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants. Emissions from operation of the proposed Project would exceed SCAQMD's threshold for VOC and NOx after implementation of regulatory requirements and mitigation measures. The large majority of operational-source NOx emissions (by weight) would be generated by Project vehicles, and the VOC emissions would be generated by consumer products, neither of which the Project applicant nor the County have the ability to regulate. Therefore, operational-source VOC and NOx emissions from implementation of the proposed Project would be cumulatively considerable, and cumulative air quality impacts would be significant and unavoidable.

Senate Bill (SB) 743 changes include the elimination of auto delay, or levels of service (LOS), and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, while the comment is correct in stating that the Project and existing warehouses would contribute to traffic congestion, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

Comment I8.5: This comment states that the commenter is concerned that the Project is being proposed in the Bloomington community, which is 83 percent Hispanic according to the 2020 US Census.

Response I8.5: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project's social and economic merits are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Consistent with CEQA, the Draft EIR analyzes the Project's potentially significant physical impacts on the environment regardless of social and economic conditions. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide

all information requested by reviewers. Thus, information related to environmental racism is not required. The comment does not raise any specific concerns with the adequacy of the Draft EIR. For an additional discussion of environmental justice, the commenter is referred to Master Response 4. The comment will be forwarded to County decisionmakers as part of the Final EIR. No further response is required or provided.

Comment I8.6: This comment states that rural communities like Bloomington deserve a chance to thrive by reducing air contaminants.

Response I8.6: This comment does not provide any substantial evidence that the Project would result in a significant air quality impact or raise any specific concerns regarding the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I8.7: This comment states that there are many active home-based businesses in the community and that they will be forced out of the community as a consequence of the proposed Project.

Response I8.7: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed in Section 5.13, *Population and Housing*, property owners within the development footprint would voluntarily sell their property and would be compensated by the Applicant. At the time future development is proposed in Planning Area B, property owners have the option to voluntarily sell their property and would be compensated by the future development's applicants. Property owners would not be forced to sell their properties, either through harassment or eminent domain. However, should the County approve the proposed Project, the entire Specific Plan Area would be rezoned to Specific Plan. Existing residences and home-based businesses could continue to exist as legal non-conforming uses after the rezone. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Further, as discussed in Response I8.5 above, CEQA does not require analysis of social or economic effects. The comment will be forwarded to County decisionmakers as part of the Final EIR. No further response is required or provided.

Comment I8.8: This comment states that the commenter does not believe that the consultant that wrote the Draft EIR is acting in the interest of the environment because impacts would be higher than those stated in the Draft EIR, and the Draft EIR does not disclose all true significant environmental effects. The comment questions who all the consultants are who conducted the studies mentioned in the Draft EIR. The comment further states that the community does not have faith in professionals chosen by the County since the Applicant has strong relationships with County Staff.

Response I8.8: This comment does not raise any specific issue regarding the adequacy of the Draft EIR's analysis. CEQA's purpose is to disclose the potential impacts of a project, suggest methods to minimize those impacts, and discuss project alternatives, so that decision-makers will have full information upon which to base their decisions. The purpose of CEQA and the Draft EIR is not to determine whether a project is good or bad. The preparation of the Draft EIR was conducted pursuant to the Public Resources Code and the CEQA Guidelines, and impacts related to the Project were compared to applicable thresholds from SCAQMD and the CEQA Guidelines Appendix G threshold. Furthermore, Chapter 8 of the Draft EIR includes a list of the preparers and persons contacted for the Draft EIR and associated appendices. The comment provides a general opinion that impacts are not sufficiently analyzed but does not raise any specific environmental concerns. The comment will be forwarded to County decisionmakers as part of the Final EIR. No further response is required or provided.

Comment I8.9: This comment states that the County is not following the 2007 Community Plan adopted by residents of Bloomington, which states that the community wants to keep the neighborhood rural and maintain large lot residences. The comment further states that the Countywide Plan Land Use Map does not designate the Specific Plan Area as commercial or industrial.

Response I8.9: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. In regard to the Bloomington Community Action Guide policies, these policies are intended to be broad actions or goals that the County of San Bernardino follows to ensure the economic and social well-being of the Bloomington Community and are not directly applicable to individual projects, such as the proposed Project, and are not intended to be environmental policies. The commenter is further referred to Master Response 1, above.

As discussed on page 3-18 of the Draft EIR, the Specific Plan Area is currently designated as Very Low Density Residential (VLDR) and Low Density Residential (LDR). The Policy Plan Amendment would re-designate the entire Specific Plan site from Very Low Residential (VLDR) and Low Density Residential (LDR) to Special Development (SD). As set forth in the San Bernardino Countywide Plan, the SD designation sets development maximums of 30 dwelling units per acre and 2:1 FAR, which can be modified pursuant to adopted specific plans. The SD designation allows for a combination of residential, commercial, and/or manufacturing activities, subject to modifications pursuant to adopted specific plans. The comment offers an opinion that the County is not listening to constituents but does not raise a specific issue with the adequacy of the Draft EIR. Therefore, no further response is required.

Comment I8.10: This comment states that the proposed Project is located in the middle of a residential neighborhood within close proximity to schools and parks. The comment provides distances from the proposed Project to schools and parks in the vicinity.

Response I8.10: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Further, the comment incorrectly summarizes distances to sensitive receptors from the Specific Plan Area. The comment states that Kessler Park and the Dave Jayne Equestrian Arena are 80 feet away from the Specific Plan boundary, when it is actually 216 south of the boundary. The comment states that Zimmerman Elementary is 57 feet away from the Specific Plan boundary when the school buildings are actually 103 feet from the proposed boundaries. The comment states that Bloomington High School is 45 feet away when it is actually 92 feet away from the Specific Plan boundary. The comment states that Ruth O. Harris Middle School is only 688 feet away when it is actually approximately 711 feet away from the boundary. The comment does not raise a specific issue with the adequacy of the Draft EIR evaluation or raise any other CEQA issue. Therefore, no further response is required.

Comment I8.11: This comment questions who conducted the studies mentioned in the Draft EIR and who they were hired by. The comment further states that the community does not trust professionals hired by the County.

Response I8.11: As discussed in Response I8.8, Chapter 8 of the Draft EIR includes a list of the preparers and persons contacted for the Draft EIR and associated appendices. The comment provides a general opinion that the community does not trust the preparers of the Draft EIR or associated appendices and does not raise any specific concerns regarding the adequacy of the Draft EIR. The comment will be forwarded to County decisionmakers as part of the Final EIR. No further response is required.

Comment I8.12: This comment states that the proposed Project would lead to a heat island effect, which will negatively impact the community, natural vegetation, and native animals in the area. Additionally, the comment states that small business nurseries would be negatively impacted and well as community fruit trees and gardens by making things harder to grow in hotter climates.

Response I8.12: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. In regard to relative contributions to the urban heat island effect, there is the potential for the Project to contribute to the effect as it would add additional pavement to the Specific Plan Area. However, as discussed on page 40 of the Specific Plan, the proposed and future buildings would have to adhere to Design Guidelines, which would require buildings to be light colored. Additionally, pursuant to Section 4.8 of the Specific Plan, development shall incorporate sustainable design features such as using white roofs for solar reflectivity and utilization of shade structures and trees with large canopies in order to reduce heat island effects. Therefore, developments pursuant to the Specific Plan would include measures to reduce the urban heat island effect to the maximum extent feasible, and would not significantly contribute to any existing urban heat island effect in the area.

Comment I8.13: This comment states that the Draft EIR does not mention schools, parks, and residences surrounding the proposed Specific Plan Area and that homes and schools would directly border the site. Additionally, the comment states that air pollution is linked to learning disabilities in children, mental illness, depression, bipolar depression, and asthma.

Response I8.13: This comment does not provide any substantial evidence that the Project would result in a significant air quality impact. The comment incorrectly states that the Draft EIR does not analyze impacts to surrounding sensitive receptors such as schools, parks, and residences. As stated in the Draft EIR and

specifically on page 4-19, the Specific Plan Area is located near Walter Zimmerman Elementary School, Kessler Park, Bloomington High School, Ruth Harris Middle School, and residences.
As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.
As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Therefore, the proposed Project would not cause a significant human health or cancer risk to nearby sensitive receptors.
Concerning the commenter's assertion that development of the Project would lead to mental health issues, the commenter provides no substantial evidence to support this. CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)) (*San Franciscans for Reasonable Growth v City & County of San Francisco* (1989) 209 Cal.App.3d 1502). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of mental health issues. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to mental health issues is not provided.
Comment I8.14: This comment states that the Project would have a significant effect on scenic vistas and would block the residents' views of the Jurupa Hills. The comment mentions that warehouses are not aesthetically pleasing and Bloomington values the rural areas and the lifestyle adds to positive mental health. The comment concludes by stating that contact with nature can be positive for underserved communities.

Response to I8.14: This comment does not provide any substantial evidence that the Project would result in a significant aesthetics impact. As discussed on page 5.1-12, scenic vistas can be impacted in two ways: when a Project directly diminishes the scenic quality of vistas and when the Project blocks views of corridors and vistas of the scenic resource at public locations. Public views of the Jurupa Hills are mostly obstructed and fragmented by the built environment. Thus, the Draft EIR concluded that implementation of the proposed Project would not significantly affect views of the Jurupa Hills. The concern of mental health and contact with nature does not raise any environmental concerns or questions; and is addressed in Response I8.13. Therefore, no further response is provided.

Comment I8.15: This comment states that the Project site is designated farmland and farmland of statewide importance and is currently in use by grazing livestock and would involve changes to the existing environment, which would result in the conversion of farmland to nonagricultural use. Additionally, the comment states that the commenter would like further analysis on how home gardens would be impacted by the air contaminants from the proposed Project and how the soil quality in the area would change.

Response I8.15: This comment does not provide any substantial evidence that the Project would result in a significant air quality impact not already disclosed in the Draft EIR. The comment is correct in stating that approximately 0.04-acre of Specific Plan Area is designated as Prime Farmland and 23.55 acres of the Specific Plan Area is designated as Farmland of Statewide Importance. Project implementation would cause the removal of 23.59 acres of mapped farmland. As discussed in Section 5.2, *Agriculture and Forestry Resources,* in accordance with Countywide Plan Policy NR-7.2 and Public Resources Code Section 21061.2, an agricultural resource evaluation was prepared for the Project. The evaluation was prepared pursuant to the California Agricultural LESA Model and considers six factors, including two land evaluation factors that measure the quality of the soil on the agricultural land and four site assessment factors that measure the Project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. As discussed in Appendix B, the mapped area contains Delhi Fine Sand, which is rated as a fair-quality soil for agriculture, and Tujunga loamy sand, which is rated as a good-quality soil for agriculture. Additionally, though there is water available at the mapped area, the site does not meet the minimum size requirement of 40 acres, and it is not surrounded by other agricultural operations. Consequently, the mapped area received a LESA score of 43 (Land Evaluation Score of 29 and a Site Assessment Score of 14) out of a 100-point scale. According to the LESA Model Significance thresholds, sites receiving a score of between 40 and 59 points are considered significant only if both the Land Evaluation and Site Assessment weighted factor subscores are each greater than or equal to 20 points. Since only the Land Evaluation subtotal exceeded 20 points and the Site Assessment score did not, the Project's conversion of the prime farmland and farmland of statewide importance to nonagricultural use is not considered significant. As the Project has complied with Policy NR-7.2 and the conversion of the site's farmlands to nonagricultural use is not considered significant, the Draft EIR concluded that the Project's impacts on the conversion of mapped farmlands to non-agricultural uses would be less than significant.

Project implementation would not facilitate the conversion of farmland within the Project vicinity to non-agricultural use. The CWP EIR identifies 11 acres of prime farmland and 24 acres of farmland of statewide importance in Bloomington; the 24 acres is within the Specific Plan, for which impact analysis is provided under Impact AG-1. The 11 acres is approximately one mile southeast of the Specific Plan; existing urban development separates this area from the Specific Plan Area, and the Project would not directly convert the 24 acres to non-agricultural uses. Additional mapped prime farmland and farmland of statewide importance exists 0.17 mile south of the Specific Plan Area, northeast of the Linden Avenue and 11th Street in the City of Fontana. This farmland is within a Southern California Edison (SCE) easement that operates high power transmission lines. As the utility lines are unlikely to cease operation, it is also unlikely that the Project would influence the conversion of the farmland within the SCE easement to non-agricultural use. Therefore, the Project would not directly or indirectly cause changes in the environment that would convert farmland not within the Specific Plan Area to non-agricultural use.

Additionally, development of the proposed Project would not result in the current residents that do not sell their homes losing the ability to raise livestock or grow fruits and vegetables on their properties. The only Toxic Air Contaminant of concern from the proposed Project is diesel particulate matter. Diesel particulate matter and other air pollutants would not result in changes to soil chemistry and exposure via soil and ingestion would not be a consideration, as diesel particulate matter is not a multi-pathway substance per Office of Environmental Health Hazard Assessment's 2015 Risk Assessment Guidelines. This means that because of its physical and chemical properties, any exposure to diesel particulate matter would occur through inhalation only and not through soil composition changes or consumption of fruits and vegetables grown in the area. This comment is speculative in nature and does not raise any specific concerns with the adequacy of the Draft EIR.

Comment I8.16: This comment states that the Project would conflict with or obstruct implementation of the applicable air quality plan and would result in cumulatively considerable net increase of a criteria pollutant.

Furthermore, the comment states that the Project would expose sensitive receptors to substantial pollutant concentrations and could result in other emissions, such as those leading to odors that would affect a substantial number of people. The comment states that these impacts are significant and unavoidable and cannot be mitigated, therefore the Project should not be approved.

Response I8.16: This comment does not provide any substantial evidence that the Project would result in a significant air quality impact not already disclosed in the Draft EIR. Consistent with the comment, due to the existing limited low-density development and vacancies within the Specific Plan area, buildout and operation of the proposed Specific Plan would increase emissions generated from the area. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products, which the Project applicant cannot meaningfully control or mitigate. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Neither the Project applicant nor the County have regulatory authority to control tailpipe emissions; thus, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate Project health risk impacts to residents, schools, and workers as a result of exposure to DPM from heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to toxic air contaminants (TAC) source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The maximum non-cancer risks to nearby residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding students at local schools, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million; and the maximum non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0. As such, operation of the Specific Plan at buildout would not cause a significant human health or cancer risk, and impacts would be less than significant.

In addition, the Draft EIR evaluates the potential of the Project to expose sensitive receptors, such as residences and schools with substantial pollutant concentrations. As detailed in Draft EIR Tables 5.3-15 through 5.3-18, after implementation of Mitigation Measure AQ-2 (use of Tier 4 Final construction equipment), emissions during construction activities would not exceed the SCAQMD's localized significance thresholds. Therefore, with implementation of mitigation measures, impacts related to localized significant emissions from construction activity would be less than significant.

Also, as detailed in Draft EIR Tables 5.3-19 through 5.3-21, emissions from operation of the Specific Plan at buildout would not exceed the SCAQMD's localized significance thresholds for any criteria pollutant at the nearest sensitive receptors. Therefore, operation of the Specific Plan at buildout would result in a less than significant impact related to localized emissions. Because the Project would not exceed thresholds for either DPM or localized significance thresholds, the Project would not expose sensitive receptors to substantial pollutant concentrations with the implementation of mitigation.

As discussed on page 5.3-55 of the Draft EIR, during construction, emissions from construction equipment, architectural coatings, and paving activities may generate odors. However, these odors would be temporary, intermittent in nature, and would not be detectible by a substantial number of people. Noxious odors would be confined to the immediate vicinity of the construction equipment. Also, short-term construction-related odors would cease upon the drying or hardening of the odor-producing materials. In

addition, all Project-generated solid waste would be stored in covered containers and removed at regular intervals in compliance with solid waste regulations and would not generate objectionable odors. Further, the Project's operations, which would be conducted indoors, would not generate any significant odors. Therefore, impacts associated with other operation- and construction-generated emissions, such as odors, would be less than significant.

Overall, the comment does not provide evidence of significant impacts that would require revision or recirculation of the Draft EIR.

Comment I8.17: This comment states that leaving large residential lots is the best form of biological mitigation and that it is not appropriate mitigation to assess impacts to biological species prior to commencement of construction activities.

Response I8.17: This comment does not provide any substantial evidence that the Project would result in a significant biological-resource impact. This comment generally refers to the pre-construction burrowing owl, nesting bird, and sensitive bat surveys as required by Mitigation Measures BIO-2, BIO-3, and BIO-7. These mitigation measures describe the specific actions that would be taken to reduce the impacts to burrowing owls, nesting birds, and sensitive bat species. These mitigation measures set specific performance standards and adhere to guidance provided by the California Department of Fish and Wildlife and State and Federal regulations. As discussed in Section 5.4, *Biological Resources,* Mitigation Measures BIO-1 through BIO-8, and existing regulations would reduce potential impacts associated with biological resources to a level that is less than significant.

Comment I8.18: This comment states that the Project should not be approved since it is home to burrowing owls and if the Project is approved, there would be no habitat assessment for burrowing owls and development would destroy the population of burrowing owls in the area. The comment further states that relocation of any found burrowing owls is not sufficient mitigation as it is unnatural.

Response I8.18: This comment does not provide any substantial evidence that the Project would result in a significant biological-resource impact. The comment incorrectly states that there would be no habitat assessment for burrowing owls. As discussed, starting on page 5.4-18 of the Draft EIR, burrowing owl habitat assessments and surveys were conducted for the Opening Year Development in accordance with the California Department of Fish and Wildlife (CDFW) Staff Report on Burrowing Owl Mitigation (CDFG 2012) at Development Site 1 and offsite infrastructure areas within the Specific Plan Area in April 2020, at Development Site 2 in December 2017, and at Development Sites 3 and 4 in January 2021. The findings of the assessments and any additional surveys completed are provided below:

- The habitat assessments determined that Development Sites 1 and 3 and offsite areas within the Specific Plan Area and offsite infrastructure areas do not support suitable burrowing owl habitat. Although suitable habitat is not present, site conditions may change prior to construction once buildings are no longer occupied. Therefore, Mitigation Measure (MM) BIO-2 would be required. MM BIO-2 requires take avoidance surveys to be conducted prior to ground disturbance for the Opening Year Development—Options 1 and 2 areas and offsite infrastructure areas. The surveys shall be completed in accordance with CDFW's *Staff Report on Burrowing Owl Mitigation* (CDFG 2012). If burrowing owl is observed during the take avoidance surveys, avoidance of active nests and/or relocation of burrowing owl would be required as outlined in MM BIO-2. Implementation of MM BIO-2 would reduce potential impacts to burrowing owl within the Opening Year Development Options 1 and 2 to less than significant.
- Development Site 2 under the Opening Year Development Options 1 and 2 supports suitable burrowing owl habitat. Focused burrowing owl surveys were conducted, consisting of four breeding season surveys performed on February 20, April 15, June 21, and July 15, 2018. No burrowing owls were observed or detected within the survey area during the focused surveys. Burrows with potential to support burrowing owls had no signs of burrowing owl occupation. Although no burrowing owls were observed during the focused surveys, a take avoidance survey shall be conducted prior to the start of construction; see MM BIO-2.
- Development Site 4 under the Opening Year Development Options 1 and 2 supports suitable burrowing owl habitat. Focused burrowing owl surveys were conducted, consisting of four breeding season surveys performed between February 21, 2021 and June 21, 2021. No burrowing owls

were observed or detected within the survey area during the focused surveys. Burrows with potential to support burrowing owls had no signs of burrowing owls occupation. Although no burrowing owls were observed during the focused surveys, take avoidance (pre-construction) survey will be required to confirm prior to the start of construction; see MM BIO-2.

Furthermore, prior to future development within Planning Area B or the Upzone Site, habitat assessments to determine whether suitable burrows are present as defined by the Staff Report on Burrowing Owl Mitigation (CDFG 2012) shall be conducted within future projects proposed within the Specific Plan Area (excluding Opening Year Development – Options 1 and 2, and offsite infrastructure areas) & the Upzone Site. The assessment shall also include a 500-foot (150-meter) buffer around proposed development footprints. If suitable burrows are identified, focused surveys shall be conducted by a qualified biologist during the breeding season in accordance with the most recent CDFW guidelines. Mitigation Measure BIO-2, including relocation measures, follows the protocols and guidance provided by the California Department of Fish and Wildlife Staff Report on Burrowing Owl Mitigation.

Comment I8.19: This comment states that the Specific Plan Area currently provides habitat for sensitive bat species and the proposed Project would destroy the active habitat of sensitive bat species. The comment further states that the there is no way that a biologist could check every possible roosting place for bat maternity roosts pursuant to Mitigation Measure BIO-3.

Response I8.19: This comment does not provide any substantial evidence that the Project would result in a significant biological-resource impact. Mitigation Measure BIO-3 requires conduct of a pre-construction roosting bat survey if construction activities are proposed within the bat maternity roosting season (April 1 through August 31). The comment incorrectly assumes that the entire Specific Plan Area would be developed at the same time. As discussed in Section 3.0, *Project Description,* the entire Specific Plan would not be developed concurrently. For the purposes of a conservative analysis, it was assumed in the Draft EIR that construction of all four sites in Planning Area A (Phase 1 and Phase 2) under Option 1 would commence concurrently over approximately a 14-month period. However, Phase 1 and Phase 2 would initiate construction at different dates, and the entirety of Planning Area A would not initiate construction at the same time. Buildout of the Future Development Area would occur in line with market conditions pursuant to purchase of land by future project applicants. As such, it is extremely unlikely that the entirety of Planning Area B would be constructed at the same time. Furthermore, Mitigation Measure BIO-3 survey protocols for pre-construction roosting bat surveys are consistent with protocols set forth by the most recent CDFW guidelines. Therefore, Mitigation Measure BIO-3 is feasible, and a biologist would be capable of surveying individual development sites prior to construction.

Comment I8.20: This comment states that there are bird species that utilize the Specific Plan Area as nesting habitat, and it is impossible to conduct a preconstruction nesting bird survey on thousands of trees at once.

Furthermore, the comment states that the Specific Plan Area is home to Kangaroo rat along with wild rabbits, roadrunners, blue jays, squirrels, skunks, raccoons, coyotes, toads, snakes, and foxes and relocation is unacceptable. Additionally, the comment states that the community does not have faith in professionals hired by the County.

Response I8.20: This comment does not provide any substantial evidence that the Project would result in a significant biological-resource impact. Pursuant to Mitigation Measure BIO-7, if construction activities (i.e., earthwork, clearing, and grubbing) must occur during the general bird nesting season for migratory songbirds (March 15 through August 31) and raptors (January 1 to August 31), a qualified biologist shall perform a pre-construction survey of potential nesting habitat to confirm the absence of active nests belonging to migratory birds and raptors afforded protection under the MBTA and CFG Code. As discussed in Response I8.19, the entire Specific Plan and individual implementing development would not initiate construction at the same time. Therefore, Mitigation Measure BIO-7 is feasible, and a biologist would be capable of surveying individual development sites prior to construction.

Additionally, as demonstrated on page 5.4-17 of the Draft EIR in Table 5.4-5, the Specific Plan Area does not support alluvial fan sage scrub and is not in proximity to this habitat type. As such, San Bernardino kangaroo rat has no potential to occur onsite. Furthermore, Planning Area A does not support suitable habitat for the San Diego black-tailed jackrabbit, and the San Diego black-tailed jackrabbit is not

expected to occur. These areas consist mostly of existing development, including rural residential homes and plant nurseries. Additionally, no suitable habitat for San Diego black-tailed jackrabbit was identified within the offsite infrastructure areas outside of the Specific Plan Area. Impacts to San Diego Black-tailed Jackrabbit caused by the proposed Opening Year Development Options 1 and 2 would be less than significant. Based on the general biological survey and aerial review, suitable habitat for burrowing owl, pocketed free-tailed bat, western yellow bat, and San Diego black-tailed jackrabbit may be present in the Future Development Area. Habitat assessments would be conducted for future projects proposed in Planning Area B to confirm suitable habitat. As such, mitigation measures related to burrowing owl and sensitive bats are included and outlined in MMs BIO-2 and BIO-3, respectively. MM BIO-4 has been included to require general biological surveys for sensitive animal species, including San Diego black-tailed jackrabbit, prior to future developments in the Future Development Area. If other sensitive animal species are identified and impacts cannot be avoided, the project-level biological survey report would justify why species-specific mitigation is necessary and propose mitigation to reduce project impacts to a less than significant level.
The rest of the species listed as part of Comment I8.20 are not considered sensitive species and, while the Project would result in the development of the Specific Plan Area through 2040, these species are often common in suburban environments, such as Bloomington, and would likely relocate on their own to other areas in the Project vicinity upon commencement of construction.

Comment I8.21: This comment states that the Project would have a substantial adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service. It states that Project impacts to sensitive vegetation cannot be avoided or mitigated in a natural way and undeveloped land would be covered in cement, which would make it impossible for animals to nest or find appropriate food sources.
Response I8.21: This comment does not provide any substantial evidence that the Project would result in a significant biological-resource impact. As discussed starting on page 5.4-20 of the Draft EIR, the Specific Plan Area is comprised of seven types of vegetation communities and land covers: Developed, Disturbed, Disturbed California Buckwheat scrub, Eucalyptus Woodland, Nursery, Ornamental, and Upland mustard fields. None of these vegetation communities are considered sensitive pursuant to local or regional plans, policies, regulations or by CDFW or USFWS. Therefore, no impact to sensitive vegetation communities would occur within the Opening Year Development and mitigation is not warranted. Furthermore, there is no riparian habitat within Planning Area A, as further discussed in Response I8.22.

Based on the general biological survey and aerial review, Planning Area B is not expected to support sensitive vegetation communities pursuant to CDFW regulations or riparian habitat (Helix 2021). However, future developments should be surveyed to confirm. As such, MM BIO-5 is included to require biological surveys for sensitive vegetation within the Planning Area B. If sensitive vegetation is identified, impacts should be avoided where feasible. Where avoidance is not feasible, sensitive vegetation communities will be mitigated through habitat acquisition/preservation, restoration, and/or creation. Additionally, while Planning Area B is not expected to contain jurisdictional features or riparian habitat, future developments proposed within Planning Area B will require surveys to be undertaken to confirm the lack of jurisdictional features and riparian habitat prior to the approval of any development applications. As such, MM BIO-6 is included to require jurisdictional surveys to determine the presence or absence of jurisdictional features and riparian habitat within Planning Area B. With implementation of MMs BIO-5 and BIO-6, impacts to sensitive vegetation communities within the Specific Plan Area would be less than significant.

While the proposed Project would result in the development of the Specific Plan Area, as discussed under threshold a in Section 5.4, *Biological Resources,* impacts to sensitive species from conversion of the Specific Plan Area to industrial uses would be less than significant with the implementation of mitigation.

Comment I8.22: This comment states that the Project would have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
Response I8.22: This comment does not provide any substantial evidence that the Project would result in a significant biological-resource impact. As discussed starting on page 5.4-21 of the Draft EIR, according to the USFWS National Wetland Inventory, no wetland features have been documented within or adjacent to the Specific Plan Area. Based on the Biological Resources Assessment included as Appendix D1 to the Draft EIR, Planning Area A does not support jurisdictional resources, including wetlands, marsh, vernal pool, etc., pursuant to Section 1602 of the California Fish and Game Code as regulated by the California Department of Fish and Wildlife (CDFW), pursuant to the Porter-Cologne Act, as regulated by the Santa Ana Regional Water Quality Control Board (RWQCB) and pursuant to Sections 404/401 of the Clean Water Act as regulated by the U.S. Army Corps of Engineers (USACE) and RWQCB, respectively. Therefore, no impacts to CDFW, USACE, or RWQCB jurisdiction would occur, and mitigation is not warranted.

Based on the general biological survey (which did not include a pedestrian survey) and aerial review, undertaken for Planning Area B, Planning Area B is not expected to support jurisdictional resources pursuant to Section 1602 of the California Fish and Game Code as regulated by CDFW, pursuant to the Porter-Cologne Act, as regulated by the RWQCB or Sections 404/401 of the Clean Water Act as regulated by USACE and RWQCB, respectively. However, future developments proposed in Planning Area B should be surveyed to confirm there are no resources under USACE or RWQCB jurisdiction. Therefore, MM BIO-7 is included to require jurisdictional assessments for projects within Planning Area B. If resources under CDFW, USACE, and/or RWQCB jurisdiction are identified, impacts should be avoided where feasible. Where avoidance is not feasible, project-specific impacts to jurisdictional resources will be applied by federal and state regulators via applicable consulting and permitting process. The types of mitigation required may include on-site or offsite preservation, enhancement, creation, and/or restoration. With implementation of MM BIO-7, impacts to federally protected wetlands would be less than significant.

Comment I8.23: This comment states that thousands of mature trees would be cut down and replaced with palm trees and young trees, which would contribute to the deterioration of residential air quality and result in significant and unavoidable impacts. Additionally, the comment states that a tree removal permit would be required to remove regulated trees, but trees would be cut down which are important to animals in the area.
Response I8.23: This comment does not provide any substantial evidence that the Project would result in a significant air quality impact. Consistent with the comment, buildout and operation of the proposed Specific Plan would increase emissions generated from the area and would result in the removal of onsite trees. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products, which the Project applicant cannot meaningfully control via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

While the proposed Project would result in the development of the Specific Plan Area and could potentially result in the removal of regulated trees, as discussed under threshold a in Section 5.4, *Biological Resources,* impacts to sensitive species from conversion of the Specific Plan Area to industrial uses would be

less than significant with the implementation of mitigation. Furthermore, the commenter's statement that the removal of trees would contribute to air quality deterioration is speculative in nature, and the proposed Project's removal of existing onsite trees would not result in a significant air quality impact. Additionally, the proposed Project would include landscaping, such as mature trees, in order to offset any loss of trees within the Specific Plan Area.

Comment I8.24: This comment states requests clarification on regulated trees and when a tree removal permit is required.

Response I8.24: This comment does not provide any substantial evidence that the Project would result in a significant biological-resource impact. As discussed on page 5.4-23 of the Draft EIR, pursuant to Development Code Section 88.01, a Tree or Plant Removal Permit would be required for the removal of a regulated tree or plant as identified by the Development Code. Pursuant to Development Code Section 88.01.070, regulated trees include living, native trees with a six inch or greater stem diameter or 19 inches in circumference measured four and one-half feet above natural grade level and three or more palm trees in linear plantings, which are 50 feet or greater in length within established windrows or parkway plantings. As discussed on page 5.4-23, based on the tree survey conducted for the Opening Year Development, no regulated trees existing within Sites 1 through 4 or within the offsite infrastructure areas. As such, construction of the Opening Year Development and offsite infrastructure would not conflict with any local policy and impacts were determined to be less than significant.

Based on the general biological survey conducted for Planning Area B and reconnaissance surveys of the Upzone Site, there is at least one tree within Planning Area B and the Upzone Site that would be regulated under Code Section 88.01. The removal of regulated trees within Planning Area B and the Upzone Site would require a permit in conjunction with the future development project's entitlement process. Therefore, MM BIO-8 would be required, which requires a tree inventory to be prepared, within the footprint of all sites where development applications are submitted to identify County-regulated trees, as defined by the County's Plant Protection and Management regulations. MM BIO-8 also requires that any impacts to regulated trees would require a removal permit from the County. Therefore, the Draft EIR concluded that, with implementation of Mitigation Measure BIO-8, impacts to regulated trees would be less than significant.

Comment I8.25: This comment states that hawks, including Swainson's hawk, and great horned owls utilize the trees in the area to nest.

Response I8.25: This comment does not provide any substantial evidence that the Project would result in a significant biological-resource impact. While no Swainson's hawk or great horned owls were observed onsite during biological surveys, as discussed on page 5.4-22 of the Draft EIR, the Specific Plan Area, offsite infrastructure areas, and the Upzone Site have the potential to support songbird and raptor, including hawk and owl, nests due to the presence of shrubs, ground cover, and trees. Project activities could disturb or destroy active migratory bird nests including eggs and young. Disturbing or destroying active nests is a violation of the MBTA (16 U.S.C. 703 et seq.). In addition, nests and eggs are protected under Fish and Game Code Section 3503. As such, direct impacts to breeding birds (e.g., through nest removal) or indirect impacts (e.g., by noise-caused abandonment of the nest) is considered a potentially significant impact. Therefore, MM BIO-7, which requires the Applicant to conduct a preconstruction nesting bird survey if construction activities occur during nesting bird season, in line with applicable CDFW guidelines, would be implemented to reduce impacts to a less than significant level.

Comment I8.26: This comment states that the commenter does not believe that an expert in every type of biological species can be present during all of construction and therefore anything that is disrupted can be ignored, neglected and covered up by the developer, construction workers, and the County of San Bernardino. The comment states that the community does not trust that findings of sensitive animals, plants, and artifacts during construction would be disclosed.

Response I8.26: This comment does not provide any substantial evidence that the Project would result in a significant biological-resource impact. This comment provides the commenter's opinion that biological monitors would not be present during all of construction and speculates that any potential findings during Project construction, such as sensitive animals, plants, and artifacts, would not be disclosed. As provided by Mitigation Measures BIO-1 through BIO-8, qualified biologists would not be required to be present during all construction activities, but would conduct required pre-construction surveys pursuant to the Draft EIR's mitigation measures. Additionally, the comment provides a speculative assumption that mitigation and monitoring would not be properly conducted. Chapter 4 of this Final EIR includes the Mitigation Monitoring and Reporting Program (MMRP), which identifies the parties that will be responsible for monitoring implementation of the individual mitigation measures in the MMRP. As discussed, County departments and the Applicant/Developer would be legally responsible for ensuring that these mitigation measures and regulatory requirements are properly implemented. Pursuant to CEQA Guidelines Section 15064, the EIR need not analyze potential speculative impacts from the proposed Project. This comment is speculative in nature and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required.

Comment I8.27: This comment states that future development may cause a substantial adverse change in the significance of a historical resource and Project construction could cause a substantial adverse change in the significance of an archeological resource. The comment states that once the Project is approved all archeological resources will be lost. The comment states that the commenter does not believe the Draft EIR's mitigation measures are valid because the sole purpose of the Applicant, and therefore their contractors, will be to build as quickly as possible, and the community has no confidence that the County or the developers will disclose important artifacts if they are found.

Response I8.27: This comment does not provide any substantial evidence that the Project would result in a significant cultural-resource impact. As discussed on pages 5.5-10 through 5.5-11 of the Draft EIR, none of the structures within the initial development area qualify as historical resources, per 14 CCR 15064.5. Therefore, Project implementation in Planning Area A—i.e., demolition of the structures for construction of the proposed Project—would not alter any listed or eligible historic resources, and impacts would be less than significant. The Future Development Area in Planning Area B of the Specific Plan contains historic-era structures. According to the Phase 1 CRA, as of 2021, there were 25 structures in the Planning Area B of the Specific Plan that are of historic age (i.e., buildings over 45 years of age). Therefore, future development in Planning Area B could alter a historical resource. Based on the reconnaissance-level survey conducted for Planning Area B and the results of the historical resources assessment for the Opening Year Development, Planning Area B is unlikely to contain structures that would be eligible for listing as a historical resource due to the fact that historic age buildings within Planning Area B are heavily modified, do not embody the distinctive characteristics of a period, and have not yielded, nor do they have the potential to yield information important to the study of local, state, or national history. Furthermore, Mitigation Measure CUL-1 is included to require preparation of a Historical Resources Assessment for future development of Planning Area B of the Specific Plan to verify that historic-age structures are not eligible for listing as historical resources. Should any structures within Planning Area B be found eligible for listing as a historical resource, preparation of additional CEQA documentation would be required. Therefore, with implementation of Mitigation Measure CUL-1, impacts to historical resources from buildout of Planning Area B would be less than significant.

As discussed on pages 5.5-11 through 5.5-12 of the Draft EIR, no prehistoric or historic-period archaeological resources were identified during the pedestrian and reconnaissance surveys within the Specific Plan Area. Due to the disturbed nature of the Specific Plan Area and Upzone Site (i.e., current development and landscaping, and historic agricultural operations), the Specific Plan Area and Upzone Site have very little, if any, undisturbed land. However, Project construction would require excavation of at least 5 feet below the existing grade and at least 3 feet below the grade of the proposed building pads. Additionally, the Project's improvements to the public storm drain system would require a 108-inch-diameter (9-foot) pipe drain with a minimum of 2 feet of cover, or soil disturbance of 11 feet bgs, if not deeper. As there have been a number of previously recorded prehistoric and historical archaeological

sites proximate to the Specific Plan Area and Upzone Site, the Specific Plan Area and Upzone Site are considered sensitive to archaeological resources, and impacts are potentially significant. As such, Mitigation Measure CUL-2 is included to require archaeological monitoring of all developments in the Specific Plan Area and Upzone Site. Therefore, the Draft EIR concluded that with implementation of Mitigation Measure CUL-2, impacts to archaeological resources would be less than significant.

This comment speculates that any potential archaeological findings during Project construction would not be disclosed. The comment provides a speculative assumption that mitigation and monitoring would not be properly conducted. Chapter 4 of this Final EIR includes the Mitigation Monitoring and Reporting Program (MMRP), which identifies the parties that will be responsible for monitoring implementation of the individual mitigation measures in the MMRP. As discussed, County departments and the Applicant/Developer would be legally responsible for ensuring that these mitigation measures and regulatory requirements are properly implemented. Pursuant to CEQA Guidelines Section 15064, the EIR need not analyze potential speculative impacts or speculative assumptions that the mitigation would not be properly implemented by the proposed Project. This comment is speculative in nature and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required.

Comment I8.28: This comment states that the proposed Project would result in substantial erosion and loss of topsoil and that soil erosion can lead to increased pollution and sedimentation. Additionally, the comment states that the health of soil is a primary concern for residents and that the Project would result in a deficiency of soil quality and nutrients.

Response I8.28: This comment does not provide any substantial evidence that the Project would result in a significant geological impact. As described on page 5.7-17 of the Draft EIR, construction of the Specific Plan Area and Upzone Site have the potential to contribute to soil erosion and the loss of topsoil. Grading and excavation activities would expose and loosen topsoil, which could be eroded by wind or water. Both the Specific Plan Area and Upzone Site are located within a wind hazard high erodibility area. County Development Code Chapter 35.01 (RR HYD-1) incorporates the requirements of the Areawide Urban Storm Water Run-off Permit (NPDES Permit no. CAS618036, Order No. R8-2002-0012). All projects in the County are required to conform to the permit requirements, which requires preparation of a Stormwater Pollution Prevention Plan (SWPPP), prepared in compliance with the NPDES permit. The SWPPP will identify potential sources of erosion and sedimentation loss of topsoil during construction, identify erosion control best management practices (BMPs) to reduce or eliminate the erosion and loss of topsoil, such as use of silt fencing, fiber rolls, or gravel bags, stabilized construction entrance/exit, hydroseeding. Additionally, construction would comply with SCAQMD Rule 403, which would further limit the loss of topsoil during construction activities. With compliance with the County Development Code, RWQCB requirements, and the BMPs in the SWPPP, potential construction impacts related to erosion and loss of topsoil at the Specific Plan Area and Upzone Site would be less than significant.

Once constructed, the developed areas within the Specific Plan and Upzone Site would contain buildings, pavement, and landscaping. Some areas may contain exposed soils; however, these areas would be part of the landscaping that would be designed to limit erosion and the loss of topsoil. Also, as described in Section 5.8, *Hydrology and Water Quality*, on-site drainage features would be installed as part of the proposed development, which would be designed to filter and slowly discharge stormwater into the off-site drainage system and further reduce the potential for stormwater to erode topsoil. Additionally, all developments in the County would require a site-specific Water Quality Management Plans (WQMP) (RR HYD-3), which would ensure that the County Development Code, RWQCB requirements, and appropriate operational BMPs would be implemented to minimize or eliminate the potential for soil erosion or loss of topsoil to occur. As a result, potential impacts related to substantial soil erosion or loss of topsoil would be less than significant.

In regard to Project impacts on soil quality and health, the commenter is referred to Response I8.15. This comment is speculative in nature and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

Comment I8.29: This comment states that impacts related to landslides are significant and cannot be mitigated without destroying the natural geology.

Response I8.29: This comment does not provide any substantial evidence that the Project would result in a significant geological impact. As described on page 5.7-16 of the Draft EIR, the southwestern portion of Development Site 2 and a portion of Planning Area B south of Development Site 3 are mapped as having moderate to high susceptibility for landslides. Topographic information for Development Site 2, however, shows the site sloping gently to the south at an estimated gradient of 1 percent. No proposed structures are within the mapped landslide susceptibility area. The proposed structures in Development Site 2 are not within an identified landslide potential area. An addendum prepared by the geologist determined no landslide susceptibility investigation was needed for Development Site 2 unless a structure is proposed in the area of the landslide area (SGC, 2021b). Thus, future development in the mapped landslide susceptibility area within Planning Area B will require a landslide susceptibility investigation in accordance with Mitigation Measure GEO-1 and in compliance with CBC requirements (CWP EIR RR GEO-1). No portion of Development Sites 1, 3, or 4 are within an area mapped with landslide susceptibility (SGC, 2021b), and impacts involving landslides at all four Development Sites are less than significant. Additionally, areas in the Project vicinity have been previously disturbed and developed and are not considered natural landscapes. As such, implementation of the Specific Plan would not destroy the natural geologic features of the area.

Comment I8.30: This comment states that the Project would generate greenhouse gas (GHG) emissions that may have a significant impact on the environment as a result of the Project's 9,000 daily trips. Additionally, the comment states that Mitigation Measure GHG-1 is unacceptable because future companies could just pay a fee if they do not meet the 100 points per the County's GHG Reduction Plan.

The comment reiterates the letter's previous comment that the County is not following the 2007 Community Plan adopted by residents of Bloomington, which states that the community wants to keep the neighborhood rural and maintain large lot residences. The comment further states that the Countywide Plan Land Use Map does not designate the Specific Plan Area as commercial or industrial.

Response I8.30: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The comment incorrectly states that the Project would result in 9,000 daily trips when it would actually result in 8,555 daily trips, as substantiated in Appendix K1. Additionally, the comment incorrectly states that Mitigation Measure GHG-1 allows for future companies to pay a fee if they do not meet 100 points pursuant to the 2021 County of San Bernardino Greenhouse Gas Reduction Plan Screening Tables. Mitigation Measure GHG-1 requires that prior to issuance of building permits for each building, the Project Applicant shall provide documentation to the County of San Bernardino Building Department demonstrating that the improvements and/or buildings subject to the building permit application include measures from the 2021 County of San Bernardino Greenhouse Gas Reduction Plan Screening Tables (June 2021), as needed to achieve the required 100 points. Specific measures may be substituted for other measures that achieve an equivalent amount of GHG reduction, subject to the County of San Bernardino Building Department approval. However, as erroneously stated by the comment, Mitigation Measure GHG-1 does not allow future developers to pay a fee in lieu of achieving the required 100 points. As such, the Draft EIR is correct in stating that Mitigation Measure GHG-1 would reduce impacts to a less than significant level.

In regard to the Bloomington Community Action Guide policies, these policies are intended to be broad actions or goals that the County of San Bernardino follows to ensure the economic and social well-being of the Bloomington Community. The policies set forth in the Bloomington Community Action Guide do not apply to specific individual projects, such as the proposed Project, and are not intended to be environmental policies. The commenter is further referred to Master Response 1, above.

Comment I8.31: This comment states the Project would create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials as the proposed Project is located in the middle of a residential neighborhood within close proximity to four schools and a park. The comment states that because the Specific Plan Area is located inside a residential neighborhood, trucks that may be transporting hazardous materials must pass homes and/or schools which makes this impact significant and unavoidable. Additionally, the comment states the Project could create a significant hazard

to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment and therefore cannot be mitigated because of its negative impacts to schools, children, and homes located around the Specific Plan Area.

Response I8.31: This comment does not provide any substantial evidence that the Project would result in a significant hazards impact. As described on page 5.9-17, the Specific Plan Area would be developed with light industrial uses, including professional office, warehousing, processing, distribution, e-commerce, and light manufacturing. Draft EIR Chapter 5.9, *Hazards and Hazardous Materials*, addresses the Project potential impacts concerning hazardous materials and physical hazards. Depending on the type of business, operations would require the use of various types and quantities of hazardous materials, including lubricants, solvents, cleaning agents, wastes, paints and related wastes, petroleum, wastewater, batteries, (lead acid, nickel cadmium, nickel, iron, carbonate), scrap metal, and used tires. These hazardous materials would be used, stored, and disposed of in accordance with applicable regulations and standards (such as CFR, Title 49, Chapter I; CCR, Title 8; CFR, Title 40, Part 263; and San Bernardino County Code Sections 23.0602 and 23.0107) that are enforced by the USEPA, USDOT, CalEPA, CalOSHA, DTSC, and County of San Bernardino.

Under California Health and Safety Code Section 25531 et seq., CalEPA requires businesses operating with a regulated substance that exceeds a specified threshold quantity to register with a managing local agency, known as the Certified Unified Program Agency (CUPA). In San Bernardino County, the County Fire Department is the CUPA. If the operations of future tenants of the proposed warehouse facilities exceed established thresholds, CUPA permits will be required. The County requires businesses subject to any of the CUPA permits to file a Business Emergency/Contingency Plan. Additionally, businesses would be required to provide workers with training on the safe use, handling, and storage of hazardous materials. Businesses would be required to maintain equipment and supplies for containing and cleaning up spills of hazardous materials that can be safely contained and cleaned by onsite workers and to immediately notify emergency response agencies in the event of a hazardous materials release that cannot be safely contained and cleaned up by onsite personnel. The compliance with existing laws and regulations governing hazard and hazardous materials would reduce potential impacts related the routine transport, use, and disposal or potential accidental release of the hazardous materials to less than significant.

Comment I8.32: This comment states that the commenter believes the Project would violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality as the commenter does not trust the preparers of the Draft EIR and Water Quality Management Plan and questions who conducted this research.

Additionally, the comment states that the Project has the possibility to decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin and requires mitigation and a professional to conduct a survey. The commenter does not agree with the findings of Chapter 5.10, *Hydrology and Water Quality,* as the Specific Plan Area contains groundwater and with development, rainwater would not be able to naturally drain into the ground.

Response I8.32: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As described on Draft EIR pages 5.10-9 through 5.10-14, the use of BMPs during construction implemented as part of the Project's SWPPP as required by the San Bernardino County Stormwater Program and the MS4 permit would serve to ensure that Project impacts related to construction activities resulting in a degradation of water quality would be less than significant. All future development of the Upzone Site and Specific Plan would require project-specific BMP and SWPPP as well, which are implemented as part of the County's construction permitting process. Proposed and future proposed development would be required to meet the specifications of the County's NPDES Permit and the Project would be required to implement a WQMP pursuant to Chapter 83.15 of the County's Code and included as RR WQ-2. Post construction BMP and LID included in the WQMP would avoid potential quality degradation of receiving waters resulting from proposed development. Plans for grading, drainage, erosion control and water quality would be reviewed by the County's Public Works Department prior to issuance of grading permits to ensure that the applicable and required LID BMPs are constructed during implementation. As such, the proposed Project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Furthermore,

the comment provides an opinion that the commenter does not trust the preparers of the Hydrology Reports, Water Quality Management Plans, or Draft EIR, but does not provide substantial evidence of impacts related to water quality. As such, no further response on this issue is warranted.

Additionally, as discussed on pages 5.10-14 through 5.10-16 of the Draft EIR, tThe Specific Plan Area is partially developed and contains approximately 145,601 square feet of impervious surface area. Opening Year Option 1 consists of approximately 4,370,307 square feet of net new impervious surfaces, resulting in a substantial increase of imperviousness. The County MS4 permit requires that LID infiltration BMPs be used to capture and infiltrate the 85th percentile of a 24-hour precipitation event. Under Opening Year Option 1, Preliminary WQMPs (Appendix I) determined that the locations of the proposed infiltration basins and subsurface basins have favorable infiltration rates and have been adequately sized to accommodate proposed development. In addition, vegetated landscaping has also been incorporated into the design to capture and infiltrate stormwater. All stormwater runoff from the site will be conveyed to infiltration basins or landscaped areas that would allow for adequate recharge of the basin, such that any impacts would be less than significant. Compliance with the MS4 permit requirements, the County's Code, and other applicable requirements implemented through WQMPs required for future developments. Plans for grading, drainage, erosion control and water quality would be reviewed by the County's Public Works Department prior to issuance of grading permits to ensure that the applicable and required LID BMPs are constructed during implementation. Therefore, Opening Year Option 2, Planning Area B development, and future Upzone Site development impacts related to groundwater depletion and recharge would be less than significant.

Comment I8.33: This comment states that the Project would divide an established community and would be located in the middle of a residential neighborhood. The comment also states that current residents are at risk of losing the farm and equestrian lifestyle. The comment states that the Project would cause a significant environmental impact due to a conflict with a land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The comment states that the Bloomington Community plan has intended to keep Bloomington rural and mentions that homeowners would be forced to rezone their properties or live in an industrial zone if they do not want to move or sell. The comment states that home property values would drop from the rezoning.

Response I8.33: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Furthermore, the comment does not reference any specific Countywide Plan policies that the proposed Project would be inconsistent with. As discussed on pages 5.11-6 and 5.11-7 of Section 5.11 *Land Use and Planning*, the physical division of an established community could occur if a major road (expressway or freeway, for example) were built through an existing community or neighborhood or if a major development were built that was inconsistent with the land uses in the community such that it divided the community. Similar to the Specific Plan Area, surrounding uses on the west, north, and east include intermixed small to large scale industrial, commercial, residential, and institutional uses that are variable in density and orientation. Furthermore, implementation of the Specific Plan would include development of sidewalks where there currently are none, which would facilitate pedestrian connectivity in the area. As discussed on pages 5.11-7 through 5.11-18, the Project would be consistent with applicable Southern California Association of Governments' Regional Transportation Plan/Sustainable Communities Strategy (SCAG RTP/SCS) policies and Countywide Plan policies.

The comment is correct in stating that the Project would rezone approximately 213 acres of land from Residential Single 1-Acre Minimum with Additional Agriculture Overlay (RS-1-AA) and Residential Single (RS-20M) to Specific Plan (SP). Within the SP zoning, the Specific Plan would apply the Industrial/Business Park (I/BP) designation to the entire Specific Plan Area. The existing residences and agricultural uses would become legal non-conforming uses within the Specific Plan. Proposed changes to these uses and structures shall be subject to the provisions of Chapter 84.17, Non-Conforming Uses and Structures, of the County Development Code. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required on this issue.

As further discussed in Master Response 1, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project's social and economic merits are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of property values. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to property values is not provided. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required.

Comment I8.34: This comment states that trucks and traffic from the warehouse would result in air pollution and noise pollution and homes and schools in close proximity to the proposed buildings would have constant noise and pollution from trucks idling, entering and exiting 24/7 since the development would border homes and schools. The comment states that the Project would expose sensitive receptors to excessive noise levels.

Additionally, the comment states the Project would result in excessive groundborne vibration or groundborne noise levels and there are native animals who are sensitive to ground vibrations and noise levels including sensitive, endangered, and native species

Response I8.34: This comment does not provide any substantial evidence that the Project would result in a significant noise- or vibration-related impact. Consistent with the comment, due to the existing limited low-density development and vacancies within the Specific Plan area, buildout and operation of the proposed Specific Plan would increase noise generated in the area.
As detailed in the Impact NOI-2 discussion that begins on page 5.12-26 of the Draft EIR, each of the Project scenarios would implement Project Design Feature NOI-2, which would require 12-foot-high to 14-foot-high cement block walls at Sites 1 and 2 and 9-foot-high cement walls at Site 4. With implementation of Project Design Feature NOI-2, onsite operational noise levels for all scenarios would not exceed the County's exterior noise level standards, as adjusted to reflect the ambient noise levels at all nearby sensitive receiver locations. Additionally, the increase in ambient noise levels would range from 0.1 to 3.0 dBA Leq with the implementation of Project Design Feature NOI-2, which would not generate a significant daytime or nighttime operational noise level increase at nearby receiver locations.

As detailed in the Draft EIR in Section 5.12, *Noise,* starting on page 5.12-48, the proposed Project would generate traffic related noise from operation. As described in Section 3.0, *Project Description*, of the Draft EIR, the proposed Specific Plan buildings would be accessed from Laurel Avenue, Locust Avenue, Maple Avenue, and Linden Avenue. As detailed in County Development Code, Title 8, Section 83.01.080, since existing noise levels in the Specific Plan Area and at surrounding sensitive receptors already exceed 65 dBA Leq, significant noise impacts would occur if the Project creates a community noise level increase of greater than 1.5 dBA Leq (Development Code Section 83.01.080).Tables 5.12-23 through 5.12-24 show that both the Opening Year with Project and General Plan Buildout with Project conditions would result in increases less than the 1.5 dBA CNEL threshold along Sierra Avenue and Cedar Avenue north of Santa Ana Avenue, Cedar Avenue north of 7th Street, Santa Ana Avenue east of Sierra Avenue, and Jurupa Avenue east of Linden Avenue. Thus, off-site traffic noise impacts from the Project would be less than significant.

Pursuant to the County Development Code, Section 83.01.090(a)), construction and operational vibration levels would be considered significant if they were above 0.2 peak particle velocity (PPV) in/sec at receiver locations. As shown on Table 5.12-29 and 5.12-30 of the Draft EIR, with

implementation of Mitigation Measure NOI-2, which prohibits loaded trucks and heavy mobile equipment greater than 80,000 pounds and jackhammers within 20 feet of noise sensitive uses, construction vibration levels would be reduced to 0.124 in/sec PPV, which would satisfy the 0.2 in/sec PPV threshold for vibration and reduce impacts to a less than significant level. Operation of the proposed business park and industrial uses would include heavy trucks for loading dock activities, deliveries, and moving trucks, and garbage trucks for solid waste disposal. Truck vibration levels are dependent on vehicle characteristics, load, speed, and pavement conditions. However, typical vibration levels for the heavy truck activity at normal traffic speeds would be approximately 0.006 in/sec PPV, based on the Federal Transit Administration Transit Noise Impact and Vibration Assessment. Truck movements onsite would be travelling at very low speed and truck movements onsite would be travelling at normal traffic speeds, so it is expected that truck vibration at nearby sensitive receivers would be less than the County's Development Code vibration standard of 0.2 in/sec PPV, and therefore, would be less than significant. As such, the proposed Project would not expose residents, schools, or sensitive species to substantial vibration levels.

Comment I8.35: This comment states that the Project would displace substantial numbers of existing people or housing and the Upzone Site would not mitigate this displacement because residents of the Specific Plan Area could not live in higher density housing because they have farm animals. As such, the Project would displace people and farm animals.

Response I8.35: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would replace up to 78 residential structures. Buildout of Planning Area B would replace 39 residences when and if future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to acquire private property for a public use—would not be used, and property owners within the development footprint would need to voluntarily sell their properties and be compensated by the Applicant for the Project to proceed. At the time future development is proposed in Planning Area B, property owners have the option to voluntarily sell their property and would be compensated by the future development's applicants. Property owners would not be forced to sell their properties, either through harassment or eminent domain. However, should the County approve the proposed Project, the entire Specific Plan Area would be rezoned to Specific Plan. Existing residences could continue to exist and maintain farm animals as legal non-conforming uses after the rezone.

Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by Department of Finance (DOF), there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-February 2022, Zillow.com—an online real estate and rental marketplace—reported 246 single-family properties listed for sale in the community of Bloomington and adjoining cities (11 units in Bloomington, 37 units in the City of Rialto, 149 units in the City of Fontana, and 49 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the owners of the 78 dwellings in Planning Area A and 39 dwellings in Planning Area B if they elect to sell their properties. Furthermore, in compliance with SB 330, the Project would offset the loss of zoned residential capacity by upzoning another site (i.e., Upzone Site). Therefore, implementation of the Project would not displace people or housing and necessitate the construction of replacement housing elsewhere, and impacts would be less than significant. The commenter is referred to Master Response 1 for a response to the displacement of farm animals within Comment I8.35. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required.

Comment I8.36: This comment states that the Project would result in substantial adverse physical impacts associated with school services or the provision of new or physically altered school facilities. The comment states that the Colton Joint Unified School District would lose student enrollment, endangering the future of

teachers and employee's jobs and the existence of the area schools. The comment states that the Project is in close proximity to schools and would displace students and families.

Response I8.36: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. In regard to the comment of displacement of students and families, please refer to Response I8.35. As discussed on page 5.14-10 of the Draft EIR, at the Upzone Site, up to 52 single-family units could be removed and up to 480 multi-family units could be constructed. Based on the Colton Joint Unified School District's student generation rates provided in the CWP EIR (0.7225 per single-family unit and 0.4841per multi-family unit), the Project could generate up to 41 students. According to the District's current attendance boundary maps, students from the Upzone Site would attend Smith Elementary, Baca Middle, and Bloomington High. Under state law, development projects are required to pay school impact fees in accordance with Senate Bill 50 (SB 50) at the time of building permit issuance. The funding program established by SB 50 allows school districts to collect fees from new developments to offset the costs associated with increasing school capacity needs and has been found by the legislature to constitute "full and complete mitigation of the impacts of any legislative or adjudicative act…on the provision of adequate school facilities" (Government Code Section 65995[h]). Mandatory payment of school fees would reduce impacts to District schools to less than significant. Furthermore, any project associated with expanding school facilities, whether related to the construction of new facilities or modernization of existing facilities, would be subject to environmental review and mitigation pursuant to CEQA. As such, with Project payment of fees to Colton Joint Unified School District, impacts to school services would be less than significant.
Additionally, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project's social and economic merits are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of declining enrollment or jobs at local schools. CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Therefore, no further response is required.

Comment I8.37: This comment states that the Project would result in substantial adverse physical impacts associated with park and recreational services or the provision of new or physically altered park facilities. The comment states that the equestrian center and Kessler Park could see a decrease in use as the proposed Project would alter the existing community.

Response I8.37: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed above in Master Response 1, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project social and economic merits are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of declining use of local recreational facilities. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to declining use of local recreational facilities is not provided. The comment does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

Comment I8.38: The comment states that the Project would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities as Bloomington's small streets do not have the capacity to take on all the diesel semi-truck and vehicle traffic

this project would bring. The comment states that widening the streets would only lead to more displacement of homes and families and destruction of property owner's land and an increase of 9000 vehicle trips to a small community is not appropriate. The comment states that horses are propense to slip on sidewalks. Traffic would be sent through the Cedar Ave off ramp and at the moment is not equipped to handle 9000 extra vehicle trips a day. The comment states that the true number of vehicle trips through Bloomington is not disclosed considering all the surrounding, proposed, and future warehouses in Bloomington, Fontana, Colton, and Rubidoux that would pass through our small town and one freeway ramp, not equipped to deal with this type of traffic and pollution.

Response I8.38: This comment does not provide any substantial evidence that the Project would result in a significant transportation impact. The Project proposes improvements along Locust Avenue and Jurupa Avenue in order to accommodate the increased traffic in the area. All roadway improvements will be designed to County standards, and plans will be reviewed and approved by the appropriate local agency prior to construction. In addition, all vehicles would be subject to follow all roadway signals and signs. Roadway capacity and intersection capacity is a LOS analysis, and LOS is no longer considered an environmental impact under CEQA, per CEQA Guidelines Section 15064.3. As a result, measures to improve LOS can be handled separately from the EIR through the Conditions of Approval. In addition, all street improvements that include widening would be within the Specific Plan area and would not include displacement of any existing residences.

The commenter also incorrectly states that the Project would generate 9,000 daily trips (actual number is 8,555) and that all 9,000 trips would use the I-10 Cedar Avenue ramps. The trip distribution for the Project shows that 3,481 trips (using passenger car equivalent values) would utilize the I-10 Cedar Avenue ramps daily. While LOS is no longer required to be analyzed as an environmental impact under CEQA, effects of the proposed Project, in conjunction with other cumulative projects, related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

Comment I8.39: This comment states that the Project would result in inadequate emergency access as Bloomington only has one freeway offramp, small streets, and because the Project would result in increased traffic congestion.

Response I8.39: This comment does not provide any substantial evidence that the Project would result in a significant transportation impact. As discussed on page 5.9-14 of the Draft EIR, the County has identified Valley Boulevard, Slover Avenue, and the San Bernardino Freeway (I-10) as potential emergency evacuation routes. This does not mean that other roadways within the community cannot be used as evacuation routes. County authorities will specify evacuation routes during an emergency in order to respond to the specific needs of the situation and circumstances. As discussed on page 5.15-9, the Specific Plan would not interfere with the circulation of emergency vehicles along public streets during operation, and roadway improvements resulting from the Circulation Plan would be expected to improve roadway conditions from the existing setting. The Specific Plan would also be required to design and construct internal access and provide fire suppression facilities (e.g., hydrants and sprinklers) in conformance with the County Development Code. The San Bernardino County Fire Department would review the development plans as part of the construction permitting process to ensure that emergency access is provided pursuant to the requirements of the Uniform Fire Code and Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9). Therefore, impacts would be less than significant.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a

diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, while the comment is correct in stating that the Project would result in 8,555 daily vehicle trips, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. As noted in Response I8.39, measures to improve LOS will be handled through Conditions of Approval.

Comment I8.40: This comment states to respect the Gabrieleno Band of Mission Indians-Kizh Nation the commenter feels that this development should not be approved.

Response I8.40: This comment does not provide any substantial evidence that the Project would result in a significant cultures-resource impact. As discussed within Section 5.16, *Tribal Cultural Resources,* of the Draft EIR, as part of the SB 18 and AB 52 consultation processes, the County of San Bernardino contacted local Native American tribes concerning the Project's General Plan Amendment and Specific Plan. Of the 15 tribes contacted, the San Manuel Band of Mission Indians and the Gabrieleño Band of Mission Indians-Kizh Nation responded with requests for formal consultation. The consultation occurred via email, during which the Tribes requested to review the Phase 1 Cultural Resource Assessment, Geotechnical Report, and Project plans showing the depth of disturbance. The Tribes indicated that the Project lies within the Serrano and Gabrieleño ancestral territory but did not provide specific information or substantial evidence indicating that potential tribal cultural resources could be within the Specific Plan Area or Upzone Site. Through consultation, the Tribes indicated that they are aware that the Specific Plan Area is disturbed with development, that they lack knowledge of any historic tribal use of the Specific Plan Area, but that tribal cultural resources have been discovered near the Specific Plan Area. Furthermore, the Project would implement Mitigation Measures TCR-1 through TCR-3, which require the Applicant to retain a Native American monitor from the Gabrieleno Band of Mission Indians-Kizh Nation and the San Manuel Band of Mission Indians and provide for procedures for discovery of tribal cultural resources. The comment provides the commenters opinion and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required.

Comment I8.41: This comment states that the commenter is unclear on how the Project would not require or result in the construction of new or expanded wastewater facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects. The commenter requests clarification on where wastewater would go.

Response I8.41: This comment does not provide any substantial evidence that the Project would result in a significant utility or service system impact. As described on page 5.17-13 of the Draft EIR, wastewater from the Project would be directed to Rialto's wastewater treatment plant. The Project would install a new onsite sewer system that includes force mains, gravity lines, a public sewer lift station and sewer easement on the southern portion of Site 3, and two private sewer lift stations adjacent to Sites 1 and 2 that would connect to off-site sewer facilities. A new 8-inch diameter gravity line will carry flows south along Maple Avenue from immediately south of Santa Ana Avenue to a public lift station on the southwest corner of Maple Avenue at Jurupa Avenue. A new 6-inch diameter force main would carry flows to the Santa Ana Avenue Trunk Sewer. A new 8-inch diameter gravity line would carry flows south along Locust Avenue from immediately south of Santa Ana Avenue to a public lift station just north of the Specific Plan boundary. A new 6-inch diameter force main would carry flows to the Santa Ana Avenue Trunk Sewer. A new 8-inch diameter gravity line along Laurel Avenue would collect flows and meet at a low point just north of the Specific Plan boundary. Flows would travel east across the Specific Plan area to the lift station serving the Locust Avenue facilities.

There is approximately 4 million gallons per day (mgd) of remaining treatment capacity at Rialto's wastewater treatment plant, which has a total permitted capacity of 12 mgd. Buildout of the Specific Plan is anticipated to generate an additional 532,500 gallons per day or 0.53 mgd of wastewater based on wastewater generation rates previously approved by Inland Empire Utilities Agency (2,500 gallons per

day per acre for industrial uses). This represents 13.3 percent of the available remaining capacity at Rialto's wastewater treatment plant. Thus, the addition of 532,500 gallons per day or 0.53 mgd from operation of the Project would not require or result in construction of new wastewater treatment facilities or expansion of existing facilities.

Comment I8.42: This comment questions what the plan is for stormwater and states Impact UT-5 states that the Project would cause significant environmental effects, but then on Level of Significance before Mitigation: it states less than significant. The comment states that the commenter feels that the consultant conducting the Draft EIR for the Project is not taking all aspects of the Project seriously as they are conflicting with their own statement.

Response I8.42: This comment does not provide any substantial evidence that the Project would result in a significant utility or service system impact. As discussed under Impact UT-5, on pages 5.17-16 through 5.17-17, new storm water drainage facilities that would be developed as part of the Specific Plan would include the following, in accordance with the County's Master Plan of Drainage and Comprehensive Storm Drain Plan (see Figure 3-7, *Buildout Stormwater Drainage Plan*):

- Laurel Avenue: A new 48-inch diameter storm drain would convey stormwater south from Santa Ana Avenue approximately 1,800 feet to a new onsite 78-inch diameter storm drain near the southern boundary of the Specific Plan.
- A new onsite 78-inch diameter storm drain extension in Planning Area B near the southern boundary of the Specific Plan would connect with the new storm drain in Laurel Avenue to the west and Locust Avenue to the east.
- Locust Avenue: A new 78-inch diameter storm drain would convey stormwater south from Santa Ana Avenue to Jurupa Avenue.
- Jurupa Avenue: A new 90-inch diameter storm drain would convey stormwater from Locust Avenue for approximately 1,000 feet where the storm drain transitions to a new 60-inch diameter storm drain in Jurupa Avenue. The new 60-inch diameter storm drain would continue conveying stormwater easter to Linden Avenue. Additionally, flows exceeding the Specific Plan-mitigated flow rates would "bubble" out from a series of inlets located on Jurupa Avenue, at or near existing low points and travel south along its historical and natural watercourse.
- Linden Avenue: A new 60-inch diameter storm drain would convey stormwater south from Jurupa Avenue to 5th Street.
- 5th Street: A new 60-inch diameter storm drain would convey stormwater from Linden Avenue to an existing basin near the eastern terminus of 5th Street.
- A new 72-inch diameter storm drain from Alder Avenue crossing the southwestern area of the Specific Plan boundary in Planning Area B to Laurel Avenue and connecting to the new onsite 78-inch diameter storm drain extension that connects Laurel Avenue and Locust Avenue.

Development Sites 1 and 2 include construction of a 78-inch diameter storm drain in Locust Avenue from Santa Ana Avenue to Jurupa Avenue, and the remainder of the downstream system to the existing trap channel at 5th Street and Cedar Avenue, including the storm drains in Jurupa Avenue and Linden Avenue to 5th Street. Development Sites 3 and 4 include lateral connections to the master drain on Locust Avenue and the construction of the 48-inch storm drain in Laurel Avenue with a new onsite storm drain extension in Planning Area B near the southern boundary of the Specific Plan that would connect the storm drain in Laurel Avenue to the storm drain system at Locust Avenue to the east. Overflows from large storm events would be collected by a series of inlets to be located on Jurupa Avenue, which would "bubble" out when capacity is exceeded. The bubbler system is sized to release 90 percent of a 25-year storm event for the entire Specific Plan area peak flow rates from the existing watershed tributary to the low point on Jurupa Avenue. In addition, a future 72-inch stormwater drain is proposed to extend from Alder Avenue crossing the southwestern area of the Specific Plan boundary to Laurel Avenue and connecting to the new onsite 78-inch diameter storm drain extension that connects Laurel Avenue and Locust Avenue.

The installation of drainage improvements lines is included as part of the proposed Specific Plan Project and are consistent with County's Master Plan of Drainage and Comprehensive Storm Drain Plan and would not result in any physical environmental effects beyond those identified in other sections of this Draft EIR. Therefore, the Specific Plan would not require the construction of new or expanded unplanned storm water drainage facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant.

As discussed, the Draft EIR is consistent in its analysis of Impact UT-5 and demonstrates that impacts related to stormwater would be less than significant, and no mitigation would be required. As such, the commenter is incorrect about stating that the Draft EIR states there would be a significant impact related to utilities. The comment provides the commenter's opinion regarding the consultants who prepared the Draft EIR and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required.

Comment I8.43: This comment asks what "Other Land" on Figure 5.2-1 is referring to.

Response I8.43: "Other Land" is a designation provided by the California Department of Conservation. According to the California Department of Conservation, Other Land represents "[l]and not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than forty acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land." The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required.

Comment I8.44: This comment states that they would like site conceptual visual simulations of the Project that reflect what the building would look like in the residential neighborhood instead of the visual simulations that show empty lots in the background. The comment also states that they are requesting a diagram of all proposed sites with correct visual representations of the homes, schools, parks, and small streets in the surrounding areas.

Response I8.44: The visual simulations contained in the Draft EIR are conceptual and aim to show the proposed Project's architecture, height, and layout. Figure 4-2A-D shows the existing views of the Specific Plan Area which includes the surrounding parcels and identifies the existing homes, schools, parks, and surrounding streets. The comment does not raise any specific concerns about the adequacy of the Draft EIR. Therefore, no further response is required.

Comment I8.45: This comment states the commenter would like to know how many trees would be cut down by the proposed Project and how many would require permits.

Response I8.45: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As part of the Biological Resources Assessment, included as Appendix D1 to the Draft EIR, an arborist surveyed Project Sites 1 through 4 and the off-site infrastructure areas, specifically looking for any trees that met the County's definition of Regulated Trees. As described on page 5.4-23, based on the tree survey conducted for the Opening Year Development, no regulated trees exist within Sites 1 through 4 or within the offsite infrastructure areas. As such, construction of the Opening Year Development and offsite infrastructure would not require any Tree Removal Permits. Based on the general biological survey conducted for the Planning Area B, there is at least one tree within the Planning Area B that would be regulated under Code Section 88.01. The removal of regulated trees within the Future Development Area would require a permit in conjunction with the future development project's entitlement process. Therefore, MM BIO-8 is included, which requires a tree inventory to be prepared, within the footprint of all sites within Planning Area B where development applications are submitted to identify County-regulated trees, as defined by the County's Plant Protection and Management regulations.

MM BIO-8 also requires that any impacts to regulated trees would require a removal permit from the County. With the implementation of MM BIO-8, the construction within the Future Development Area would not conflict with any local policies or ordinances protecting biological resources, and impacts would be less than significant.
There is no development proposed for the proposed rezoning of the Upzone Site in the foreseeable future. Future developments will require project-specific environmental review to determine potential impacts and to obtain a Native Tree Removal Permit pursuant to Development Code section 88.01.050, if necessary, as outlined in MM BIO-8. Compliance with this mandatory regulatory requirement and implementation of MM BIO-8 would ensure that impacts related to the Upzone Site would be less than significant.

Comment I8.46: This comment states that the commenter would like a study conducted on the effects of noise pollution on teachers and students as the commenter is concerned that vehicle and truck noise would impact the quality of education and increase stress. Furthermore, the comment states that contact with nature can reduce risk factors for some mental illnesses.

Response I8.46: This comment does not provide any substantial evidence that the Project would result in a significant noise impact. As detailed in the Impact NOI-2 discussion that begins on page 5.12-26 of the Draft EIR, each of the Project scenarios would implement Project Design Feature NOI-2, which would require 12-foot-high to 14-foot-high cement block walls at Sites 1 and 2 and 9-foot-high cement walls at Site 4. With implementation of Project Design Feature NOI-2, onsite operational noise levels for all scenarios would not exceed the County's exterior noise level standards, as adjusted to reflect the ambient noise levels at all nearby sensitive receiver locations. Additionally, the increase in ambient noise levels would range from 0.1 to 3.0 dBA Leq with the implementation of Project Design Feature NOI-2, which would not generate a significant daytime or nighttime operational noise level increase at nearby receiver locations.

As detailed in the Draft EIR in Section 5.12, *Noise,* starting on page 5.12-48, the proposed Project would generate traffic related noise from operation. As described in Section 3.0, *Project Description*, of the Draft EIR, the proposed Specific Plan buildings would be accessed from Laurel Avenue, Locust Avenue, Maple Avenue, and Linden Avenue. As detailed in County Development Code, Title 8, Section 83.01.080, since existing noise levels in the Specific Plan Area and at surrounding sensitive receptors already exceed 65 dBA Leq, significant noise impacts would occur if the Project creates a community noise level increase of greater than 1.5 dBA Leq (Development Code Section 83.01.080).Tables 5.12-23 through 5.12-24 show that both the Opening Year with Project and General Plan Buildout with Project conditions would result in increases less than the 1.5 dBA CNEL threshold along Sierra Avenue and Cedar Avenue north of Santa Ana Avenue, Cedar Avenue north of 7th Street, Santa Ana Avenue east of Sierra Avenue, and Jurupa Avenue east of Linden Avenue. Thus, off-site traffic noise impacts from the Project would be less than significant. The remainder of the comment states the commenter's opinions about mental health benefits related to individual access to nature but does not raise a specific claim of inadequacy regarding the Draft EIR. Thus, no further response is required.

Comment I8.47: This comment states that the Draft EIR should conduct a full analysis and study of the light pollution and negative effects on surrounding homes, sensitive bat species, owl species, and nocturnal animals. The comment also states that the Draft EIR should analyze the Project's light pollution on farm animals in the area.

Response I8.47: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed on pages 5.1-21 and 5.1-22 of Section 5.1, *Aesthetics*, there would be limited, if any, nighttime lighting required for Project construction. Section 3.11 of the San Bernardino County Development Code limits construction between the hours of 7 a.m. to 7 p.m. Monday to Saturday, with no construction activity permitted on Sundays and national holidays. Thus, most construction

activities would occur during daytime hours during the week. Construction-related illumination would be used for limited safety and security purposes and would be required to be directed downward. The Project's operations would comply with Section 84.07.030 of the County's Development Code, among other applicable County Code requirements, which provides standards for glare and outdoor lighting for new development. Compliance with these regulations would ensure that developments within the Specific Plan would not cause a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Furthermore, wildlife currently inhabiting areas in the Specific Plan vicinity are currently exposed to light from existing residences, streetlights, security lighting, and industrial buildings. The proposed Specific Plan would introduce additional lighting consistent with the level of lighting in the vicinity of the site. As such, the Project would not increase exposure of wildlife to light pollution. Thus, additional analysis of light pollution is not warranted, and impacts related to substantial light or glare would be less than significant.

Comment I8.48: This comment questions how much of Bloomington and earth would be covered in warehouse or industrial development and if the County could compare that to surrounding cities and areas that are not predominately of color or low socioeconomic status. The comment reiterates the previous statement that the Project is environmental racism.

Response I8.48: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed above in Master Response 1, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project's social and economic merits are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not speculate as to or assert judgments on issues of environmental racism. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. For an additional discussion of environmental justice, the commenter is referred to Master Response 4. The comment does not raise any specific concerns about the adequacy of the Draft EIR. Thus, no further response is required.

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LETTER I9: Fanelly Milan (1 page)

Timestamp:

12/14/2021 15:10:03

Name/Nombre:

Fanelly Milian

Email/Correo Electronico:

fmillan@pomonadaylabor.org

Address/Direccion:

224 1/2 E El Morado Ct Ontario CA 91764

Phone number/ Numero de Telefono:

9094469068

What are your greatest concerns about this new warehouse proposal?/¿Qué es lo que más le preocupa de esta nueva almacen? (check all that apply/marque todo lo que corresponda):

Contamination to local water sources / Contaminación de las fuentes de agua locales, Pollution /Contaminación, Forced removal of renters / Desalojo forzoso de inquilinos

I9.1

What projects would you like to see instead of logistical developments?/¿Qué proyectos le gustaría ver en lugar de desarrollos logísticos? (check all that apply/marque todo lo que corresponda):

Schools / Escuelas, Community Garden / Jardín Comunitario, Parks / Parques, Green Spaces / Espacios Verdes

Do you agree with the proposed warehouse development of the Bloomington Business Park Specific Plan? / ¿Está usted de acuerdo con la propuesta de construcción de el Bloomington Business Park Specific Plan?:

No

Comments or Opinions on Bloomington Business Park Specific Plan/Commentarios o Opiniones Sobre la Propuesta de Almacen:

N/A

Are you interested in staying connected with us?/¿Está interesado en seguir conectado con nosotros?:

Yes

Response to Comment Letter I9: Fanelly Milan, dated December 14, 2021

Comment I9.1: This comment states that contamination of local water sources, forced removal of renters and pollution are the greatest concerns. The comment states that they would like to see schools, community gardens, parks, and green spaces built instead.

Response I9.1: The comment does not include any substantial evidence relating to any environmental impact. As discussed on page 5.10-11 in Section 5.10, *Hydrology and Water Quality*, mandatory compliance with the SWPPP, included as RR WQ-1, would ensure that the Project's implementation does not violate any water quality standards or waste discharge requirements during construction activities. Plans for grading, drainage, erosion control and water quality would be reviewed by the County's Public Works Department prior to issuance of grading permits to ensure that the applicable and required BMPs are constructed during implementation of the Project.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate Project health risk impacts to residents, schools, and workers as a result of exposure to Diesel Particulate Matter (DPM) from heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The maximum non-cancer risks to nearby residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million; and the maximum non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0, and therefore, be less than significant.

Also, as detailed in Master Responses 2 and 3, in response to comments received to the public review Draft EIR additional DPM and AERMOD dispersion modeling was completed (and is included as Appendix A of this Final EIR) to identify worst-case conditions, which is the highest daily peak on-site emissions resulting from overlapping operational and construction activity at the nearest land use to the Project site where an individual could remain. This additional modeling shows that neither DPM emissions or localized significance emissions would not exceed the applicable SCAQMD thresholds. As such, operation of the Specific Plan at buildout would not cause a significant human health or cancer risk related to DPM emissions and impacts would be less than significant.

As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant at or above market values. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-May 2021, Zillow.com—an online real estate and rental marketplace—reported 668 single-family properties listed for sale in the community of Bloomington and adjoining cities (25 units in Bloomington, 176 units in the City of Rialto, 329 units in the City of Fontana, and 138 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, to comply with SB 330, the Project would offset the loss of zoned residential capacity by upzoning (i.e., increasing the allowable density) another site (i.e., Upzone Site).

CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)) (*San Franciscans for Reasonable Growth v City & County of San Francisco* (1989) 209 Cal.App.3d 1502). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of individuals losing their homes. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to individuals losing their homes is not provided. Therefore, implementation of the Project would not displace people or housing in a manner which would necessitate the construction of replacement housing elsewhere, and impacts would be less than significant.

As discussed on page 5.14-10 of Section 5.14, *Public Services*, The Countywide Plan EIR addressed the demand increase in park services and provides that development (residential and nonresidential) in the Bloomington Community would be accompanied by a direct increase in property tax revenue assessed explicitly for the Bloomington Park and Recreational District to provide park and recreation service. The commenter does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is provided.

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LETTER I10: Helen Castillejos (1 page)

Timestamp:

12/14/2021 15:33:07

Name/Nombre:

Helen Castillejos

Email/Correo Electronico:

castillejos_helen@yahoo.com

Address/Direccion:

18285 11th st Bloomington CA 92316

Phone number/ Numero de Telefono:

9096995249

What are your greatest concerns about this new warehouse proposal?/¿Qué es lo que más le preocupa de esta nueva almacen? (check all that apply/marque todo lo que corresponda):

I10.1

Proximity to local schools /Proximidad a las escuelas locales, Proximity to residencies / Proximidad a las residencias, Truck traffic / Tráfico de camiones, Contamination to local water sources / Contaminación de las fuentes de agua locales, Pollution /Contaminación, Further industrialization of Bloomington / Mas industrialización de Bloomington, Forced removal of renters / Desalojo forzoso de inquilinos

What projects would you like to see instead of logistical developments?/¿Qué proyectos le gustaría ver en lugar de desarrollos logísticos? (check all that apply/marque todo lo que corresponda):

Grocery Stores / Mercados de Comida, Community Center / Centro Comunitario, Schools / Escuelas, Community Garden / Jardín Comunitario, Parks / Parques, Green Spaces / Espacios Verdes

Do you agree with the proposed warehouse development of the Bloomington Business Park Specific Plan? / ¿Está usted de acuerdo con la propuesta de construcción de el Bloomington Business Park Specific Plan?:

No

Comments or Opinions on Bloomington Business Park Specific Plan/Commentarios o Opiniones Sobre la Propuesta de Almacen:

N/A

Are you interested in staying connected with us?/¿Está interesado en seguir conectado con nosotros?:

No

Response to Comment Letter I10: Helen Catillejos, dated December 14, 2021

Comment I10.1: This comment states that the greatest concerns are proximity to local schools, residences, truck traffic, contamination to local water sources, pollution, further industrialization of Bloomington, and forced removal of renters. The comment states that they would like to see grocery stores, community centers, schools, community gardens, parks, and green spaces instead. The comment states that they do not agree with the proposed Project development.

Response I10.1: The comment does not include any substantial evidence relating to any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As discussed on page 5.10-11 in Section 5.10, *Hydrology and Water Quality*, mandatory compliance with the SWPPP, included as RR WQ-1, would ensure that the Project's implementation does not violate any water quality standards or waste discharge requirements during construction activities. Plans for grading, drainage, erosion control and water quality would be reviewed by the County's Public Works Department prior to issuance of grading permits to ensure that the applicable and required BMPs are constructed during implementation of the Project.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate Project health risk impacts to residents, schools, and workers as a result of exposure to Diesel Particulate Matter (DPM) from heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The maximum non-cancer risks to nearby residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding school

children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million; and the maximum non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0, and therefore, be less than significant.

Also, as detailed in Master Responses 2 and 3, in response to comments received to the public review Draft EIR additional DPM and AERMOD dispersion modeling was completed (and is included as Appendix A of this Final EIR) to identify worst-case conditions, which is the highest daily peak on-site emissions resulting from overlapping operational and construction activity at the nearest land use to the Project site where an individual could remain. This additional modeling shows that neither DPM emissions or localized significance emissions would not exceed the applicable AQMD thresholds. As such, operation of the Specific Plan at buildout would not cause a significant human health or cancer risk related to DPM emissions and impacts would be less than significant. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools.

As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant at or above market values. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-May 2021, Zillow.com—an online real estate and rental marketplace—reported 668 single-family properties listed for sale in the community of Bloomington and adjoining cities (25 units in Bloomington, 176 units in the City of Rialto, 329 units in the City of Fontana, and 138 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, to comply with SB 330, the Project would offset the loss of zoned residential capacity by upzoning (i.e., increasing the allowable density) another site (i.e., Upzone Site).

CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)) (*San Franciscans for Reasonable Growth v City & County of San Francisco* (1989) 209 Cal.App.3d 1502). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of individuals losing their homes. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to individuals losing their homes is not provided. Therefore, implementation of the Project would not displace people or housing in a manner which would necessitate the construction of replacement housing elsewhere, and impacts would be less than significant.

As discussed on page 5.14-10 of Section 5.14, *Public Services*, The Countywide Plan EIR addressed the demand increase in park services and provides that development (residential and nonresidential) in the Bloomington Community would be accompanied by a direct increase in property tax revenue assessed explicitly for the Bloomington Park and Recreational District to provide park and recreation service.

The comment expresses opposition to the Project. The comment does not raise a specific issue with the adequacy of the Draft EIR evaluation or raise any other CEQA issue. Therefore, no further response is required or provided.

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LETTER I11: Dipaali Reddy (1 page)

Timestamp:

12/14/2021 17:11:15

Name/Nombre:

dipaali reddy

Email/Correo Electronico:

dipaali.reddy@gmail.com

Address/Direccion:

Phone number/ Numero de Telefono:

What are your greatest concerns about this new warehouse proposal?/¿Qué es lo que más le preocupa de esta nueva almacen? (check all that apply/marque todo lo que corresponda):

Proximity to local schools /Proximidad a las escuelas locales, Proximity to residencies / Proximidad a las residencias, Truck traffic / Tráfico de camiones, Contamination to local water sources / Contaminación de las fuentes de agua locales, Pollution /Contaminación, Further industrialization of Bloomington / Mas industrialización de Bloomington, Forced removal of renters / Desalojo forzoso de inquilinos

I11.1

What projects would you like to see instead of logistical developments?/¿Qué proyectos le gustaría ver en lugar de desarrollos logísticos? (check all that apply/marque todo lo que corresponda):

Community Center / Centro Comunitario, Community Garden / Jardín Comunitario

Do you agree with the proposed warehouse development of the Bloomington Business Park Specific Plan? / ¿Está usted de acuerdo con la propuesta de construcción de el Bloomington Business Park Specific Plan?:

No

Comments or Opinions on Bloomington Business Park Specific Plan/Commentarios o Opiniones Sobre la Propuesta de Almacen:

we have to stop being complacent about the murder and displacement of life caused by the industrialization of our communities.

Are you interested in staying connected with us?/¿Está interesado en seguir conectado con nosotros?:

Yes

Response to Comment Letter I11: Dipaali Reddy, dated December 14, 2021

Comment I11.1: This comment states that proximity to local schools, proximity to residencies, truck traffic, contamination to local water sources, pollution, further industrialization of Bloomington, and forced removal of renters are the greatest concerns.

Response I11.1: The comment does not provide any substantial evidence concerning any environmental impact. As discussed on page 5.10-11 in the Draft EIR, *Hydrology and Water Quality*, mandatory compliance with the SWPPP, included as RR WQ-1, would ensure that the Project's implementation does not violate any water quality standards or waste discharge requirements during construction activities. Plans for grading, drainage, erosion control and water quality would be reviewed by the County's Public Works Department prior to issuance of grading permits to ensure that the applicable and required BMPs are constructed during implementation of the Project.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate Project health risk impacts to residents, schools, and workers as a result of exposure to Diesel Particulate Matter (DPM) from heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The maximum non-cancer risks to nearby residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million; and the maximum non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0, and therefore, be less than significant.

Also, as detailed in Master Responses 2 and 3, in response to comments received to the public review Draft EIR additional DPM and AERMOD dispersion modeling was completed (and is included as Appendix A of this Final EIR) to identify worst-case conditions, which is the highest daily peak on-site emissions resulting from overlapping operational and construction activity at the nearest land use to the Project site where an individual could remain. This additional modeling shows that neither DPM emissions or localized significance emissions would not exceed the applicable SCAQMD thresholds. As such, operation of the Specific Plan at buildout would not cause a significant human health or cancer risk related to DPM emissions and impacts would be less than significant.

Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools.

Senate Bill (SB) 743 changes include the elimination of auto delay, levels of service (LOS), and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As discussed on page 5.14-10 of the Draft EIR, *Public Services*, The Countywide Plan EIR addressed the demand increase in park services and provides that development (residential and nonresidential) in the Bloomington Community would be accompanied by a direct increase in property tax revenue assessed explicitly for the Bloomington Park and Recreational District to provide park and recreation service.

As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant at or above market values. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-May 2021, Zillow.com—an online real estate and rental marketplace—reported 668 single-family properties listed for sale in the community of Bloomington and adjoining cities (25 units in Bloomington, 176 units in the City of Rialto, 329 units in the City of Fontana, and 138 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, to comply with SB 330, the Project would offset the loss of zoned residential capacity by upzoning (i.e., increasing the allowable density) another site (i.e., Upzone Site).

CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)) (*San Franciscans for Reasonable Growth v City & County of San Francisco* (1989) 209 Cal.App.3d 1502). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of individuals losing their homes. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to individuals losing their homes is not provided. Therefore, implementation of the Project would not displace people or housing in a manner which would necessitate the construction of replacement housing elsewhere, and impacts would be less than significant.

The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

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LETTER I12: Mireya, dated December 14, 2021

Timestamp:

12/14/2021 18:07:14

Name/Nombre:

Mireya

Email/Correo Electronico:

suarezmireya@yahoo.com

Address/Direccion:

1269 W 29th St

Phone number/ Numero de Telefono:

9514882230

What are your greatest concerns about this new warehouse proposal?/¿Qué es lo que más le preocupa de esta nueva almacen? (check all that apply/marque todo lo que corresponda):

Proximity to local schools /Proximidad a las escuelas locales, Truck traffic / Tráfico de camiones, Pollution /Contaminación

What projects would you like to see instead of logistical developments?/¿Qué proyectos le gustaría ver en lugar de desarrollos logísticos? (check all that apply/marque todo lo que corresponda): **I12.1**

Green Spaces / Espacios Verdes

Do you agree with the proposed warehouse development of the Bloomington Business Park Specific Plan? / ¿Está usted de acuerdo con la propuesta de construcción de el Bloomington Business Park Specific Plan?:

No

Comments or Opinions on Bloomington Business Park Specific Plan/Commentarios o Opiniones Sobre la Propuesta de Almacen:

Este proyecto traera contaminación, trafico, trafico de vehiculos pesados en areas residenciasles y cerca de escuelas, ruido y estres a la comunidad.

Are you interested in staying connected with us?/¿Está interesado en seguir conectado con nosotros?:

No

Response to Comment Letter I12: Mireya, dated December 14, 2021

Comment I12.1: This comment states that proximity to local schools, truck traffic, and pollution are the greatest concerns. The comment states that they disagree with the project and traffic would be near the schools and noise would stress the community

Response I12.1: The comment does not provide any substantial evidence relating to an environmental impact.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate Project health risk impacts to residents, schools, and workers as a result of exposure to Diesel Particulate Matter (DPM) from heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The maximum non-cancer risks to nearby residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million; and the maximum non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0, and therefore, be less than significant.

Also, as detailed in Master Responses 2 and 3, in response to comments received to the public review Draft EIR additional DPM and AERMOD dispersion modeling was completed (and is included as Appendix A of this Final EIR) to identify worst-case conditions, which is the highest daily peak on-site emissions resulting from overlapping operational and construction activity at the nearest land use to the Project site where an individual could remain. This additional modeling shows that neither DPM emissions or localized significance emissions would not exceed the applicable AQMD thresholds. As such, operation of the Specific Plan at buildout would not cause a significant human health or cancer risk related to DPM emissions and impacts would be less than significant.

Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools.

Senate Bill (SB) 743 changes include the elimination of auto delay, levels of service (LOS), and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As

part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. The commenter does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is provided.

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LETTER I13: Cynthia Rivera (1 page)

Timestamp:

12/14/2021 18:16:52

Name/Nombre:

Cynthia Rivera

Email/Correo Electronico:

cindyloveswolves@gmail.com

Address/Direccion:

1548 s. Fillmore Ave Bloomington CA 92316

Phone number/ Numero de Telefono:

3235355972

What are your greatest concerns about this new warehouse proposal?/¿Qué es lo que más le preocupa de esta nueva almacen? (check all that apply/marque todo lo que corresponda):

Proximity to local schools /Proximidad a las escuelas locales, Proximity to residencies / Proximidad a las residencias, Truck traffic / Tráfico de camiones, Contamination to local water sources / Contaminación de las fuentes de agua locales, Pollution /Contaminación, Further industrialization of Bloomington / Mas industrialización de Bloomington, Forced removal of renters / Desalojo forzoso de inquilinos

What projects would you like to see instead of logistical developments?/¿Qué proyectos le gustaría ver en lugar de desarrollos logísticos? (check all that apply/marque todo lo que corresponda):

Grocery Stores / Mercados de Comida, Retail Stores / Tiendas, Restaurants / Restaurantes, Community Center / Centro Comunitario, Schools / Escuelas, Community Garden / Jardín Comunitario, Parks / Parques, Green Spaces / Espacios Verdes

I13.1

Do you agree with the proposed warehouse development of the Bloomington Business Park Specific Plan? / ¿Está usted de acuerdo con la propuesta de construcción de el Bloomington Business Park Specific Plan?:

No

Comments or Opinions on Bloomington Business Park Specific Plan/Commentarios o Opiniones Sobre la Propuesta de Almacen:

N/A

Are you interested in staying connected with us?/¿Está interesado en seguir conectado con nosotros?:

No

Response to Comment Letter I13: Cynthia Rivera, dated December 14, 2021

Comment I13.1: This comment states that proximity to local schools, proximity to residences, contamination of local water sources, pollution, truck traffic, further industrialization of Bloomington, and forced removal of renters are the greatest concerns. The comment states that they disagree with the project and would prefer grocery stores, restaurants, retail stores, schools, community gardens, parks, or green spaces instead.

Response I13.1: The comment does not include any substantial evidence relating to any environmental impact. As discussed on page 5.10-11 in Section 5.10, *Hydrology and Water Quality*, mandatory compliance with the SWPPP, included as RR WQ-1, would ensure that the Project's implementation does not violate any water quality standards or waste discharge requirements during construction activities. Plans for grading, drainage, erosion control and water quality would be reviewed by the County's Public Works Department prior to issuance of grading permits to ensure that the applicable and required BMPs are constructed during implementation of the Project.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate Project health risk impacts to residents, schools, and workers as a result of exposure to Diesel Particulate Matter (DPM) from heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The maximum non-cancer risks to nearby residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million; and the maximum non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0, and therefore, be less than significant.

Also, as detailed in Master Responses 2 and 3, in response to comments received to the public review Draft EIR additional DPM and AERMOD dispersion modeling was completed (and is included as Appendix A of this Final EIR) to identify worst-case conditions, which is the highest daily peak on-site emissions resulting from overlapping operational and construction activity at the nearest land use to the Project site where an individual could remain. This additional modeling shows that neither DPM emissions or localized significance emissions would not exceed the applicable AQMD thresholds. As such, operation of the

Specific Plan at buildout would not cause a significant human health or cancer risk related to DPM emissions and impacts would be less than significant.

Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant at or above market values. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-May 2021, Zillow.com—an online real estate and rental marketplace—reported 668 single-family properties listed for sale in the community of Bloomington and adjoining cities (25 units in Bloomington, 176 units in the City of Rialto, 329 units in the City of Fontana, and 138 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, to comply with SB 330, the Project would offset the loss of zoned residential capacity by upzoning (i.e., increasing the allowable density) another site (i.e., Upzone Site).

CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)) (*San Franciscans for Reasonable Growth v City & County of San Francisco* (1989) 209 Cal.App.3d 1502). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of individuals losing their homes. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to individuals losing their homes is not provided. Therefore, implementation of the Project would not displace people or housing in a manner which would necessitate the construction of replacement housing elsewhere, and impacts would be less than significant.

As discussed on page 5.14-10 of Section 5.14, *Public Services*, The Countywide Plan EIR addressed the demand increase in park services and provides that development (residential and nonresidential) in the Bloomington Community would be accompanied by a direct increase in property tax revenue assessed explicitly for the Bloomington Park and Recreational District to provide park and recreation service. The commenter does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is provided.

LETTER I14: Renato Gonzalez, dated December 14, 2021

Timestamp:

12/14/2021 18:23:54

Name/Nombre:

Renato Gonzalez

Email/Correo Electronico:

rgonzalez1077@gmail.com

Address/Direccion:

1269 W 29th St San Bernardino Ca 92405

Phone number/ Numero de Telefono:

(951)488-2266

What are your greatest concerns about this new warehouse proposal?/¿Qué es lo que más le preocupa de esta nueva almacen? (check all that apply/marque todo lo que corresponda):

Proximity to local schools /Proximidad a las escuelas locales, Proximity to residencies / Proximidad a las residencias, Truck traffic / Tráfico de camiones, Contamination to local water sources / Contaminación de las fuentes de agua locales, Pollution /Contaminación, Further industrialization of Bloomington / Mas industrialización de Bloomington, Forced removal of renters / Desalojo forzoso de inquilinos

What projects would you like to see instead of logistical developments?/¿Qué proyectos le gustaría ver en lugar de desarrollos logísticos? (check all that apply/marque todo lo que corresponda):

Schools / Escuelas, Community Garden / Jardín Comunitario, Parks / Parques, Green Spaces / Espacios Verdes

Do you agree with the proposed warehouse development of the Bloomington Business Park Specific Plan? / ¿Está usted de acuerdo con la propuesta de construcción de el Bloomington Business Park Specific Plan?:

I14.1

No

Comments or Opinions on Bloomington Business Park Specific Plan/Commentarios o Opiniones Sobre la Propuesta de Almacen:

No queremos más industrias que solo que sólo contribuyen al aumento de la contaminación.

Are you interested in staying connected with us?/¿Está interesado en seguir conectado con nosotros?:

Yes

Response to Comment Letter I14: Renato Gonzalez, dated December 14, 2021

Comment I14.1: This comment states that proximity to local schools, proximity to residences, contamination of local water sources, pollution, further industrialization of Bloomington, and forced removal of renters are the greatest concerns. The comment states that they disagree with the Project and would prefer schools, parks, and green spaces instead. The comment also states that they do not want more industrial buildings as it contributes to an increase in pollution.

Response I14.1: The comment does not include any substantial evidence relating to a specific environmental impact. As discussed on page 5.10-11 in Section 5.10, *Hydrology and Water Quality*, mandatory compliance with the SWPPP, included as RR WQ-1, would ensure that the Project's implementation does not violate any water quality standards or waste discharge requirements during construction activities. Plans for grading, drainage, erosion control and water quality would be reviewed by the County's Public Works Department prior to issuance of grading permits to ensure that the applicable and required BMPs are constructed during implementation of the Project.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate Project health risk impacts to residents, schools, and workers as a result of exposure to Diesel Particulate Matter (DPM) from heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The maximum non-cancer risks to nearby residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million; and the maximum non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0, and therefore, be less than significant.

Also, as detailed in Master Responses 2 and 3, in response to comments received to the public review Draft EIR additional DPM and AERMOD dispersion modeling was completed (and is included as Appendix A of this Final EIR) to identify worst-case conditions, which is the highest daily peak on-site emissions resulting from overlapping operational and construction activity at the nearest land use to the Project site where an individual could remain. This additional modeling shows that neither DPM emissions or localized significance emissions would not exceed the applicable SCAQMD thresholds. As such, operation of the

Specific Plan at buildout would not cause a significant human health or cancer risk related to DPM emissions and impacts would be less than significant.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining environmental impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools.

As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant at or above market values. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-May 2021, Zillow.com—an online real estate and rental marketplace—reported 668 single-family properties listed for sale in the community of Bloomington and adjoining cities (25 units in Bloomington, 176 units in the City of Rialto, 329 units in the City of Fontana, and 138 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, to comply with SB 330, the Project would offset the loss of zoned residential capacity by upzoning (i.e., increasing the allowable density) another site (i.e., Upzone Site).

CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)) (*San Franciscans for Reasonable Growth v City & County of San Francisco* (1989) 209 Cal.App.3d 1502). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of individuals losing their homes. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to individuals losing their homes is not provided. Therefore, implementation of the Project would not displace people or housing in a manner which would necessitate the construction of replacement housing elsewhere, and impacts would be less than significant.

As discussed on page 5.14-10 of the Draft EIR, The Countywide Plan EIR addressed the demand increase in park services and provides that development (residential and nonresidential) in the Bloomington Community would be accompanied by a direct increase in property tax revenue assessed explicitly for the Bloomington Park and Recreational District to provide park and recreation service. The commenter does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is provided.

LETTER I15: Unnamed, dated December 14, 2021

Timestamp:

12/14/2021 20:16:09

Name/Nombre:

Nah

Email/Correo Electronico:

nothanks@gmail.com

Address/Direccion:

No

Phone number/ Numero de Telefono:

...no

What are your greatest concerns about this new warehouse proposal?/¿Qué es lo que más le preocupa de esta nueva almacen? (check all that apply/marque todo lo que corresponda):

Proximity to local schools /Proximidad a las escuelas locales, Proximity to residencies / Proximidad a las residencias, Truck traffic / Tráfico de camiones, Contamination to local water sources / Contaminación de las fuentes de agua locales, Pollution /Contaminación, Further industrialization of Bloomington / Mas industrialización de Bloomington, Forced removal of renters / Desalojo forzoso de inquilinos

What projects would you like to see instead of logistical developments?/¿Qué proyectos le gustaría ver en lugar de desarrollos logísticos? (check all that apply/marque todo lo que corresponda):

I15.1

Grocery Stores / Mercados de Comida, Retail Stores / Tiendas, Restaurants / Restaurantes, Green Spaces / Espacios Verdes

Do you agree with the proposed warehouse development of the Bloomington Business Park Specific Plan? / ¿Está usted de acuerdo con la propuesta de construcción de el Bloomington Business Park Specific Plan?:

No

Comments or Opinions on Bloomington Business Park Specific Plan/Commentarios o Opiniones Sobre la Propuesta de Almacen:

This project should be cancelled! It is bad for the environment and a waste of space! Unnecessary! A waste of space!

Are you interested in staying connected with us?/¿Está interesado en seguir conectado con nosotros?:

No

Response to Comment Letter I15: Unnamed, dated December 14, 2021

Comment I15.1: This comment states that proximity to local schools, proximity to residences, contamination of local water sources, pollution, truck traffic, further industrialization of Bloomington, and forced removal of renters are the greatest concerns. The comment states that they disagree with the Project and would prefer grocery stores, restaurants, and green spaces instead. The comment also states that the Project should be cancelled and that it is bad for the environment.

Response I15.1: The comment does not provide any substantial evidence concerning any environmental impact. As discussed on page 5.10-11 in the Draft EIR, mandatory compliance with the SWPPP, included as RR WQ-1, would ensure that the Project's implementation does not violate any water quality standards or waste discharge requirements during construction activities. Plans for grading, drainage, erosion control and water quality would be reviewed by the County's Public Works Department prior to issuance of grading permits to ensure that the applicable and required BMPs are constructed during implementation of the Project.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate Project health risk impacts to residents, schools, and workers as a result of exposure to Diesel Particulate Matter (DPM) from heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The maximum non-cancer risks to nearby residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million; and the maximum non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0, and therefore, be less than significant.

Also, as detailed in Master Responses 2 and 3, in response to comments received to the public review Draft EIR additional DPM and AERMOD dispersion modeling was completed (and is included as Appendix A of this Final EIR) to identify worst-case conditions, which is the highest daily peak on-site emissions resulting from overlapping operational and construction activity at the nearest land use to the Project site where an individual could remain. This additional modeling shows that neither DPM emissions or localized significance emissions would not exceed the applicable SCAQMD thresholds. As such, operation of the

Specific Plan at buildout would not cause a significant human health or cancer risk related to DPM emissions and impacts would be less than significant.

Senate Bill (SB) 743 included the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining environmental impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools.

As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant at or above market values. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-May 2021, Zillow.com—an online real estate and rental marketplace—reported 668 single-family properties listed for sale in the community of Bloomington and adjoining cities (25 units in Bloomington, 176 units in the City of Rialto, 329 units in the City of Fontana, and 138 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, to comply with SB 330, the Project would offset the loss of zoned residential capacity by upzoning (i.e., increasing the allowable density) another site (i.e., Upzone Site).

CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)) (*San Franciscans for Reasonable Growth v City & County of San Francisco* (1989) 209 Cal.App.3d 1502). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of individuals losing their homes. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to individuals losing their homes is not provided. Therefore, implementation of the Project would not displace people or housing and necessitate the construction of replacement housing elsewhere, and impacts would be less than significant.

As discussed on page 5.14-10 of the Draft EIR, *Public Services*, The Countywide Plan EIR addressed the demand increase in park services and provides that development (residential and nonresidential) in the Bloomington Community would be accompanied by a direct increase in property tax revenue assessed explicitly for the Bloomington Park and Recreational District to provide park and recreation service. The commenter does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is provided.

LETTER I16: Grecia, dated December 14, 2021

Timestamp:

12/15/2021 12:04:30

Name/Nombre:

Grecia

Email/Correo Electronico:

gracemarquez1293@gmail.com

Address/Direccion:

N/A

Phone number/ Numero de Telefono:

N/A

What are your greatest concerns about this new warehouse proposal?/¿Qué es lo que más le preocupa de esta nueva almacen? (check all that apply/marque todo lo que corresponda):

Proximity to local schools /Proximidad a las escuelas locales, Proximity to residencies / Proximidad a las residencias, Truck traffic / Tráfico de camiones, Contamination to local water sources / Contaminación de las fuentes de agua locales, Pollution /Contaminación, Further industrialization of Bloomington / Mas industrialización de Bloomington, Forced removal of renters / Desalojo forzoso de inquilinos

What projects would you like to see instead of logistical developments?/¿Qué proyectos le gustaría ver en lugar de desarrollos logísticos? (check all that apply/marque todo lo que corresponda):

Grocery Stores / Mercados de Comida, Community Center / Centro Comunitario, Community Garden / Jardín Comunitario, Parks / Parques, Green Spaces / Espacios Verdes

I16.1

Do you agree with the proposed warehouse development of the Bloomington Business Park Specific Plan? / ¿Está usted de acuerdo con la propuesta de construcción de el Bloomington Business Park Specific Plan?:

No

Comments or Opinions on Bloomington Business Park Specific Plan/Commentarios o Opiniones Sobre la Propuesta de Almacen:

I am opposed to this project for many reasons. I am concerned for the homes which will be destroyed in a time when housing is in crisis nationwide but especially in California. This warehouse will also contribute to the already bad air quality in Bloomington with increased pollution, contamination and warehouse. The worst part is that this project is being proposed right in the middle of our community, right next to an elementary school, middle school, high school, and park as well as countless homes. The impact on community wellness, safety, and the environment are too high!

Are you interested in staying connected with us?/¿Está interesado en seguir conectado con nosotros?:

Yes

Response to Comment Letter I16: Grecia, dated December 15, 2021

Comment I16.1: This comment states that proximity to local schools, proximity to residences, contamination of local water sources, pollution, truck traffic, further industrialization of Bloomington, and forced removal of renters are the greatest concerns. The comment states that they disagree with the Project and would prefer grocery stores, restaurants, and green spaces instead. The comment also states that they are opposed to the Project and are concerned for homes that will be destroyed when there is a housing crisis. The comment states that the warehouse will contribute to bad air quality in Bloomington. The comment states that the Project is right in the middle of the community, right next to an elementary school, middle school, and high school. The comment also states that the impact on community wellness, safety, and environment are high.

Response I16.1: The comment does not provide any substantial evidence relating to an environmental impact. As discussed on page 5.10-11 of the Draft EIR, *Hydrology and Water Quality*, mandatory compliance with the stormwater pollution prevention plan (SWPPP), included as regulatory requirementWQ-1, would ensure that the Project's implementation does not violate any water quality standards or waste discharge requirements during construction activities. Plans for grading, drainage, erosion control and water quality would be reviewed by the County's Public Works Department prior to issuance of grading permits to ensure that the applicable and required best management practices (BMPs) are constructed during implementation of the Project.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate Project health risk impacts to residents, schools, and workers as a result of exposure to Diesel Particulate Matter (DPM) from heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The maximum non-cancer risks to nearby residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million; and the maximum non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0, and therefore, be less than significant.

Also, as detailed in Master Responses 2 and 3, in response to comments received to the public review Draft EIR additional DPM and AERMOD dispersion modeling was completed (and is included as Appendix

A of this Final EIR) to identify worst-case conditions, which is the highest daily peak on-site emissions resulting from overlapping operational and construction activity at the nearest land use to the Project site where an individual could remain. This additional modeling shows that neither DPM emissions or localized significance emissions would not exceed the applicable SCAQMD thresholds. As such, operation of the Specific Plan at buildout would not cause a significant human health or cancer risk related to DPM emissions and impacts would be less than significant.

Senate Bill (SB) 743 changes included the elimination of auto delay, levels of service (LOS), and similar measures of vehicular capacity or traffic congestion as the basis for determining environmental impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools.

As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-February 2022, Zillow.com—an online real estate and rental marketplace—reported 246 single-family properties listed for sale in the community of Bloomington and adjoining cities (11 units in Bloomington, 37 units in the City of Rialto, 149 units in the City of Fontana, and 49 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, in compliance to SB 330, the Project would offset the loss of zoned residential capacity by upzoning another site (i.e., Upzone Site). Therefore, implementation of the Project would not displace people or housing in a manner which would necessitate the construction of replacement housing elsewhere, and impacts would be less than significant.

CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)) (*San Franciscans for Reasonable Growth v City & County of San Francisco* (1989) 209 Cal.App.3d 1502). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of individuals losing their homes. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental

issues and do not need to provide all information requested by reviewers. Thus, information related to individuals losing their homes is not provided. The commenter does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is provided.

LETTER I17: Jonathan Del Toro (1 page)

Jonathan Del Toro, j.deltoro021@gmail.com, Bloomington, 92316, 9099973505

I do not want anymore warehouses in Bloomington. People will lose their homes, people will have nowhere to go Bloomington is not for sale this is land our land our home we need more fresh air less pollution adding more warehouses will add more pollution, more traffic and since theres more traffic higher chances of collision

I17.1

Response to Letter I17: Jonathan Del Toro, undated

Comment I17.1: This comment states that the commenter does not want any more warehouses in Bloomington and that people would lose their homes. The comment states Bloomington needs less pollution and warehouses will add more pollution and more traffic, which can lead to traffic collisions.

Response I17.1: The comment does not include any substantial evidence regarding any environmental impact. As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant at or above market values. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-May 2021, Zillow.com—an online real estate and rental marketplace—reported 668 single-family properties listed for sale in the community of Bloomington and adjoining cities (25 units in Bloomington, 176 units in the City of Rialto, 329 units in the City of Fontana, and 138 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, to comply with SB 330, the Project would offset the loss of zoned residential capacity by upzoning (i.e., increasing the allowable density) another site (i.e., Upzone Site). CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)) (*San Franciscans for Reasonable Growth v City & County of San Francisco* (1989) 209 Cal.App.3d 1502). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of individuals losing their homes. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to individuals losing their homes is not provided. Therefore, implementation of the Project would not displace people or housing in a manner which would necessitate the construction of replacement housing elsewhere, and impacts would be less than significant.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate Project health risk impacts to residents, schools, and workers as a result of exposure to Diesel Particulate Matter (DPM) from heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The maximum non-cancer risks to nearby residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million; and the maximum non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0, and therefore, be less than significant.

Also, as detailed in Master Responses 2 and 3, in response to comments received to the public review Draft EIR additional DPM and AERMOD dispersion modeling was completed (and is included as Appendix A of this Final EIR) to identify worst-case conditions, which is the highest daily peak on-site emissions resulting from overlapping operational and construction activity at the nearest land use to the Project site where an individual could remain. This additional modeling shows that neither DPM emissions or localized significance emissions would not exceed the applicable AQMD thresholds. As such, operation of the Specific Plan at buildout would not cause a significant human health or cancer risk related to DPM emissions and impacts would be less than significant.

Furthermore, as discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue and Santa Ana. As discussed in Appendix K1 to the Draft EIR, these road improvements should help improve traffic safety on roadways in Bloomington, although CEQA does not require a discussion of safety impacts. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

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LETTER I18: Nathaly Ortiz, dated December 15, 2021

Timestamp:

12/15/2021 15:28:42

Name/Nombre:

Nathaly Ortiz

Email/Correo Electronico:

nathalylilia@gmail.com

Address/Direccion:

N/A

Phone number/ Numero de Telefono:

N/A

What are your greatest concerns about this new warehouse proposal?/¿Qué es lo que más le preocupa de esta nueva almacen? (check all that apply/marque todo lo que corresponda):

I18.1

Proximity to local schools /Proximidad a las escuelas locales, Proximity to residencies / Proximidad a las residencias, Truck traffic / Tráfico de camiones, Contamination to local water sources / Contaminación de las fuentes de agua locales, Pollution /Contaminación, Further industrialization of Bloomington / Mas industrialización de Bloomington, Forced removal of renters / Desalojo forzoso de inquilinos

What projects would you like to see instead of logistical developments?/¿Qué proyectos le gustaría ver en lugar de desarrollos logísticos? (check all that apply/marque todo lo que corresponda):

Community Center / Centro Comunitario, Schools / Escuelas, Community Garden / Jardín Comunitario, Parks / Parques, Green Spaces / Espacios Verdes

Do you agree with the proposed warehouse development of the Bloomington Business Park Specific Plan? / ¿Está usted de acuerdo con la propuesta de construcción de el Bloomington Business Park Specific Plan?:

No

Comments or Opinions on Bloomington Business Park Specific Plan/Commentarios o Opiniones Sobre la Propuesta de Almacen:

The displacement of an entire community is a blatant sign of profit over people, and that excludes the acknowledgement of further environmental destruction of the Inland Empire through the proliferation of a warehouse economy that is unsustainable for a multitude of reasons. If a project seeks to literally destroy and displace a community, that is enough to oppose the Bloomington Business Park Specific Plan.

Are you interested in staying connected with us?/¿Está interesado en seguir conectado con nosotros?:

Yes

Response to Comment Letter I18: Nathaly Ortiz, dated December 15, 2021

Comment I18.1: This comment states that proximity to local schools, proximity to residences, contamination of local water sources, pollution, truck traffic, further industrialization of Bloomington, and forced removal of renters are the greatest concerns. The comment states that they disagree with the Project and would prefer community centers, schools, community gardens, parks, and green spaces instead. The comment also states that they are opposed to the Project and are concerned for homes that will be destroyed when there is a housing crisis. The comment states that the displacement of an entire community is a sign of profit over people, and that excludes acknowledgement of further destruction of the Inland Empire. The comment also states that the Project seeks to destroy and displace a community.

Response I18.1: The comment does not include any substantial evidence relating to any environmental impact. As discussed on page 5.10-11 in Section 5.10, *Hydrology and Water Quality*, mandatory compliance with the SWPPP, included as RR WQ-1, would ensure that the Project's implementation does not violate any water quality standards or waste discharge requirements during construction activities. Plans for grading, drainage, erosion control and water quality would be reviewed by the County's Public Works Department prior to issuance of grading permits to ensure that the applicable and required BMPs are constructed during implementation of the Project.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate Project health risk impacts to residents, schools, and workers as a result of exposure to Diesel Particulate Matter (DPM) from heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The maximum non-cancer risks to nearby residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million; and the maximum non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0, and therefore, be less than significant.

Also, as detailed in Master Responses 2 and 3, in response to comments received to the public review Draft EIR additional DPM and AERMOD dispersion modeling was completed (and is included as Appendix A of this Final EIR) to identify worst-case conditions, which is the highest daily peak on-site emissions resulting from overlapping operational and construction activity at the nearest land use to the Project site

where an individual could remain. This additional modeling shows that neither DPM emissions or localized significance emissions would not exceed the applicable SCAQMD thresholds. As such, operation of the Specific Plan at buildout would not cause a significant human health or cancer risk related to DPM emissions and impacts would be less than significant.

Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As discussed on page 5.14-10 of Section 5.14, *Public Services*, The Countywide Plan EIR addressed the demand increase in park services and provides that development (residential and nonresidential) in the Bloomington Community would be accompanied by a direct increase in property tax revenue assessed explicitly for the Bloomington Park and Recreational District to provide park and recreation service.

As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-February 2022, Zillow.com—an online real estate and rental marketplace—reported 246 single-family properties listed for sale in the community of Bloomington and adjoining cities (11 units in Bloomington, 37 units in the City of Rialto, 149 units in the City of Fontana, and 49 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, in compliance to SB 330, the Project would offset the loss of zoned residential capacity by upzoning another site (i.e., Upzone Site). Therefore, implementation of the Project would not displace people or housing in a manner which would necessitate the construction of replacement housing elsewhere, and impacts would be less than significant.

CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)) (*San Franciscans for Reasonable Growth v City & County of San Francisco* (1989) 209 Cal.App.3d 1502). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does

not include a discussion of individuals losing their homes. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to individuals losing their homes is not provided. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I19: Elizabeth Sena, dated December 15, 2021

Timestamp:

12/15/2021 15:57:44

Name/Nombre:

Elizabeth Sena

Email/Correo Electronico:

elizabeth.sena@yahoo.com

Address/Direccion:

14418 Shadow Dr. Fontana CA 92337

Phone number/ Numero de Telefono:

9097867400

What are your greatest concerns about this new warehouse proposal?/¿Qué es lo que más le preocupa de esta nueva almacen? (check all that apply/marque todo lo que corresponda):

Proximity to local schools /Proximidad a las escuelas locales, Proximity to residencies / Proximidad a las residencias, Truck traffic / Tráfico de camiones, Contamination to local water sources / Contaminación de las fuentes de agua locales, Pollution /Contaminación, Further industrialization of Bloomington / Mas industrialización de Bloomington, Forced removal of renters / Desalojo forzoso de inquilinos

What projects would you like to see instead of logistical developments?/¿Qué proyectos le gustaría ver en lugar de desarrollos logísticos? (check all that apply/marque todo lo que corresponda):

Grocery Stores / Mercados de Comida, Retail Stores / Tiendas, Restaurants / Restaurantes, Community Center / Centro Comunitario, Schools / Escuelas, Community Garden / Jardín Comunitario, Parks / Parques, Green Spaces / Espacios Verdes

Do you agree with the proposed warehouse development of the Bloomington Business Park Specific Plan? / ¿Está usted de acuerdo con la propuesta de construcción de el Bloomington Business Park Specific Plan?: **I19.1**

No

Comments or Opinions on Bloomington Business Park Specific Plan/Commentarios o Opiniones Sobre la Propuesta de Almacen:

N/A

Are you interested in staying connected with us?/¿Está interesado en seguir conectado con nosotros?:

Yes

Response to Comment Letter I19: Grecia, dated December 15, 2021

Comment I19.1: This comment states that proximity to local schools, proximity to residences, contamination of local water sources, pollution, truck traffic, further industrialization of Bloomington, and forced removal of renters are the greatest concerns. The comment states that they disagree with the Project and would prefer grocery stores, restaurants, and green spaces instead. The comment also states that they are opposed to the Project and are concerned for homes that will be destroyed when there is a housing crisis. The comment states that the warehouse will contribute to bad air quality in Bloomington. The comment states that the Project is right in the middle of the community, right next to an elementary school, middle school, and high school. The comment also states that the impact on community wellness, safety, and environment are high.

Response I19.1: The comment does not include any substantial evidence relating to any environmental impact. As discussed on page 5.10-11 in Section 5.10, *Hydrology and Water Quality*, mandatory compliance with the SWPPP, included as RR WQ-1, would ensure that the Project's implementation does not violate any water quality standards or waste discharge requirements during construction activities. Plans for grading, drainage, erosion control and water quality would be reviewed by the County's Public Works Department prior to issuance of grading permits to ensure that the applicable and required BMPs are constructed during implementation of the Project.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate Project health risk impacts to residents, schools, and workers as a result of exposure to Diesel Particulate Matter (DPM) from heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The maximum non-cancer risks to nearby residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million; and the maximum non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0, and therefore, be less than significant.

Also, as detailed in Master Responses 2 and 3, in response to comments received to the public review Draft EIR additional DPM and AERMOD dispersion modeling was completed (and is included as Appendix A of this Final EIR) to identify worst-case conditions, which is the highest daily peak on-site emissions

resulting from overlapping operational and construction activity at the nearest land use to the Project site where an individual could remain. This additional modeling shows that neither DPM emissions or localized significance emissions would not exceed the applicable SCAQMD thresholds. As such, operation of the Specific Plan at buildout would not cause a significant human health or cancer risk related to DPM emissions and impacts would be less than significant.

Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As discussed on page 5.14-10 of Section 5.14, *Public Services*, The Countywide Plan EIR addressed the demand increase in park services and provides that development (residential and nonresidential) in the Bloomington Community would be accompanied by a direct increase in property tax revenue assessed explicitly for the Bloomington Park and Recreational District to provide park and recreation service.

As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-May 2021, Zillow.com—an online real estate and rental marketplace—reported 668 single-family properties listed for sale in the community of Bloomington and adjoining cities (25 units in Bloomington, 176 units in the City of Rialto, 329 units in the City of Fontana, and 138 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, in compliance to SB 330, the Project would offset the loss of zoned residential capacity by upzoning another site (i.e., Upzone Site). Therefore, implementation of the Project would not displace people or housing in a manner which would necessitate the construction of replacement housing elsewhere, and impacts would be less than significant.

CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)) (*San Franciscans for Reasonable Growth v*

City & County of San Francisco (1989) 209 Cal.App.3d 1502). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of individuals losing their homes. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to individuals losing their homes is not provided.

As discussed on pages 5.14-9 and 5.14-10 of Section 5.14, *Public Services*, impacts to police services are considered significant if Project implementation would result in inadequate staffing levels, response times, and/or increased demand for services that would require the construction of new or expansion of existing law enforcement facilities. The CWP EIR addressed a projected increase in demand for law enforcement services in Bloomington. According to the CWP EIR, operations at the Fontana County Sheriff Station have decreased over the years, because their service areas have been annexed to the City of Fontana, which has its own police department. Therefore, the Fontana Sheriff Station has capacity to accommodate more staff in order to meet the increased demand in Bloomington, including that contributed by the Project. Therefore, construction of a new or expansion of the existing police station would not be required; and therefore, impacts would be less than significant. The comments provide the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided

LETTER I20: Carmen Perez, dated December 12, 2021

Good evening esteemed San Bernardino County Planning Division, my name is Carmen Perez and have been a resident of Bloomington for 13 years. I am writing in response to the Bloomington Business Park Specific Plan Project EIR-Draft and I wanted to raise my concerns on the following;

I am against warehouses being built around my community. I like Bloomington to stay rural, with horses around the streets. We need stores, restaurants, parks, community center for kids and seniors. I moved from Los Angeles from all the traffic, noise and industrial. Please keep Bloomington rural for the safety of our future generations. Bloomington has not benefit from any Warehouses that already been built. I pay taxes so I have a right to be heard Bloomington is not for sale!

Carmen Perez

12-12-21

I20.1

Response to Comment Letter I20: Carmen Perez, dated December 12, 2021

Comment I20.1: This comment states that they are against warehouses being built around the community and wants Bloomington to stay safe and rural with horses around the streets. The comment also states that they need stores, restaurants, parks, community center for kids and seniors. The comment states that Bloomington does not benefit from warehouses.

Response I20.1: The comment does not include any substantial evidence relating to any environmental impact. As discussed on page 5.14-10 of Section 5.14, *Public Services*, The Countywide Plan EIR addressed the demand increase in park services and provides that development (residential and nonresidential) in the Bloomington Community would be accompanied by a direct increase in property tax revenue assessed explicitly for the Bloomington Park and Recreational District to provide park and recreation service. The commenter is referred to the response provided in Response I14.1. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I21: Juan Cuevas, dated December 12, 2021

Buenas noches, estimada División de Planificación del Condado de San Bernardino, mi nombre es JUAN CUEVAS y he sido residente de BLOOMINGTON durante 24 años. Le escribo en respuesta al Borrador del Proyecto EIR del Plan Específico del Parque Empresarial de Bloomington y quería plantear mis inquietudes sobre lo siguiente:

estimados Supervisores del condado de San Bernardino
Me llamo Juan y vivo en la comunidad de BLOOMINGTON

Me opongo ala bodega BLOOMINGTON BUISNESS SPECIFIC PARK
Me incomodaria la Tranquilidad que e Tenido en bloomington ya Tenemos Suficientes bodegas

I21.1

Response to Comment Letter I21: Juan Cuevas, dated December 12, 2021

Comment I21.1: This comment states that they live in the Community of Bloomington and they oppose the Bloomington Business Specific Plan. The comment also states that the Project would disturb the tranquility in Bloomington and that there are already enough warehouses.

Response I21.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I22: Virginia (1 page)

Buenas noches, estimada División de Planificación del Condado de San Bernardino, mi nombre es Virginia y he sido residente de Bloomington durante 34 años. Le escribo en respuesta al Borrador del Proyecto EIR del Plan Específico del Parque Empresarial de Bloomington y quería plantear mis inquietudes sobre lo siguiente:

estimados supervisores del
condado de san Bernardino
me llome Virginia y vivo en la
comunidad de Bloomington

me opongo ala bodega
Bloomington Business
Specific Park
ya Tenemos Suficientes
Vodegas

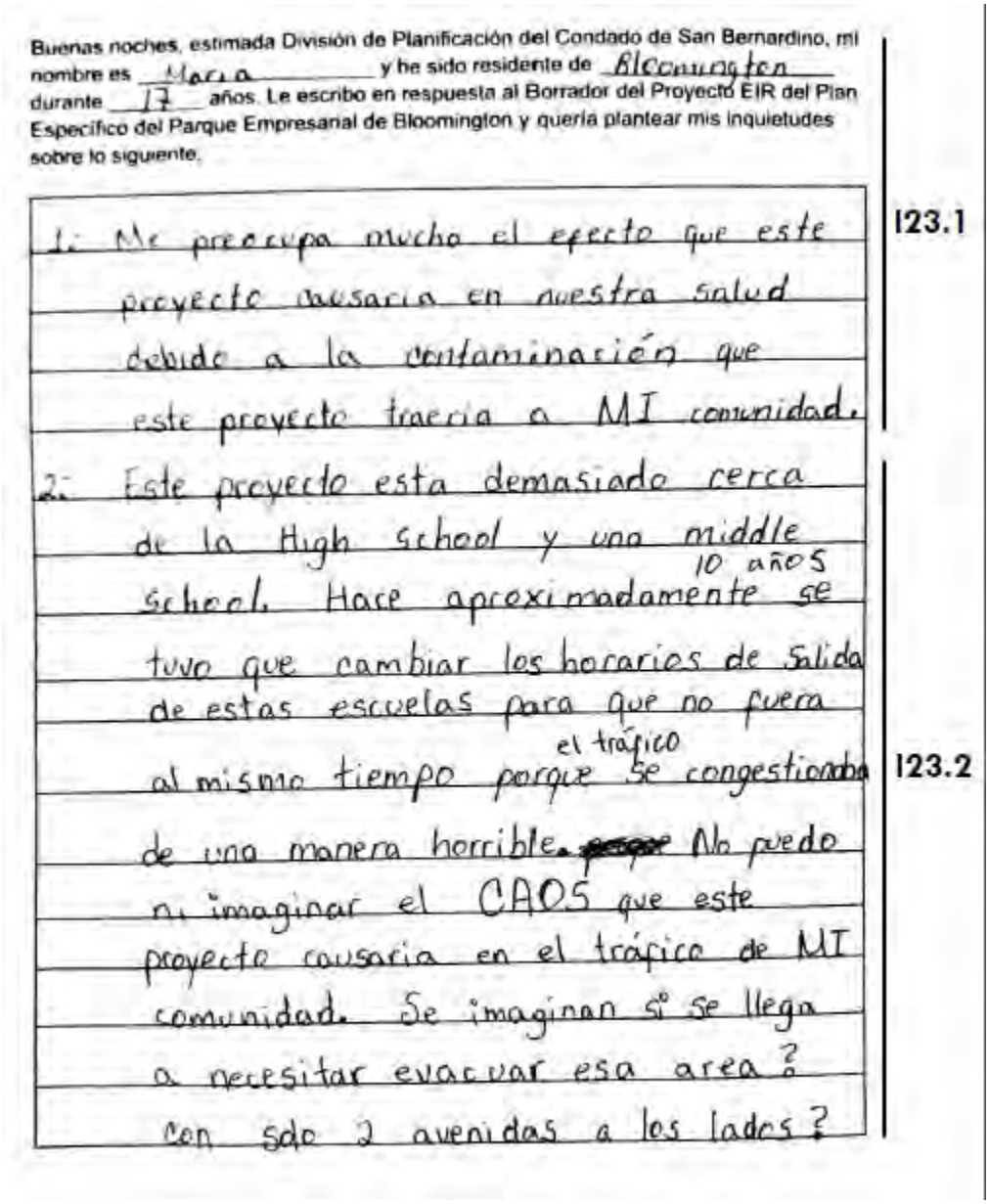
I22.1

Response to Comment Letter I22: Virginia, dated December 12, 2021

Comment I22.1: This comment states that they live in the Community of Bloomington and oppose the Bloomington Business Specific Plan. The comment also states that there are enough warehouses.

Response I22.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I23: Maria (1 page)



Buenas noches, estimada División de Planificación del Condado de San Bernardino, mi nombre es Maria y he sido residente de Bloomington durante 17 años. Le escribo en respuesta al Borrador del Proyecto EIR del Plan Específico del Parque Empresarial de Bloomington y quería plantear mis inquietudes sobre lo siguiente.

1: Me preocupa mucho el efecto que este proyecto causaría en nuestra salud debido a la contaminación que este proyecto traería a MI comunidad. I23.1

2: Este proyecto esta demasiado cerca de la High School y una middle School. Hace aproximadamente 10 años se tuvo que cambiar los horarios de salida de estas escuelas para que no fuera al mismo tiempo porque el tráfico se congestionaba de una manera horrible. No puedo ni imaginar el CAOS que este proyecto causaría en el tráfico de MI comunidad. Se imaginan si se llega a necesitar evacuar esa area? Con sólo 2 avenidas a los lados? I23.2

Response to Comment Letter I23: Maria, dated December 12, 2021

Comment I23.1: This comment states that they are very concerned about the effect of the project on the health due to the contamination that the Project would bring into the Community.

Response I23.1: The comment does not provide substantial evidence of any environmental impact. The comment does not raise any specific concerns with the adequacy of the Draft EIR. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I23.2: This comment states that the Project is too close to the high school and middle school. The comment also states that it has been approximately 10 years that the schools had to change the time students were released from school due to horrible traffic/congestion. The comment states that the proposed Project will cause chaos on traffic in the Community. The comment also states imagine if you had to evacuate the area there would only be two avenues on both sides.

Response I23.2: The comment does not provide substantial evidence of any environmental impact. As described in Section 5.13, *Transportation*, the Project's driveways and roadways would provide adequate and safe circulation to, from, and through the Project Site and would provide a variety of routes for emergency responders to access the site and surrounding areas. Additionally, in order to limit truck traffic into the community north of the Specific Plan Area and allow access to the area from emergency responders, Project truck routes would be limited to south of Site 4 on Laurel Avenue, south of Sites 2 and 3 on Locust Avenue, south of Site 2 on Maple Avenue, Jurupa Avenue, and Cedar Avenue.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. Nevertheless, as discusses in Appendix K1 to the Draft EIR, the Project

would pay a fair share contribution toward the improvement of roads, such as through widening and restriping, in the vicinity of the Specific Plan Area.

The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

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LETTER I24: Javier Cerrato (1 page)

Good evening esteemed San Bernardino County Planning Division, my name is Javier Cerrato and have been a resident of Bloomington for 17 years. I am writing in response to the Bloomington Business Park Specific Plan Project EIR-Draft and I wanted to raise my concerns on the following;

I have a big Concern of the traffic, Air Control, and the truck messing up the streets. I dont think its Safe for school kids to be around these warehouses.

Javier Cerrato

I24.1

Response to Comment Letter I24: Javier Cerrato, dated December 12, 2021

Comment I24.1: This comment states that the commenter has a big concern regarding traffic, air quality, and trucks messing up the streets. The comment also states that it is not safe for school kids to be around the warehouses.

Response I24.2: The comment does not provide any substantial evidence relating to any environmental impact. Senate Bill (SB) 743 included the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining environmental impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

As shown on Figure 3-4, Project trucks would utilize established County truck routes, which are directed away from schools in Bloomington. Furthermore, the Project would implement PDF AQ-22, which would require the Project Applicant/Developer/Owner to post signs at every truck exit driveway providing directional information to the truck route. As such, Project trucks would be directed away from residences and schools and would not result in a safety hazard for residents or students. Furthermore, sidewalks currently exist on Cedar Avenue intermittently on both side of the roadway, on Santa Ana Avenue intermittently on the north side of the roadway, on Jurupa Avenue on the north side east of Linden Avenue. Implementation of the Specific Plan would include roadway improvements within the Specific Plan area that would provide for new sidewalks where none exist currently, thereby improving pedestrian facilities and the sidewalk network. As such, the Project would provide safer sidewalk connectivity for pedestrians and truck routes directed away from sensitive uses, which would limit hazards presented by truck traffic from the proposed Project. Furthermore, as discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue, and Santa Ana Avenue. As such, the proposed Project would actually benefit the community by providing road improvements to previously damaged roads. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I25: Various Residents in Form Letter (1 page letter, 66 signed copies)

Bloomington is not for Sale

Concerned residents of Bloomington and surrounding neighbors have discussed some concerns about all the tilt-ups (construction of more than one warehouse) occurring in our neighborhoods. We want to clarify that we are 100% opposed to any new warehouses. We have current and future concerns. I25.1

The quality of air that we currently have is not the best. The warehouses will bring in big rigs driving next to our schools and parks. Diesel and semi-trucks are the major sources of smog and poor air quality. That can contribute to respiratory problems and cancers. I25.2

The traffic is already getting bad, and it will worsen with the increase of diesel and semi-trucks and warehouse traffic. Some residents transport children to and from school over the freeway bridge. These trips can take 30 to 45 minutes to get to Crestmore Elementary, Grimes Elementary, Zimmerman Elementary, Joe Baca Middle School, Ruth O. Harris Middle School, and Bloomington High School. I25.3

We are also concerned for the safety of our families, given that extractive industries such as warehouses bring an influx of workers that will place a strain on Bloomington. Our community does not have adequate law enforcement and human services, which can increase violence and localized violent crimes. (See Sheriff Department Report from MAC Meetings: https://www.sbcounty.gov/bosd5/Meetings/Bloomington) I25.4

If we continue to create more warehouses in Bloomington, our community's population size will further decrease. This decrease in population will also decrease student enrollment at Colton Joint Unified School District. What students will attend our schools if homes are not built? We are also highly concerned with rezoning residential homes to industrial commercial. I25.5

In Bloomington, diesel and semi-trucks continue to cause residential and commercial street deterioration. We have a significant amount of potholes that do not get fixed or become neglected and cause costly tire, wheel, and vehicle damage. Residents are also experiencing problems with illegal street parking. We are concerned that drivers are not following regulations. I25.6

We currently don't have law enforcement to patrol our streets to enforce an additional 9,000 vehicle and truck trips on the road. This lack of oversight will lead to unsafe and dangerous street conditions for pedestrians and local traffic.

As Bloomington residents, we enjoy sustainably co-existing with nature. Many of us have horses, other livestock, and animals on our property, which is deeply part of our culture and our identity. We love our equestrian lifestyle and the beautiful mountain view. These invasive warehouses will take our lifestyle away. I25.7

Name: Jesus Cervantes

Address: 746 S Lilac Ave.

Email: cervantes2791@att.net

Phone: 909.877-3397

Signature: Jesus Cervantes

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Bloomington is not for Sale

Concerned residents of Bloomington and surrounding neighbors have discussed some concerns about all the tilt-ups (construction of more than one warehouse) occurring in our neighborhoods. We want to clarify that we are 100% opposed to any new warehouses. We have current and future concerns.

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The traffic is already getting bad, and it will worsen with the increase of diesel and semi-trucks and warehouse traffic. Some residents transport children to and from school over the freeway bridge. These trips can take 30 to 45 minutes to get to Crestmore Elementary, Grimes Elementary, Zimmerman Elementary, Joe Baca Middle School, Ruth O. Harris Middle School, and Bloomington High School.

We are also concerned for the safety of our families, given that extractive industries such as warehouses bring an influx of workers that will place a strain on Bloomington. Our community does not have adequate law enforcement and human services, which can increase violence and localized violent crimes. (See Sheriff Department Report from MAC Meetings: https://www.sbcounty.gov/bosd5/Meetings/Bloomington)

If we continue to create more warehouses in Bloomington, our community's population size will further decrease. This decrease in population will also decrease student enrollment at Colton Joint Unified School District. What students will attend our schools if homes are not built? We are also highly concerned with rezoning residential homes to industrial commercial.

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We currently don't have law enforcement to patrol our streets to enforce an additional 9,000 vehicle and truck trips on the road. This lack of oversight will lead to unsafe and dangerous street conditions for pedestrians and local traffic.

As Bloomington residents, we enjoy sustainably co-existing with nature. Many of us have horses, other livestock, and animals on our property, which is deeply part of our culture and our identity. We love our equestrian lifestyle and the beautiful mountain view. These invasive warehouses will take our lifestyle away.

Name: Ana Bertha Cervantes
Address: 7416 S. Lucas Ave.
Email: cervantes2791@att.net
Phone: 909-877-3797
Signature: Ana Bertha Cervantes

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Bloomington no está a la venta

Los residentes de Bloomington preocupados y los vecinos alrededor han discutido algunas preocupaciones sobre todos los "tilt-ups" (construcción de más de una bodega) que ocurren en nuestros vecindarios. Queremos aclarar que nos oponemos al 100% a nuevas bodegas. Tenemos preocupaciones actuales y futuras. Además, nos oponemos firmemente al 'Bloomington Business Park Specific Plan Project' (BBPSP). Los supervisores, comisionados de planificación y miembros del consejo asesor municipal del condado de San Bernardino no deben aprobar el BBPSP.

La calidad del aire que tenemos actualmente no es la mejor. Las bodegas traerán camiones grandes que conducen junto a nuestras escuelas y parques. Los camiones diésel y los semirremolques son las principales fuentes de contaminación y mala calidad del aire. Eso puede contribuir a problemas respiratorios y cánceres.

El tráfico ya está empeorando y empeorará con el aumento del tráfico de diésel, semirremolques y bodegas. Algunos residentes transportan a los niños hacia y desde la escuela por el puente de la autopista. Estos viajes pueden tomar de 30 a 45 minutos para llegar a la escuela primaria Crestmore, la escuela primaria Grimes, la escuela primaria Zimmerman, la escuela secundaria Joe Baca, la escuela secundaria Ruth O. Harris y la escuela secundaria Bloomington.

También nos preocupa la seguridad de nuestras familias, dado que las industrias extractivas, como las bodegas, tienen un influjo de trabajadores que ejercerá estrés sobre la planificación de Bloomington. Nuestra comunidad no cuenta con servicios humanos ni cuerpos de seguridad adecuados, lo que puede aumentar la violencia y los delitos violentos localizados. (Consulte el Informe del Departamento del Sheriff de las reuniones de Bloomington MAC: https://www.sbcounty.gov/bosd5/Meetings/Bloomington)

Si continuamos creando más bodegas en Bloomington, el tamaño de la población de nuestra comunidad disminuirá aún más. Esta disminución en la población también disminuirá la inscripción de estudiantes en el Distrito Escolar Colton Joint Unified School District. ¿Cuáles estudiantes asistirán a nuestras escuelas si no se construyen casas? También estamos muy preocupados por la rezonificación de viviendas residenciales a comerciales industriales.

En Bloomington, los camiones diésel y los semirremolques continúan causando el deterioro de las calles comerciales y residenciales. Tenemos una cantidad significativa de baches que no se reparan o se descuidan y causan costosos daños en llantas, ruedas y vehículos. Los residentes también están sufriendo con problemas sobre el estacionamiento ilegal en la calle. Nos preocupa que los conductores no siguen las regulaciones.

Actualmente no contamos con agentes de la ley para patrullar nuestras calles para hacer cumplir 9,000 viajes adicionales de vehículos y camiones en la carretera. Esta falta de supervisión conducirá a condiciones de calle peligrosas para los peatones y el tráfico local.

Como residentes de Bloomington, disfrutamos de una coexistencia sostenible con la naturaleza. Muchos de nosotros tenemos caballos, otro ganado y animales en nuestra propiedad, lo cual es parte profunda de nuestra cultura e identidad. Nos encanta nuestro estilo de vida ecuestre y la hermosa vista a la montaña. Estas bodegas invasivas nos quitarán nuestro estilo de vida.

Nombre: JORGE VELASCO PEREZ
Direccion: 19279 SANTA ANA AVE BLOOMINGTON
Correo Electronico: JOSINCO@GMAIL.COM
Tele: 909 232 34 61
Firma y Fecha: [signature] 12-14-2021

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Bloomington no está a la venta

Los residentes de Bloomington preocupados y los vecinos alrededor han discutido algunas preocupaciones sobre todos los "tilt-ups" (construcción de más de una bodega) que ocurren en nuestros vecindarios. Queremos aclarar que nos oponemos al 100% a nuevas bodegas. Tenemos preocupaciones actuales y futuras. Además, nos oponemos firmemente al 'Bloomington Business Park Specific Plan Project' (BBPSP). Los supervisores, comisionados de planificación y miembros del consejo asesor municipal del condado de San Bernardino no deben aprobar el BBPSP.

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El tráfico ya está empeorando y empeorará con el aumento del tráfico de diésel, semirremolques y bodegas. Algunos residentes transportan a los niños hacia y desde la escuela por el puente de la autopista. Estos viajes pueden tomar de 30 a 45 minutos para llegar a la escuela primaria Crestmore, la escuela primaria Grimes, la escuela primaria Zimmerman, la escuela secundaria Joe Baca, la escuela secundaria Ruth O. Harris y la escuela secundaria Bloomington.

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En Bloomington, los camiones diésel y los semirremolques continúan causando el deterioro de las calles comerciales y residenciales. Tenemos una cantidad significativa de baches que no se reparan o se descuidan y causan costosos daños en llantas, ruedas y vehículos. Los residentes también están sufriendo con problemas sobre el estacionamiento ilegal en la calle. Nos preocupa que los conductores no siguen las regulaciones.

Actualmente no contamos con agentes de la ley para patrullar nuestras calles para hacer cumplir 9,000 viajes adicionales de vehículos y camiones en la carretera. Esta falta de supervisión conducirá a condiciones de calle peligrosas para los peatones y el tráfico local.

Como residentes de Bloomington, disfrutamos de una coexistencia sostenible con la naturaleza. Muchos de nosotros tenemos caballos, otro ganado y animales en nuestra propiedad, lo cual es parte profunda de nuestra cultura e identidad. Nos encanta nuestro estilo de vida ecuestre y la hermosa vista a la montaña. Estas bodegas invasivas nos quitarán nuestro estilo de vida.

Nombre: RAMON RUIZ

Direccion: 19964 SANTA ANA AV

Correo Electronico: BLOOMINGTON CA 92316

Tele:

Firma y Fecha:

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Firma y Fecha: [signature] 12-13-2021

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The quality of air that we currently have is not the best. The warehouses will bring in big rigs driving next to our schools and parks. Diesel and semi-trucks are the major sources of smog and poor air quality. That can contribute to respiratory problems and cancers.

The traffic is already getting bad, and it will worsen with the increase of diesel and semi-trucks and warehouse traffic. Some residents transport children to and from school over the freeway bridge. These trips can take 30 to 45 minutes to get to Crestmore Elementary, Grimes Elementary, Zimmerman Elementary, Joe Baca Middle School, Ruth O. Harris Middle School, and Bloomington High School.

We are also concerned for the safety of our families, given that extractive industries such as warehouses bring an influx of workers that will place a strain on Bloomington. Our community does not have adequate law enforcement and human services, which can increase violence and localized violent crimes. (See Sheriff Department Report from MAC Meetings: https://www.sbcounty.gov/bosd5/Meetings/Bloomington)

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As Bloomington residents, we enjoy sustainably co-existing with nature. Many of us have horses, other livestock, and animals on our property, which is deeply part of our culture and our identity. We love our equestrian lifestyle and the beautiful mountain view. These invasive warehouses will take our lifestyle away.

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Signature:

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Phone: 626-364-8980

Signature: Michael R. Robles

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Phone: (909) 831-1476
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Nombre: Luis Arroyo

Direccion: 11621 Appaloosa ln Bloomington Ca 92316

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Tele: 9095437937

Firma y Fecha: Luis Arroyo

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Nombre: Fatima M Arroyo

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Signature and Date: Catalina Glz.

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Firma y Fecha: 12-13-21 Roberto Perez

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La calidad del aire que tenemos actualmente no es la mejor. Las bodegas traerán camiones grandes que conducen junto a nuestras escuelas y parques. Los camiones diésel y los semirremolques son las principales fuentes de contaminación y mala calidad del aire. Eso puede contribuir a problemas respiratorios y cánceres.

El tráfico ya está empeorando y empeorará con el aumento del tráfico de diésel, semirremolques y bodegas. Algunos residentes transportan a los niños hacia y desde la escuela por el puente de la autopista. Estos viajes pueden tomar de 30 a 45 minutos para llegar a la escuela primaria Crestmore, la escuela primaria Grimes, la escuela primaria Zimmerman, la escuela secundaria Joe Baca, la escuela secundaria Ruth O. Harris y la escuela secundaria Bloomington.

También nos preocupa la seguridad de nuestras familias, dado que las industrias extractivas, como las bodegas, tienen un influjo de trabajadores que ejercerá estrés sobre la planificación de Bloomington. Nuestra comunidad no cuenta con servicios humanos ni cuerpos de seguridad adecuados, lo que puede aumentar la violencia y los delitos violentos localizados. (Consulte el Informe del Departamento del Sheriff de las reuniones de Bloomington MAC: https://www.sbcounty.gov/bosd5/Meetings/Bloomington)

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Nombre: Erica Perez
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The quality of air that we currently have is not the best. The warehouses will bring in big rigs driving next to our schools and parks. Diesel and semi-trucks are the major sources of smog and poor air quality. That can contribute to respiratory problems and cancers.

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Signature: Ariana Lopez

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Nombre: JAIME PEREZ

Direccion: 18910 LUSITANO DR BLOOMINGTON CA 92316

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Firma y Fecha: [signature] 12-13-21

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Name: Jorge E. Lopez Granado
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Email: Borrego Lopez DG @ gmail
Phone: 909- 485-2436
Signature: Jorge E. Lopez

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Name: Gloria Mendoza
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Email: Gloriacurtellone@gmail.com
Phone: 909 608-3447
Signature: Gloria Mendoza

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Name: Mayra Shul
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Email: Mayra.shul98@gmail.com
Phone: (909) 835-8320
Signature: Mayra Shul

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Name: Edgar Mr

Address: 14278 Merrill St Bloomington CA

Email:

Phone:

Signature: Edgar Mr

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La calidad del aire que tenemos actualmente no es la mejor. Las bodegas traerán camiones grandes que conducen junto a nuestras escuelas y parques. Los camiones diésel y los semirremolques son las principales fuentes de contaminación y mala calidad del aire. Eso puede contribuir a problemas respiratorios y cánceres.

El tráfico ya está empeorando y empeorará con el aumento del tráfico de diésel, semirremolques y bodegas. Algunos residentes transportan a los niños hacia y desde la escuela por el puente de la autopista. Estos viajes pueden tomar de 30 a 45 minutos para llegar a la escuela primaria Crestmore, la escuela primaria Grimes, la escuela primaria Zimmerman, la escuela secundaria Joe Baca, la escuela secundaria Ruth O. Harris y la escuela secundaria Bloomington.

También nos preocupa la seguridad de nuestras familias, dado que las industrias extractivas, como las bodegas, tienen un influjo de trabajadores que ejercerá estrés sobre la planificación de Bloomington. Nuestra comunidad no cuenta con servicios humanos ni cuerpos de seguridad adecuados, lo que puede aumentar la violencia y los delitos violentos localizados. (Consulte el Informe del Departamento del Sheriff de las reuniones de Bloomington MAC: https://www.sbcounty.gov/bosd5/Meetings/Bloomington)

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Actualmente no contamos con agentes de la ley para patrullar nuestras calles para hacer cumplir 9,000 viajes adicionales de vehículos y camiones en la carretera. Esta falta de supervisión conducirá a condiciones de calle peligrosas para los peatones y el tráfico local.

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Nombre: Victor Ramirez Garcia

Direccion: 11567 Appaloosa Ln. Bloomington Ca 92316

Correo Electronico: rmzfleet@gmail.com

Tele: (909) 200-6189

Firma y Fecha: 12/13/21

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Nombre: Vicente Ortega

Direccion: 18926

Correo Electronico: Vicente Ortega 909 @ G mail. Com

Tele: 909 251 - 5301

Firma y Fecha: Vicente Ortega 12-13-2021

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Name: Maria A. Mendoza
Address: 18913 Paso Fino St.
Email:
Phone: (909) 556-2420
Signature: M. A. M

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Name: Thelma Smith

Address: 18921 PASO FINO St.

Email:

Phone:

Signature and Date: Thelma Smith

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Nombre: Consuelo Escobar

Direccion: 18926 Paso Fino Bloomington

Correo Electronico:

Tele: 909 . 212 4492

Firma y Fecha: Consuelo Escobar

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Name: Francisa Ibarra
Address: 18937 Paso Fino St Bloomington CA 92316
Email: francisu19@Gmail.com
Phone: (909) 949-0892
Signature and Date: [signature] 12/13/21

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Name: Armando Ibarra
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Name: Mireya Ledesma
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Signature and Date: Miguel Ramirez

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Bloomington no está a la venta

Los residentes de Bloomington preocupados y los vecinos alrededor han discutido algunas preocupaciones sobre todos los "tilt-ups" (construcción de más de una bodega) que ocurren en nuestros vecindarios. Queremos aclarar que nos oponemos al 100% a nuevas bodegas. Tenemos preocupaciones actuales y futuras. Además, nos oponemos firmemente al 'Bloomington Business Park Specific Plan Project' (BBPSP). Los supervisores, comisionados de planificación y miembros del consejo asesor municipal del condado de San Bernardino no deben aprobar el BBPSP.

La calidad del aire que tenemos actualmente no es la mejor. Las bodegas traerán camiones grandes que conducen junto a nuestras escuelas y parques. Los camiones diésel y los semirremolques son las principales fuentes de contaminación y mala calidad del aire. Eso puede contribuir a problemas respiratorios y cánceres.

El tráfico ya está empeorando y empeorará con el aumento del tráfico de diésel, semirremolques y bodegas. Algunos residentes transportan a los niños hacia y desde la escuela por el puente de la autopista. Estos viajes pueden tomar de 30 a 45 minutos para llegar a la escuela primaria Crestmore, la escuela primaria Grimes, la escuela primaria Zimmerman, la escuela secundaria Joe Baca, la escuela secundaria Ruth O. Harris y la escuela secundaria Bloomington.

También nos preocupa la seguridad de nuestras familias, dado que las industrias extractivas, como las bodegas, tienen un influjo de trabajadores que ejercerá estrés sobre la planificación de Bloomington. Nuestra comunidad no cuenta con servicios humanos ni cuerpos de seguridad adecuados, lo que puede aumentar la violencia y los delitos violentos localizados. (Consulte el Informe del Departamento del Sheriff de las reuniones de Bloomington MAC: https://www.sbcounty.gov/bosd5/Meetings/Bloomington)

Si continuamos creando más bodegas en Bloomington, el tamaño de la población de nuestra comunidad disminuirá aún más. Esta disminución en la población también disminuirá la inscripción de estudiantes en el Distrito Escolar Colton Joint Unified School District. ¿Cuáles estudiantes asistirán a nuestras escuelas si no se construyen casas? También estamos muy preocupados por la rezonificación de viviendas residenciales a comerciales industriales.

En Bloomington, los camiones diésel y los semirremolques continúan causando el deterioro de las calles comerciales y residenciales. Tenemos una cantidad significativa de baches que no se reparan o se descuidan y causan costosos daños en llantas, ruedas y vehículos. Los residentes también están sufriendo con problemas sobre el estacionamiento ilegal en la calle. Nos preocupa que los conductores no siguen las regulaciones.

Actualmente no contamos con agentes de la ley para patrullar nuestras calles para hacer cumplir 9,000 viajes adicionales de vehículos y camiones en la carretera. Esta falta de supervisión conducirá a condiciones de calle peligrosas para los peatones y el tráfico local.

Como residentes de Bloomington, disfrutamos de una coexistencia sostenible con la naturaleza. Muchos de nosotros tenemos caballos, otro ganado y animales en nuestra propiedad, lo cual es parte profunda de nuestra cultura e identidad. Nos encanta nuestro estilo de vida ecuestre y la hermosa vista a la montaña. Estas bodegas invasivas nos quitarán nuestro estilo de vida.

Nombre: Jose' Torres

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Firma y Fecha:

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Name: Michelle Ramirez

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Signature and Date: Ramona dela Cruz 12-13-2021

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Name: Dolores M Rodriguez

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Email: mgm2213 @ gmail.com

Phone: 626 705 6270

Signature and Date: 12/13/2021

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Name: Marie Bonillas

Address: 18945 Paso Fino St

Email: —

Phone: —

Signature and Date: Marie Bonillas 12/13/21

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Name: Dolores A Rodriguez

Address: 18945 Paso Fino St.

Email: —

Phone:

Signature: Dolores Rodriguez

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Name: Miguel A Rodriguez

Address: 18945 Paso Fino St

Email: —

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Signature and Date: Miguel A Rodriguez

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Name: Maria Perez

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Phone: 951 823 4849

Signature and Date: María Perez 12/13/21

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Name: Brandon Richards

Address: 18976 Pyso Fino St

Email:

Phone:

Signature:

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Nombre: Sonia Ramirez
Direccion: 11567 Appaloosa Ln Bloomington Ca 92316
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Name: Miguel Gomez
Address: 19042 Gregory Ct Bloomington CA 92316
Email: Ayutita300@Hotmail.Com
Phone: 562-857-5439
Signature: Miguel Gomez 12-15-2021

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Phone: 909 633 7487
Signature: Michael C. Moncini

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Response to Letter I25: Various Residents (undated)

As the letters provided are identical comment letters in English and Spanish, there is no need to respond to each individual scanned and signed comment letter.

Comment I25.1: This comment states that residents of Bloomington and surrounding communities have discussed the concerns with all of the warehouses being developed in the area and states that they are opposed to any new warehouses.

Response I25.1: The comment does not include any substantial evidence of any environmental impact. Also, the comment is introductory in nature and does not raise any specific concerns with the adequacy of the Draft EIR. The comment will be forwarded to County decisionmakers as part of the Final EIR. Therefore, no further response is required or provided.

Comment I25.2: This comment states that air quality in the area is poor and warehouses would bring in diesel trucks that are major sources of smog and poor air quality, which can contribute to respiratory problems and cancer.

Response I25.2: The comment does not include any substantial evidence of any environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

Comment I25.3: This comment states that warehouses result in increased traffic and that current traffic congestion is bad in Bloomington.

Response I25.3: The comment does not include any substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze

impacts related to traffic congestion. The comment will be forwarded to County decisionmakers as part of the Final EIR. Therefore, no further response is required or provided.

Comment I25.4: This comment states that the community is concerned for the safety of families given that warehouses bring an influx of workers that will place a strain on Bloomington. The comment states that Bloomington does not have adequate law enforcement, which can increase violence.

Response I25.4: The comment does not include any substantial evidence of any environmental impact. As discussed on page 5.13-8 of the Draft EIR, based on the proposed building square footages, the Opening Year Development – Option 1 would generate 1,769 jobs and the Opening Year Development – Option 2 would generate 2,270 jobs. Based on Tables 5.13-1 and 5.13-5, the workforce demand of up to 2,270 employees could be filled by persons residing in unincorporated County, including from Bloomington, and the surrounding areas. Additionally, the immediate availability in the labor pool in the vicinity of the Specific Plan Area is not expected to be constrained due to the 5.2 percent unemployment rate in the County as of December 2021.[13] As such, operation of the proposed warehouses and Specific Plan is not expected to result in substantial unplanned population growth. Furthermore, as discussed on page 5.14-9 of the Draft EIR, impacts to police services are considered significant if Project implementation would result in inadequate staffing levels, response times, and/or increased demand for services that would require the construction of new or expansion of existing policies facilities. According to the CWP EIR, operations at the Fontana County Sheriff Station have decreased over the years, because their service areas have been annexed to the City of Fontana, which has its own police department. Therefore, the Fontana Sheriff Station has capacity to accommodate more staff in order to meet the increased demand in Bloomington, including that contributed by the Project, as staffing levels at the station have been reduced due to service areas being annexed to the City of Fontana. Therefore, construction of a new or expansion of the existing police station would not be required as the station has capacity for additional staff; and therefore, impacts would be less than significant. Property tax revenue generated by development of the Project and would provide funding for police services and would help to offset the Project's increase in the demand for services; the Project would additionally include funding of additional San Bernardino County Sheriff's Deputy for the Bloomington Area. Therefore, impacts to police protection facilities would be less than significant.

Additionally, the comment provides a speculative unsubstantiated opinion that crime would increase with construction of additional warehouses in the community. The comment does not raise any specific concerns with the adequacy of the Draft EIR. The comment will be forwarded to County decisionmakers as part of the Final EIR. Therefore, no further response is required or provided.

Comment I25.5: This comment states that if development of warehouses in Bloomington continues, the community's population would decrease, which would result in a decrease in student enrollment.

Response I25.5: The comment does not include any substantial evidence of any environmental impact. CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of declining enrollment at schools or a population decrease in

[13] California Employment Development Department. Local Area Unemployment Statistics. Accessed February 16, 2022. https://www.labormarketinfo.edd.ca.gov/geography/sanbernardino-county.html

Bloomington. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to declining enrollment at schools or a population decrease in Bloomington is not required to be provided. The comment provides no data to substantiate the assertion that development of warehouses would lead to decreased school enrollment. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I25.6: This comment states that diesel and semi-trucks in Bloomington lead to street deterioration and that residents are experiencing illegal street parking.

This comment further states that Bloomington does not have law enforcement to patrol streets and to enforce the additional 9,000 vehicles from the Project and the lack of oversight would lead to unsafe and dangerous street conditions.

Response I25.6: The comment does not include any substantial evidence of any environmental impact. As discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue and Santa Ana Avenue. Therefore, while the Project would increase truck travel in Bloomington, it would include multiple road improvements to reduce street deterioration. The comment does not provide any data regarding street deterioration. Should vehicles traveling to or from the site park illegally on residential streets, these vehicles are to be cited by law enforcement. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

The comment also states that increases in passenger car trips and truck trips would negatively affect safety. The comment provides no data that increases in trips would negatively affect safety. Should automobiles or trucks utilizing streets in Bloomington drive unsafely or otherwise present a safety hazard to the community, the vehicles would be subject to citation from law enforcement. Furthermore, in regard to the comment's alleged lack of law enforcement, the community of Bloomington is served by the San Bernardino County Fontana Patrol Station and Bloomington is in an existing patrol area. As CEQA only requires an analysis of the potential physical impacts on the environment, issues related to existing law enforcement not enforcing current regulations and laws is not required to be analyzed under CEQA. The comment is speculative in nature regarding potential safety issues from the proposed Project and does not raise any particular issues with the analysis within the Draft EIR. This comment will be forwarded to County decisionmakers as part of the Final EIR. Therefore, no further response is required or provided.

Comment I25.7: This comment stats that Bloomington residents enjoy coexisting with nature and have horses, livestock, and other animals on their properties. The comment states that residents enjoy their equestrian lifestyle and mountain views, which would be taken away by warehouses.

Response I25.7: The comment does not include any substantial evidence of any environmental impact. As discussed on page 5.1-12, scenic vistas can be impacted in two ways: when a Project directly diminishes the scenic quality of vistas and when the Project blocks views of corridors and vistas of the scenic resource at public locations. Public views of the Jurupa Hills presently are mostly obstructed and fragmented by the built environment. Thus, implementation of the proposed Project would not significantly affect views of the Jurupa Hills. As described by Master Response 1, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of

equestrian lifestyle in Bloomington. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to equestrian lifestyle in Bloomington is not provided. The comment does not raise any specific concerns with the adequacy of the Draft EIR. This comment will be forward to County decisionmakers as part of the Final EIR. Therefore, no further response is required or provided.

LETTER I26: State Senator Connie M. Leyva (2 pages)

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SELECT COMMITTEE ON
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COMMUNITIES

MEMBER
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SUBCOMMITTEE NO. 1
ON EDUCATION

BUSINESS, PROFESSIONS
& ECONOMIC DEVELOPMENT

ELECTIONS & CAMPAIGN
FINANCE REFORM

HEALTH

December 15th, 2021

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

Dear County of San Bernardino,

As a member of the California State Senate, I write this letter in opposition to the 'Bloomington Business Park Specific Plan Project' (BBPSP). **I believe that this proposed project's significant and unavoidable impacts cannot be mitigated nor justified with an overriding consideration.** I26.1

The residents of the unincorporated community of Bloomington have experienced a massive influx of warehouse development and diesel trucks over the past decade. There has been public opposition by community members, small businesses, workers, elected officials, and even nearby cities over the unsustainable and dangerous growth of warehouse development near homes, schools, and parks in the Bloomington community. The County of San Bernardino even sued over the approval of a warehouse in Bloomington (the West Valley Logistics Center, a 3.5 million sq. ft. warehouse within the City of Fontana limits but is directly impacting the residents of Bloomington). We believe the County of San Bernardino should continue to look out for its residents and protect them from encroaching warehouse development. Principally, because community members have participated in their General Plan process (through the Bloomington Community Plan and the Environmental Justice Element) and overwhelmingly have shown the need to monitor the air quality, bring in more recreational resources and investments into Bloomington, instead of warehouse development that increases pollution, traffic and health risks. I26.2

However, the County of San Bernardino is ignoring their residents and the plan they wanted for their future. Instead, they have allowed a developer to come in and have given them the green light to buy out families, harass resistant homeowners, kick out tenants and displace hundreds of people throughout the Bloomington Business Park Specific Plan Project. I26.3

- This project would rezone 213 acres of residential and agricultural land to industrial zoning - creating legally nonconforming uses in that area
- This project would be less than 100 ft. to three public schools (Bloomington High School, Ruth O Harris Middle School and Walter Zimmerman Elementary School).
- This project would bring in over 9,000 vehicle and truck trips on roads adjacent to homes, schools, and parks.
- This project would create additional traffic, noise, poorer air quality, deterioration of commercial and residential roads, unsafe pedestrian and bicycle safety and other impacts in an area that is considered in the 90th% - 95% on CalEnviroScreen.

I26.4

- This project would be in a community that is over 80% Hispanic.
- This project would have significant and unavoidable impacts for
  - obstructing the implementation of the air quality plan
  - net increase of criteria pollutants
  - cumulative impacts

126.4 cont.

- There are higher-than-normal risks that come from living in a highly polluted environment. Public health is at stake when we continue to increase pollution in residential communities. 126.5
- There are unavoidable cumulative impacts - an entire residential community will be disrupted.
- Community members have brought up the fear of being displaced or harassed out of their homes, despite stating that they do not want to sell or rezone their home 126.6
- This community is over 80% Hispanic, with 20% of the community experiencing poverty - this is a common practice of environmental racism. 126.7
- This region deals with some of the worst traffic in the city - idling cars double the negative impact of pollution on the nearby communities. 126.8
- The region for the proposed development is in an area that is a fire risk and with the increasing dangers of climate change and wildfires. The County should focus its efforts on wildfire mitigation. 126.9
- The Municipal Advisory Council (MAC) and developer, Tim Howard has not provided adequate translation, even when requested for its constituents. In Bloomington, 66.5% of the community speaks a language other than English.
- The Municipal Advisory Council (MAC) has silenced voices during meetings when community members have brought up concerns. 126.10
- The Municipal Advisory Council (MAC) and County of San Bernardino have not released all minutes for their meetings.

I request that the County of San Bernardino Supervisors, Planning Commissioners, and Municipal Advisory Council Members oppose the Bloomington Business Park Specific Plan and honor the community's plans for residential, healthy, and thriving development. We believe that there can be no overriding consideration for the physical impact and disruption this development will have. 126.11

Sincerely,



Connie M. Leyva
State Senator, 20th District

CC:

Concerned Neighbors of Bloomington
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COB@sbcounty.gov

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Response to Letter I26: State Senator Connie M. Leyva, dated December 15, 2021

Comment I26.1: This comment provides an introduction to the comment letter and states that the State Senator is opposed to the Project and believes that the Project's significant and unavoidable impacts cannot be mitigated or justified with an overriding consideration.

Response I26.1: The comment does not provide any substantial evidence concerning the Project's environmental impacts. State CEQA Guidelines Section 15126.2(c) requires an EIR to describe "any significant impacts, including those which can be mitigated but not reduced to a level of insignificance." As discussed in Section 6, *Other CEQA Considerations,* emissions from operation of the Project would exceed SCAQMD's thresholds for VOC and NOx after implementation of regulatory requirements and mitigation measures. Because a majority of operational-source NOx emissions (by weight) would be generated by Project vehicles, and the VOC emissions would be generated by consumer products, neither the Project applicant nor the County have the ability to reduce these emissions. Therefore, despite the inclusion of Mitigation Measures AQ-1 through AQ-7, operational-source VOC and NOx emissions would be significant on a project-level and a cumulative basis. Additionally, the Project would not result in an exceedance of SCAG's growth projections, but the Project would result in an increase of criteria pollutants that would exceed regional thresholds after implementation of mitigation measures. Therefore, the Project would result in a conflict with, or obstruct, implementation of the applicable Air Quality Management Plan.

In accordance with CEQA Section 21081(b) and CEQA Guideline Section 15093, in order to approve the Project would be required to determine that the unavoidable adverse environmental impacts identified above may be considered acceptable due to specific considerations which outweigh the unavoidable, adverse environmental impacts of the Project. The comment offers an opinion that unavoidable impacts cannot be mitigated or justified with an overriding consideration but does not raise a specific issue with the adequacy of the Draft EIR. Therefore, no further response is provided.

Comment I26.2: This comment states that the Bloomington community has experienced an influx of warehouse development over the past decade, along with associated diesel trucks, which has been publicly opposed. The comment states that the County sued the City of Fontana over the West Valley Logistics Center. The comment states that the County of San Bernardino is not listening to residents' desires for the community, which include adding more recreational resources and investments and instead allow warehouse development that increase pollution, traffic, and health risks.

Response I26.2: The comment does not provide any substantial evidence concerning the Project's environmental impacts. Due to the existing limited low-density development and vacancies within the Specific Plan area, buildout and operation of the proposed Specific Plan would increase traffic and air quality emissions generated from the area.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, while the comment is stating that the Project would result in 8,555 daily vehicle trips, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-February 2022, Zillow.com—an online real estate and rental marketplace—reported 246 single-family properties listed for sale in the community of Bloomington and adjoining cities (11 units in Bloomington, 37 units in the City of Rialto, 149 units in the City of Fontana, and 49 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, in compliance to SB 330, the Project would offset the loss of zoned residential capacity by upzoning another site (i.e., Upzone Site). Therefore, implementation of the Project would not displace people or housing and necessitate the construction of replacement housing elsewhere, and impacts would be less than significant. The commenter is referred to Master Response 1, at the beginning of this Chapter, for a response to the other comments, such as those related to the Applicant purchasing homes within the Specific Plan Area, within Comment I26.2. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I26.3: This comment states that the County is ignoring their residents and what residents want for the community. The comment further states that the County has allowed a developer to buy out families, harass homeowners, kick out tenants, and displace individuals within the Specific Plan area.

Response I26.3: The comment does not provide any substantial evidence concerning the Project's environmental impacts. As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be

compensated by the Applicant. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-February 2022, Zillow.com—an online real estate and rental marketplace—reported 246 single-family properties listed for sale in the community of Bloomington and adjoining cities (11 units in Bloomington, 37 units in the City of Rialto, 149 units in the City of Fontana, and 49 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, in compliance to SB 330, the Project would offset the loss of zoned residential capacity by upzoning another site (i.e., Upzone Site). Therefore, implementation of the Project would not displace people or housing and necessitate the construction of replacement housing elsewhere, and impacts would be less than significant. The commenter is referred to Master Response 1 for a response to the other comments, such as those related to the Applicant purchasing homes within the Specific Plan area, within Comment I26.3. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I26.4: This comment states that the Project would rezone 213 acres of residential and agricultural land to industrial zoning, which would create legally nonconforming uses.

This comment states that the Project would be less than 100 feet from three public schools (Bloomington High School, Ruth O. Harris Middle School, and Walter Zimmerman Elementary School).

This comment states that the Project would result in over 9,000 vehicle trips each day in the Project area. This comment states that the Project would create additional traffic, noise, air quality emissions, deterioration of residential road, unsafe pedestrian/bicycle safety in an area that ranks within the 90 to 95th percentile on CalEnviroScreen.

This comment states that the Project would have significant and unavoidable impacts for obstructing the implementation of the air quality plan, net increase of criteria pollutants, and cumulative impacts.

Response I26.4: The comment does not provide any substantial evidence concerning the Project's environmental impacts. The Project would rezone approximately 213 acres of land from Residential Single 1-Acre Minimum with Additional Agriculture Overlay (RS-1-AA) and Residential Single (RS-20M) to Specific Plan (SP). Within the SP zoning, the Specific Plan would apply the I/BP designation to the entire Specific Plan area. The existing residences and agricultural uses would become legal non-conforming uses within the Specific Plan. Proposed changes to these uses and structures shall be subject to the provisions of Chapter 84.17, Non-Conforming Uses and Structures, of the County Development Code.

The Specific Plan area is adjacent to Bloomington High School, Walter Zimmerman Elementary School, and Ruth O. Harris Middle School. However, the Project is not within 100 feet of Ruth O. Harris Middle School. As discussed in Section 5.9, *Hazards and Hazardous Materials*, of the Draft EIR, operational emissions of pollutant emissions or diesel particulate matter from the proposed development in the Specific Plan Area would not exceed established localized significance thresholds. Additionally, with implementation of Mitigation Measure AQ-2, which requires the use of Tier 4 construction equipment, construction emissions would be below localized significance thresholds. Therefore, the use of hazardous materials and the generation of hazardous emissions within the Specific Plan Area would not pose a significant hazard at nearby schools, and operational impacts would be less than significant.

This comment that the Project will bring in over 9,000 vehicle and truck trips per day is inaccurate in stating how many trips would result from the Project. As discussed in K1, Traffic Impact Analysis, to the Draft EIR, the Project would result in 8,555 daily vehicle trips, including truck trips. In regard to traffic and air quality, the commenter is referred to Response I26.2.

In regard to noise, as detailed in the Impact NOI-1 discussion that begins on page 5.12-26 of the Draft EIR, each of the Project scenarios would implement PDF NOI-2, which would require 12-foot-hight to 14-foot-high cement block walls at Sites 1 and 2 and 9-foot-high cement walls at Site 4, pursuant to proposed site plans and proposed Specific Plan design guidelines. With implementation of PDF NOI-2, operational noise levels for all scenarios would not exceed the County's exterior noise level standards, as adjusted to reflect the ambient noise levels at all nearby sensitive receiver locations. Additionally, the increase in ambient noise levels would range from 0.1 to 3.0 dBA Leq with the implementation of PDF NOI-2, which would not generate a significant daytime or nighttime operational noise level increase at nearby receiver locations.

As detailed in the Draft EIR in Section 5.12, *Noise,* starting on page 5.12-48, the proposed Project would generate traffic related noise from operation. As described in Section 3.0, *Project Description*, of the Draft EIR, the proposed Specific Plan buildings would be accessed from Laurel Avenue, Locust Avenue, and Maple Avenue. Tables 5.12-23 through 5.12-24 show that both the Opening Year with Project and General Plan Buildout with Project conditions would result in increases less than the 1.5 dBA CNEL threshold. Thus, off-site traffic noise impacts from the Project would be less than significant.

Related to bicycle and pedestrian safety, as detailed in the Draft EIR for Impact TR-1, starting on page 5.15-6, sidewalks currently exist on Cedar Avenue intermittently on both side of the roadway, on Santa Ana Avenue intermittently on the north side of the roadway, on Jurupa Avenue on the north side east of Linden Avenue. Implementation of the Specific Plan would include roadway improvements within the Specific Plan area that would provide for new sidewalks where none exist currently, thereby improving pedestrian facilities and the sidewalk network. Therefore, the proposed Specific Plan would also not conflict with pedestrian facilities, but instead would provide additional facilities. Sierra Avenue has a bike lane on the east side between Santa Ana Avenue and Technology Street. The Countywide Plan Transportation & Mobility Element identifies Cedar Avenue, Jurupa Avenue, Santa Ana Avenue, and Locust Avenue for planned Class II bike lanes. Class II bike lanes are striped lanes that provide bike travel and can be next to a curb or parking lane. Implementation of the Specific Plan would not alter or conflict with existing or planned bike lanes or bicycle transportation. Overall, impacts related to transit, bicycle, and pedestrian facilities were determined to be less than significant.

As stated by the comment and analyzed in the Draft EIR in Section 5.3, *Air Quality,* the Project would result in significant and unavoidable impacts related to conflict with the air quality management plan, Project-level operational emissions, and cumulative operational emissions. Land use changes of the Project would not result in an exceedance of SCAG's growth projections, but the Project would result in an increase of criteria pollutants that would exceed regional thresholds after implementation of mitigation measures. Therefore, the Project would result in a conflict with, or obstruct, implementation of the applicable Air Quality Management Plan. Emissions from operation of the Project would exceed SCAQMD's thresholds for VOC and NOx after implementation of regulatory requirements and mitigation measures. A majority of operational-source NOx emissions (by weight) would be generated by Project vehicles, and the VOC emissions would be generated by consumer products. Neither the Project applicant nor the County have the ability to reduce these emissions. Therefore, operational-source VOC and NOx emissions would be significant on a project-level and a cumulative basis. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I26.5: This comment states that there are high health risks that come from living in a highly polluted environment and increased pollution in residential communities puts public health at risk.

Response I26.5: The comment does not provide any substantial evidence concerning the Project's environmental impacts. Section 5.3, *Air Quality,* of the Draft EIR describes in Table 5.3-2 that data from the Central San Bernardino Valley 1 monitoring station that is located approximately 5.7 miles northwest of the Project site shows that in 2019 there were 41 days that exceeded the state ozone standard and 67 days that exceeded the state/federal 8-hour standard. In addition, 12 days exceeded the PM_{10} state standard and 2 days exceeded the federal 24-hour standard for $PM_{2.5}$. However, ambient air quality standards (NAAQS and CAAQS) were exceeded on one or more days for ozone, PM_{10}, and $PM_{2.5}$ at most monitoring locations throughout the South Coast Air Basin (SCAB).

As detailed beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate Project health risk impacts to residents, schools, and workers as a result of exposure to Diesel Particulate Matter (DPM) from heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The maximum non-cancer risks to nearby residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million; and the maximum non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0, and therefore, be less than significant.

Also, as detailed in Master Responses 2 and 3, in response to comments received to the public review Draft EIR additional DPM and AERMOD dispersion modeling was completed (and is included as Appendix A of this Final EIR) to identify worst-case conditions, which is the highest daily peak on-site emissions resulting from overlapping operational and construction activity at the nearest land use to the Project site where an individual could remain. This additional modeling shows that neither DPM emissions or localized significance emissions would not exceed the applicable AQMD thresholds. As such, operation of the Specific Plan at buildout would not cause a significant human health or cancer risk related to DPM emissions and impacts would be less than significant. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I26.6: This comment states that there are unavoidable cumulative impacts, and an entire residential community would be disrupted. This comment states that community members have discussed fearing being displaced or harassed out of their homes, despite stating that they do not want to sell or rezone their home.

Response I26.6: The comment does not provide any substantial evidence concerning the Project's environmental impacts. The significant and unavoidable impacts resulting from the proposed Project are discussed in Response I26.4. The comment vaguely claims that the proposed Project would result in the disruption of an entire residential community; however, it does not point to an environmental issue. The commenter is referred to Master Response 1 for a discussion of how the social disruption of a residential community is not a physical impact requiring analysis in the Draft EIR pursuant to CEQA. As discussed in Section 5.13, *Population and Housing*, property owners within the development footprint would voluntarily sell their property and would be compensated by the Applicant. At the time future development is proposed in Planning Area B, property owners have the option to voluntarily sell their property and would be compensated by the future development's applicants. Property owners would not be forced to sell their properties, either through harassment or eminent domain. However, should the County approve the

proposed Project, the entire Specific Plan area would be rezoned to Specific Plan. As stated in Response I26.4, existing residences could continue to exist as legal non-conforming uses after the rezone. The comment does not raise any specific concerns with the adequacy of the Draft EIR. The comment will be forwarded to County decisionmakers as part of the Final EIR. Therefore, no further response is required or provided.

Comment I26.7: This comment states that the community is over 80 percent Hispanic and over 20 percent of the community experiencing poverty. This comment states that this is a common practice of environmental racism.

Response I26.7: The comment does not provide any substantial evidence concerning the Project's environmental impacts. The commenter is referred to Master Response 4 for a discussion regarding environmental justice. CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of environmental racism. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to environmental racism is not provided. The comment does not raise any specific concerns with the adequacy of the Draft EIR. The comment will be forwarded to County decisionmakers as part of the Final EIR. Therefore, no further response is required or provided.

Comment I26.8: This comment states that the region deals with some of the worst traffic in the City and idling cars double the negative impact of pollution to nearby communities.

Response I26.8: The comment does not provide any substantial evidence concerning the Project's environmental impacts. The commenter is referred to Response I26.2 for a response regarding traffic and pollution. In regard to trucks and cars idling in traffic, impacts related to idling at congested intersections was analyzed in Appendices C1 and C2. As discussed on page 5.3-34 of the Draft EIR, the Project's NO_X emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less-than-significant.

Furthermore, the Project would implement PDF AQ-1 and MM AQ-3, which would require the Project Applicant/Developer/Operator to post interior and exterior facing signs identifying idling restrictions and contact information to report violations to CARB, SCAQMD, and the building manager. Pursuant to California Code of Regulations (CCR) Title 13, Motor Vehicles, Section 2449(d)(3), no truck may idle for longer than five minutes, which would reduce pollution from trucks onsite. The comment does not raise any specific concerns with the adequacy of the Draft EIR. The comment will be forwarded to County decisionmakers as part of the Final EIR. Therefore, no further response is required or provided.

Comment I26.9: This comment states that the Valley Region is in a fire risk area and that the County should focus efforts on wildfire mitigation.

Response I26.9: The comment does not provide any substantial evidence concerning the Project's environmental impacts. As discussed on page 6.0-5 of the Draft EIR, the Specific Plan area and Upzone Site area located within an urban developed area and are not located within an identified wildland fire hazard area according to CalFire (CalFire, 2022). Therefore, the site is not in a wildfire risk area and no mitigation measures are required.

Comment I26.10: This comment states that the Municipal Advisory Council (MAC) and developer have not provided adequate translation, the MAC has silenced voices during meetings, and the MAC and County of San Bernardino have not released all minutes for their meetings.

Response I26.10: The comment does not provide any substantial evidence concerning the Project's environmental impacts. CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to the MAC meetings is not provided. In order to provide additional access to the notification process, the County provided the Notice of Preparation and Notice of Availability in Spanish and English. Furthermore, the Public Scoping Meeting conducted on January 14, 2021 was provided in Spanish translation. The comment does not raise any specific concerns with the adequacy of the Draft EIR. The comment will be forwarded to County decisionmakers as part of the Final EIR. Therefore, no further response is required or provided.

Comment I26.11: This comment provides a conclusion to the State Senator's comment letter and states that the State Senator requests the County oppose the Project and honor the community's plans for the Bloomington area. The comment further states that there could be no overriding consideration for the Project's environmental impacts.

Response I26.11: The comment does not provide any substantial evidence concerning the Project's environmental impacts. Pursuant to Public Resources Code Section 21081(a)(3), the County of San Bernardino would be required to make findings that specific economic, legal, social, technological, or other considerations make infeasible the alternatives identified in the Draft EIR related to significant environmental effects. As such, the County shall prepare a Findings of Fact, which would be included as part of the administrative record. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

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LETTER I27: Ben Granillo III (3 pages)

From: Ben Granillo III <gra691@msn.com>
Sent: Wednesday, December 15, 2021 11:35 PM
To: Liang, Aron <Aron.Liang@lus.sbcounty.gov>
Subject: Bloomington Business Park Specific Plan Project - SCH No. 20200120545 / Project# PROJ-2020-00204

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello Mr Liang

In regards to Howard Industrial Partners Interest in developing South Bloomington into a business park, I have to say that I, we as a house hold do not support this development in our area and it is not our intention to consider selling or reallocating from our residence to support outside developers interest. This can clearly be seen as a money grab for these Orange county developers to come in and believe they can purchase our land for cheep in the Inland Empire and leave us with nothing more that increased pollution and truck traffic, traffic that I might add is already here and affecting our day to day life with the warehousing that is all ready here in Bloomington and the surrounding communities that are within the county. Its so often that an EIR is just looked at by the scope of the proposed project and that is something that can no longer be done, these project have to be looked at as a combined impact with warehousing that is already here, as what has been approved. Add is the surrounding warehousing of Fontana, Riverside & Rialto that border the small town of Bloomington and you have an ecological pollution nightmare as it is there are projects on the books being built and waiting to be built adding more will only cause more health issues to the people to Bloomington. To further approve more projects would simply show people the lack of concern the County has for the people of Bloomington. **I27.1**

I have been a lifelong resident of this town, originally we lived in a track home in the so called number street area at the corner of 9th and Linden. The area has always been riddled with crime, gangs and poverty, we left the area in the mid 1970's for a better way of living to raise a family so we found a 2+ acre lot close to Bloomington High and built a home/estate with the help of family and friends and long hours, this was not something built by a contractor but something done by myself and my family. We have built a better life here for us that allows us privacy and safety for my family. Having large parcels should not be a crime and it shouldn't make us targets for development, my choice to live the way I do on a large estate is my freedom to do so and not for some developer to

come in a say "we want your large property for our project, but hey wait we are doing you a favor by building you condensed living for you, you can move over there" Im sorry I like my 2+ acres, here I don't have to worry about my neighbor complaining that my music is too loud or that my back yard is to small for my dog or that my kids will have to go to a community park to play because there is no room for a swing set. I for one enjoy going out in my yard and enjoying what space provides me with and the countless wild birds and animals that roam in the yard from time to time. Living here puts me a center point for not only shopping but also to medical. I provide care for 2 seniors who rely on accessibility to medical care as well as retail outlets that are close to the house for them to drive within a mile radius, loosing that freedom for them would be detrimental.

I27.1 cont.

As noted its not our intention to sell and relocate from our residence or relinquish our current zoning to "specific plan". To change the zoning from under the resident would be cause for litigation, as land owners we purchased this land for a certain use with a zoning that supports that use, to simply say that our zoning could be changed to "specific plan" takes our rights away as a home owner, making us non compliant which is non acceptable. We cannot support private development by an out of county developer who had no interest of our way of living but rather sees us as a means to a better way of living for their partners by destroying our county by covering it in concrete warehouses and polluting our air with thousands of trucks running on our streets. Let be honest we know these developers do not live in our community, they wont breathe the same air we do and they wont be our neighbors and we know they wouldn't build these warehouse in the their back yards or allow countless truck on their streets so why is it ok for them to do it here where we live. We as a community have an equal rite to a heathy way of living just as much as they do. We as the Inland Empire cannot continue to be seen as the weak link, were are not dispensable to Orange and Los Angeles County, we cannot not continue to be a dumping ground for their dirty pollutive business when there are building high end homes and condominiums for themselves, thus building a better stronger family community for themselves while destroying ours. It time for the county to ask itself why cant these developers build us a better community for the people, if they can do it in their communities why cant they do the same for us, build us better houses, bring in higher end outlets that will allow the community to grow and have better family values. If you look around warehousing has not done anything to improve the community, nor surrounding communities, you don't see new restaurants, stores or malls that would bring people out. You don't even see these development anchored by outlets to support the workforce by offering them surrounding places to break for lunch.

I27.2

It doesn't take a genius to see that Howard Industrial Partners does not have our best interest in concern, their intent is to build out the Inland Empire without concern to its people, just by lookin at their web site of the 15 projects on their books you can see 14 were here in the Inland Empire and all for warehouse development and the 1 project in Los Angelus for a road. We should be concerned that none of these warehouse developments are not being built in Orange or Los Angeles as they are being done here. Why do we need to take all this development on!! We as a community need to have pride in our people, we worry about living conditions for our animals that are in our zoos and shelters why shouldn't we do the same for our community, do we want our kids and grand kids to grow up in a pollution warehouse infested community with breathing issues and high rates of lung cancer! Its time to stop destroying inner communities. If these projects are so important, the county has plenty of desert property that can developed without affecting it people, its time we start

sending these developers out there.

I27.2 cont.

Regards

Benjamin Granillo III
10976 Laurel Ave
Bloomington Ca 92316

Sent from Mail for Windows

Response to Letter I27: Ben Granillo III, dated December 15, 2021

Comment I27.1: This comment states that the commenter does not support the proposed Project and has no intention of selling their home or relocating in order to support an outside developer's interest. The comment further states that warehouses leave the community with increased pollution and truck traffic and that the EIR should look at the combined Project's impact combined with the impact of existing warehouses. The comment states that the increase in warehouse projects will lead to more health impacts and that the County is not concerned for the community members.

The comment further states that the commenter formerly lived in an area riddled by crime, gangs, and poverty before moving to the Specific Plan Area near Bloomington High School and built a home on a lot that allows privacy and safety. The commenter states that having large parcels should not be a crime and that the commenter enjoys their large lot home and would not want to live in denser housing. Furthermore, the commenter states that they care for two seniors who need access to medical care and close retail outlets.

Response I27.1: The comment does not provide substantial evidence of any environmental impact. Due to the existing limited low-density development and vacancies within the Specific Plan area, buildout and operation of the proposed Specific Plan would increase traffic and air quality emissions generated from the area.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). Pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOX emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be reduced below applicable SCQMD thresholds. Additionally, the majority of the Project's NOX emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be

enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible.

As discussed in Section 5.13, *Population and Housing*, property owners within the development footprint would voluntarily sell their property and would be compensated by the Applicant at or above market value. At the time future development is proposed in Planning Area B, property owners have the option to voluntarily sell their property and would be compensated by the future development's applicants. Property owners would not be forced to sell their properties, either through harassment or eminent domain. However, should the County approve the proposed Project, the entire Specific Plan Area would be rezoned to Specific Plan. Existing residences, such as the residence the commenter lives in, could continue to exist as legal non-conforming uses after the rezone. The comment does not raise any specific concerns with the adequacy of the Draft EIR. The comment will be forwarded to County decisionmakers as part of the Final EIR. Therefore, no further response is required or provided.

Comment I27.2: This comment states that it is not the commenter's intention to sell their home or to change their zoning to specific plan and that the change in zoning would be a cause for litigation as it would make existing residences non-compliant. This comment states that developers are ruining the community with warehouses that lead to air pollution and trucks, which developers would not want in their own neighborhoods. The comment states that the County should ask why these developers why they cannot build a better community with better houses and outlets to allow the community to grow as warehouses do not improve the community.

The comment provides an opinion that the Applicant does not have the community's best interest in mind as all of their warehouse developments are in the Inland Empire. The comment states that the community does not want kids to grow up in a polluted community with warehouses leading to health problems and cancer. The commenter states that these projects should be built in the desert.

Response I27.2: The comment does not provide substantial evidence of any environmental impact. In regard to traffic and air pollution, the commenter is referred to Response I27.1. Additionally, as previously stated, while the existing residences would become legal non-conforming uses if the Specific Plan is adopted, these residences could continue to exist as they currently are after the rezone.

As detailed beginning on page 5.3-44 of the Draft EIR, a Mobile Source Health Risk Assessment was prepared to evaluate the health risk impacts to residents, schools, and workers as a result of exposure to DPM as a result of heavy-duty diesel trucks traveling to and from the site, maneuvering onsite, and entering and leaving the site. The Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to residences attributable to TAC source emissions is 3.11 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The non-cancer risks to residences were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding workers, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk impact is 0.33 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.17 in one million which is less than the significance threshold of 10 in one million; and the non-cancer risks were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0. As such, operation of the Specific Plan at buildout would not cause a significant human health or cancer risk and impacts would be less than significant. A further discussion on how the Project is limiting health risks at adjacent sensitive receptors is included in Response I27.1. The comment does not raise any specific concerns with the adequacy of the Draft EIR. The comment will be forwarded to County decisionmakers as part of the Final EIR. Therefore, no further response is required or provided.

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LETTER I28: Cynthia Magana (1 page)

CNB would like to submit to the public record the following document in regards to the Bloomington Business Park Specific Plan Draft Environmental Impact Report (DEIR).

These comments are to be considered individually and responded to individually. These comments were gathered through a community survey that asked their position on the Bloomington Business Park Specific Plan.

Cynthia Magana, meekobam@hotmail.com, Bloomington, 92316, (909) 771-3814

No, I do not want anymore warehouses in Bloomington. "Horrible!!!! I drive past warehouse development that has been 'finished' for months now with Now Leasing signs still posted. WHY would they even consider building more, when others are still empty. Also, NO because this area should be for Families, Communities. NOT warehouses. They need to go build in vacant areas, NOT in already residential areas, especially at the cost of destroying our homes. Really?"

I28.1

Response to Letter I28: Cynthia Magana, undated

Comment I28.1: This comment states that the commenter does not want any more warehouses in Bloomington and that existing warehouses are empty. Additionally, the comment states the area should be for families and that developers should build in vacant areas.

Response I28.1: The commenter is referred to Master Response 1. The comment provides the commenter's opinion on warehouses and warehouse development in Bloomington and does not raise any specific concerns with the adequacy of the Draft EIR. The comment does not provide substantial evidence of any environmental impact. This comment will be forwarded to County decisionmakers are part of the Final EIR. Therefore, no further response is required or provided.

LETTER I29.1: Liliana Garcia (1 page)

Liliana Garcia, garcialiliana2975@yahoo.com, Bloomington , 92316 (909)-258-0898

I do not want anymore warehouses in Bloomington. It's very upsetting knowing that my community is being destroyed by warehouses, displacing families and experiencing health problems because of these warehouses.

I29.1

Response to Letter I29: Liliana Garcia, undated

Comment I29.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the community is being destroyed by warehouses, which displace families and lead to health problems.

Response I29.1: The comment does not provide substantial evidence of any environmental impact. As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures in Planning Area A. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-February 2022, Zillow.com—an online real estate and rental marketplace—reported 246 single-family properties listed for sale in the community of Bloomington and adjoining cities (11 units in Bloomington, 37 units in the City of Rialto, 149 units in the City of Fontana, and 49 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, in compliance with SB 330, the Project would offset the loss of zoned residential capacity by upzoning another site (i.e., Upzone Site). Therefore, implementation of the Project would not displace people or housing in a manner which would necessitate the construction of replacement housing elsewhere, and impacts would be less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds and the Project would not expose sensitive receptors to substantial health risks. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I30: Susana Garita

Susana Garita, Susiegarita@gmail.com, Bloomington, 92316, (909) 235-1635,

I do not want anymore warehouses in Bloomington. Not a good idea. This is a peaceful area where people have animals and ride horses. Let's keep it that way.

I30.1

Response to Letter I30: Susana Garita, undated

Comment O30.1: This comment states that the commenter does not want anymore warehouses in Bloomington and that it is a peaceful area where people have animals and raise horses.

Response O30.1: The comment does not provide substantial evidence of any environmental impact. The commenter is referred to Master Response 1. The comment provides the commenter's opinion on warehouses and warehouse development in Bloomington and does not raise any specific concerns with the adequacy of the Draft EIR. This comment will be forwarded to County decisionmakers are part of the Final EIR. Therefore, no further response is required or provided.

LETTER I31: Alejandra Ramirez (1 page)

Alejandra Ramirez, Alejandraramirez437@gmail.com, Claremont, 91711, (909) 972-3099

I do not want anymore warehouses in Bloomington. Honestly, it feels like they are trying to erase and gentrify a place where many families and generations live. I have friends that grew up here and this is completely wrong to just erase for corporate greed. **I31.1**

Response to Letter 31, Alejandra Ramirez, undated

Comment I31.1: This comment states that the commenter does not want any more warehouses in Bloomington and that developers are trying to gentrify a place where families and multiple generations live.

Response I31.1: The comment does not provide substantial evidence of any environmental impact. The commenter is referred to Master Response 1. As discussed in Master Response 1, a discussion of gentrification is not required under CEQA. CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)) (*San Franciscans for Reasonable Growth v City & County of San Francisco* (1989) 209 Cal.App.3d 1502). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of gentrification. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to gentrification is not provided. The comment provides the commenter's opinion on warehouses and warehouse development in Bloomington and does not raise any specific concerns with the adequacy of the Draft EIR. This comment will be forwarded to County decisionmakers are part of the Final EIR. Therefore, no further response is required or provided.

LETTER I32: Alina Landa (1 page)

Alina Landa, alinalanda@ymail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. It has ruined my quality of life due to traffic congestion, specifically from semi-trucks and out of town employees. The air quality has noticeably worsened in the past 20 years. I don't want my parents to continue being at risk of exposure due to the exponential problems caused by the amount of warehouse development. It is practically impossible to get in and out of town without traffic during most of the day. There are more traffic accidents and collisions than ever before. The low-paying jobs do not increase opportunities for locals or neighboring property owners. Bloomington continues to be a subject of negligence by the county and as citizens, we deserve better.

I32.1

Response to Letter I32: Alina Landa, undated

Comment I32.1: This comment states that the commenter does not want more warehouses in Bloomington and that it has ruined the commenter's quality of life due to traffic congestion and deteriorating air quality. The commenter does not want parents to be at exposed to health risks and that there are a lot of traffic accidents. Furthermore, the comment states low paying jobs do not increase opportunities for local property owners and the Bloomington community is negligibly treated by the County.

Response I32.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible.

Furthermore, as discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue and Santa Ana. Therefore, the Project would provide improvements that should result in safer traveling conditions. Should future vehicles in the Bloomington community drive unsafely, they would be subject to citation by law enforcement. The comment provides the commenter's opinion and does not raise any

specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

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LETTER I33: Claudia Enriquez (1 page)

Claudia Enriquez, Claudia777enriquez@yahoo.com, Fontana, 92335, 9096094497

I do not want anymore warehouses in Bloomington. It ruins the charm that BLoomington has, it infringes on communities of color, and it increases pollution and traffic danger.

I33.1

Response to Letter I33: Claudia Enriquez, undated

Comment I33.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses ruin the charm that Bloomington has, infringes on communities of color, and increases pollution and traffic danger.

Response I33.1: The comment does not provide substantial evidence of any environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible.

Furthermore, as discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue and Santa Ana. Therefore, the Project would provide improvements that should result in safer traveling conditions. Should future vehicles in the Bloomington community drive unsafely, they would be subject to citation by law enforcement. In regard to charm and communities of color, the commenter is referred to Master Response 1. In regard to environmental justice, the commenter is referred to Master Response 4. The comment provides the commenter's opinion and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I34: Joanna Manzk (1 page)

Joanna Manzk, joannamanzo.01@gmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. It saddens me that there's people who are for the warehouses and don't care about the health of the community. Bringing more warehouses in this area is not only going to displace many families, but affect the health of those families that remain from the amount of pollution the warehouses create. There's no way to justify the harm that will be done to these communities if more warehouses are built. **I34.1**

Response to Letter I34: Joanna Manzk, undated

Comment I34.1: This comment states that the commenter does not want any more warehouses in Bloomington and that people supporting the warehouse development do not care about the health of the community. The comment states that bringing in warehouses will displace families, negatively impact health from pollution, and there is no way to justify the harm warehouses bring.

Response I34.1: The comment does not provide substantial evidence of any environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible.

As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-February 2022, Zillow.com—an online real estate and rental marketplace—reported 246 single-family properties listed for sale in the community of Bloomington and adjoining cities (11 units in Bloomington, 37 units in the City of Rialto, 149 units in the City of Fontana, and 49 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, in compliance with SB 330, the Project would offset the loss of zoned residential capacity by upzoning another site (i.e., Upzone Site). Therefore, implementation of the Project would not displace people or housing in a manner which would necessitate the construction of replacement housing elsewhere, and impacts would be less than significant. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I35: Andrea Moreno (1 page)

Andrea Moreno, Andrea.moreno323@yahoo.com, Bloomington, 9097148556

I do not want anymore warehouses in Bloomington. There is too many near schools and so close to each other. I worry about how this is going to affect my community and where I live in regards to health concerns, traffic, and area. I enjoyed living here because it was a small town without much commercial/industrial. I feel like they don't care about our community and what it stands for.

I35.1

Response to Letter I35: Andrea Moreno, undated

Comment I35.1: This comment states that the commenter does not want any more warehouses in Bloomington and there are too many near schools. The comment expresses concerns that warehouses would result in health risks and traffic.

Response I35.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I36: Ernesto Saldivar (1 page)

Ernesto Saldivar, ernesto.saldivar98@yahoo.com, La Puente, 91744

I do not want anymore warehouses in Bloomington. It is wrong.

I36.1

Response to Letter I36: Ernesto Saldivar, undated

Comment I36.1: This comment states that the commenter does not want any more warehouses in Bloomington and it is wrong.

Response I36.1: The comment does not provide substantial evidence of any environmental impact. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I37: DeAsy Gallardo (1 page)

DeAsy Gallardo, deasygc@gmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. Bloomington is a small community in which we care about the future of our kids. This plan will bring in more congestion of traffic and environmental harm in the long run. Perhaps bring in othe projects that can bring in revenue to this community.

I37.1

Response to Letter I37: DeAsy Gallardo, undated

Comment I37.1: This comment states that the commenter does not want any more warehouses in Bloomington and that Bloomington is a small community. The comment states the Project would bring in more traffic congestion and environmental harm and asks the County to bring in projects that could bring revenue to the community.

Response I37.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As discussed in Section 5.14, *Public Services,* the Project would generate revenue from taxes and development impact fees that could be used within the community to provide additional public services or infrastructure improvements. Furthermore, the comment vaguely states that the Project would result in environmental harm, but does not point to a specific environmental impact. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Letter I38: Diana Campos (1 page)

Diana Campos, Dc.campos7@gmail.com, Bloomington, 92316, 9095865472

I do not want anymore warehouses in Bloomington. CONCERNING! Bloomington is already such a small town and constantly overlooked when it comes to beautification and improvement through government funding so it's very telling why the warehouses are planned to be built here. Is this all that we are worthy of? The answer is NO! Cloaking these warehouses with the idea that they'll create jobs and contribute to the economy is a slap in the face to our community and people. It's very alarming that this plan is expected to take place near 3 public schools and 1 of the only 2 parks in Bloomington. Our children deserve better, our elders deserve better, our community deserves better. Many already experience terrible symptoms due to environmental factors. Building these warehouses would only add fuel to that fire. Not to mention the already terrible traffic we experience on a day-to-day basis. Building these warehouses would make that situation so much worse and at the end of the day it would impact parents, students, and educators who work or commute to these schools. Our community deserves sidewalks, updated infrastructure, and more. None of which should be financed through building these warehouses.

I38.1

Response to Letter I38: Diana Campos, undated

Comment I38.1: This comment states that the commenter does not want any more warehouses in Bloomington and that Bloomington is a small town is overlooked when it comes to funding and improvements. The comment states the idea that warehouses will create jobs and contribute to the economy is disrespectful to the community. The comment further states that the Project would be developed near three public schools and a park and that community members experience health issues.

Furthermore, the comment states that there is terrible traffic in the community and the warehouses would make traffic worse and the community deserves sidewalks and updated infrastructure.

Response I38.1: The comment does not provide substantial evidence of any environmental impact. As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Therefore, the proposed Project would not expose sensitive receptors to substantial health risks.

In regard to increased traffic, Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As discussed in Section 3.0, *Project Description,* starting on page 3-12, the Project would include sidewalk and bicycle lane improvements on surroundings streets and would provide additional infrastructure improvements such as storm drainage, sewer, and water improvements within the Specific Plan Area. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I39.1: Lori Nelson (1 page)

Lori Nelson, lahixnelson@yahoo.com, Bloomington, 92316, 9098752826

I do not want anymore warehouses in Bloomington. They County sees Bloomington as a cash cow. They just want the revenue created at the detriment of our community. They are surrounding our children's schools and rec areas with pollution producing businesses

I39.1

Response to Letter I39.1: Lori Nelson, undated

Comment I39.1: This comment states that the commenter does not want any more warehouses in Bloomington and that developers are using Bloomington for profit at the detriment of the community. The comment states that the Project would surround schools and recreation areas with pollution producing business.

Response I39.1: The comment does not provide substantial evidence of any environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I40: Desiree Lopez (1 page)

Desiree Lopez, dlope019@gmail.com, Jurupa Valley, 92509, 9098564967

I do not want anymore warehouses in Bloomington. I am opposed to the warehouse development in Bloomington. Land in Bloomington should be utilized to build community resources instead of commercial buildings which increase pollution and do not provide quality jobs with competitive pay or benefits. I40.1

Response to Letter I40: Desiree Lopez, undated

Comment I40.1: This comment states that the commenter does not want any more warehouses in Bloomington and that land in Bloomington should be used for community resources instead of warehouses which increase pollution and do not provide quality jobs.

Response I40.1: The comment does not provide substantial evidence of any environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible.

As further discussed in Master Response 1, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of the quality of warehouse jobs. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to the quality of warehouse jobs is not provided. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I41: Rafael Garcia (1 page)

Rafael Garcia, rgarcia4691@gmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. It is ruining our community and would completely change the landscape for years to come. This city should be a place for families and family activities not these horrible distribution centers that clog the streets and destroy our air quality.

I41.1

Response to Letter I41: Rafael Garcia, undated

Comment I41.1: This comment states that the commenter does not want any more warehouses in Bloomington and that it is ruining the community. The comment states that warehouses lead to traffic congestion and destroy air quality.

Response I41.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I42: Jennifer Peñazola (1 page)

Jennifer Peñaloza, Jencpen00@gmail.com, Bloomington, 92316, 9092751018

I do not want anymore warehouses in Bloomington. I do not want anymore warehouses in Bloomington

I42.1

Response to Letter I42: Jennifer Peñazola, undated

Comment I42.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I42.1: The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I43: Gina Cardenas (1 page)

Gina Cardenas, jeangena4@gmail.com, Hesperia, 92345

I do not want anymore warehouses in Bloomington. As a former resident, I strongly disapprove of warehouse expansion in such a small and underfunded community. To me, this proves that the welfare of areas with higher POC populations are disregarded for the sole purpose of profit. We need to protect these communities. I43.1

Response to Letter I43: Gina Cardenas, undated

Comment I43.1: This comment states that the commenter does not want any more warehouses in Bloomington and that Bloomington is small and underfunded. The comment states that warehouse expansion in Bloomington justifies that areas with higher POC populations are disregarded for the sole purpose of profit.

Response I43.1: The comment does not provide substantial evidence of any environmental impact. As further discussed in Master Response 1, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of the warehouse expansion in areas with diverse communities. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to warehouse expansion in diverse communities is not provided. In regard to environmental justice, the commenter is referred to Master Response 4. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I44: Karen Martinez (1 page)

Karen Martínez, Blonkaren@gmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. I do not agree with it.

I44.1

Response to Letter I44: Karen Martinez, undated

Comment I44.1: This comment states that the commenter does not agree with more warehouses being developed in Bloomington.

Response I44.1: The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I45: Estela Duran-Cerritos (1 page)

Estela Duran-Cerritos, E.duran91@yahoo.com, Fontana, 92337, 5107062869

I do not want anymore warehouses in Bloomington. The air quality is already horrible, this will only make it worse. Please do not build any more warehouses. The city can't even fill the ones that already exist! So many commercial buildings are so lease. This has to stop. **I45.1**

Response to Letter I45: Estela Duran-Cerritos, undated

Comment I45.1: This comment states that the commenter does not want any more warehouses in Bloomington and warehouses would lead to worse air quality and that existing warehouses are currently vacant.

Response I45.1: The comment does not provide substantial evidence of any environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I46: Alexandra Lopez (2 pages)

Alexandra Lopez, Lopexalex210@gmail.com, Bloomington, 92316, 9099908172

I do not want anymore warehouses in Bloomington. Growing up in Bloomington we already have more than enough air population and traffic from semi trucks everyday . As a child a warehouse was being built right by my house and unfortunately I got very sick from everyday construction and building residue in the air ! I do not stand with the project at all I know too many people who have already lost their homes and have had to move for the selfish business and warehouses that start their projects in Bloomington ! It would just add to the fire even more and the children

I46.1

would not be able to live normal lives for this matter.

I46.1 cont.

Response to Letter I46: Alexandra Lopez, undated

Comment I46.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is bad air pollution and traffic from semi-trucks in Bloomington. The comment states that as a child, the commenter got sick from construction pollutants while a warehouse was being built next to their house. The comment states people have already lost their homes and the Project would contribute to that.

Response I46.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant. In addition, the Draft EIR evaluates the potential of the Project to expose sensitive receptors, such as residences and schools with substantial pollutant concentrations. As detailed in Draft EIR Tables 5.3-15 through 5.3-18, after implementation of Mitigation Measure AQ-2, emissions during construction activities would not exceed the SCAQMD's localized significance threshold. Therefore, with implementation of mitigation measures, impacts related to localized significant emissions from construction activity would be less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

As discussed in Section 5.13, *Population and Housing*, property owners within the development footprint would voluntarily sell their property and would be compensated by the Applicant. At the time future development is proposed in Planning Area B, property owners have the option to voluntarily sell their

property and would be compensated by the future development's applicants. Property owners would not be forced to sell their properties, either through harassment or eminent domain. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

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LETTER I47: Kaylee Amezcua (1 page)

Kaylee Amezcua, kayleeamezcua1d@gmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. It's taking over this town and taking away from homes of families that have lived her for years.

I47.1

Response to Letter I47: Kaylee Amezcua, undated

Comment I47.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses are taking away homes from families that lived in Bloomington for years.

Response I47.1: The comment does not provide substantial evidence of any environmental impact. As discussed in Section 5.13, *Population and Housing*, property owners within the development footprint would voluntarily sell their property and would be compensated by the Applicant. At the time future development is proposed in Planning Area B, property owners have the option to voluntarily sell their property and would be compensated by the future development's applicants. Property owners would not be forced to sell their properties, either through harassment or eminent domain. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I48: Daniel Sarabia (1 page)

Daniel Sarabia, daniel.sarabia1o1@gmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. I would like to stop all creation of warehouses. Bad for the environment and the people.

I48.1

Response to Letter I48: Daniel Sarabia, undated

Comment I48.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter would like to stop the development of warehouses as they are bad for the environment and people.

Response I48.1: The comment does not provide substantial evidence of any environmental impact. As further discussed in Master Response 1, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). CEQA does not require an EIR to disclose whether the proposed Project is inherently good or bad. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I49: Karlenne Rodriguez (1 page)

Karlenne Rodriguez, Karlenne26@hotmail.com, Bloomington, 92316, 9096850764

I do not want anymore warehouses in Bloomington. This does not benefit the residents of Bloomington. We don't need more pollution, damaged roads from the trucks or this development to take away from businesses and homes. **I49.1**

Response to Letter I49: Karlenne Rodriguez, undated

Comment I49.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the community does not need more pollution, damaged roads from trucks or this development to take away from businesses and homes.

Response I49.1: The comment does not provide substantial evidence of any environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

Furthermore, as discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue, and Santa Ana Avenue. As such, the proposed Project would actually benefit the community by providing road improvements to previously damaged roads. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I50: Sofia Torres (1 page)

Sofia Torres, brandyntorres054@gmail.com, Grand Terrace, 92313

I do not want anymore warehouses in Bloomington. It's not fair or right to move people out of their homes or ruin their streets and further pollute their air. They shouldn't be taking these peoples houses, parks, schools or sense of security and home. They aren't for sale.

I50.1

Response to Letter I50: Sofia Torres, undated

Comment I50.1: This comment states that the commenter does not want any more warehouses in Bloomington and that it is not fair to move people out of their homes, ruin their streets, and pollute their air.

Response I50.1: The comment does not provide substantial evidence of any environmental impact. Furthermore, as discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue, and Santa Ana Avenue. As such, the proposed Project would actually benefit the community by providing road improvements to previously damaged roads. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible.

As discussed in Section 5.13, *Population and Housing*, property owners within the development footprint would voluntarily sell their property and would be compensated by the Applicant. At the time future development is proposed in Planning Area B, property owners have the option to voluntarily sell their property and would be compensated by the future development's applicants. Property owners would not be forced to sell their properties, either through harassment or eminent domain. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I51: Roxana Valleji (1 page)

Roxana Valleji, Roxanarod@ymail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. I am in the zone where I would have to move. This is not a benefit to me.

I51.1

Response to Letter I51: Roxana Valleji, undated

Comment I51.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter lives in the area where they would have to move.

Response I51.1: The comment does not provide substantial evidence of any environmental impact. As discussed in Section 5.13, *Population and Housing*, property owners within the development footprint would voluntarily sell their property and would be compensated by the Applicant. At the time future development is proposed in Planning Area B, property owners have the option to voluntarily sell their property and would be compensated by the future development's applicants. Property owners would not be forced to sell their properties, either through harassment or eminent domain. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Letter I52: Vaness Rodriguez (1 page)

Vaness Rodriguez, Rodriguez_293@yahoo.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. I feel ashamed and embarrassed my neighborhood is filled with warehouses and no shopping centers and schools. Bad roads as well!

I52.1

Response to Letter I52: Vaness Rodriguez, undated

Comment I52.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter's neighborhood is embarrassed that their neighborhood is filled with warehouses and bad roads without shopping centers and schools.

Response I52.1: As discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue, and Santa Ana Avenue. As such, the proposed Project would actually benefit the community by providing road improvements to previously damaged roads. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Letter I53: Senaida Rivera (1 page)

Senaida Rivera, Priscillasenaida@gmail.com, Bloomington, 92316, 9096404487

I do not want anymore warehouses in Bloomington. As someone who grew up in this city I've always thought it was such a peaceful neighborhood with many agricultural qualities. I've always admired all of the local flora and fauna that is able to grow in the surrounding neighborhoods and how creative the home owners years spaces grew and I am sure the industrialization of this area will tarnish the communities visual appeal and comfort of the residents that live in this town.

I53.1

Response to Letter I53: Senaida Rivera, undated

Comment I53.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter though it was a peaceful neighborhood with agricultural qualities and admired the local flora and fauna. The comment states that warehouses will tarnish the community's visual appeal and comfort that the residents feel in the town.

Response I53.1: The comment does not provide substantial evidence of any environmental impact. The proposed Specific Plan sets forth a land use plan that dictates development standards, including building design and landscape design for the development and operation of industrial business park uses, see Section 3, *Project Description*. All developments proposed within the Specific Plan—including the currently proposed development in Planning Area A and future development(s) in Planning Area B—would be required to adhere to the standards therein. Though development within the Specific Plan Area would change the 213-acre site's residential character to one of industrial business park, the change would not degrade the visual character or quality of the site as development would adhere to set guidelines and development standards.

Furthermore, with implementation of Mitigation Measures BIO-1 through BIO-8 and Mitigation Measures WVLC BIO-1, impacts to biological resources would be less than significant from implementation of the Project. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I54.1: Edna Buenrostro (1 page)

Edna Buenrostro, ednabuenrostro@yahoo.com, Fontana, 92335, 9094418398

I do not want anymore warehouses in Bloomington. "It's taking away from our community and our children's future. Let alone the pollution and traffic that will result from these warehouses. I was raised in Bloomington, I attended BHS it would hurt me to see the town I grew up in no longer be a family and agriculture community. It upsets me to see this developer trying to make this an industrial town and kicking current residents to the curve.

I54.1

Response to Letter I54: Edna Buenrostro, undated

Comment I54.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses result in pollution and traffic. Furthermore, the comment states that it would hurt the commenter to see the town they grew up in no longer being a family and agricultural community.

Response I54.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I55: David Marin (1 page)

David Marin. Davidmarin525@gmail.com. Riverside. 92509. 9096375509

I55.1

I do not want anymore warehouses in Bloomington. It'll be taking folks homes, adding bad to the environment with added pollution

Response to Letter I55: David Marin, undated

Comment I55.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the Project would take away homes and add pollution.

Response I55.1: The comment does not provide substantial evidence of any environmental impact. As discussed in Section 5.13, *Population and Housing*, property owners within the development footprint would voluntarily sell their property and would be compensated by the Applicant. At the time future development is proposed in Planning Area B, property owners have the option to voluntarily sell their property and would be compensated by the future development's applicants. Property owners would not be forced to sell their properties, either through harassment or eminent domain.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I56: Karina Mendoza (1 page)

Karina Mendoza, karinaariana99@gmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. It is already busy enough just to drop off and pick up my little sister from school. This is just gonna add more fire to the flame. I56.1

Response to Letter I56: Karina Mendoza, undated

Comment I56.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is enough traffic, and the Project would only make it worse.

Response I56.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I57: Hector Anaya (1 page)

Hector Anaya, hectoranaya250@yahoo.com, Bloomington, 92316, 9097422495

I57.1

I do not want anymore warehouses in Bloomington. I dislike having these warehouses in Bloomington there is a lot of other places where they could place these warehouses, also all these warehouses could and can be a risk to the children

Response to Letter I57: Hector Anaya, undated

Comment I57.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses are a risk to children.

Response I57.1: The comment provides the commenter's opinion that warehouses are bad and vaguely states that warehouses are a risk to children. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I58: Ivette Macias (2 pages)

Ivette Macias, ivee423@gmail.com, Perris, 92571

No, I do not want anymore warehouses in Bloomington. As it pertains to Perris or the Inland Empire in general, unhappy with the unequal concentration of warehouses in low-income **I58.1**

communities where the regard for environmental justice by local elected representatives doesn't seem to exist. **I58.1 cont.**

Response to Letter I58: Ivette Macias, undated

Comment I58.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is an unequal concentration of warehouses in low-income communities as elected representatives do not consider environmental justice.

Response I58.1: The comment does not provide substantial evidence of any environmental impact. As further discussed in Master Response 1, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of environmental justice and inequity. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to environmental justice and inequity is not provided. However, the commenter is referred to Master Response 4 for a further discussion of environmental justice. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I59: Marlet Juarez (1 page)

Marlet Juarez, slanir22@gmail.com, Bloomington, 92316, 323-872-6096

I do not want anymore warehouses in Bloomington. They are invading our community and surrounding us with unnecessary warehouses. They are forcing people and not giving them an option to move out of their homes. That is wrong on so many levels. These are residential homes and areas. There is plenty of empty space in other areas, why go after a small town in the first place.

I59.1

Response to Letter I59: Marlet Juarez, undated

Comment I59.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses are forcing individuals out of their homes. The comment further states that there is plenty of empty space in other areas to build warehouses.

Response I59.1: The comment does not provide substantial evidence of any environmental impact. As discussed in Section 5.13, *Population and Housing*, property owners within the development footprint would voluntarily sell their property and would be compensated by the Applicant at or above market value. At the time future development is proposed in Planning Area B, property owners have the option to voluntarily sell their property and would be compensated by the future development's applicants. Property owners would not be forced to sell their properties, either through harassment or eminent domain. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I60: Brenda Lugo (1 page)

Brenda Lugo, Brendalugo67@gmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. It is concerning because our health is in danger. It will bring more traffic to our already small streets

I60.1

Response to Letter I60: Brenda Lugo, undated

Comment I60.1: This comment states that the commenter does not want any more warehouses in Bloomington and that they lead to health dangers and traffic.

Response I60.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I61: Candace Mendoza (1 page)

Candace Mendoza, Mendoza_candace@yahoo.com, Bloomington, 92316 *I do not want anymore warehouses in Bloomington. It is damaging to the community!* I61.1

Response to Letter I61: Candace Mendoza, undated

Comment I61.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses damage the community.

Response I61.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I62: Alyzza Cabrera

Alyzza Cabrera, Alyzzanicole447@gmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. I feel it is inconsiderate and horrible. We already have bad air pollution and this will make it worse. We don't need more warehouses. We need to prioritize our schools and communities!

I62.1

Response to Letter I62: Alyzza Cabrera, undated

Comment I62.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the community already has bad air pollution and this Project will make it worse. The comment further states that the County should prioritize schools and communities.

Response I62.1: The comment does not provide substantial evidence of any environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I63: Amy Vasquez (1 page)

Amy Vasquez, limeaboutsomething@outlook.com, Colton, 92324, 951963254

I do not want anymore warehouses in Bloomington. it is too much, although I do not reside in Bloomington, everything that goes on in surrounding city's affects us all. We need a healthy community and warehouses do not bring health. they bring pollution (air/noise/etc).

I63.1

Response to Letter I63: Amy Vasquez, undated

Comment I63.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses in Bloomington impact surrounding communities. The comment further states that warehouses bring air and noise pollution.

Response I63.1: The comment does not provide substantial evidence of any environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible.

In regard to noise, as detailed in the Impact NOI-1 discussion that begins on page 5.12-26 of the Draft EIR, each of the Project scenarios would implement PDF NOI-1, which would require 12- to 14-foot-high cement block walls at Sites 1 and 2 and 9-foot-high cement walls at Site 4. With implementation of PDF NOI-1, operational noise levels for all scenarios would not exceed the County's exterior noise level standards, as adjusted to reflect the ambient noise levels at all nearby sensitive receiver locations. Additionally, the increase in ambient noise levels would range from 0.1 to 3.0 with the implementation of PDF NOI-1, which would not generate a significant daytime or nighttime operational noise level increase at nearby receiver locations. Furthermore, pursuant to Specific Plan guidelines, future projects developed near residences or schools would be required to install at least 12-foot-high screen walls.

As detailed in the Draft EIR in Section 5.12, *Noise,* starting on page 5.12-48, the proposed Project would generate traffic related noise from operation. As described in Section 3.0, *Project Description*, of the Draft EIR, the proposed Specific Plan buildings would be accessed from Laurel Avenue, Locust Avenue, and Maple Avenue. Tables 5.12-23 through 5.12-24 show that both the Opening Year with Project and General Plan Buildout with Project conditions would result in increases less than the 1.5 dBA CNEL threshold. Thus, off-site traffic noise impacts from the Project would be less than significant. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I64: Priscilla CaroRivas (2 pages)

Priscilla CaroRivas, pcaro18@aol.com, Bloomington, 92316, 9092658544

I do not want anymore warehouses in Bloomington. I already live around three warehouses **I64.1**

down the street are near my home. I am tired of the traffic it has caused to get out of my house. The trailers not obeying laws and using cross streets that do not allow them to cross. The traffic it takes me for a 3.5 mile drive which is typically 10 minutes takes me 30 now to cross over because of the lack of restaurants and grocery stores. **I64.1 cont.**

Response to Letter I64: Priscilla CaroRivas, undated

Comment I64.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter is tired of traffic from existing warehouses. The comment further states that there is a lack of restaurants and grocery stores.

Response I64.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I65: Lorena Ornelas Sainz

Lorena Ornelas Sainz, Sainz.lorena95@gmail.com, Bloomington, 92316, 9095436164

I do not want anymore warehouses in Bloomington. Las bodegas has causado mucho más tráfico y contaminación a Bloomington.

I65.1

Response to Letter I65: Lorena Ornelas Sainz, undated

Comment I65.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses cause traffic and pollution.

Response I65.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I66: Alberto Rivas (1 page)

Alberto Rivas, patricialove71@gmail.com, Bloomington, 92316, 9094190948

No estoy de acuerdo que haya mas bodegas en Bloomington. Están haciendo cosas ilegales construyendo bodegas a menos de 300 pies de escuelas y casas

I66.1

Response to Letter I66: Alberto Rivas, undated

Comment I66.1: This comment states that the commenter does not want any more warehouses in Bloomington and that it should be illegal to construct warehouses less than 300 feet from schools and homes.

Response I66.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I67: Sandra Barbosa (1 page)

Sandra Barbosa, Sandra.m.bee@gmail.com, Bloomington, 92316, 4253125114

I do not want anymore warehouses in Bloomington. It taken over our city and no benefits have been seen to the community. Traffic is also becoming more of an issue

I67.1

Response to Letter I67: Sandra Barbosa, undated

Comment I67.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there are no benefits from warehouses. The comment also states that traffic is becoming an issue.

Response I67.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I68: Arcelia Martinez (1 page)

ArceliaMartinez, Camila071313@gmail.com, Bloomington, 92316, 9093002991

I68.1

No estaba enterado de esto No, no estoy de acuerdo que haya mas bodegas en Bloomington. Mucho trafico mucho humo de los trailers

Response to Letter I68: Arcelia Martinez, undated

Comment I68.1: This comment states that the commenter was unaware of this Project and does not want more warehouses in Bloomington. The comment further states that there is a lot of traffic from semi-trucks.

Response I68.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I69: Emily Vasquez (1 page)

Emily Vasquez, esulasw391@gmail.com, Colton, 92324, 9099009956

I do not want anymore warehouses in Bloomington. I don't agree with over development. It harms our communities.

I69.1

Response to Letter I69: Emily Vasquez, undated

Comment I69.1: This comment states that the commenter does not want any more warehouses in Bloomington and that overdevelopment harms communities.

Response I69.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I70: Valerie Tuyu (1 page)

Valerie Tuyu, Valerie7489@gmail.com, Bloomington, 92316, 9096887726

I do not want anymore warehouses in Bloomington. It makes our city unattractive and the air quality for our families

I70.1

Response to Letter I70: Valerie Tuyu, undated

Comment I70.1: This comment states that the commenter does not want any more warehouses in Bloomington and that it makes the city unattractive and ruins air quality.

Response I70.1: The comment does not provide substantial evidence of any environmental impact. As detailed in the Impact AE-3 discussion that begins on page 5.1-3 of the Draft EIR, the proposed Specific Plan sets forth a land use plan that dictates development standards, including building design and landscape design for the development and operation of industrial business park uses, see Section 3, *Project Description*. All developments proposed within the Specific Plan—including the currently proposed development in Planning Area A and future development(s) in Planning Area B—would be required to adhere to the standards therein. Though development within the Specific Plan Area would change the 213-acre site's residential character to one of industrial business park, the change would not degrade the visual character or quality of the site.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I71: Damian Lasheras (1 page)

Damian Lasheras, damianlas1992@gmail.com, Bloomington, 92316, 9095452711

I do not want anymore warehouses in Bloomington. That's unbelievable you guys are practically forcing people to move out of there homes just so you guys can fill your pockets. I strongly disagree with this there's a while community rite where you guys wanna build a truck stop

I71.1

Response to Letter I71: Damian Lasheras, undated

Comment I71.1: This comment states that the commenter does not want any more warehouses in Bloomington and that developers are forcing people out of their homes.

Response I71.1: The comment does not provide substantial evidence of any environmental impact. As discussed in Section 5.13, *Population and Housing*, property owners within the development footprint would voluntarily sell their property and would be compensated by the Applicant at or above market value. At the time future development is proposed in Planning Area B, property owners have the option to voluntarily sell their property and would be compensated by the future development's applicants. Property owners would not be forced to sell their properties, either through harassment or eminent domain. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I72: Vanessa Avalos (1 page)

Vanessa Avalos, Vavalos14@yahoo.com , Bloomington, 92316

I72.1

No estoy de acuerdo que haya mas bodegas en Bloomington. Nos traira mas contaminación y apaerte que esta serca de las escuelas

Response to Letter I72: Vanessa Avalos, undated

Comment I72.1: This comment states that the commenter does not want any more warehouses in Bloomington and that they will bring more pollution so close to schools.

Response I72.1: The comment does not provide substantial evidence of any environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

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LETTER I73: Jose Avalos (1 page)

José Avalos, Fudge1980@ymail.com, Bloomington, 92316

No estoy de acuerdo que haya mas bodegas en Bloomington. La verdad se esta perdiendo la sensia del rancho muchos de nosatros tenemos años viviendo aqui eso es lo que me gusta de Este ciudad si asen las bodegas todo esa esencia se pierde

I73.1

Response to Letter I73: Jose Avalos, undated

Comment I73.1: This comment states that the commenter does not want any more warehouses in Bloomington and that it would ruin the sense of ranching community.

Response I73.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I74: Brenda Reyes (1 page)

Brenda Reyes, Karinaryes@hotmail.com, Bloomington, 92316, 9092775179

I do not want anymore warehouses in Bloomington. That it will only bring more pollution and traffic to Bloomington. That's not safe for our families

I74.1

Response to Letter I74: Brenda Reyes, undated

Comment I74.1: This comment states that the commenter does not want any more warehouses in Bloomington and that they will only bring more traffic and pollution.

Response I74.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

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LETTER I75: Shannon Galasso (1 page)

Shannon Galasso, Ionshampster@hotmail.com, Bloomington, 92316, 9099972899

I75.1

I do not want anymore warehouses in Bloomington. It is horrible! The traffic is bad the air is bad! What type of community will it be once all the houses and people are gone!

Response to Letter I75: Shannon Galasso, undated

Comment I75.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the traffic and air quality are bad.

Response I75.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

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LETTER I76: Guadalupe Solis (1 page)

Guadalupe Solis. Slsgdlp@aol.com. Bloomington. 92316. 909-230-0530

I76.1

I do not want anymore warehouses in Bloomington. We need parks and more homes.

Response to Letter I76: Guadalupe Solis, undated

Comment I76.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the community needs more parks and homes.

Response I76.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I77: Mary Pound (2 pages)

Mary Pound, marypound@icloud.com, Bloomington, 92316 I77.1

I do not want anymore warehouses in Bloomington. We don't need any more. I77.1 cont.

Response to Letter I77: Mary Pound, undated

Comment I77.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I77.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I78: Kimm Grady (1 page)

Kimm Grady, kimmgrady@gmail.com, Bloomington, 92316, 9096810744

I do not want anymore warehouses in Bloomington. no, no, no. too much pollution, traffic, and trucks. not safe at all. there are too many schools with young children. I don't want any more near my home or our town.

I78.1

Response to Letter I78: Kimm Grady, undated

Comment I78.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses lead to too much pollution, traffic, and trucks near schools with young children.

Response I78.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I79: Jennifer Boatman (1 page)

Jennifer Boatman, Jmklug@yahoo.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. We already have too much truck traffic from people using their property for trucking. Hear roads were not made for the amount of heavy traffic. We choose to live in a rural environment not an industrial one

I79.1

Response to Letter I79: Jennifer Boatman, undated

Comment I79.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is already too much traffic and local roads were not made for the amount of heavy traffic.

Response I79.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I80: Roxanne Flores (1 page)

Roxanne Flores, Roxanneyanez716@gmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. It's frustrating! Especially because they aren't thinking of our kids. Building all these warehouse near schools in unexeptable. This isn't a warehouse community. If fontana and rialto want to then do in on thier city not ours. It's hard enough it doesn't have much ad other city's and now adding more warehouse is the last straw. **I80.1**

Response to Letter I80: Roxanne Flores, undated

Comment I80.1: This comment states that the commenter does not want any more warehouses in Bloomington and that developers are not thinking about kids by building warehouses near schools. The comment further states that Fontana and Rialto can build warehouses in their cities.

Response I80.1: The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I81: Terri Ramirez (1 page)

Terri Ramirez. ramirez551@sbcglobal.net. Colton. 92334

I do not want anymore warehouses in Bloomington. It is making Bloomington a bad place to live. It shows no respect for education. It's making the air bad. Encouraging illegal business and is telling people who live and work there they don't matter, all that matters is money. I believe politicians are making money on all these deals.

I81.1

Response to Letter I81: Terri Ramirez, undated

Comment I81.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses are making Bloomington a bad place to live and making the air polluted. The comment further states that the County is encouraging illegal business and telling people that work and live in Bloomington that they do not matter.

Response I81.1: The comment does not provide substantial evidence of any environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I82: Kathy Fleener (1 page)

Kathy Fleener, Kathyfleener@aol.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. They are ruining our beautiful town! I've lived here more than 40 years and I want to move because of all the trucks!

I82.1

Response to Letter I82: Kathy Fleener, undated

Comment I82.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter wants to move because of all of the trucks.

Response I82.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I83: Elizabeth Amador (1 page)

Elizabeth Amador, Aelizabeth@roadrunner.com, Bloomington, 92316, 9093195807

I do not want anymore warehouses in Bloomington. It's frustrating to see our community disappearing **I83.1**

Response to Comment I83: Elizabeth Amador, 1 page

Comment I83.1: This comment states that the commenter does not want any more warehouses in Bloomington and that it is frustrating to see the community disappearing.

Response I83.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I84: Valerie Rivera (1 page)

Valerie Rivera, Riveranvalerie00@gmail.com, Bloomington, 92316, 9092645090

I do not want anymore warehouses in Bloomington. Environmentalism aside, having more warehouses in Bloomington creates a funnel for students leaving high school. This does not allow a pathway of getting out of poverty and can discourage many from pursuing a higher education. Yes we get sidewalks from all these building but they don't lead to parks or libraries. These corporations are only okay with creating a road to keeping the poor and middle class stagnant. So much so that high schools provide CTE pathway classes TO WAREHOUSES. We have had enough. With the few that are already built to provide income to our small city, it's time we have these spaces available for our growth as a city.

I84.1

Response to Letter I84: Valerie Rivera, undated

Comment I84.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses contribute to students leaving high school. The comment further states that these warehouses don't lead to parks or libraries.

Response I84.1: The comment does not provide substantial evidence of any environmental impact. As further discussed in Master Response 1, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of students dropping out of high schools. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to students dropping out of high schools is not provided. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I85: Esmeralda Avalos (1 page)

Esmeralda Avalos, nanabanana733@gmail.com, Bloomington, 92316, 9513730053

I do not want anymore warehouses in Bloomington. "We are a community we are family Been here for yeafs this is home for us, cant just want to knock a neighborhood down just like that" **I85.1**

Response to Letter I85: Esmeralda Avalos, undated

Comment I85.1: This comment states that the commenter does not want any more warehouses in Bloomington and that Bloomington is a community and family. The commenter further states that the Project cannot just knock down a neighborhood.

Response I85.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I86: Margarita Martinez (1 page)

Margarita Martinez, Margaritavargas20@yahoo.com, Bloomington, 92316, 9094966536

I86.1

No, no estoy de acuerdo que haya mas bodegas en Bloomington. CONTAMINACIÓN, TRÁFICO

Response to Letter I86: Margarita Martinez, undated

Comment I86.1: This comment states that the commenter does not want any more warehouses in Bloomington and that they lead to pollution and traffic.

Response I86.1: The comment does not provide substantial evidence of any environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I87: Sandra Rodriguez (1 page)

Sandra Rodriguez, Rawflourishingskincare@gmail.com, Fontana, 92316, 3239783370

I do not want anymore warehouses in Bloomington. "I feel that the warehouse development takes away a sense of community for the residents , I also feel that These plans are demographically targeted! Why not go do this in Rancho Cucamonga or Redlands ,why ?? because of the income bracket in those city's , it is a shame to displace people who have worked hard their whole lives for their homes to now be forced to sell , my 93 year old grandmother will be displaced of the home she has lived in for the past 23 years !
if these plans take place, Children will no longer grow up with sense of community, these warehouses bring congestion , traffic and unwanted loitering from their young employees taking lunch breaks in their vehicles to smoke and drink, this is not the Bloomington we want fir our children!"

I87.1

Response to Letter I87: Sandra Rodriguez, undated

Comment I87.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouse development takes away the sense of community and is demographically targeted. The comment states that the commenter's grandmother will be forced to sell and will be displaced. Furthermore, the comment states that the warehouses bring traffic congestion and loitering.

Response I87.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As discussed in Section 5.13, *Population and Housing*, property owners within the development footprint would voluntarily sell their property and would be compensated by the Applicant. At the time future development is proposed in Planning Area B, property owners have the option to voluntarily sell their property and would be compensated by the future development's applicants. Property owners would not be forced to sell their properties, either through harassment or eminent domain.

As further discussed in Master Response 1, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of a feeling of community or loitering. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to the feeling of community and loitering is not provided. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I88: Daniel Spencer (1 page)

DANIEL Spencer, Asplicerdude@gmail.com, Upland, 91786

I88.1

I do not want anymore warehouses in Bloomington. Too much heavy traffic in residential neighborhoods.

Response to Letter I88: Daniel Spencer, undated

Comment I88.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is too much traffic in residential neighborhoods.

Response I88.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I89: Maria Durazo (1 page)

Maria Durazo, Fernandaka123@gmail.com, Bloomington, 92316, 909-251-8466

I do not want anymore warehouses in Bloomington. I feel upset and frustrated about the displacement of homes that has been made to build more unnecessary warehouses in my hometown.

I89.1

Response to Letter I89: Maria Durazo, undated

Comment I89.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter is upset about the displacement of homes for unnecessary warehouses.

Response I89.1: The comment does not provide substantial evidence of any environmental impact. As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant at or above market value. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-February 2022, Zillow.com—an online real estate and rental marketplace—reported 246 single-family properties listed for sale in the community of Bloomington and adjoining cities (11 units in Bloomington, 37 units in the City of Rialto, 149 units in the City of Fontana, and 49 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, in compliance with SB 330, the Project would offset the loss of zoned residential capacity by upzoning another site (i.e., Upzone Site). Therefore, implementation of the Project would not displace people or housing in a manner which would necessitate the construction of replacement housing elsewhere, and impacts would be less than significant. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I90: Saul Ramirez (1 page)

Saul Ramirez, Saul.ramirez26@yahoo.com, Las Vegas, 89121, 7022379686

I do not want anymore warehouses in Bloomington. It sucks

I90.1

Response to Letter I90: Saul Ramirez, undated

Comment I90.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I90.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I91: Hermania Matias (1 page)

Herminia Matias, Herminiamatias01@gmail.com, Bloomington, 92316, 9096401918

I91.1

No, I do not want anymore warehouses in Bloomington.The plots could be used for far better resources

Response to Letter I91: Hermania Matias, undated

Comment I91.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the land could be used for better resources.

Response I91.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I92: Viviana Bivian (1 page)

Viviana Bivian, Bivianv.925@gmail.com, Bloomington, 92316, (951)772-3487

I do not want anymore warehouses in Bloomington. I won't like where I live to become more of warehouses. It won't feel like home anymore. There will be more traffic and semi-trucks in the area making difficult for everyone.

I92.1

Response to Letter I92: Viviana Bivian, undated

Comment I92.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter does not like living in Bloomington because of all of the warehouses. The comment further states that there would be more traffic and semi-trucks in the area.

Response I92.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I93: Magdalena Matias (1 page)

Magdalena Matias, Matias.magdalena@yahoo.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. It's bringing more traffic and we are loosing homes

I93.1

Response to Letter I93: Magdalena Matias, undated

Comment I93.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the Project would bring more traffic. The comment also states that the community is losing homes.

Response I93.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

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The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I94: Sunni Ivey (1 page)

Sunni Ivey, sunni.ivey@gmail.com, Berkeley, 94709

I do not want anymore warehouses in Bloomington. It is a gross mismanagement of the land, and development will not serve the community in their best interests. Warehouses will bring pollution and heating due to increasing temperatures and heat island affect.

I94.1

Response to Letter I94: Suni Ivey, undated

Comment I94.1: This comment states that the commenter does not want any more warehouses in Bloomington and that they do not serve the community's best interests. The comment further states that warehouses lead to pollution and increasing temperatures from the heat island effect.

Response I94.1: The comment does not provide substantial evidence of any environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible.

In regard to relative contributions to the urban heat island effect, there is the potential for the Project to contribute to the effect as it would add additional pavement to the Specific Plan Area. However, as discussed on page 40 of the Specific Plan, the proposed and future buildings would have to adhere to Design Guidelines, which would require buildings to be light colored the majority of the proposed Specific Plan warehouse. Additionally, pursuant to Section 4.8 of the Specific Plan, development shall incorporate sustainable design features such as using white roofs for solar reflectivity and utilization of shade structures and trees with large canopies in order to reduce heat island effects. The comment provides a general opinion that the Project would result in an urban heat island effect, which would negatively impact the community, and does not raise any specific concerns with the adequacy of the Draft EIR. The comment will be forwarded to County decisionmakers as part of the Final EIR. Therefore, no further response is required or provided.

LETTER I95: Ada Trujillo (1 page)

Ada Trujillo, adat2013.at@gmail.com, San Bernardino, 92410, 19095713309,

No, no estoy de acuerdo que haya mas bodegas en Bloomington. No me gusta la construccion de bodegas o cualquier industria cerca de los vecindarios o cerca de las escuelas. Las bodegas en Bloominton estan al lado de las escuelas y no es justo que los residentes debamos de respirar toda su contaminacion y el peligro que causa porque a las bodegas llegan demasiados camiones a descargar o recoger materiales y todo esta esta pasando en frente de las casas

I95.1

Response to Letter I95: Ada Trujillo, undated

Comment I95.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter does not like warehouses near neighborhoods or schools. The comment also states that warehouses lead to pollution and dangers from trucks while they are unloading at warehouses.

Response I95.1: The comment does not provide substantial evidence of any environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I96: Naomii Radoi (1 page)

Naomi Radoi, naomi_radoi@yahoo.com, bloomington, 92316

I do not want anymore warehouses in Bloomington. too much traffic, trucks create damage to the roads, takes so long to get over freeway and that's with just the warehouses already built. more warehouses will make it terrible to get over freeway. its just a residential area not a warehouse area. **I96.1**

Response to Letter I96: Naomi Radoi, undated

Comment I96.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is too much traffic and trucks creating damage to roads.

Response I96.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

Furthermore, as discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue, and Santa Ana Avenue. As such, the proposed Project would actually benefit the community by providing road improvements to previously damaged roads, among other new infrastructure improvements. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

COMMENT I97: Mary Radoi (1 page)

Mary Radoi, Maryradoi92@yahoo.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. With just the ones that have been created, traffic has increased and it takes forever to get over the bridges. Increase in pot holes that just reopen every time it gets filled. Increase pollution. This is a residential area not LA. We live here for a reason and now the warehouses are taking over. Unacceptable

I97.1

Response to Letter I97: Mary Radoi, undated

Comment I97.1: This comment states that the commenter does not want any more warehouses in Bloomington and that traffic and pollution has increased. The comment further states that warehouses lead to potholes and warehouses are taking over.

Response I97.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible.

Furthermore, as discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue and Santa Ana. As such, the proposed Project would actually benefit the community by providing road improvements to previously damaged roads, among other new infrastructure improvements. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I98: Nina Radoi (1 page)

Nina Radoi, Nnradoi@yahoo.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. I have been in Bloomington for over 25 years. I choose to live away from traffic and warehouses. Now everywhere I look there is trucks and a crazy amount of traffic. I can't even get to my post office that's 2 miles away without taking 20-30 min to get over the bridge. no more warehouses! This air is getting worse and my daughter had a immune problems and if new warehouses or even a truck stop gets made, her health will get worse. Please stop, don't remove people out of their homes for warehouses!

I98.1

Response to Letter I98: Nina Radoi, undated

Comment I98.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouse lead to a lot of traffic and the air quality getting worse. The comment further staters that the commenter's daughter has health problems, which would get worse with increased warehouses. The comment says that the County should stop removing people from their homes for warehouses.

Response I98.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible.

As discussed in Section 5.13, *Population and Housing*, property owners within the development footprint would voluntarily sell their property and would be compensated by the Applicant. At the time future development is proposed in Planning Area B, property owners have the option to voluntarily sell their property and would be compensated by the future development's applicants. Property owners would not be forced to sell their properties, either through harassment or eminent domain. The comment provides the

commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

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LETTER I99: Peter Radoi (1 page)

Peter Radoi, Radoipeter@gmail.com , Bloomington, 92316

I do not want anymore warehouses in Bloomington. As a truck driver myself, I do not want to see anymore warehouses or a truck stop in bloomington! I have been here for over 25 years. I see the damage the trucks have done to area and the increase pollution and traffic. When I am home with my family what should take us 5-10 min to get a few miles not can take up to 30 min. That is unacceptable, we are in a residential area and we do not want to see anymore warehouses built. Why is Bloomington council so set on removing people out of their homes to make money? Most of the residents in Bloomington have been here for a long time maybe longer then myself. We moved out here to build our lives with our family's not to live next to a warehouse. It's damaging our lives and health. We now have to leave earlier just to calculate how to get around the 50 trucks on the road to get over the bridge. They are on our streets, they are everywhere. I see the damage trucks have done to LA. Is that what we want Bloomington to become? A place where we cringe when we mention the city. We all know the ugliness of LA and how trucks are filling the streets and the damage it creates. That's what Bloomington will look like if we continue this road.

I99.1

Response to Letter I99: Peter Radoi, undated

Comment I99.1: This comment states that the commenter does not want any more warehouses in Bloomington and that trucks lead to damage from trucks and increase pollution and traffic. The comment questions why the Bloomington council is set on removing people from their homes as warehouses are damaging to residents' lives and health. The comment states that Bloomington would look like Los Angeles if warehouses continue to be developed.

Response I99.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible.

Furthermore, as discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue and Santa Ana. As such, the proposed Project would actually benefit the community by providing road improvements to previously damaged roads, among various new infrastructure improvements.

As discussed in Section 5.13, *Population and Housing*, property owners within the development footprint would voluntarily sell their property and would be compensated by the Applicant. At the time future development is proposed in Planning Area B, property owners have the option to voluntarily sell their property and would be compensated by the future development's applicants. Property owners would not be forced to sell their properties, either through harassment or eminent domain. The comment provides opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

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LETTER I100: Macedonia Gonzalez (1 page)

Macedonio Gonzalez, Mgonzalez.landscape@gmail.com, Bloomington, 92316, 9513124332

I do not want anymore warehouses in Bloomington. The proposed Bloomington Business Park threatens the rural lifestyle and overall quality of life for Bloomington residents. This would completely change the make up of our community and I strongly oppose the plan. I100.1

Response to Letter I100: Macedonio Gonzalez, undated

Comment I100.1: his comment states that the commenter does not want any more warehouses in Bloomington and that the proposed Project threatens the rural lifestyle and quality of life for Bloomington residents.

Response I100.1: The comment does not provide substantial evidence of any environmental impact. As further discussed in Master Response 1, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of rural lifestyle or overall quality of life in Bloomington. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to the rural lifestyle or overall quality of life in Bloomington is not provided. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I101: Cecilia Gonzalez (1 page)

Cecilia Gonzalez, Ceciliamercadoglez@gmail.com, Bloomington, 92316, 9513230364

I do not want anymore warehouses in Bloomington. Bloomington deserves better, warehouses are not what the Bloomington community is asking for. I would like to see recreation and leisure opportunities for all ages in the community. I have raised my children in this community and now my granddaughter is a Bloomington resident and I am concerned about what warehouses will do to her quality of life. **I101.1**

Response to Letter I101: Cecilia Gonzalez, undated

Comment I101.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter would like to see recreation opportunities. Furthermore, the commenter is worries about what warehouses would do for the commenter's granddaughter's quality of life.

Response I101.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I102: Alejandra Gonzalez (1 page)

Alejandra González, alejandra.gonzalez001@gmail.com, Rialto, 92376, 9095432178

I do not want anymore warehouses in Bloomington. The proposed Bloomington Business Park is not being proposed in an empty lot, this proposal will displace families from their homes and impact a residential rural community. Developers proposing this plan are not members of this community and do not understand the rural atmosphere in Bloomington. The Board of Supervisors who serve and represent the Bloomington community must listen to their constituents and vote in the best interest of the community and developers.

I102.1

Response to Letter I102: Alejandra Gonzalez, undated

Comment I102.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the Project would displace families. The comment further states that the developers are not part of the community and do not understand the rural atmosphere of Bloomington. The comment states the Board of Supervisors must listen to the community.

Response I102.1: The comment does not provide substantial evidence of any environmental impact. As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant at or above market value. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-February 2022, Zillow.com—an online real estate and rental marketplace—reported 246 single-family properties listed for sale in the community of Bloomington and adjoining cities (11 units in Bloomington, 37 units in the City of Rialto, 149 units in the City of Fontana, and 49 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, in compliance with SB 330, the Project would offset the loss of zoned residential capacity by upzoning another site (i.e., Upzone Site). Therefore, implementation of the Project would not displace people or housing in a manner which would necessitate the construction of replacement housing elsewhere, and impacts would be less than significant. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I103: Amy Mendoza (1 page)

Amy Mendoza, amy.m72216@gmail.com, Bloomington, 92316, 9092326378

I do not want anymore warehouses in Bloomington. Angry. There shouldn't be warehouses in communities that have been established for a long time. Many people won't have places to go after if this comes to effect.

I103.1

Response to Letter I103: Amy Mendoza, undated

Comment I103.1: This comment states that the commenter does not want any more warehouses in Bloomington and that people would not have anywhere to go if the Project gets approved.

Response I103.1: The comment does not provide substantial evidence of any environmental impact. As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant at or above market value. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-February 2022, Zillow.com—an online real estate and rental marketplace—reported 246 single-family properties listed for sale in the community of Bloomington and adjoining cities (11 units in Bloomington, 37 units in the City of Rialto, 149 units in the City of Fontana, and 49 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, in compliance with SB 330, the Project would offset the loss of zoned residential capacity by upzoning another site (i.e., Upzone Site). Therefore, implementation of the Project would not displace people or housing in a manner which would necessitate the construction of replacement housing elsewhere, and impacts would be less than significant. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I104: Kimberly Conrad (1 page)

Kimberly Conrad. HippieatHeart3@gmail.com. Bloomington. 92316.

I do not want anymore warehouses in Bloomington. We hate them. They are clogging up the streets with even more trucks which damage the roads. Not to mention the added population. We may be a small city but we shouldn't be eaten away by bug corporations buying our land all for greed

I104.1

Response to Letter I104: Kimberly Conrad, undated

Comment I104.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses lead to traffic congestion and trucks that damage roads. The comment further states that warehouses lead to an increased population and developers should not buy Bloomington for their greed.

Response I104.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

Furthermore, as discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue and Santa Ana. As such, the proposed Project would actually benefit the community by providing road improvements to previously damaged roads.

Based on the proposed building square footages, the Opening Year Development – Option 1 would generate 1,769 jobs and the Opening Year Development – Option 2 would generate 2,270 jobs. Based on Tables 5.13-1 and 5.13-5, the workforce demand of up to 2,270 employees could be filled by persons residing in unincorporated County, including from Bloomington, and the surrounding areas. Additionally, the immediate availability in the labor pool in the vicinity of the Specific Plan Area is not expected to be constrained due to the current 7.7 percent unemployment rate in the County (EDD, 2021). As such, the proposed Project would not result in unplanned population growth. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I105: Victor Montoya (1 page)

Victor Montoya, victor2686@att.net, Fontana, 92335, 9093479248

I do not want anymore warehouses in Bloomington. The warehouses are one thing, but there is no infrastructure to support these buildings the roads haven't been improved the cedar overpass is a mess, the county/ city doesn't care they don't have to drive these roads, also there's not enough parking for the employees there having to park in the streets

I105.1

Response to Letter I105: Victor Montoya, undated

Comment I105.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is no infrastructure to support warehouse buildings and that the roads are a mess. The comment further states that there is not enough parking for employees and they are having to park on the streets.

Response I105.1: The comment does not provide substantial evidence of any environmental impact. As discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue and Santa Ana. As such, the proposed Project would actually benefit the community by providing road improvements to previously damaged roads, among various new infrastructure improvements. Furthermore, as described in Section 3.0, the Project would include various infrastructure improvements to support the proposed development such as storm drainage, sewer, and water improvements, among others.

While parking is not a CEQA issue, the Specific Plan would include parking standards to ensure there is sufficient parking for Project employees. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I106: Brenda Butler (2 pages)

Brenda Butler, awellbeing2@gmail.com, Bloomington, 92316, 19092051111,

I do not want anymore warehouses in Bloomington. I feel it is very costly in many ways for Bloomington. High traffic leading to road/pavement destruction. How many times will the roads need to repaved and at what cost? More air pollution and traffic congestion. I have already noticed the increase in traffic just due to the new warehouses. More would only add to this

I106.1

problem. I am concerned about the "routes" for semi vehicles being so close to schools as it is just an accident waiting to happen. It is very hard for truck drivers (as they sit so high) to see small children. We already have many illegal truck yards. There are several new warehouses still under construction near the cement plant. How many more do we need? I have lived in the area for over 45 years and while I realize change is inevitable, enough is enough.

I106.1 cont.

Response to Letter I106: Brenda Butler, undated

Comment I106.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses lead to traffic, air pollution, and pavement destruction. The comment states that the commenter is worried that truck routes are too close to schools. The comment states that there are currently illegal truck yards and enough warehouses.

Response I106.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible.

Furthermore, as discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue and Santa Ana. As such, the proposed Project would actually benefit the community by providing road improvements to previously damaged roads, among various new infrastructure improvements. Furthermore, as shown on Figure 3-4, the proposed truck routes would be located away from existing schools.

As further discussed in Master Response 1, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of current illegal trucking operations. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to current illegal trucking operations is not provided. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

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LETTER I107: Cristina Torres (1 page)

Cristina Torres, cristinatorresoc@yahoo.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. Warehouse development is destroying the community that exist in Bloomington. It will be displacing many families. Rezoning means more pollution and less housing for families of lower income.

I107.1

Response to Letter I107: Cristina Torres, undated

Comment I107.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the proposed Project would displace families and lead to more pollution.

Response I107.1: The comment does not provide substantial evidence of any environmental impact. As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant at or above market value. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-February 2022, Zillow.com—an online real estate and rental marketplace—reported 246 single-family properties listed for sale in the community of Bloomington and adjoining cities (11 units in Bloomington, 37 units in the City of Rialto, 149 units in the City of Fontana, and 49 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, in compliance with SB 330, the Project would offset the loss of zoned residential capacity by upzoning another site (i.e., Upzone Site). Therefore, implementation of the Project would not displace people or housing in a manner which would necessitate the construction of replacement housing elsewhere, and impacts would be less than significant.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I108: Joslyn Santana (1 page)

Joslyn Santana, jospamsantana@gmail.com, Rancho Cucamonga, 91730, 19092432744

I do not want anymore warehouses in Bloomington. I am very against the continual growth of warehouses in my hometown of the Inland Empire, including Bloomington. I have lived in Fontana in a unincorporated zip code before, and my family should be able to breath clean air, have access to parks, and have access to other community resources!

I108.1

Response to Letter I108: Joslyn Santana, undated

Comment I108.1: This comment states that the commenter does not want any more warehouses in Bloomington and that residents should be able to breath clean air, access parks, and have community resources.

Response I108.1: The comment does not provide substantial evidence of any environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I109: Luis Saavedra (1 page)

Luis Saavedra, joetorres11892@yahoo.com, Bloomington, 92316,

I do not want anymore warehouses in Bloomington. Don't want the traffic on Cedar and Sierra. It's bad already during 3-6 PM

I109.1

Response to Letter I109: Luis Saavedra, undated

Comment I109.1: This comment states that the commenter does not want any more warehouses in Bloomington and that commenter does not want any more traffic.

Response I109.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I110:

Paola Yanez, paolayanez33@gmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. There are already so many warehouses in the area that these "new jobs" would not do anything for our economy.

I110.1

Response to Letter I110: Paola Yanez, undated

Comment I110.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the new jobs would not do anything for the economy.

Response I110.1: The comment does not provide substantial evidence of any environmental impact. As further discussed in Master Response 1, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of economic impacts. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to economic impacts is not provided. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I111: Arcelia Mendoza (1 page)

ArceliaMendoza, apasionada29@sbcglobal.net, Bloomington, 92316-3443, 9098311471

I111.1

I do not want anymore warehouses in Bloomington. Too many trucks on small streets

Response to Letter I111: Arcelia Mendoza, undated

Comment I111.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there would be too many trucks on small streets.

Response I111.1: The comment does not provide substantial evidence of any environmental impact. As discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue and Santa Ana Avenue. As such, the proposed Project would provide road improvements to ensure that roadways would have adequate capacity for trucks, as further demonstrated in Appendix K1. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I112: Darby Osnaya (1 page)

Darby Osnaya, vpdarby@gmail.com, Colton 92324, 9095331119

I112.1

No estoy de acuerdo que haya mas bodegas en Bloomington. No me gustan para nada!

Response to Letter I112: Darby Osnaya, undated

Comment I112.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I112.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I113: Laura Blumberg (1 page)

Laura Blumberg, laurablumberg22@gmail.com, Bloomington, 92316, 7143807262

I do not want anymore warehouses in Bloomington. I think there are already too many warehouses in the area. We certainly don't need to be tearing down houses for more of them. I like the rural/agricultural area that we live in. I don't think warehouses should be so close to schools. New warehouses would bring too much traffic to the area, which is getting worse already.

I113.1

Response to Letter I113: Laura Blumberg, undated

Comment I113.1: This comment states that the commenter does not want any more warehouses in Bloomington and that we should not tear down houses for more warehouses. The comment further states that the commenter likes the rural area and does not think warehouses should be so close to schools. The comment states that warehouses add to traffic issues.

Response I113.1: The comment does not provide substantial evidence of any environmental impact. As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant at or above market value. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-February 2022, Zillow.com—an online real estate and rental marketplace—reported 246 single-family properties listed for sale in the community of Bloomington and adjoining cities (11 units in Bloomington, 37 units in the City of Rialto, 149 units in the City of Fontana, and 49 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, in compliance with SB 330, the Project would offset the loss of zoned residential capacity by upzoning another site (i.e., Upzone Site). Therefore, implementation of the Project would not displace people or housing in a manner which would necessitate the construction of replacement housing elsewhere, and impacts would be less than significant.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I114: Jolene Saldivar (1 page)

Jolene Saldivar, monroe_909@yahoo.com, Riverside, 92507

I do not want anymore warehouses in Bloomington. Warehouse development makes me extremely upset and concerned. I am a doctoral candidate at UCR and I grew up in Colton, California. I study native plant and pollinator communities in Riverside and San Bernardino Counties. One of the largest threats to our ecosystems is habitat destruction and I have witnessed our beautiful habitats be destroyed constantly during the 34 years that I have lived in the Inland Empire. Also, the diesel truck traffic is out of control due to warehouses. Not to mention, the air quality is worsening each year and the impacts of warehousing pollution is evident in our residents. Enough is enough. We need to put a stop to warehouse and logistic development in Bloomington and all of the Inland Empire! I114.1

Response to Letter I114: Jolene Saldivar, undated

Comment I114.1: This comment states that the commenter does not want any more warehouses in Bloomington and that one of the largest threats to our ecosystems is habitat construction, and the commenter has witness that living in the Inland Empire. The comment further states that truck traffic and air quality is worsening from the increase in warehouses.

Response I114.1: The comment does not provide substantial evidence of any environmental impact. As discussed in Draft EIR Section 5.4, *Biological Resources,* the Project site is comprised of seven types of vegetation communities and land covers, Developed lands, Disturbed lands, Disturbed California Buckwheat scrub, Eucalyptus Woodland, Nursery, Ornamental, and Upland Mustard Fields. Development within the Specific Plan Area is not expected to impact any rare species. However, while it is not expected that the Future Development-Specific Plan Buildout Area, including full buildout infrastructure areas (i.e., for areas outside of Opening Year – Options 1 and 2 and offsite infrastructure areas supporting the Opening Year-Options 1 and 2 Development) would support suitable habitat for rare plant species (Helix 2021), general biological surveys will be performed for future developments outside of the Opening Year-Options 1 and 2 Development areas to confirm whether suitable habitat exists. As such, MM BIO-1 is included to require habitat surveys for special-status plant species prior to developments in the Future Development-Specific Plan Buildout Area. If suitable habitat is identified, rare plant surveys should be conducted to determine presence of species, in accordance with published agency guidelines (CDFW 2009, CDFW 2000, and USFWS 2000) and during the appropriate time of year. If rare plants are identified and cannot be avoided, the project-level biological survey report would justify why species-specific mitigation is necessary and propose mitigation to reduce project impacts to a less than significant level. The Opening Year Development Options 1 and 2 areas supports potentially suitable roosting and foraging habitat for pocketed free-tailed bat and western yellow bat. As such, MM BIO-3 has been included to require construction and demolition activities to occur outside the bat maternity roosting season when feasible, which is generally defined as April 1 through August 31. If construction/demolition must occur during the maternity roosting season, pre-construction surveys will be conducted as outlined in MM BIO-3. Additional avoidance and minimization measures are required if maternity roosts are identified, as outlined in MM BIO-3. Implementation of MM BIO-3 would reduce potential impacts to sensitive bat species to a less than significant level. Furthermore, additional biological surveys would be required prior to construction within the Future Development Area or Upzone Site pursuant to MM BIO-1 through MM BIO-4. Overall, with implementation of mitigation, impacts would be less than significant.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures

AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

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LETTER I115: Femila Manoj (1 page)

Femila Manoj, femila.manoj@gmail.com, Riverside, 92507, 6362816797

I do not want anymore warehouses in Bloomington. Unnecessary

I115.1

Response to Letter I115: Femila Manoj, undated

Comment I115.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I115.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I116: Ernesto Carlos (1 page)

Ernesto Carlos, Vaquerozlg@gmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. Estas bodegas van a crear mucho tráfico, mucho ruido, y mucha contaminación. Me gustaría que los supervisores del condado fueran servidores públicos y democráticos y que hicieran una encuesta en la area afectada y que se guiaran por la mayoría.

I116.1

Response to Letter I116: Ernesto Carlos, undated

Comment I116.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses cause traffic, noise, and pollution. The comment asks the County Supervisors to listen to the majority and deny the Project.

Response I116.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

In regard to noise, as detailed in the Impact NOI-1 discussion that begins on page 5.12-26 of the Draft EIR, each of the Project scenarios would implement PDF NOI-1, which would require 12- to 14-foot-high cement block walls at Sites 1 and 2 and 9-foot-high cement walls at Site 4. With implementation of PDF NOI-1, operational noise levels for all scenarios would not exceed the County's exterior noise level standards, as adjusted to reflect the ambient noise levels at all nearby sensitive receiver locations. Additionally, the increase in ambient noise levels would range from 0.1 to 3.0 with the implementation of PDF NOI-1, which would not generate a significant daytime or nighttime operational noise level increase at nearby receiver locations. Furthermore, pursuant to Specific Plan guidelines, future projects developed near residences or schools would be required to install at least 12-foot-high screen walls.

As detailed in the Draft EIR in Section 5.12, *Noise,* starting on page 5.12-48, the proposed Project would generate traffic related noise from operation. As described in Section 3.0, *Project Description*, of the Draft EIR, the proposed Specific Plan buildings would be accessed from Laurel Avenue, Locust Avenue, and Maple Avenue. Tables 5.12-23 through 5.12-24 show that both the Opening Year with Project and General Plan Buildout with Project conditions would result in increases less than the 1.5 dBA CNEL threshold. Thus, off-site traffic noise impacts from the Project would be less than significant.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

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LETTER I117: Cristi Caraveo (1 page)

Cristi Caraveo, cristicc92@icloud.com, Bloomington, 92316, (909) 219-3155

I do not want anymore warehouses in Bloomington. The cedar bridge is already crammed, I don't even want to imagine how much more traffic there will be than there already is.

I117.1

Response to Letter I117: Cristi Caraveo, undated

Comment I117.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the traffic is already bad and would get worse.

Response I117.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I118: Guadalupe Duran

Guadalupe Duran, Lupe31586@gmail.com, Bloomington, 92316, 9098519286 *I do not want anymore warehouses in Bloomington. Too many wearhouse in the area*

I118.1

Response to Letter I118: Guadalupe Duran, undated

Comment I11.18: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I118.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I119: Francisco Ramirez (1 page)

Francisco Ramirez, pancho2514@gmail.com, Bloomington, 92316 , 19092448300

I do not want anymore warehouses in Bloomington. I do not agree because there is going to be more traffic and more air polution. Its not safe to build around schools.

I119.1

Response to Letter I119: Francisco Ramirez, undated

Comment I119.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there will be more traffic and air pollution, which is not safe near schools.

Response I119.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I120: Francisco Ramirez (1 page)

Francisco Ramirez, franciscoramirez909@yahoo.com, Bloomington, 9094874678

I do not want anymore warehouses in Bloomington. Not safe for our community and can cause more of a traffic delay then there already is.

I120.1

Response to Letter I20: Francisco Ramirez, undated

Comment I120.1: This comment states that the commenter does not want any more warehouses in Bloomington and that it is not safe and will cause more traffic delay.

Response I120.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I121: Luis Ramirez (1 page)

Luis Ramirez, Ludramir@gmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. The people of Bloomington have had enough of warehosue construction. The nearby schools are surrounded by warehouses, and there continues to be more. There is consistent traffic, bad air quality and its upsetting seeing so many peoole growing up like this. Bloomington is predominantly people of color, and we deserve better. **I121.1**

Response to Letter I121: Luis Ramirez, undated

Comment I121.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the nearby schools are surrounded by warehouses. The comment states Bloomington has bad traffic and air quality. The comment further states that the community is predominantly people of color and they deserve better.

Response I121.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. For an additional discussion regarding environmental justice, the commenter is referred to Master Response 4. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I122: Brandalyne Evans (2 pages)

Brandalyne Evans, dalyne.evans@gmail.com, Fontana, 92336, 9095287781

I do not want anymore warehouses in Bloomington. I'm sick of the Inland Empire being used to I122.1

make millionaires and billionaires while the11y give nothing back to the community. I grew up near this community, and although I no longer live here, it hurts to see it being turned into warehouses. I122.1 cont.

Response to Letter I122: Brandalyne Evans

Comment I122.1: This comment states that the commenter does not want any more warehouses in Bloomington and that it is sad that developers use the Inland Empire for money, but do not give anything back.

Response I122.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I123: Maria Magallanes (1 page)

Maria Magallanes, maria.magallanes@live.com, Bloomington, 92316, 9095331545

No estoy de acuerdo que haya mas bodegas en Bloomington. Bloomington is supposed to be a residential peaceful town not a busy industrial town filled with noice, traffic and trucks.

I123.1

Response to Letter I123: Maria Magallanes, undated

Comment I123.1: This comment states that the commenter does not want any more warehouses. The comment also states that Bloomington is supposed to be a peaceful town not an industrial town with noise, traffic, and trucks.

Response I123.1: The comment does not provide substantial evidence of any environmental impact. In regard to noise, as detailed in the Impact NOI-1 discussion that begins on page 5.12-26 of the Draft EIR, each of the Project scenarios would implement PDF NOI-1, which would require 12- to 14-foot-high cement block walls at Sites 1 and 2 and 9-foot-high cement walls at Site 4. With implementation of PDF NOI-1, operational noise levels for all scenarios would not exceed the County's exterior noise level standards, as adjusted to reflect the ambient noise levels at all nearby sensitive receiver locations. Additionally, the increase in ambient noise levels would range from 0.1 to 3.0 with the implementation of PDF NOI-1, which would not generate a significant daytime or nighttime operational noise level increase at nearby receiver locations. Furthermore, pursuant to Specific Plan guidelines, future projects developed near residences or schools would be required to install at least 12-foot-high screen walls.

As detailed in the Draft EIR in Section 5.12, *Noise,* starting on page 5.12-48, the proposed Project would generate traffic related noise from operation. As described in Section 3.0, *Project Description*, of the Draft EIR, the proposed Specific Plan buildings would be accessed from Laurel Avenue, Locust Avenue, and Maple Avenue. Tables 5.12-23 through 5.12-24 show that both the Opening Year with Project and General Plan Buildout with Project conditions would result in increases less than the 1.5 dBA CNEL threshold. Thus, off-site traffic noise impacts from the Project would be less than significant.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I124: Kathren Brooks (1 page)

Kathren Brooks, kathren_brooks@cjusd.net, Bloomington, 92316, 9099215215

I do not want anymore warehouses in Bloomington. As an educator in the community I do not want anymore warehouses in the community. As it stands, many families in this area are already very low income, renters, multifamily residences who cannot afford to move elsewhere. By buying out the property owners, they earn financial gain but for the renters there is only more financial burden.To displace them is unfair and unjust. We have worked hard as a community and as educators to build relationships with these families and we belong together, to continue to support each other both in and out of school. By removing the houses our enrollment will go down substantially which will also displace several CJUSD employees. There is no positive impact in this situation for the residents and cjusd employees that have been the foundation in this community for decades.

I124.1

Response to Letter I124: Kathren Brooks, undated

Comment I124.1: This comment states that the commenter does not want any more warehouses in Bloomington and that families in the area are low income, renters, or multi-family residences who cannot afford to move elsewhere. The comment states that by removing houses, school enrollment will go down which would displace several CJUSD employees.

Response I124.1: The comment does not provide substantial evidence of any environmental impact. As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant at or above market value. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-February 2022, Zillow.com—an online real estate and rental marketplace—reported 246 single-family properties listed for sale in the community of Bloomington and adjoining cities (11 units in Bloomington, 37 units in the City of Rialto, 149 units in the City of Fontana, and 49 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, in compliance with SB 330, the Project would offset the loss of zoned residential capacity by upzoning another site (i.e., Upzone Site). Therefore, implementation of the Project would not displace people or housing in a manner which would necessitate the construction of replacement housing elsewhere, and impacts would be less than significant.

As further discussed in Master Response 1, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of school enrollment. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to school enrollment is not provided. For an additional discussion regarding environmental justice, the commenter is referred to Master Response 4. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I125: Victor Montoya (1 page)

Victor Montoya, victor2686@att.net, Fontana, 92335, 9093479248

I do not want anymore warehouses in Bloomington. They should build these warehouses in the communities and neighborhoods that the city council members live in, then they'll see what Bloomington residents are going though

I125.1

Response to Letter I125: Victor Montoya, undated

Comment I125.1: This comment states that the commenter does not want any more warehouses in Bloomington and that these warehouses should build the warehouses in areas where councilmembers live.

Response I125.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER 126 Ana Gonzalez Reyes (1 page)

Ana Gonzalez Reyes, ana.quezada60@yahoo.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. I don't like the warehouse development idea because that would mean more pollution to the environment. I have a 6 year old who has respiratory problems and I know this would definitely be a problem for him and would mean a lot more expensive hospital/doctor visits. Besides that, this is our home, Bloomington has been amazing just the way it is. With its beauty of all the farms and animals around all the nice neighbors we have.

I126.1

Response to Letter I126: Ana Gonzalez Reyes, undated

Comment I126.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouse development would lead to more pollution. The comment states that the commenter has a child with respiratory problems and this Project would lead to more health problems for him. The comment further states that Bloomington is beautiful the way that it is with farm animals and neighbors.

Response I126.1: The comment does not provide substantial evidence of any environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I127: Brad Stott (1 page)

Brad Stott, Bradngina5384@gmail.com, Bloomington, 92335, 9097702434

I do not want anymore warehouses in Bloomington. Building more warehouse will crate more traffic in an already congested area. The Cedar overpass is already heavily traveled with big rigs and this will create more problems.

I127.1

Response to Letter I127: Brad Stott, undated

Comment I127.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the area is already congested and more warehouses would lead to more congestion.

Response I127.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I128: Heather Butterworth (1 page)

Heather Butterworth, HEATHER_BUTTERWORTH@CJUSD.NET, Bloomington, 92316, 9095805004

I128.1

I do not want anymore warehouses in Bloomington. The warehouses that have already been built here have destroyed this rural neighborhood. What a shame.

Response to Letter I128: Heather Butterworth, undated

Comment I128.1: This comment states that the commenter does not want any more warehouses in Bloomington and that current warehouses have already ruined Bloomington.

Response I128.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I129: Gustavo Rojo (1 page)

Gustavo Rojo, gustavorojo1988@gmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. Developers are targeting our community and they just see cheap land. You can't seriously displace hundreds of people and think it is ok. This project's impact far outweighs its benefits, from increased pollution, more traffic that is already bad as it is, big impact on the environment including some of the wildlife that surprisingly lives there. My family moved into Bloomington 4 years ago and we loved the community, it was what we could afford. The new warehouse that was built off cedar Ave at one time we thought it was going to be a shopping center but it was all a dream, now we see all the change that is happening, how these warehouses are driving people out. I love my home and community and we will not stand for some individuals with hungry pockets to try and make our small city and community worse. Of you don't live here and witness the impact that these warehouses have made first hand!, then you have no say in what is our best interest.

I129.1

Response to Letter I129: Gustavo Rojo, undated

Comment I129.1: This comment states that the commenter does not want any more warehouses in Bloomington and that developers are targeting Bloomington and will displace hundreds of people. The comment further states that the impacts from the Project outweigh the benefits and include pollution, more traffic, and impact wildlife. The comment states that the change happening in Bloomington is driving people out and that if individuals do not live in Bloomington, they should not have a say in what happens in Bloomington.

Comment I129.1: The comment does not provide substantial evidence of any environmental impact. As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant at or above market value. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-February 2022, Zillow.com—an online real estate and rental marketplace—reported 246 single-family properties listed for sale in the community of Bloomington and adjoining cities (11 units in Bloomington, 37 units in the City of Rialto, 149 units in the City of Fontana, and 49 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, in compliance with SB 330, the Project would offset the loss of zoned residential capacity by upzoning another site (i.e., Upzone Site). Therefore, implementation of the Project would not displace people or housing in a manner which would necessitate the construction of replacement housing elsewhere, and impacts were determined to be less than significant.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As discussed in Section 5.4, *Biological Resources,* with implementation of Mitigation Measures BIO-1 through BIO-8 and existing regulations, impacts to biological species, included sensitive wildlife, were determined to be less than significant. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

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LETTER I130: Armando Torres (1 page)

Armando Torres, netos1@yahoo.com, Bloomington, 92316, 9099368007

I do not want anymore warehouses in Bloomington. Leave the people in their homes. I do not want more traffic and pollution.

I130.1

Response to Letter I130: Armando Torres, undated

Comment I130.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter does not want more traffic or pollution.

Response I130.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I131: Eduardo Martinez (1 page)

Eduardo Martinez, Edxxxiii@gmail.com, Rancho Cucamonga, 91737, 951-206-9030

I do not want anymore warehouses in Bloomington. I work in administration for CJUSD. I do not want my 14 year job experience with the district and in education to be determined by extra warehouses.

I131.1

I131.1 cont.

Response to Letter I131: Eduardo Martinez, undated

Comment I131.1: This comment states that the commenter does not want any more warehouses in Bloomington and that they do not want their position as an administrator at CJUSD to be influenced by warehouses.

Response I131.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I132: Teresa Garcia (1 page)

Teresa Garcia, trgarcia80@yahoo.com, Bloomington, 92316, 9098770824

I do not want anymore warehouses in Bloomington. I don't think this community needs anymore warehouses. Traffic and air quality is very much a concern. My house is surrounded by at least three warehouses. There is plenty of empty land(Barstow/Needles etc.) in other areas of the county. The traffic on the Cedar overpass is extremely at its worst at any given time. This bridge was built in 1968 and is in need of remodeling. The major streets (Riverside Ave and Sierra Ave) have been updated but not the Cedar bridge. There is an overpass on Cypress Ave in Fontana to help with the traffic. Why can a bridge be built on Alder to help with the traffic. I have seen truck trailers parked in the middle of Slover Ave waiting to get into the warehouse. What will happen once we have more warehouses.

I132.1

Response to Letter I132: Teresa Garcia, undated

Comment I132.1: This comment states that the commenter does not want any more warehouses in Bloomington and that traffic and air quality are the commenter's main concerns. The comment further states that traffic congestion on the Cedar overpass is really bad and that the commenter sees a lot of trucks parked on Slover Avenue. The comment further states that there is plenty of space in Barstow and Needles to build warehouses.

Response I132.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

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LETTER I133: Alma Morrell (1 page)

Alma Morrell, almamorrell@gmail.com, Bloomington, 92316, 9099578134,

I do not want anymore warehouses in Bloomington. I think it is bad for our community, increasing traffic and air quality. I would like to keep our city residential.

I133.1

Response to Letter 133: Alma Morrell, undated

Comment I133.1: This comment states that the commenter does not want any more warehouses in Bloomington and that it is bad for the community as it increases traffic and poor air quality.

Response I133.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

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As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER 134: Susana Garita (1 page)

Susana Garita, Susiegarita@gmail.com, Bloomington, 92316, 9092351635

I do not want anymore warehouses in Bloomington. It's a bad idea. Why are they trying to push so many families out of their homes?

I134.1

Response to Letter 134: Susana Garita, undated

Comment I134.1: This comment states that the commenter does not want any more warehouses in Bloomington. The comment questions why developers are trying to push people out of their homes.

Response I134.1: The comment does not provide substantial evidence of any environmental impact. As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant at or above market value. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-February 2022, Zillow.com—an online real estate and rental marketplace—reported 246 single-family properties listed for sale in the community of Bloomington and adjoining cities (11 units in Bloomington, 37 units in the City of Rialto, 149 units in the City of Fontana, and 49 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, in compliance with SB 330, the Project would offset the loss of zoned residential capacity by upzoning another site (i.e., Upzone Site). Therefore, implementation of the Project would not displace people or housing in a manner which would necessitate the construction of replacement housing elsewhere, and impacts would be less than significant. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I135: Elisa Garcia (2 pages)

Elisa Garcia, garciaelisa1022@gmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. The warehouse development in Bloomington is a gross and irresponsible disregard for the quality of life for the people residing in Bloomington. Time and time again concerned neighbors in Bloomington attend public forums to address our grievances and we are overlooked every time. I believe there are better ways to boost our local economy without having to sacrifice our quality of life. These warehouses have a largely negative impact on our community. Bloomington doesn't even have sidewalks. Its roads are riddled with potholes and streets that are too narrow for the semi trucks needed to make these warehouses function. Simply put, Bloomington does not have the infrastructure to sustain the traffic caused by these warehouses. Furthermore, these projects have a negative impact on the livelihood, health, and goals for the community. The air quality is already extremely poor in the Inland Empire and adding more warehouses and trucks can lead to people developing **I135.1**

respiratory problems. I say that the goals and aspirations of people in Bloomington can be negatively affected by these warehouses because it seems that the government has failed to protect their interests despite their attempts to organize and advocate for their quality of life. Furthermore, at the board of supervisors meeting the point was made that these warehouses would be beneficial for the community because it would mean more jobs. This argument is extremely disrespectful and demeaning. It infers that the only thing residents of Bloomington are capable of is working at a warehouse. This is a reflection of the thoughts that Bloomington's own representatives have one them. Through these words, representatives are saying that the Bloomington community cannot be better than the condition they are in. **I135.1 cont.**

Response to Letter I135: Elisa Garcia, undated

Comment I135.1: This comment states that the commenter does not want any more warehouses in Bloomington and that concerned neighbors have voiced their concerns in the past but have been overlooked every time. The comment further states that warehouses have a negative impact on the community as Bloomington does not have sidewalks, streets are narrow and riddled with potholes, and that Bloomington does not have the roadway infrastructure for warehouse traffic. The comment further states that current air quality is poor, and warehouses will lead to more people developing respiratory problems. The comment states that representatives have failed to protect community interests.

Response I135.1: The comment does not provide substantial evidence of any environmental impact. As discussed in Section 3.0, *Project Description,* the Project would include multiple roadway improvements such as repaving and/or widening Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue, and Santa Ana Avenue. The Project would also construct sidewalks on all of the previously listed streets. These improvements would ensure that the Project would have adequate access and roadway infrastructure for the proposed warehouses.

Furthermore, Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as

much as possible. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

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LETTER I136: Maria Arellano (1 page)

Maria Arellano, Ofearellano138871@gmail.com, Bloomington, 92316, 9099150848

I do not want anymore warehouses in Bloomington. I'm so upset about it. They wanna build warehouse by schools which means more people in our town and more traffic.

I136.1

Response to Letter I136: Maria Arellano, undated

Comment I136.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses would bring an increase in population and more traffic.

Response I136.1: The comment does not provide substantial evidence of any environmental impact. As discussed on page 5.13-8 of the Draft EIR, based on the proposed building square footages, the Opening Year Development – Option 1 would generate 1,769 jobs and the Opening Year Development – Option 2 would generate 2,270 jobs. Based on Tables 5.13-1 and 5.13-5 of the Draft EIR, the workforce demand of up to 2,270 employees could be filled by persons residing in unincorporated County, including from Bloomington, and the surrounding areas. Additionally, the immediate availability in the labor pool in the vicinity of the Specific Plan Area is not expected to be constrained due to the current 7.7 percent unemployment rate in the County (EDD, 2021).As mentioned, implementation of the Specific Plan would contribute toward a more balanced jobs-to-housing ratio (see Table 5.13-5 of the Draft EIR), and as such, the available labor pool in the County as well as in Bloomington would adequately meet the Specific Plan's employment demands without directly resulting in new residents or unplanned population growth.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I137: Kaleigh Lambaren (1 page)

Kaleigh Lambaren, Lambarenkaleigh1@gmail.com, Bloomington, 92316, 909-521-6858

I do not want anymore warehouses in Bloomington. I feel complete Hate towards warehouse development. It's ridiculous it won't be safe considering it's bringing more trucks, as that is being by schools it puts the children at risk as well as more accidents. The streets are small and will cause more care accidents, as well as trash, glass, and many other hazardous items. As it being by houses we will create more homelessnesses and prostitution which puts the Bloomington people at risk. I137.1

Response to Letter 137: Kaleigh Lambaren, undated

Comment I137.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouse development is not safe as it will increase truck traffic close to schools. The comment further states that warehouses result in trash, glass, and other hazardous items. The comment further states that warehouses would result in prostitution and homelessness.

Response 137.1: The comment does not provide substantial evidence of any environmental impact. This comment speculatively states that the Project would result in safety hazards for school children with the increase of truck traffic near schools. As shown on Figure 3-4, Project trucks would utilize established County truck routes, which are directed away from schools in Bloomington. Furthermore, the Project would implement PDF AQ-22, which would require the Project Applicant/Developer/Owner to post signs at every truck exit driveway providing directional information to the truck route. As such, Project trucks would be directed away from schools and would not result in a safety hazard for school children. Furthermore, sidewalks currently exist on Cedar Avenue intermittently on both side of the roadway, on Santa Ana Avenue intermittently on the north side of the roadway, on Jurupa Avenue on the north side east of Linden Avenue. Implementation of the Specific Plan would include roadway improvements within the Specific Plan area that would provide for new sidewalks where none exist currently, thereby improving pedestrian facilities and the sidewalk network. As such, the Project would provide safer sidewalk connectivity for pedestrians, such as school children to utilize.

As discussed on 5.9-17, the Specific Plan Area would be developed with light industrial uses, including professional office, warehousing, processing, and light manufacturing. Depending on the type of business, operations would require the use of various types and quantities of hazardous materials, including lubricants, solvents, cleaning agents, wastes, paints and related wastes, petroleum, wastewater, batteries, (lead acid, nickel cadmium, nickel, iron, carbonate), scrap metal, and used tires. These hazardous materials would be used, stored, and disposed of in accordance with applicable regulations and standards (such as CFR, Title 49, Chapter I; CCR, Title 8; CFR, Title 40, Part 263; and San Bernardino County Code Sections 23.0602 and 23.0107) that are enforced by the USEPA, USDOT, CalEPA, CalOSHA, DTSC, and County of San Bernardino.

Under California Health and Safety Code Section 25531 et seq., CalEPA requires businesses operating with a regulated substance that exceeds a specified threshold quantity to register with a managing local agency, known as the Certified Unified Program Agency (CUPA). In San Bernardino County, the County Fire Department is the CUPA. If the operations of future tenants of the proposed warehouse facilities exceed established thresholds, CUPA permits will be required. The County requires businesses subject to any of the CUPA permits to file a Business Emergency/Contingency Plan. Additionally, businesses would be required to provide workers with training on the safe use, handling, and storage of hazardous materials. Businesses would be required to maintain equipment and supplies for containing and cleaning up spills of hazardous materials that can be safely contained and cleaned by onsite workers and to immediately notify emergency response agencies in the event of a hazardous materials release that cannot be safely contained and cleaned up by onsite personnel. The compliance with existing laws and regulations governing hazard and hazardous materials would reduce potential impacts related the routine transport, use, and disposal of the hazardous materials was determined to be less than significant.

As further discussed in Master Response 1, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's

potentially significant physical impacts on the environment and does not include a discussion of homelessness and prostitution. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to homelessness and prostitution is not provided. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

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LETTER I138: Jack Rubio (1 page)

Jack Rubio, oldmetallicarox@gmail.com, Bloomington, 92316, 909-561-6536

I do not want anymore warehouses in Bloomington. We don't want anymore truck pollution and congestion near our Children's Schools

I138.1

Response to Letter I138: Jack Rubio, undated

Comment I138.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter does not want any more truck pollution or congestion near schools.

Response I138.1: The comment does not provide substantial evidence of any environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I139: Pam Geil (2 pages)

Pam Geil, bloomingtown@sbcglobal.net, Bloomington, 92316

I do not want anymore warehouses in Bloomington. "Bloomington at one time went to Riverside Ave and Sierra Ave. If you add up the amount of wearhouses in the area between the to streets Bloomington has more than it's fair share. Additionally plenty of vacant land east of Cedar has been rezoned Industrial, instead of taking resident and commercial zoned areas of what's left in

I139.1

the Bloomington area requiring developers to develop out the areas already indicated industrial. Bloomington scores 98 percentile in ozone according to the State. Asthma rates are highest in the County along with low birth rates and heart conditions. Overall environmental living conditions are beyond the threshold for a safe living environment. Possibly the County is trying to limit population by causing early death to it's lower income residents, that would be sad, since the data is available and the County intentionally is allowing several developers perform Full EIRs as indicated by Senate Bill SB1000. It appears deliberate intent to impact lower income area health. It is also evident of the Counties intent as replacement housing for the displaced homes is being presented north of the I-10 rather than in areas near the proposed projeçt. In doing so subsequently displacing Green space large parcels ok n the north side. In the zoning changes on the south side there should be equal areas in south Bloomington for displaced zoning to keep a fair balance. This is not being done. Showing. indications that the push is to move Bloomingtons population North of the I-10 freeway and eventually industrialize the majority of South Bloomington. Further shown by the lack of support from the County to seek Federal assistance to intse commercial development to the are of roughy 15000 population south of the freeway. Further shown by 0 commercial business growth and willingnesss to work with industrial builders without some sort of requirement to have Commercial elements on their projects that have been built in General plan designated Commercial areas. This implys to me the County does not support Commercial growth on Cedar Ave South Bloomington. With the last new commercial business built over 20 years ago south of the 10. It is sad the County Board of Supervisors vote to support developers to skirt EIRs and ignore public responses bringing more ozone polluting projects Possibly they want Bloomington to make it to 100 percent on the unhealthful air charts in the whole State. At least we can say Bloomington rates at the top of something, while watching our children and senors suffer from those who live elsewhere. Wearhouses need to be build where the General plan has designated once those lands are exhausted then that's it. Areas like Bloomington need a fair Balance of Commercial and residential. And finallyBloomington needs Commercial growth, not industrial. Should industrial be built it should always have a commercial element attached."

I139.1 cont.

Response to Letter I139: Pam Geil, undated

Comment I139.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there are enough warehouses in Bloomington. The comment further states that health risks are high in Bloomington due to the existing environmental conditions and that potentially the County is trying to limit population by causing early death in low-income communities. The comment questions why the Upzone Site is north of the I-10 instead of south of the I-10, and wonders if the County is trying to fully industrialize the areas south of the I-10. The comment states the County is limiting commercial development and is not willing to request federal aid. The comment states that it is sad that the County is allowing developers to not prepare EIRs and are willing to allow polluting projects in Bloomington. The comment states that warehouse should only be built in areas designated for Industrial by the Countywide Plan.

Response to I139.1: The comment does not provide substantial evidence of any environmental impact. As demonstrated by the Draft EIR, an EIR was prepared for the proposed Project pursuant to CEQA Guidelines Sections 15122 through 15131. Furthermore, as detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible.

The majority of the comment includes speculation into the intentions of the County and does not raise any CEQA concerns. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. The comment will be forwarded to County decisionmakers as part of the Final EIR. Therefore, no further response is required or provided.

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LETTER I140: Monica Sanchez (1 page)

Monica Sanchez, Ilovechepo@hotmail.com , Bloomington, 92316

I do not want anymore warehouses in Bloomington. Overtaking our town, too much traffic, too close to schools, too much pollution.

I140.1

Response to Letter I140: Monica Sanchez, undated

Comment I140.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is too much traffic and too much pollution close to schools.

Response I140.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I141: Ana Ipina (2 pages)

Ana Ipina, Anasalguero71@yahoo.com, Bloomington, 92316, 951-9065428

I do not want anymore warehouses in Bloomington. Mis hijos y yo estamos indignaos molestos

I141.1

con las construcciones de bodegas estamos perdiendo todo lo de la naturaleza

I141.1 cont.

Response to Letter I141: Ana Ipina, undated

Comment I141.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter is upset about risking nature.

Response I141.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I142: Natalie Lopez (1 page)

NatalieLopez, Nlopez909@gmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. We do NOT need anymore warehouses in our city. What we need are sidewalks and a small shopping center.

I142.1

Response to Letter I142: Natalie Lopez, undated

Comment I142.1: This comment states that the commenter does not want any more warehouses in Bloomington and that Bloomington needs sidewalks.

Response I142.1: The comment does not provide substantial evidence of any environmental impact. As detailed in the Draft EIR for Impact TR-1, starting on page 5.15-6, sidewalks currently exist on Cedar Avenue intermittently on both side of the roadway, on Santa Ana Avenue intermittently on the north side of the roadway, on Jurupa Avenue on the north side east of Linden Avenue. Implementation of the Specific Plan would include roadway improvements within the Specific Plan area that would provide for new sidewalks where none exist currently, thereby improving pedestrian facilities and the sidewalk network. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I143: Miguel Moreno (1 page)

MiguelMoreno.miggz909@icloud.com, Bloomington, 92316, 9092645226

I do not want anymore warehouses in Bloomington. There's excessive traffic already and the community doesn't benefit from these warehouses

I143.1

Response to Letter I143: Miguel Moreno, undated

Comment I143.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is already too much traffic.

Response I143.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I144: Charman Diaz (1 page)

Charman Diaz, Charmandiaz@hotmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. I don't like it. To many trucks

I144.1

Response to Letter I144: Charman Diaz, undated

Comment I144.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I144.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I145: Jeanette Munoz (1 page)

Jeanette Munoz, J2009munoz@gmail.com, Riverside, 92509, 9518346845

I do not want anymore warehouses in Bloomington. Warehouse developments take away space from the community and take down trees making the community look more industrial and the community brings less people making it look less attractive. **I145.1**

Response to Letter I145: Jeanette Munoz, undated

Comment I145.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses take space away from the community and make the community look less attractive.

Response I145.1: The comment does not provide substantial evidence of any environmental impact. The proposed Specific Plan sets forth a land use plan that dictates development standards, including building design and landscape design for the development and operation of industrial business park uses, see Section 3, *Project Description*. All developments proposed within the Specific Plan—including the currently proposed development in Planning Area A and future development(s) in Planning Area B—would be required to adhere to the standards therein. Though development within the Specific Plan Area would change the 213-acre site's residential character to one of industrial business park, the change would not degrade the visual character or quality of the site. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I146: Jerry Navarro (1 page)

Jerry Navarro, jNavarro926@yahoo.com, Bloomington, 9517518916

I146.1

I do not want anymore warehouses in Bloomington. There are too many and our roads can barely handle the traffic that is being generated by existing warehouses.

Response to Letter I146: Jerry Navarro, undated

Comment I146.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the roads in Bloomington can barely handle the existing traffic.

Response I146.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I147: Marisela Zermeno (1 page)

Marisela Zermeno, Redluda5@yahoo.com, Bloomimgtom, 92316

I do not want anymore warehouses in Bloomington. It's really frustrating and enraging. All of these warehouses are adding additional pollution and traffic to the city and it's not as if the jobs were being primarily filled by our residents. We've been affected by the cement factory and a lot of people have asthma. This would only worsen our living conditions.

I147.1

Response to Letter I147: Marisela Zermeno, undated

Comment I147.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses are adding pollution and traffic. The comment further states that the jobs are not being filled by Bloomington residents and residents are currently impacted by asthma.

Response I147.1: The comment does not provide substantial evidence of any environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Additionally, as shown on Figure 3-4 of the Draft EIR, trucks traveling to and from the Project site would use truck routes oriented away from residences and existing schools. These truck routes would be enforced by the County to ensure that DPM exposure and truck exposure to sensitive receptors is limited as much as possible.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I148: Estrella H (1 page)

Estrella H, gorrgunk@gmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. I feel upset about the warehouse development in Bloomington. **I148.1**

Response to Letter I148: Estrella H, undated

Comment I148.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I148.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I149: Randy Underwood (1 page)

Randy Underwoodm Rwoodhunt@aol.com, Bloomington, 92316, 909-936-2885

I do not want anymore warehouses in Bloomington. "To much traffic now. With all the added big rigs and employees, the streets will be gridlocked. The city need to enforce code violators now with all the illegal trucking that is going on. (A blind person could write thousand tickets.) NO THANKS"

I149.1

Response to Letter I149: Randy Underwood, undated

Comment I149.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is too much traffic and warehouses would make it worse. The comment further states that the city needs to enforce code violators from all of the illegal trucking activity that is going on.

Response I149.1: The comment does not provide substantial evidence of any environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As further discussed in Master Response 1, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of current illegal trucking activities. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to the current illegal trucking activities is not provided. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I150: Margarita Martinez (1 page)

Margarita Martinez, Margaritavargas20@yahoo.com, Bloomington, 92316, 909 4966536

No estoy de acuerdo que haya mas bodegas en Bloomington. Creo que esto nos va a perjudicar enormemente en cuestiones de salud y el tráfico ni se diga

I150.1

Response to Letter I150: Margarita Martinez, undated

Comment I150.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the Project would lead to health impacts and more traffic.

Response I150.1: The comment does not provide substantial evidence of any environmental impact. As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers (residents, workers, and school children) to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I151: Tania Sandoval (1 page)

Tania Sandoval, Taniasandoval180@yahoo.com, Bloomington, 91316, 997146732

I do not want anymore warehouses in Bloomington. They are horrible. Trucks drive through our homes and trucks park in our neighborhoods. They mess up our streets and make it unsafe to walk in our own neighborhood

I151.1

Response to Letter I151: Tania Sandoval, undated

Comment I151.1: This comment states that the commenter does not want any more warehouses in Bloomington and that trucks drive through and park in residential neighborhoods. The comment states that trucks mess up streets and make it unsafe to walk in residential neighborhoods.

Response I151.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As shown on Figure 3-4, Project trucks would utilize County-established truck routes and would be directed away from existing residential neighborhoods. Furthermore, the proposed Project would implement PDF AQ-22, which would require the Project Applicant/Developer/Owner to post signs at every truck exit driveway providing directional information to the truck route. The Bloomington Business Park Specific Plan prohibits commercial truck parking on local streets. Should trucks utilize residential streets for driving or parking, they would be subject to citation from law enforcement. Additionally, as detailed in the Draft EIR for Impact TR-1, starting on page 5.15-6, sidewalks currently exist on Cedar Avenue intermittently on both side of the roadway, on Santa Ana Avenue intermittently on the north side of the roadway, on Jurupa Avenue on the north side east of Linden Avenue. Implementation of the Specific Plan would include roadway improvements within the Specific Plan area that would provide for new sidewalks where none exist currently, thereby improving pedestrian facilities and the sidewalk network. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I152: Jim Walter (1 page)

Jim Walter, Jw83598jr@gmail.com, Bloomington, 92316, 9519068090

I do not want anymore warehouses in Bloomington. It needs to stop, already too much traffic. **I152.1**

Response to Letter I152: Jim Walter, undated

Comment I152.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is already too much traffic.

Response I152.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I153: Jose L. Garcia Jr. (1 page)

Jose L Garcia Jr. generaldemeanor@gmail.com, Bloomington, 92316, 19096094791

No estoy de acuerdo que haya mas bodegas en Bloomington. Bloomington will NOT become some "company" town. We are Bloomington, we don't belong to some CEO.

I153.1

Response to Letter I153: Jose L. Garcia Jr., undated

Comment I153.1: This comment states that the commenter does not want any more warehouses in Bloomington and that Bloomington does not belong to a CEO.

Response I115.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I154: Efren Perez (2 pages)

Efren Perez, 2perros12@gmail.com, Bloomington, 92316, 18184213488

I do not want anymore warehouses in Bloomington. "I don't like all the construction of Warehouses in bloomington exacltly Because of the traffic, pollution and Of the unruly drivers

I154.1

that continue to Not obey laws of not driving on non truck route streets this is bad for our streets And also they feel they can get away With being negligent scince we have. No police presence. Ther we was a truck area that was proposed people gave their opinion But it didi ot help it still was aloud Dont understand why ask the community Some one in the city will still let things Pass."

I154.1 cont.

Response to Letter I154: Efren Perez, undated

Comment I154.1: This comment states that the commenter does not want any more warehouses in Bloomington and that they lead to traffic, pollution, and truck drivers that do not obey laws and drive on roadways that are not designated as truck routes. The comment also states that there is no police presence in Bloomington.

Response I154.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

As shown on Figure 3-4, Project trucks would utilize County-established truck routes and would be directed away from existing residential neighborhoods. Furthermore, the proposed Project would implement PDF AQ-22, which would require the Project Applicant/Developer/Owner to post signs at every truck exit driveway providing directional information to the truck route. The Bloomington Business Park Specific Plan prohibits commercial truck parking on local streets. As such, trucks from the proposed Project would not be allowed to park on local streets near adjacent residences. Furthermore, should trucks utilize residential streets for driving or parking, they would be subject to citation from law enforcement. The comment

provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

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LETTER I155: Yesica Ortiz (1 page)

Yesica Ortiz, boo3450@hotmail.com, Bloomington, 92316, 9095038612

I do not want anymore warehouses in Bloomington. Ridiculous! Warehouses can go elsewhere instead of residential areas. Leave our homes ALONE!!!

I155.1

Response to Letter I155: Yesica Ortiz, undated

Comment I155.1: This comment states that the commenter does not want any more warehouses in Bloomington and that developers should leave homes alone.

Response I155.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I156: Nicole Christensen (1 page)

Nicole Christensen, nicolechristensen1980@yahoo.com, Bloomington, 92316, 6618690773

I do not want anymore warehouses in Bloomington. This will have a negative effect on our community in Bloomington. The development will destroy our neighborhood & cause so much traffic. The trucks will tear up our streets more. We have such a beautiful, family neighborhood community but that will be lost to this development.

I156.1

Response to Letter I156: Nicole Christensen, undated

Comment I156.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the development would destroy the neighborhood and cause too much traffic. The comment states that the trucks would tear up the streets.

Response I156.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

Furthermore, as discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue and Santa Ana Avenue. As such, the proposed Project would actually benefit the community by providing road improvements to previously damaged roads and would ensure roads would be capable of handling Project trucks. Additionally, the Project would include a Community Benefits Agreement, which would provide additional community benefits such as maintenance of community facilities. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I157: Rosa Ramos (1 page)

Rosa Ramos, rosyeramos0818@icloud.com , Bloomington, 92316

No estoy de acuerdo que haya mas bodegas en Bloomington. No estoy de acuerdo porq no hacen casas

I157.1

Response to Letter I157: Rosa Ramos, undated

Comment I157.1: This comment states that the commenter does not want any more warehouses in Bloomington because they are not houses.

Response I157.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I158: Ramona Gutierrez (1 page)

Ramona Gutierrez, luckygut12389@yahoo.com, Bloomington, 92316, 909-265-8937

I158.1

No, I do not want anymore warehouses in Bloomington. There are to many trucks.

Response to Letter I158: Ramona Gutierrez, undated

Comment I158.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there are too many trucks.

Response I158.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I159: Christopher Castillo (undated)

Christopher Castillo, christophercastillo210@gmail.com, Bloomington, 92316, 909-800-1216

I do not want anymore warehouses in Bloomington. I completely dislike it. They want to build next to a high school, nurseries and many ranches.

I159.1

Response to Letter I159: Christopher Castillo, undated

Comment I159.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the Project is next to a high school, nurseries, and ranches.

Response I159.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I160: Steve Boonkrong (1 page)

Steve Boonkrong, Steve.boonkrong@gmail.com, Bloomington, 92316, 9092384955

I do not want anymore warehouses in Bloomington. We have enough. **I160.1**

Response to Letter I160: Steve Boonkrong, undated

Comment I160.1: This comment states that the commenter does not want any more warehouses in Bloomington as there are enough already.

Response I160.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I161: Betty Hernandez (1 page)

Betty Hernandez, Emherolano@gmail.com, Bloomington, 92316, 9098386168 *I do not want anymore warehouses in Bloomington. Too many warehouses in the area*

I161.1

Response to Letter I161: Betty Hernandez, undated

Comment I161.1: This comment states that the commenter does not want any more warehouses in Bloomington as there are too many already.

Response I161.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I162: Arturo Casas (1 page)

Arturo Casas, casasart16@gmail.com, Bloomington, 92316, 9096859006 .

I do not want anymore warehouses in Bloomington. I want Joe Baca Jr to respond and make a live announcement against this plan.

I162.1

Response to Letter I162: Arturo Casas, undated

Comment I162.1: This comment states that the commenter does not want any more warehouses in Bloomington and that Joe Baca Jr. should make an announcement against the plan.

Response I162.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I163: Mary Johnson (1 page)

Mary Johnson, Lighthousedream2@aol.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. Our Town is a rural family oriented place. I've lived here all my life, over 50yrs. My parents, grandparents, aunt's, uncles, cousins & lifelong friends have lived here even longer. Warehouses have no place near our houses, schools & areas meant for horses, motorcycle riding, kids playing. Not to mention they will cause more air pollution. The trucks will more then double the traffic that is horrible already. Two years ago a warehouse was built across the street from me. Across from an elementary school. Another warehouse same street as our high school. All this is bad for our town

I163.1

Response to Letter I163: Mary Johnson, undated

Comment I163.1: This comment states that the commenter does not want any more warehouses in Bloomington and that Bloomington is a rural, family-oriented place. The comment further states that warehouses have no place near houses, schools, or areas meant for horses, motorcycle riding, and kids playing. The comment further states that warehouses cause more air pollution and traffic.

Response I163.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I164: Edgar Garcia (1 page)

Edgar Garcia, Edgarg376@gmail.com, Bloomington, 92316

I164.1

I do not want anymore warehouses in Bloomington. Upset

Response to Letter I164: Edgar Garcia, undated

Comment I164.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I164.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I65: Araceli Lopez (1 page)

AraceliLopez, ara.lopezvi@gmail.com, Bloomington, 92316, 6262832145

No estoy de acuerdo que haya mas bodegas en Bloomington. Perjudicaría el nivel de salud. No solo la contaminación , también el peligro de nuestros niños y toda la comunidad pues al haber más tránsito vehicular nos exponen a más accidentes y vivir con miedo y estress porque ya no seríamos libres de salir a caminar y respirar este aire que al menos hasta ahorita es un poco saludable. También nos obligarían a quedarnos dentro de nuestras casas pues con tanto crecimiento cerca de las escuelas nuestros hijos corren el peligro de que los atropellen.

I165.1

Response to Letter I165: Araceli Lopez, undated

Comment I165.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses lead to unhealthy air quality and trucks that can lead to accidents. The comment states that people have to live in fear and stress because of the health risks from warehouses.

Response I165.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

As detailed in the Draft EIR for Impact TR-1, starting on page 5.15-6, sidewalks currently exist on Cedar Avenue intermittently on both side of the roadway, on Santa Ana Avenue intermittently on the north side of the roadway, on Jurupa Avenue on the north side east of Linden Avenue. Implementation of the Specific Plan would include roadway improvements within the Specific Plan area that would provide for new sidewalks where none exist currently, thereby improving pedestrian facilities and the sidewalk network. While the Project would increase trucks on nearby roads, as shown on Figure 3-4 of the Draft EIR, trucks would use established truck routes which would be oriented away from surrounding residences and schools. As such, trucks from the proposed Project would not result in a hazard to pedestrians in the area. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I166: Sandra Valtierra (1 page)

Sandra Valtierra, Shortypuppy_13@hotmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. There's already too much traffic especially by the schools, it's just going to bring even more traffic and accidents.

I166.1

Response to Letter I166: Sandra Valtierra, undated

Comment I166.1: This comment states that the commenter does not want any more warehouses in Bloomington and that traffic is already bad, and more warehouses would lead to more traffic and accidents.

Response I166.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. Furthermore, as discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue and Santa Ana Avenue. By providing road improvements, the Project would ensure that roads would have capacity for trucks to safely maneuver on designated truck routes. Additionally, the Project would include a Community Benefits Agreement, which would provide additional community benefits such as maintenance of community facilities.

As detailed in the Draft EIR for Impact TR-1, starting on page 5.15-6, sidewalks currently exist on Cedar Avenue intermittently on both side of the roadway, on Santa Ana Avenue intermittently on the north side of the roadway, on Jurupa Avenue on the north side east of Linden Avenue. Implementation of the Specific Plan would include roadway improvements within the Specific Plan area that would provide for new sidewalks where none exist currently, thereby improving pedestrian facilities and the sidewalk network. While the Project would increase trucks on nearby roads, as shown on Figure 3-4 of the Draft EIR, trucks would use established truck routes, which would be oriented away from surrounding residences and schools. As such, trucks from the proposed Project would not result in a hazard to pedestrians in the area. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I167: Manuel Lopez (1 page)

Manuel López, Lopezortencia71@gmail.com, Bloomington, 92316, 909 5629570 *No estoy de acuerdo que haya mas bodegas en Bloomington. Mucho tráfico y contaminación* **I167.1**

Response to Letter I167: Manuel Lopez, undated

Comment I167.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is a lot of traffic and air pollution.

Response I167.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required.

LETTER I168: Eduardo Galvan & Benjamin Orozco (1 page)

Eduardo Galvan, eperez@rtvsolution.com, Bloomington, 92316, 909 665 9771

I do not want anymore warehouses in Bloomington. Its a community surrounded by schools, I feel the city and school district don't care. They are not taking this into consideration. **I168.1**

Benjamin Orozco, Benjaminorozco10@yahoo.com, Bloomington, 92316, 9515446355 No, I do not want anymore warehouses in Bloomington. It's horrible. These warehouse have and continue to destroy the way of life of the residents of this small community. More traffic, horrible air quality, and, and countless other negative impacts. There are already more than enough warehouse that have been built in the area that remain empty. No need for anymore horrendous eye sores. **I168.2**

Response to Letter I168: Eduardo Galvan & Benjamin Orozco, undated

Comment I168.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter feels that the city and school district do not care that the Project is surrounded by schools

Response I168.1: The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I168.2: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses destroy the way of life for residents in Bloomington. The comment states that warehouses lead to traffic and air pollution, among other negative impacts. The comment states that there are enough warehouses in the area and some are empty.

Response I168.2: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I169: Andres Orozco (1 page)

AndresOrozco, andres_orozco12@yahoo.com, Bloomington, 92316, 9096848342

I do not want anymore warehouses in Bloomington. I am strongly opposed! This is unacceptable; this so-called development will ruin Bloomington's history. It will also add tons of pollution and extra traffic to our neighborhood. Take your commercial developments elsewhere - leave Bloomington alone!

I169.1

Response to Letter I169: Andres Orozco, undated

Comment I169.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the Project would add pollution and traffic to the neighborhood. The comment states that the Project will ruin Bloomington's history.

Response I169.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I170: Maria Maribel Orozco (2 pages)

Maria MaribelOrozco, maria_maribel71@yahoo.com, Bloomington, 92316, 9512414273

I do not want anymore warehouses in Bloomington. I strongly disagree with this development! Bloomington does not want neither does it need more warehouses and added traffic/air pollution. It is also morally wrong of these huge logistic companies to bribe people so they can relocate for their own financial gain. It is ruining Bloomington's history! This is unacceptable and I hope this development stops dead in it's tracks.

I170.1

I170.1 cont.

Response to Letter I170: Maria Maribel Orozco, undated

Letter I170.1: This comment states that the commenter does not want any more warehouses in Bloomington and that Bloomington does not need added traffic cand air pollution. The comment states that it is morally wrong for companies to bribe people so they can relocate for their own financial gain. The comment states that the commenter hopes the development stops.

Response I170.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I171: Amalia Cordova (1 page)

Amalia Cordova, Son049092@gmail.com, Bloomington, 92316, 909 702-8807

I do not want anymore warehouses in Bloomington. They are taking over our community, to much traffic and polutation.

I171.1

Response to Letter I171: Amalia Cordova, undated

Comment I171.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is too much traffic and pollution.

Response I171.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I172: Susana A (1 page)

Susana A. karlaa_3@yahoo.com, Bloomington. 92316

I do not want anymore warehouses in Bloomington. Do not like the direct impact the warehouse will have on our community. They are too close to our schools. **I172.1**

Response to Letter I172: Susana A, undated

Comment I172.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter does not like the impact warehouses have on the community.

Response I172.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I173: Cinthya Cerrato (1 page)

Cinthya Cerrato, Cinthya.cer@gmail.com, Bloomington, 92316, 9095781551

I do not want anymore warehouses in Bloomington. Its not safe to put them close to homes and schools. Its going to bring unwanted traffic and pollution.

I173.1

Response to Letter I173: Cinthya Cerrato, undated

Comment I173.1: This comment states that the commenter does not want any more warehouses in Bloomington and that it is not safe to put them close to homes or schools. The comment further states that the Project is going to bring unwanted traffic and pollution.

Response I173.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I174: Kimm Hadnot (1 page)

Kimm Hadnot,hotgirlie8t6@gmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. I have deep concerns and trepidation regarding the warehouses. This is not only unhealthy but also prejudicial. It is predatory and misleading on a community where a lot of its population do not speak english. This area is surrounded by schools and there is a mobile home park as well. This would cause more and more traffic in an area that is already overly congested, air pollution, and most importantly,, danger to the elementary, middle, and high school children, and the many pedestrians, most of whom walk their children to and from school.

I174.1

Response to Letter I174: Kimm Hadnot, undated

Comment I174.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses are unhealthy and prejudicial. The comment states the Project would cause more traffic and air pollution. The comment states that the Project would pose a danger to school children and pedestrians walking to and from schools.

Response I174.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

As detailed in the Draft EIR for Impact TR-1, starting on page 5.15-6, sidewalks currently exist on Cedar Avenue intermittently on both side of the roadway, on Santa Ana Avenue intermittently on the north side of the roadway, on Jurupa Avenue on the north side east of Linden Avenue. Implementation of the Specific Plan would include roadway improvements within the Specific Plan area that would provide for new sidewalks where none exist currently, thereby improving pedestrian facilities and the sidewalk network. Furthermore, the Project would include a Community Benefits Agreement, which would provide funding for regular maintenance of community facilities. While the Project would increase trucks on nearby roads, as shown on Figure 3-4 of the Draft EIR, trucks would use established truck routes which would be oriented away from surrounding residences and schools. As such, trucks from the proposed Project would not result in

a hazard to pedestrians in the area. For an additional discussion of environmental justice, the commenter is referred to Master Response 4. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

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LETTER I175: Andre Marshall (1 page)

Andre Marshall, awm3321@gmail.com, Ontario, 91762, 9095862944

I do not want anymore warehouses in Bloomington. I am completely against the proposed Bloomington Business Park project and the continued warehouse developments in the inland empire. This project is opposed by the community at large and I support community members in their fight to keep their community and rural living and urge the Board of Supervisors to listen to their constituents.

I175.1

Response to Letter I175: Andre Marshall, undated

Comment I175.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the Project is opposed by the community at large. The comment urges the Board of Supervisors to listen to their constituents.

Response I175.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I176: Priscilla Medina (1 page)

Priscilla Medina, priscillaaa.916@gmail.com, Bloomington, 92316, 9092180830 I176.1

I do not want anymore warehouses in Bloomington. Bad

Response to Letter I176: Priscilla Medina

Comment I176.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I176.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I177: Kathryn Probert (1 page)

Kathryn Probert, tyki1990@yahoo.com, Bloomington, 92316, 5622980556

I do not want anymore warehouses in Bloomington. I don't fell that it's right forcing people to sell their property when they don't want to. It's like San Bernardino county is stealing our properties by rezoning our neighborhoods. Nothing good is going to come of this, just a lot of simi truck traffic, pollution and more road repair.

I177.1

Response to Letter I177: Kathryn Probert, undated

Comment I177.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter feels that the Project is forcing people to sell their properties. The comment states that the Project would result in more truck traffic, pollution, and more road repair.

Response I177.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed in Section 5.13, *Population and Housing*, property owners within the development footprint would voluntarily sell their property and would be compensated by the Applicant. At the time future development is proposed in Planning Area B, property owners have the option to voluntarily sell their property and would be compensated by the future development's applicants. Property owners would not be forced to sell their properties, either through harassment or eminent domain.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOX emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOX emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

Furthermore, as discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue and Santa Ana. As such, the proposed Project would actually benefit the community by providing road improvements to previously damaged roads and would ensure that roads are capable of handling

increased truck traffic from the proposed Project. Furthermore, the Project would include a Community Benefits Agreement, which would provide funding for regular maintenance of community facilities. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

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LETTER I178: Henry Baltazar (1 page)

Henry Baltazar, henrybaltazar4@yahoo.com, Bloomington, 92316 , 9517568035 **I178.1**

I do not want anymore warehouses in Bloomington. not happy

Response to Letter I178: Henry Baltazar, undated

Comment I178.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I178.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I179: America Rodriguez (1 page)

America Rodriguez, Xiorodriguez134@gmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. The warehouses are creating more traffic and pollution are air quality even more than it already is. On top of that they are getting too close to out schools and I am worried a truck driver will not see a kid walking home because we do not have proper sidewalks. On top of that it makes the community look so much more run down.

I179.1

Response to Letter I179: America Rodriguez, undated

Comment I179.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses are creating more traffic and pollution. Furthermore, the comment states that the commenter is worried a truck driver will not see a kid walking because Bloomington does not have proper sidewalks. The comment states that warehouses make the community look run down.

Response I179.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

As detailed in the Draft EIR for Impact TR-1, starting on page 5.15-6, sidewalks currently exist on Cedar Avenue intermittently on both side of the roadway, on Santa Ana Avenue intermittently on the north side of the roadway, on Jurupa Avenue on the north side east of Linden Avenue. Implementation of the Specific Plan would include roadway improvements within the Specific Plan area that would provide for new sidewalks where none exist currently, thereby improving pedestrian facilities and the sidewalk network. Furthermore, the Project would include a Community Benefits Agreement, which would provide funding for regular maintenance of community facilities. While the Project would increase trucks on nearby roads, as shown on Figure 3-4 of the Draft EIR, trucks would use established truck routes which would be oriented

away from surrounding residences and schools. As such, trucks from the proposed Project would not result in a hazard to pedestrians in the area.

The proposed Specific Plan sets forth a land use plan that dictates development standards, including building design and landscape design for the development and operation of industrial business park uses, see Section 3, *Project Description*. All developments proposed within the Specific Plan—including the currently proposed development in Planning Area A and future development(s) in Planning Area B—would be required to adhere to the standards therein. Though development within the Specific Plan Area would change the 213-acre site's residential character to one of industrial business park, the change would not degrade the visual character or quality of the site. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

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LETTER I180: Gabriel Gonzalez (1 page)

Gabriel Gonzalez, gonzalezg17@gmail.com , Bloomington, 92316, 9094190398

I do not want anymore warehouses in Bloomington. Residents of Bloomington are well aware of the negative impacts of warehouse development as we have been witness to this in our neighboring cities for years and will not stand by while big greedy corporations profit and deprive us of our health and livelihood. **I180.1**

Response to Letter I180: Gabriel Gonzalez, undated

Comment I180.1: This comment states that the commenter does not want any more warehouses in Bloomington and that Bloomington residents are aware of the negative impacts of warehouse developments. The comment states that residents will not stand by while corporations profit and deprive the community of its health and livelihood.

Response I180.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I181: Andrea Gonzalez (1 page)

Andrea Gonzalez, gonzalezdrea15@gmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. I am very much against this project. As a Bloomington resident I would not want to be surrounded by warehouses that will bring no benefits to our community.

I181.1

Response to Letter I181: Andrea Gonzalez, undated

Comment I181.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter is against the Project as warehouses bring no benefits to the community.

Response I181.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I182: Martin Navarro (1 page)

Martin Navarro, 3martinnavarro@gmail.com, Bloomington, 92316, 951 7337082

No estoy de acuerdo que haya mas bodegas en Bloomington. Ya hay suficientes. No quiero mas warehouse

I182.1

Response to Letter I182: Martin Navarro, undated

Comment I182.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there are already enough warehouses.

Response I182.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I183: Penny Travis (1 page)

Penny Travis, loverofleppard@gmail.com, Bloomington, 92316, 9512957439

I do not want anymore warehouses in Bloomington. As a lifelong resident feel we need to preserve what is left of our little rural town. People migrated here for the acreage of their animals NOT the busyness of warehouses. Miss the days of old as kids where could walk/play in serene quietness. If development continues our kids/grandchildren will never know the Bloomington that we love.

I183.1

Response to Letter I183: Penny Travis, undated

Comment I183.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter feels that they should preserve Bloomington as a rural town. The comment states that the commenter misses days where kids could walk and play in serene quietness.

Response I183.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I184: Harold Cifeuntes (1 page)

Harold Cifuentes, hcifuen7777@gmail.com, Bloomington, 92316, 19097142530 *I do not want anymore warehouses in Bloomington. It creates more traffic and pollution*

I184.1

Response to Letter I184: Harold Cifuentes, undated

Comment I184.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses create more traffic and pollution.

Response I184.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I185: Ryan Blackwood (1 page)

Ryan Blackwood, Blackwood.kuroki@gmail.com, Bloomington, 92316

I185.1

I do not want anymore warehouses in Bloomington. The increase in traffic and pollution is unacceptable

Response to Letter I185: Ryan Blackwood, undated

Comment I185.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the increase in traffic and pollution is unacceptable.

Response I185.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I186: Javier Cerrato (1 page)

Javier Cerrato, jcerrato@quadc.org, Bloomington, 92316, (213) 332-5088

I do not want anymore warehouses in Bloomington. I'm concerned of the traffic and the air quality pollution.

I186.1

Response to Letter I186: Javier Cerrato, undated

Comment I186.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the increase in traffic and pollution is concerning.

Response I186.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I187: Veronica Lopez (1 page)

Veronica Lopez, Veronica1996@yahoo.com, Bloomington, 92316

I187.1

I do not want anymore warehouses in Bloomington. Pollution to the environment in the city and more diesel truck traffic.

Response to Letter I187: Veronica Lopez, undated

Comment I187.1: This comment states that the commenter does not want any more warehouses in Bloomington and that it would add pollution and more truck traffic.

Response I187.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I188: Michael Oneal (1 page)

Michael Oneal, mikeoneal3n8@yahoo.com, Bloomington, 92316, 9097703124

I do not want anymore warehouses in Bloomington. Enough is enough too much traffic in the afternoon you can't get overpass **I188.1**

Response to Letter I188: Michael Oneal, undated

Comment I188.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is too much traffic.

Response I188.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I189: Sharon Oneal (1 page)

Sharon Oneal, sharononeal@yahoo.com, Bloomington, 92316, 9097703124

I189.1

I do not want anymore warehouses in Bloomington. The air is horrible traffic is horrible they will never fix that

Response to Letter I189: Sharon Oneal

Comment I189.1: This comment states that the commenter does not want any more warehouses in Bloomington and that air quality and traffic is horrible.

Response I189.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I190: Emily Rangel (1 page)

Emily Rangel, Rangelkr@icloud.com, Bloomington, 92316, 9095860357

I190.1

I do not want anymore warehouses in Bloomington. There is already too many warehouses in our community, if anything they need to remove some of them instead.

Response to Letter I190: Emily Rangel, undated

Comment I190.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there are too many warehouses already that should be removed.

Response I190.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I191: Gloria Moreno (1 page)

Gloria Moreno, Gloriamoreno0812@gmail.com, San Bernardino, 92405, 9099633948

No estoy de acuerdo que haya mas bodegas en Bloomington.No estoy deacuerdo

I191.1

Response to Letter I191: Gloria Moreno, undated

Comment I191.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I191.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I192: Julio Quintero (1 page)

Julio Quintero, Julioquintero346@gmail.com, Bloomington, 92316, 4244152627

I do not want anymore warehouses in Bloomington. No estoy de acuerdo que quieran hacer esto. Va afectar Las escuelas de nuestros hijos. Aparte la contaminacion y trafico

I192.1

Response to Letter I192: Julio Quintero, undated

Comment I192.1: The comment states that the commenter does not want any more warehouses in Bloomington and the Project would impact schools with increased pollution and traffic.

Response I192.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I193: Miguel Munoz (2 pages)

Miguel Muñoz, mike13-13@hotmail.com, Bloomington, 92316, 9094342396

No estoy de acuerdo que haya mas bodegas en Bloomington. After attending a city hall meeting regarding the project I learned that the original proposition for the land was the creation of a recreational park. I believe that the benefits of a large recreational park would be grater to the health of the community more than the generation of more warehouses. Most importantly, the location of the warehouses is too close to residential areas. As we know it's forcing a change from residential to commercial which is ridiculous since the surrounding area continues to be residential. This will greatly affect the roads which we all use to get to school or drop our kids off. Higher use of the roads which are already underfunded and lack maintenance will only increase the burden of traffic, air pollution, noise pollution and overall quality of life in the

I193.1

residential area that stays.

I193.1 cont.

Response to Letter I193: Miguel Munoz, undated

Comment I193.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there was previously a project to turn the area into a park. The comment states that warehouses would increase the burden of traffic, air pollution, and noise pollution. The comment further states that warehouses would negatively impact the quality of life for residents that stay in the area.

Response I193.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

In regard to noise, as detailed in the Impact NOI-1 discussion that begins on page 5.12-26 of the Draft EIR, each of the Project scenarios would implement Project Design Feature (PDF) NOI-2, which would require 12- to 14-foot-high cement block walls at Sites 1 and 2 and 9-foot-high cement walls at Site 4. With implementation of PDF NOI-2, operational noise levels for all scenarios would not exceed the County's exterior noise level standards, as adjusted to reflect the ambient noise levels at all nearby sensitive receiver locations. Additionally, the increase in ambient noise levels would range from 0.1 to 3.0 dBA with the implementation of PDF NOI-2, which would not generate a significant daytime or nighttime operational noise level increase at nearby receiver locations.

As detailed in the Draft EIR in Section 5.12, *Noise,* starting on page 5.12-48, the proposed Project would generate traffic related noise from operation. As described in Section 3.0, *Project Description*, of the Draft EIR, the proposed Specific Plan buildings would be accessed from Laurel Avenue, Locust Avenue, Linden Avenue, and Maple Avenue. Tables 5.12-23 through 5.12-24 show that both the Opening Year with Project and General Plan Buildout with Project conditions would result in increases less than the 1.5 dBA CNEL threshold. Thus, off-site traffic noise impacts from the Project would be less than significant. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

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LETTER I194: Jennifer Boatman (1 page)

Jennifer Boatman, Jmklug@yahoo.com, Bloomington, 92316.

I194.1

I do not want anymore warehouses in Bloomington. It's taking away from the rural atmosphere that we moved here for

Response to Letter I194: Jennifer Boatman, undated

Comment I194.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses are taking away from the rural atmosphere that individuals moved to Bloomington for.

Response I194.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I195: Yolanda Felix (1 page)

Yolanda Felix, Yolandafelix538@gmail.com, Bloomington, 92316, 951-545-8449

I do not want anymore warehouses in Bloomington. Bloomington is a great place to live. Warehouses are destroying agriculture and nature. This is a place to ride your horses, grow your crops and have your animals. We have blue jays and other rare birds that love to come and enjoys the trees and greenery. It's terrible that they want to build buildings in Bloomington. Please find another place where you are not destroying nature and peoples hard work in agriculture and wildlife too!

I195.1

Response to Letter I195: Yolanda Felix, undated

Comment I195.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses are destroying agriculture and nature. The comment states that Bloomington has blue jays and other rare birds.

Response I195.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed starting on page 5.2-8 under Impact AG-1, the Specific Plan Area includes 0.04 acre of prime farmland and 23.55 acres of farmland of statewide importance. This mapped area is entirely within Planning Area A and includes a commercial palm tree nursery. However, this area is not considered actively productive agricultural lands, and the Project would not conflict with Countywide Plan Policy NR-7.1, which protects economically viable and productive agricultural lands. Moreover, CWP EIR Impact 5.2-1 acknowledges growth in Bloomington and states that implementation of the Countywide Plan could convert up to 35 acres of mapped farmlands in Bloomington to nonagricultural land use. The 35 acres includes the 23.59 acres in the Specific Plan Area. Project implementation would cause the removal of 23.59 acres of mapped farmland and reduce the acreage of farmland in Bloomington to 11.4 acres. In accordance with Countywide Plan Policy NR-7.2 and Public Resources Code Section 21061.2, an agricultural resource evaluation was prepared for the Project. The evaluation was prepared pursuant to the California Agricultural LESA Model and considers six factors, including two land evaluation factors that measure the quality of the soil on the agricultural land and four site assessment factors that measure the Project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. As discussed in Appendix B, the mapped area contains Delhi Fine Sand, which is rated as a fair-quality soil for agriculture, and Tujunga loamy sand, which is rated as a good-quality soil for agriculture. Additionally, though there is water available at the mapped area, the site does not meet the minimum size requirement of 40 acres, and it is not surrounded by other agricultural operations. Consequently, the mapped area received a LESA score of 43 (Land Evaluation Score of 29 and a Site Assessment Score of 14) out of a 100-point scale. According to the LESA Model Significance thresholds, sites receiving a score of between 40 and 59 points are considered significant only if both the Land Evaluation and Site Assessment weighted factor subscores are each greater than or equal to 20 points. Since only the Land Evaluation subtotal exceeded 20 points and the Site Assessment score did not, the Project's conversion of the prime farmland and farmland of statewide importance to nonagricultural use is not considered significant. As the Project has complied with Policy NR-7.2 and the conversion of the site's farmlands to nonagricultural is not considered significant, Project impacts on the conversion of mapped farmlands to non-agricultural uses were determined to be less than significant.

As discussed in Section 5.4, *Biological Resources,* with implementation of Mitigation Measures BIO-1 through BIO-8 and existing regulations, impacts to biological species, included sensitive wildlife, were determined to be less than significant. The comment does not provide evidence of any additional impacts or increased severity of impacts related to biological resources than what is disclosed in the Draft EIR. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I196: Hugo Felix (1 page)

Hugo Felix, yolandafelix538@gmail.com, Bloomington, 92316, 562-244-7182

I do not want anymore warehouses in Bloomington. Again warehouses trying to destroy nature and wildlife. Agriculture and animals are so important that supply everyday food. Horses enjoying a ride with its rider along the hill. We have the beautiful hill and nature and now they want to surround it to warehouse. More pollution, and more deseases created by humans. Let nature where it is and animals enjoy there habitats and families enjoy their homes in Bloomington. I am sure there is another place where warehouses can be built without destroying families and animals.

I196.1

Response to Letter I196: Hugo Felix, undated

Comment I196.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses are destroying nature and wildlife. The comment further states that agriculture and animals are important and that there is a beautiful hill. The comment further states that the Project would lead to more pollution and deaths.

Response I196.1: As discussed starting on page 5.2-8 under Impact AG-1, the Specific Plan Area includes 0.04 acre of prime farmland and 23.55 acres of farmland of statewide importance. This mapped area is entirely within Planning Area A and includes a commercial palm tree nursery. However, this area is not considered actively productive agricultural lands, and the Project would not conflict with Countywide Plan Policy NR-7.1, which protects economically viable and productive agricultural lands. Moreover, CWP EIR Impact 5.2-1 acknowledges growth in Bloomington and states that implementation of the Countywide Plan could convert up to 35 acres of mapped farmlands in Bloomington to nonagricultural land use. Project implementation would cause the removal of 23.59 acres of mapped farmland and reduce the acreage of farmland in Bloomington to 11.4 acres. In accordance with Countywide Plan Policy NR-7.2 and Public Resources Code Section 21061.2, an agricultural resource evaluation was prepared for the Project. The evaluation was prepared pursuant to the California Agricultural LESA Model and considers six factors, including two land evaluation factors that measure the quality of the soil on the agricultural land and four site assessment factors that measure the Project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. As discussed in Appendix B, the mapped area contains Delhi Fine Sand, which is rated as a fair-quality soil for agriculture, and Tujunga loamy sand, which is rated as a good-quality soil for agriculture. Additionally, though there is water available at the mapped area, the site does not meet the minimum size requirement of 40 acres, and it is not surrounded by other agricultural operations. Consequently, the mapped area received a LESA score of 43 (Land Evaluation Score of 29 and a Site Assessment Score of 14) out of a 100-point scale. According to the LESA Model Significance thresholds, sites receiving a score of between 40 and 59 points are considered significant only if both the Land Evaluation and Site Assessment weighted factor subscores are each greater than or equal to 20 points. Since only the Land Evaluation subtotal exceeded 20 points and the Site Assessment score did not, the Project's conversion of the prime farmland and farmland of statewide importance to nonagricultural use is not considered significant. As the Project has complied with Policy NR-7.2 and the conversion of the site's farmlands to nonagricultural is not considered significant, Project impacts on the conversion of mapped farmlands to non-agricultural uses were determined to be less than significant.

There are no designated scenic viewpoints near the Specific Plan Area and Upzone Site that provide unobstructed viewsheds of the San Bernardino and San Gabriel Mountains and Jurupa Hills. Public views of the ridgelines of these resources at or near the Specific Plan and Upzone Site occur along public roadways, but they are mostly obstructed and fragmented by intervening building structures, utility poles, trees, and other elements of the built environment. Therefore, implementation of the proposed Specific Plan, including development of Planning Area A, Opening Year Development – Options 1 and 2 with the proposed industrial business park, future development of Planning Area B, and rezoning of the Upzone Site would not significantly affect scenic views of the San Bernardino and San Gabriel Mountains and Jurupa Hills.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is

concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

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LETTER I197: Diana Mandujano (1 page)

Diana Mandujano, edm5@att.net, Bloomington, 92316

I do not want anymore warehouses in Bloomington. We already have too many warehouses in the area. Warehouses should be spread throughout the state rather than make the residents in one area suffer with the truck traffic, noise, bad air, and road destruction. We live in Bloomington because we like the agricultural lifestyle. **I197.1**

Response to Letter I197: Diana Mandujano, undated

Comment I197.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses make residents in Bloomington suffer from truck traffic, noise, air pollution, and road destruction. The comment further states that people live in Bloomington because they like the agricultural lifestyle.

Response I1967.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

In regard to noise, as detailed in the Impact NOI-1 discussion that begins on page 5.12-26 of the Draft EIR, each of the Project scenarios would implement PDF NOI-2, which would require 12- to 14-foot-high cement block walls at Sites 1 and 2 and 9-foot-high cement walls at Site 4. With implementation of PDF NOI-2, operational noise levels for all scenarios would not exceed the County's exterior noise level standards, as adjusted to reflect the ambient noise levels at all nearby sensitive receiver locations. Additionally, the increase in ambient noise levels would range from 0.1 to 3.0 dBA with the implementation of PDF NOI-2, which would not generate a significant daytime or nighttime operational noise level increase at nearby receiver locations.

As detailed in the Draft EIR in Section 5.12, *Noise,* starting on page 5.12-48, the proposed Project would generate traffic related noise from operation. As described in Section 3.0, *Project Description*, of the Draft EIR, the proposed Specific Plan buildings would be accessed from Laurel Avenue, Locust Avenue, Linden Avenue, and Maple Avenue. Tables 5.12-23 through 5.12-24 show that both the Opening Year with Project and General Plan Buildout with Project conditions would result in increases less than the 1.5 dBA CNEL threshold. Thus, off-site traffic noise impacts from the Project would be less than significant.

Furthermore, as discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue and Santa Ana. As such, the proposed Project would actually benefit the community by providing road improvements to previously damaged roads and improvements would ensure that roads could adequately support increased truck traffic from the Project. Furthermore, the Project would include a Community Benefits Agreement, which would provide funding for regular maintenance of community facilities. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

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LETTER I198.1: Sashi Juarez- Galindo (1 page)

Sashi Juarez-Galindo, sashi.jua0903@gmail.com, Perris, 92571

I do not want anymore warehouses in Bloomington. Unless the pollution is somehow kept in check and reduced, I believe building warehouses is a bad idea **I198.1**

Response to Letter I198: Sashi Juarez- Galindo, undated

Comment I198.1: This comment states that the commenter does not want any more warehouses in Bloomington and that unless pollution is kept in check, building warehouses is a bad idea.

Response I198.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I199: Jacqueline Avalos (1 page)

Jacqueline Avalos, jackieavalos92@gmail.com, Bloomington, 92316, 9096378855

I199.1

I do not want anymore warehouses in Bloomington. We don't need any more

Response to Letter I199: Jacqueline Avalos, undated

Comment I199.1: This comment states that the commenter does not want any more warehouses in Bloomington and Bloomington does not need any more.

Response I199.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I200: Ben Vasquez (1 page)

Ben Vasquez, benzee@live.com, Fontana, 92335

I200.1

I do not want anymore warehouses in Bloomington. No more poisoning our environment

Response to Letter I200: Ben Vasquez, undated

Comment I200.1: This comment states that the commenter does not want any more warehouses in Bloomington and there should be no more poisoning of the environment.

Response I200.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I201: Edith Rubio (1 page)

Edith Rubio, Arasely85@gmail.com, Bloomington, 92316, 909 697 5579

I do not want anymore warehouses in Bloomington. we want clean air for our children. And no more truck traffic there is enough

I201.1

Response to Letter I201: Edith Rubio, undated

Comment I201.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the community wants clean air and no more truck traffic.

Response I201.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I202: Angie Balderas (1 page)

Angie Balderas, goodlifeent@yahoo.com, San bernardino, 92407

I do not want anymore warehouses in Bloomington. It's irresponsible development and all we doing is polluting the air by building more warehouses

I202.1

Response to Letter I202: Angie Balderas, undated

Comment I202.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses are only polluting the air.

Response I202.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I203: Bernadette Smith (1 page)

Bernadette Smith, Q5bernie@yahoo.com, Bloomington, 92316, 9516759986

I203.1

I do not want anymore warehouses in Bloomington. There are too many trucks on the road and too much traffic congestion as a result. The roads are also in disrepair from all the heavy trucks not to mention more pollution.

Response to Letter I203: Bernadette Smith, undated

Comment I203.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is too much traffic congestion as a result of all of the trucks. The comment states that the roads are in a state of disrepair from all of the heavy trucks and there is pollution.

Response I203.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

Furthermore, as discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue and Santa Ana Avenue. As such, the proposed Project would actually benefit the community by providing road improvements to previously damaged roads and would ensure that roads are capable of handling increased truck traffic from the proposed Project. Furthermore, the Project would include a Community Benefits Agreement, which would provide funding for regular maintenance of community facilities.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I204: Jim Walter (1 page)

Jim Walter, Jimwalterjr@gmail.com, Bloomington, 92316, 9519068090

I204.1

I do not want anymore warehouses in Bloomington. Against it.

Response to Letter I204: Jim Walter, undated

Comment I204.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I204.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I205: Evelyn Chacon (1 page)

Evelyn Chacon, Mzchacon01@gmail.com, Fontana, 92337, 9518309023

I do not want anymore warehouses in Bloomington. Not only are you pushing families out of our communities, you are jeopardizing the health of those still living in the community. **I205.1**

Response to Letter I205: Evelyn Chacon, undated

Comment I205.1: This comment states that the commenter does not want any more warehouses in Bloomington and that they are pushing families out of the community and jeopardizing the health of those still living in the community.

Response I205.1: As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I206: Brenda Santacruz (1 page)

Brenda Santacruz, Brendasantacruz75@gmail.com, 18779, Bloomington, 92316 *I do not want anymore warehouses in Bloomington. It's horrible with traffic on the bridge*

I206.1

Response to Letter I206: Brenda Santacruz, undated

Comment I206.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the traffic is horrible on the bridge.

Response I206.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I207: Matt Tucker (1 page)

Matt Tucker, Matbhs20@aol.com, Bloomington, 92316,

I do not want anymore warehouses in Bloomington. It brings way too much traffic and big rigs.

I207.1

Response to Letter I207: Matt Tucker, undated

Comment I207.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses bring too much traffic and big rigs.

Response I207.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I208: Guadalupe Gatibay (1 page)

Guadalupe Gatibay. Marygary1515@gmail.com. Bloomington. 92316. 9099575510

I do not want anymore warehouses in Bloomington. Totalmente en desacuerdo, porque nos están invadiendo de bodegas , no les importa la gente que no podemos comprar en otras ciudades y nos van a invadir de bodegas es injusto para nuestros hijos también pagamos impuestos y no piensan en haser un parque o arreglar nuestras calles solo escuchan a los empresarios y la gente de dinero no estoy deacuerdo

I208.1

Response to Letter I208: Guadalupe Gatibay, undated

Comment I208.1: This comment states that the commenter does not want any more warehouses in Bloomington and that all of the warehouse development is unjust for children. The comment also states that residents pay taxes. The comment questions why the County does not build parks or fix existing streets instead of listening to rich businessmen.

Response I208.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I209: Gem Montes (1 page)

Gem Montes, gem@culturaticoncepts.com, Colton, 92324, 9512326965,

I209.1

I do not want anymore warehouses in Bloomington. It brings smog, traffic and the few jobs it will bring are quickly replaced by artificial intelligence.

Response to Letter I209: Gem Montes, undated

Comment I209.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses bring smog and traffic. The comment states that the few jobs that warehouses bring will be replaced by artificial intelligence.

Response I209.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I210: Luz Rengifo (1 page)

Luz Rengifo, Lucyrengifo@yahoo.com, Fontana, 92347, 9092394245,

I do not want anymore warehouses in Bloomington. I dislike the pollution, traffic and lack of thought for our students. Their health is being affected by the bad air causing more asthmatics in the area. Trucks are unsafe for the kids walking home. No more trucks or warehouse. **I210.1**

Response to Letter I210: Luz Rengifo, undated

Comment I210.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter dislikes the pollution, traffic, and the lack of though for students. The comment further states that the pollution is causing an increase in asthma and trucks are unsafe for children walking home.

Response I210.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As shown on Figure 3-4, Project trucks would utilize County-established truck routes and would be directed away from existing residential neighborhoods. Furthermore, the proposed Project would implement PDF AQ-22, which would require the Project Applicant/Developer/Owner to post signs at every truck exit driveway providing directional information to the truck route. The Bloomington Business Park Specific Plan prohibits commercial truck parking on local streets. Should trucks utilize residential streets for driving or parking, they would be subject to citation from law enforcement. Additionally, as detailed in the Draft EIR for Impact TR-1, starting on page 5.15-6, sidewalks currently exist on Cedar Avenue intermittently on both side of the roadway, on Santa Ana Avenue intermittently on the north side of the roadway, on Jurupa Avenue on the north side east of Linden Avenue. Implementation of the Specific Plan would include roadway improvements within the Specific Plan area that would provide for new sidewalks where none

exist currently, thereby improving pedestrian safety by improving facilities and the sidewalk network. Furthermore, the Project would include a Community Benefits Agreement, which would provide funding for regular maintenance of community facilities. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

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LETTER I211: Mary Johnson (1 page)

Mary Johnson, Lighthousedream2@aol.com, Bloomington, 92316,

I do not want anymore warehouses in Bloomington. I don't like the warehouses here. I've lived & loved this small rural town all my life over 50 yrs. My parents, grandparents, aunts,

I211.1

uncles,cuzns..have been here over 60yrs. My kids went to the same schools as I did & my Grandkids. There is too much traffic, unhealthy air & its unsafe for our kids w/warehouses just feet from our schools & houses. It is so sad we don't have a Quiet Rural town anymore. So much has been taken from all of us. We don't need anymore warehouses taking up our fields & tearing down our houses.

I211.1 cont.

Response to Letter I211: Mary Johnson, undated

Comment I211.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter has lived in Bloomington their whole life. The comment states there is too much traffic, unhealthy air quality. The comment further states that it is unsafe to have warehouses close to schools and houses.

Response I211.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I212: Brisa Carrion (1 page)

Brisa Carrion, Carrionbrisa@gmail.com, Bloomington, 92326, 9097879133 *No, I do not want anymore warehouses in Bloomington. They are distorting our community* I212.1

Response to Letter I212: Brisa Carrion, undated

Comment I212.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses are distorting the community.

Response I212.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I213: Maribel Aguilera (1 page)

Maribel Aguilera, Mgarcia090282@gmail.com, Bloomington, 92316, 951-453-1289

I do not want anymore warehouses in Bloomington. More cars and traffic around school. Warehouse employees get out in the middle of night and race in our streets. I also see them taking breaks or lunch drinking beer. Not safe for our community.

I213.1

Response to Letter I213: Maribel Aguilera, undated

Comment I213.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses result in more traffic around schools. Additionally, the comment states that warehouse employees race in the streets at night and drink beer on breaks.

Response I213.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. In regard to employees conducting illegal activities, should warehouse employees drive unsafely or illegally consume alcohol on public property, they shall be subject to citation from law enforcement. However, assuming that the proposed warehouse employees would conduct illegal activities is speculative. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I214: Leticia Avalos (1 page)

Leticia Avalos, lettyavalos81@gmail.com, Bloomington, 92316, 9092320800

I do not want anymore warehouses in Bloomington. Will affect schools around it. Will affect our air quality not good for my asthmatic child.Will create More traffic that we don't need.With all this it will attract prostitution, trafficking and a site to leave a deceased person that's happened not to long ago. Bloomington needs theater, shopping center to create more Job opportunities. **I214.1**

Response to Letter I214: Leticia Avalos, undated

Comment I214.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the air quality and traffic is bad and would get worse. The comment states that warehouses would attract prostitution, human trafficking, and are a place to leave a dead body. The comment states that Bloomington needs a movie theater or shopping center to create more job opportunities.

Response I214.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

Furthermore, the comments related to prostitution, human trafficking, and murder are speculative in nature, are unrelated to CEQA, and do not warrant a response. Additionally, as substantiated on page 5.13-8 of the Draft EIR, based on the proposed building square footages, the Opening Year Development – Option 1 would generate 1,769 jobs and the Opening Year Development – Option 2 would generate 2,270 jobs. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I215: Johnny Herrera (1 page)

Johnny Herrera, Wathafukk@gmail.com, Bloomington, 92316, 9512377009

I215.1

I do not want anymore warehouses in Bloomington. I don't want them

Response to Letter I215: Johnny Herrera, undated

Comment I215.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I215.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I216: Nely Partida Manzano (1 page)

Nely Partida Manzano, nelypmanzano62@yahoo.com, Bloomington, 92316, 909 436-5836

I do not want anymore warehouses in Bloomington. We need retail stores instead of warehouses we already have enough warehouses by building more warehouses will created a lot of traffic instead we need a community center

I216.1

Response to Letter I216: Nely Partida Manzano, undated

Comment I216.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses lead to a lot of traffic. The comment states Bloomington needs retail stores or a community center instead of warehouses.

Response I216.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I217: David Delgado (1 page)

David Delgado, David_delgado92316@aol.com, Bloomington, 92316, 9095509442

I do not want anymore warehouses in Bloomington. I feel like we don't need anymore warehouses it is taking up to much space from what was once a nice city

I217.1

Response to Letter I217: David Delgado, undated

Comment I217.1: This comment states that the commenter does not want any more warehouses in Bloomington and that they take up too much space.

Response I217.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I218: Rosio Ramirez (1 page)

Rosio Ramirez, rramirezorozco@gmail.com, Bloomington, 92316, 909 684 2297 *I do not want anymore warehouses in Bloomington. It is detrimental to our community.*

I218.1

Response to Letter I218: Rosio Ramirez, undated

Comment I218.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I218.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I219: Joel Ramirez (1 page)

Joel Ramirez, mrramirezresendiz@gmail.com, Bloomington, 92316, 909 684 2297

No estoy de acuerdo que haya mas bodegas en Bloomington. No queremos mas bodegas en Bloomington.

I219.1

Response to Letter I219: Joel Ramirez, undated

Comment I219.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I219.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I220: Jennifer Torres (1 page)

Jennifer Torres, Jennifertorres87@yahoo.com, Bloomington, 92316, 9099194291

I do not want anymore warehouses in Bloomington. TRAFFIC NOT SAFE FOR KIDS ! WE DONT NEED MORE TRUCKBLOCKING EVERYTHING !!!

I220.1

Response to Letter I220: Jennifer Torres, undated

Comment I220.1: This comment states that the commenter does not want any more warehouses in Bloomington and truck traffic is not safe for children and trucks block everything.

Response I220.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As shown on Figure 3-4, Project trucks would utilize Specific Plan-established truck routes and would be directed away from existing residential neighborhoods. Furthermore, the proposed Project would implement PDF AQ-22, which would require the Project Applicant/Developer/Owner to post signs at every truck exit driveway providing directional information to the truck route. The Bloomington Business Park Specific Plan prohibits commercial truck parking on local streets. Should trucks utilize residential streets for driving or parking, they would be subject to citation from law enforcement. Additionally, as detailed in the Draft EIR for Impact TR-1, starting on page 5.15-6, sidewalks currently exist on Cedar Avenue intermittently on both side of the roadway, on Santa Ana Avenue intermittently on the north side of the roadway, on Jurupa Avenue on the north side east of Linden Avenue. Implementation of the Specific Plan would include roadway improvements within the Specific Plan area that would provide for new sidewalks where none exist currently, thereby improving pedestrian safety by improving facilities and the sidewalk network. Furthermore, the Project would include a Community Benefits Agreement, which would provide funding for regular maintenance of community facilities. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I221: Jorge Carrion (1 page)

Jorge Carrion, Jorgecce@icloud.com, Bloomington, 92316, 9094902005

I do not want anymore warehouses in Bloomington. I don't like the change will increase the traffic

I221.1

Response to Letter I221: Jorge Carrion, undated

Comment I221.1: This comment states that the commenter does not want any more warehouses in Bloomington and that it will increase traffic.

Response I221.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I222: Patricia Morales (1 page)

Patricia Morales, rpatriciagomez@yahoo.com, Bloomington, 92316, 9097280524

I do not want anymore warehouses in Bloomington. Our kids and grandkids live here, we don't need more pollution, we need a community center, a park east of cedar Ave, somewhere where the children could go without crossing cedar which is alway congested after school

I222.1

Response to Letter I222: Patricia Morales, 1 page

Comment I222.1: This comment states that the commenter does not want any more warehouses in Bloomington and that Bloomington does not need more pollution. The comment also states that Bloomington needs a park east of Cedar Avenue as Cedar Avenue gets congested after school.

Response I222.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I223: Rozana Ruiz (1 page)

Roxana Ruiz, sanchezroxy59@gmail.com, Bloomimgton, 92316,

I do not want anymore warehouses in Bloomington. I feel that they are making the traffic worse and harder for everyone.

I223.1

Response to Letter I223.1: Roxana Ruiz, undated

Comment I223.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses are making traffic worse.

Response I223.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I224: Mariana Enriquez (1 page)

Mariana Enriquez, annaenriquez542@yahoo.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. The traffic is getting worse and also it takes to long for me to get out of the mobile homes I live in just to cross the street. Also it takes really long to cross the bridge.

I224.1

Response to Letter I224: Mariana Enriquez, undated

Comment I224.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the traffic is getting worse.

Response I224.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I225: Maricela Real (1 page)

Maricela Real, realbudgirl@yahoo.com, Bloomington, 92316, 9094897738 *I do not want anymore warehouses in Bloomington. Too much traffic for this little town*

I225.1

Response to Letter I225: Maricela Real, undated

Comment I225.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is too much traffic.

Response I225.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I226: Karen Ramirez (1 page)

Karen Ramirez, Ramirez_karen2@hotmail.com, Bloomington, 92316, 9094404811

I226.1

I do not want anymore warehouses in Bloomington. It's causing a lot more traffic & damage to roads that take forever to get fixed

Response to Letter I226: Karen Ramirez, undated

Comment I226.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses are causing a lot of traffic and damage to roads.

Response I226.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

Furthermore, as discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue and Santa Ana Avenue. As such, the proposed Project would actually benefit the community by providing road improvements to previously damaged roads and would ensure that roadways in the Project vicinity would be adequate to support the increase in truck trips. Furthermore, the Project would include a Community Benefits Agreement, which would provide funding for regular maintenance of community facilities. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I227: Brenda Holmes (1 page)

Brenda Holmes, swtpeaholmes@yahoo.com, Bloomington, 92316, 909 822 3344

I do not want anymore warehouses in Bloomington. There is so much traffic now, I cant imagine adding so many more trucks onto the Cedar Ave overpass. I think its a bad idea. We are overwhelmed with warehouses in the area already. These need to be built in a more industrial area or even in undeveloped areas. Our heritage of being a more rural community is going to be taken away when we turn into a super concrete city.

I227.1

Response to Letter I227: Brenda Holmes, undated

Comment I227.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is too much traffic now. The comment states that the Project should be built in a more industrial area or in an undeveloped area.

Response I227.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

Additionally, the proposed Project is located in an industrializing area, with an existing industrial warehouse located directly east of the Specific Plan Area and a proposed industrial development located south of the Specific Plan Area. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I228: Lorena Gilman (1 page)

Lorena Gilman, lorenagilman@yahoo.com, Bloomington, 92316, 9006859121

No estoy de acuerdo que haya mas bodegas en Bloomington. Vivíamos tranquilos, ahora solo hay preocupaciones por tanta bodega, hay mucho tráfico especialmente trailers

I228.1

Response to Letter I228: Lorena Gilman, undated

Comment I228.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there are too many warehouses and too much traffic.

Response I228.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I229: Mariana Hernandez (1 page)

Mariana Hernandez, Hkids05@hotmail.com, Bloomington, 92316. **I229.1**

I do not want anymore warehouses in Bloomington. I do not like it at all.

Response to Letter I229: Mariana Hernandez, undated

Comment I229.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I229.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I230: Melissa DeAnda (1 page)

Melissa DeAnda, Msdeanda92@ymail.com , Bloomington, 92316

I do not want anymore warehouses in Bloomington. Disgusted I230.1

Response to Letter I230: Melissa DeAnda, undated

Comment I230.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I230.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I231: Sandra Barrera (1 page)

Sandra Barrera, Barreras122@gmail.com, Bloomington, 92317

I do not want anymore warehouses in Bloomington. Too much traffic, more truck pollution, less safety for children and school zones

I231.1

Response to Letter I231: Sandra Barrera, undated

Comment I231.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the Project would result in too much traffic, more truck pollution, and less safety for children in school zones.

Response I231.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

As shown on Figure 3-4, Project trucks would utilize Specific Plan-established truck routes and would be directed away from existing residential neighborhoods. Furthermore, the proposed Project would implement PDF AQ-22, which would require the Project Applicant/Developer/Owner to post signs at every truck exit driveway providing directional information to the truck route. The Bloomington Business Park Specific Plan prohibits commercial truck parking on local streets. Should trucks utilize residential streets for driving or parking, they would be subject to citation from law enforcement. Additionally, as detailed in the Draft EIR for Impact TR-1, starting on page 5.15-6, sidewalks currently exist on Cedar Avenue intermittently on both side of the roadway, on Santa Ana Avenue intermittently on the north side of the roadway, on Jurupa Avenue on the north side east of Linden Avenue. Implementation of the Specific Plan would include roadway improvements within the Specific Plan area that would provide for new sidewalks

where none exist currently, thereby improving pedestrian safety through improving facilities and the sidewalk network. Furthermore, the Project would include a Community Benefits Agreement, which would provide funding for regular maintenance of community facilities. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

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LETTER I232: Cindy Herrera (1 page)

Cindy Herrera, Cindyherrera909@gmail.com, Fontana, 92335, 9094524449

I232.1

I do not want anymore warehouses in Bloomington. I hate it they did new warehouses in Rialto on locust and linden and there is always big rigs blocking the whole lane.

Response to Letter I232: Cindy Herrera, undated

Comment I232.1: This comment states that the commenter does not want any more warehouses in Bloomington and that new warehouses in Rialto led to big rigs blocking streets.

Response I232.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I233: Elizabeth Amador (1 page)

Elizabeth Amador, Aelizabeth@roadrunner.com, Bloomington, 92316, 9093195807

I do not want anymore warehouses in Bloomington. I don't want my kids growing up with werehouses around their neighborhood

I233.1

Response to Letter I233: Elizabeth Amador, undated

Comment I233.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter does not want her kids growing up around warehouses.

Response I233.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I234: Roxanne Flores (1 page)

Roxanne Flores, Roxanneyanez716@gmail.com, Bloomington, 92316, 9512518770

I do not want anymore warehouses in Bloomington. It's unacceptable thats this is happiness in our community. They are not taking in consideration our kids health. How can they expect us to agree when so many warehouse are veing build already and a traffic is extremely bad. I live right on slover and traffic is worse now that the Amazon warehouse was opened. Don't take into consideration the traffic by other warehouse, school and the freeway exit. It's a nightmare all day!

I234.1

Response to Letter I234: Roxanne Flores, undated

Comment I234.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the County is not taking childhood health into consideration. The comment states that traffic is already really bad.

Response I234.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. Therefore, the Project would not pose a substantial health risk to children.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I235: Angelica Ramirez (1 page)

Angelica Ramirez, Angelicarami22@gmail.com, Bloomington, 92316, 9098314684 *I do not want anymore warehouses in Bloomington. It's not going to be a town no more*

I235.1

Response to Letter I235: Angelica Ramirez, undated

Comment I235.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I235.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I237: Monica Arzate (1 page)

Monica Arzate, arzatemonica81@gmail.com, Bloomington, 92316, 9094520753

I237.1

No estoy de acuerdo que haya mas bodegas en Bloomington.Es demasiado tráfico y con eso seria aun mas y el cuidado de los estudiantes .

Response to Letter I237: Monica Arzate, undated

Comment I237.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is too much traffic already. The comment states that this puts the safety of students at risk.

Response I237.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As shown on Figure 3-4, Project trucks would utilize Specific Plan-established truck routes and would be directed away from existing residential neighborhoods. Furthermore, the proposed Project would implement PDF AQ-22, which would require the Project Applicant/Developer/Owner to post signs at every truck exit driveway providing directional information to the truck route. The Bloomington Business Park Specific Plan prohibits commercial truck parking on local streets. Should trucks utilize residential streets for driving or parking, they would be subject to citation from law enforcement. Additionally, as detailed in the Draft EIR for Impact TR-1, starting on page 5.15-6, sidewalks currently exist on Cedar Avenue intermittently on both side of the roadway, on Santa Ana Avenue intermittently on the north side of the roadway, on Jurupa Avenue on the north side east of Linden Avenue. Implementation of the Specific Plan would include roadway improvements within the Specific Plan area that would provide for new sidewalks where none exist currently, thereby improving pedestrian safety by improving facilities and the sidewalk network. Furthermore, the Project would include a Community Benefits Agreement, which would provide funding for regular maintenance of community facilities. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I238: Rigoberto Munoz (1 page)

RIGOBERTO MUNOZ, Depmun @yahoo.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. We have enough traffic and pollution

I238.1

Response to Comment I238: Rigoberto Munoz, undated

Comment I238.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is enough traffic and pollution already.

Response I238.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I239: Jenifer Aragon (1 page)

Jenifer Aragon. Jennyflute52@yahoo.com. Bloomington. 92316. 9097097077 *I do not want anymore warehouses in Bloomington. Ruining our already bad quality of life.*

I239.1

Response to Letter I239: Jenifer Aragon, undated

Comment I239.1: This comment states that the commenter does not want any more warehouses in Bloomington and warehouses ruining Bloomington residents' already bad quality of life.

Response I239.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I240: Brenda Reyes (1 page)

Brenda Reyes, Karinaryes@hotmail.com, Bloomington, 92316, 9092775179

I240.1

I do not want anymore warehouses in Bloomington. I don't like the idea. I don't want any more pollution around my kids

Response to Letter I240: Brenda Reyes, undated

Comment I240.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter does not want any more pollution around their kids.

Response I240.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I241: Jessica Salguero (1 page)

Jessica Salguero, cheesyqueso626@yahoo.com, Bloomington, 92316, 9517123403

I do not want anymore warehouses in Bloomington. It's made traffic a lot worse and walking much more dangerous. The drivers that deliver and work at these warehouses are not cautious
and are reckless. The warehouses have brought a lot of noise disturbance that goes all day and all night.

I241.1

Response to Letter I241: Jessica Salguero, undated

Comment I241.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses have made traffic worse and walking dangerous. The comment states that warehouse workers are reckless and have brought a lot of noise disturbance.

Response I241.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As shown on Figure 3-4, Project trucks would utilize Specific Plan-established truck routes and would be directed away from existing residential neighborhoods. Furthermore, the proposed Project would implement PDF AQ-22, which would require the Project Applicant/Developer/Owner to post signs at every truck exit driveway providing directional information to the truck route. The Bloomington Business Park Specific Plan prohibits commercial truck parking on local streets. Should trucks utilize residential streets for driving or parking, they would be subject to citation from law enforcement. Additionally, as detailed in the Draft EIR for Impact TR-1, starting on page 5.15-6, sidewalks currently exist on Cedar Avenue intermittently on both side of the roadway, on Santa Ana Avenue intermittently on the north side of the roadway, on Jurupa Avenue on the north side east of Linden Avenue. Implementation of the Specific Plan would include roadway improvements within the Specific Plan area that would provide for new sidewalks where none exist currently, thereby improving pedestrian safety through enhancing facilities and the sidewalk network. Furthermore, the Project would include a Community Benefits Agreement, which would provide funding for regular maintenance of community facilities.

In regard to noise, as detailed in the Impact NOI-1 discussion that begins on page 5.12-26 of the Draft EIR, each of the Project scenarios would implement PDF NOI-2, which would require 12- to 14-foot-high cement block walls at Sites 1 and 2 and 9-foot-high cement walls at Site 4. With implementation of PDF NOI-2, operational noise levels for all scenarios would not exceed the County's exterior noise level standards, as adjusted to reflect the ambient noise levels at all nearby sensitive receiver locations. Additionally, the increase in ambient noise levels would range from 0.1 to 3.0 dBA with the implementation of PDF NOI-2, which would not generate a significant daytime or nighttime operational noise level increase at nearby receiver locations.

As detailed in the Draft EIR in Section 5.12, *Noise,* starting on page 5.12-48, the proposed Project would generate traffic related noise from operation. As described in Section 3.0, *Project Description*, of the Draft EIR, the proposed Specific Plan buildings would be accessed from Laurel Avenue, Locust Avenue, Linden Avenue, and Maple Avenue. Tables 5.12-23 through 5.12-24 show that both the Opening Year with Project and General Plan Buildout with Project conditions would result in increases less than the 1.5 dBA CNEL threshold. Thus, off-site traffic noise impacts from the Project would be less than significant. The

comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

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LETTER I242: Ema Ibarra (1 page)

Ema Ibarra, emmagon75@hotmail.com, Bloomington, 92316, 9092511622 *No estoy de acuerdo que haya mas bodegas en Bloomington. No es buena idea y me opongo* **I242.1**

Response to Letter I242: Ema Ibarra, undated

Comment I242.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I242.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I243: Victoria Ramirez (1 page)

Victoria Ramirez, Vixvalo@gmail.com, Bloomington, 92316, 9094191042

I do not want anymore warehouses in Bloomington. It saddens me to see Bloomington become full of warehouses. I grew up in Bloomington and am now raising my family in Bloomington. I wish my kids could grow up here just like I did but I don't see that happening with all the warehouses being built. I am afraid that one day they will push us out of our home.

I243.1

Response to Letter I243: Victoria Ramirez, undated

Comment I243.1: This comment states that the commenter does not want any more warehouses in Bloomington and that it saddens the commenter to see Bloomington full of warehouses. The comment states that they are afraid that one day they will be pushed out of their home.

Response I243.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I244: Dainna Cordero (1 page)

Dianna Cordero, cordero23d@yahoo.com, Bloomington, 92316, 9095862209

I244.1

I do not want anymore warehouses in Bloomington. Upset that they are all near schools, will increase smog & bad air, will increase traffic.

Response to Letter I244: Diana Cordero, undated

Comment I244.1: This comment states that the commenter does not want any more warehouses in Bloomington and that they will increase air pollution and traffic.

Response I244.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I245: Martha Espinoza (1 page)

Martha Espinoza, freedominetransport@icloud.com, Bloomington, 92316 *I do not want anymore warehouses in Bloomington. As a individual o feel that we have no rights* **I245.1**

Response to Letter I245: Martha Espinoza, undated

Comment I245.1: This comment states that the commenter does not want any more warehouses in Bloomington and the commenter feels that individuals have no rights.

Response I245.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I246: Sonia Rios (1 page)

Sonia Rios. Timosonia99@gmail.com. Bloomington. 92326. 9092581310

I246.1

I do not want anymore warehouses in Bloomington. I bought 16 years ago and nothing was mention back then. Actually traffic has gotten worse and this will get worse as time goes by.

Response to Letter I246: Sonia Rios, undated

Comment I246.1: This comment states that the commenter does not want any more warehouses in Bloomington and that traffic has gotten worse and will continue to get worse.

Response I246.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I247: Nayelie Duran (1 page)

Nayelie Duran, Nayelie8201@gmail.com, Bloomington, 92316, 9096844577

I do not want anymore warehouses in Bloomington. It's not safe for warehouses to be built next to schools

I247.1

Response to Letter I247: Nayelie Duran, undated

Comment I247.1: This comment states that the commenter does not want any more warehouses in Bloomington and it is not safe for warehouses to be built near schools.

Response I247.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I248: Erika Perez (1 page)

Erika Perez, erikaperez909@gmail.com, Boomigton, 92316, (909) 5347251 *I do not want anymore warehouses in Bloomington. Frustrated in annoyed Too much traffic.*

I248.1

Response to Letter I248: Erika Perez, undated

Comment I248.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is too much traffic.

Response I248.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I249: Marisa Lopez-Sevilla (2 pages)

Marisa Lopez-Sevilla marisalop@msn.com, Rialto, 92376, 9096441834

I do not want anymore warehouses in Bloomington. I have worked in Bloomington for over 20

I249.1

years. I have seen The Strawberry Fields on the corner of Orange and Cedar disappear. I've seen housing go up. And now tall cement structures have replaced the landscape. In addition big rigs now run rampant in the streets, and the airfield with metallic particles. I recently went to a nutritionist and had them do bloodwork. She asked where I worked because the amount of metal in my blood was off the chart. Thinking I worked in some sort of metalworking industry she was shocked to know I was a teacher. I had to explain that I've worked in Bloomington for 20 years. That I work not only near a freeway, a railyard, but I'm surrounded by big rigs. To have housing replaced by these structures has taken away from the communities that have provided themselves and obtain in the American dream. It's understood that these communities are bought out and paid however those behind and I must live in the shadows of pollution and strangers driving in and out of their neighborhoods. They're once familiar neighbors are now strangers who drive past their families. It's understood that the taxes from these industries allow the county to prosper however at what cost to the community. Please do not go the way of Fontana and advertise that warehouses are build healthy communities. Such propaganda is laughable. Please do not create that here in Bloomington . I cannot imagine living across from one of these warehouses having checkers come in and knowing that my daughter was in the front yard playing or that I would sit on my porch. This is what you're asking of those living next to such structures.

I249.1 cont.

Response to Letter I249: Marisa Lopez-Sevilla, undated

Comment I249.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter has worked in Bloomington for over 20 years and has seen the strawberry fields disappear, housing go up, warehouses get built, and increased big rig trips that lead to pollution. The comment states that the commenter had a high amount of metal in her blood from working near the freeway, railyard, and big rigs. The comment states that people in Bloomington have to live with pollution and strangers driving in their neighborhoods. The comment states that the County should not follow in the path of Fontana by saying warehouses help build healthy communities.

Response I249.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I250: Bianka Villasenor (1 page)

Bianka Villasenor, biankavillasenor@yahoo.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. Warehouses bring so many felons to work in and it causes danger to our students and families. Not to mention the traffic and polution that's causing.

I250.1

Response to Letter I250: Bianka Villasenor, undated

Comment I250.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses bring in felons to work, which presents a danger to students and families. The comment states that warehouses cause traffic and pollution.

Response I250.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The comment related to warehouses hiring felons is speculative in nature, is unrelated to CEQA, and does not warrant a response.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

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LETTER I251: Arcelia Salmeron (1 page)

Arcelia Salmeron, arcesal@hotmail.com, Bloomington, 92316 **I251.1**

I do not want anymore warehouses in Bloomington. It's destroying a life style

Response to Letter I251: Arcelia Salmeron, undated

Comment I251.1: This comment states that the commenter does not want any more warehouses in Bloomington and warehouses are destroying a lifestyle.

Response I251.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I252: Elizabeth Sanchez (1 page)

Elizabeth Sanchez, ru1es2jr3@yahoo.com, Bloomington, 92316, 9092332562 *I do not want anymore warehouses in Bloomington. Awful. All you see know is warehouses.* **I252.1**

Response to Letter I252: Elizabeth Sanchez, undated

Comment I252.1: This comment states that the commenter does not want any more warehouses in Bloomington and all you see in Bloomington is warehouses.

Response I252.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I253: Evelyn Renteria (1 page)

Evelyn Renteria, Evelynrenteria2012@gmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. I am so disappointed that this is what they are planning. I want a community where my kids can grow and shop not extra dirtiness from prostitutes and drugs at truck stops.

I253.1

Response to Letter I253: Evelyn Renteria, undated

Comment I253.1: The comment states that the commenter does not want any more warehouses in Bloomington and does not want dirtiness from prostitutes and drugs at truck stops.

Response I253.1: The comment related to the warehouses resulting in drugs and prostitutes is speculative in nature, is unrelated to CEQA, and does not warrant a response. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I254: German Cervantes (1 page)

German Cervantes, Ever.ent23@gmail.com , Bloomington, 92316

I do not want anymore warehouses in Bloomington. We are tired of these industrial buildings polluting our air. We deserve to have nice restaurants and stores we can shop locally.

I254.1

Response to Letter I254: German Cervantes, undated

Comment I254.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the community is tired of industrial buildings polluting the air. The comment states that Bloomington deserves to have nice restaurants and stores.

Response I254.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I255: Andrea Sandoval (1 page)

Andrea Sandoval, andreasandoval_3@msn.com, Bloomington, 92316, 9098755662

I do not want anymore warehouses in Bloomington. Im a life long resident of Bloomington. Matter of fact I lived on Laurel where they want to change the zoning. Bloomington was very nice place to raise your children seeing the farms, crops of vegetables and fruit trees. In my opinion why so many whearhouses most are empty in Fontana and Ontario. Not to mention the traffic its unbelievable now. I'm a school bus driver and we cant get across Cedar bridge or Sierra in time to make it to our next school. Something needs to be done to cut down on truck traffic in Bloomington.

I255.1

Response to Letter I255: Andrea Sandoval, undated

Comment I255.1: This comment states that the commenter does not want any more warehouses in Bloomington and that Bloomington used to be a nice place to raise children. The comment states that there is too much truck traffic and congestion in Bloomington.

Response I255.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I256: Jose Lopez (1 page)

Jose Lopez, Joselopez25@me.com, Bloomington, 92316.

I do not want anymore warehouses in Bloomington. To much traffic. And the doesn't even look nice with all these warehouses.

I256.1

Response to Letter I256: Jose Lopez, undated

Comment I256.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is too much traffic and warehouses do not look nice.

Response I256.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I257: Patricia Garcia (1 page)

Patricia Garcia, Pgaaliyah2019@gmail.com, Bloomington, 92316.

I do not want anymore warehouses in Bloomington. There is to many traffic already due to the new warehouse in Bloomington. We don't want more traffic.

I257.1

Response to Letter I257: Patricia Garcia, undated

Comment I257.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is too much traffic already.

Response I257.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I258: Aprilia Noer (1 page)

Aprilia Noer, Aprilnoer@hotmail.com, Redlands, 92374, 9513348828,

I do not want anymore warehouses in Bloomington. We should value our community more than profit

I258.1

Response to Letter I258: Aprilia Noer, undated

Comment I158.1: This comment states that the commenter does not want any more warehouses in Bloomington and the County should value community over profit.

Response I158.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I259: Paul Lucero (1 page)

Paul Lucero, Paullucero1214@gmail.com, Mentone, 92359

I do not want anymore warehouses in Bloomington. As a 19 year teacher in the Bloomington community, I have seen the negative cultural, social, and environmental impact these large

I259.1

warehouses have. They take land away from potential families. They breed crime since only 1 Sheriff patrols Bloomington that person can't be everywhere and there are plenty of blind spots created by these massive stuctures. Finally, the trucks that feed these warehouses tear up the roads, congest intersections, and obviously add to poor air quality. There has always been a strong trucking and logistics industry in Bloomington, and that industry helped transport goods to other areas, not house them in the community and sit idle while they wait. Warehouses belong in places where residential communities are not established. Bloomington is established. Please do not let the possibility of increased revenue outweigh the needs of the residents in the community.

I259.1 cont.

Response to Letter I259: Paul Lucero, undated

Comment I259.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter has seen the negative impacts that warehouses have. The comment states that warehouses take land away from families and breed crime since only one sheriff patrols Bloomington. The comment states that warehouses tear up the roads, lead to congestion, and contribute to poor air quality. The comment states warehouses belong where residential communities are not established.

Response I259.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed in Section 5.13, *Population and Housing*, property owners within the development footprint would voluntarily sell their property and would be compensated by the Applicant. At the time future development is proposed in Planning Area B, property owners have the option to voluntarily sell their property and would be compensated by the future development's applicants. Property owners would not be forced to sell their properties, either through harassment or eminent domain.

As discussed on page 5.14-9, according to the CWP EIR, operations at the Fontana County Sheriff Station have decreased over the years because their service areas have been annexed to the City of Fontana, which has its own police department. Therefore, the Fontana Sheriff Station has capacity to accommodate more staff in order to meet the increased demand in Bloomington, including that contributed by the Project. Therefore, construction of a new or expansion of the existing police station would not be required; and therefore, impacts would be less than significant. Property tax revenue generated by development of the Project and the Project's Community Benefits Agreement (CBA) would provide funding for police services and would help to offset the Project's increase in the demand for services; the Project would additionally include funding of additional San Bernardino County Sheriff's Deputy for the Bloomington Area.

Furthermore, as discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue and Santa Ana. As such, the proposed Project would actually benefit the community by providing road improvements to previously damaged roads and would ensure that roads are capable of handling increased truck traffic from the proposed Project. Furthermore, the Project would include a Community Benefits Agreement, which would provide funding for regular maintenance of community facilities.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of

VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

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LETTER I260: Laura Garcia (1 page)

Laura Garcia, neibig89@gmail.com, Bloomington, 92316

No estoy de acuerdo que haya mas bodegas en Bloomington. To much traffic to take my kids to school.

I260.1

Response to Letter I260: Laura Garcia, undated

Comment I260.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is too much traffic.

Response I260.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I261: Amber Murray (1 page)

Amber Murray, Ambonee@aol.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. I'm mad! I've lived here my whole life! I'm 40! I don't want to raise my kids here! Pollution! Truck traffic! Everything is so dirty now! Our beautiful town is being taken over by this nonsense. I can't even pull off my street safely with trucks barreling down Cactus Ave now! I've almost been hit multiple times. They put in a red curb the trucks still park there and leave their trash! What? Am I supposed to pick it up? My disabled mom maybe?? These trucks should never have been allowed in! Build warehouses and truck depots in YOUR backyard! Leave ours alone!

I261.1

Response to Letter I261: Amber Murray, undated

Comment I261.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is too much traffic and pollution. The comment further states that the commenter cannot drive safely as trucks barrel down Cactus Avenue and trucks park and leave trash in the neighborhood. The comment states that warehouses should be built elsewhere.

Response I261.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

As shown on Draft EIR Figure 3-4, Project trucks would utilize County-established truck routes and would be directed away from existing residential neighborhoods. Furthermore, the proposed Project would implement PDF AQ-22, which would require the Project Applicant/Developer/Owner to post signs at every truck exit driveway providing directional information to the truck route. The Bloomington Business Park Specific Plan prohibits commercial truck parking on local streets. Should trucks utilize residential streets for driving or parking, they would be subject to citation from law enforcement. The comment

provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

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LETTER I262: Marlene Espinoza (1 page)

Marlene Espinoza, Dreababy0910@yahoo.com, Bloomington, 92316, 9097753159

I262.1

I do not want anymore warehouses in Bloomington. I don't like it

Response to Letter I262: Marlene Espinoza, undated

Comment I262.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I262.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I263: Imelda Fierros (1 page)

Imelda Fierros. Ifierros@yahoo.com, Bloomington, 92316, 9515818304

I do not want anymore warehouses in Bloomington. Upset. This is destroying our city, it's becoming a circus and this will not be safe for our children as we have schools all over and truck drivers from all over will be in our neighborhoods **I263.1**

Response to Letter I263: Imelda Fierros, undated

Comment I263.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses are not safe for children since truck drivers will be all over neighborhoods.

Response I263.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I264: Alyssa Garcia (1 page)

Alyssa Garcia, Lyssiekatherine98@gmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. Warehouse development has caused a significant increase in traffic with big rigs more prone to fill city streets, main and otherwise. Our nights are no longer truly night, as lights from the surrounding warehouses keep the sky lit. Our homes already neighbor sizeable warehouses, we do not benefit from more.

I264.1

Response to Comment I264: Alyssa Garcia, undated

Comment I264.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouse development has led to an increase in traffic. The comment states that lights from surrounding warehouses create light pollution.

Response I264.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

The proposed improvements in Planning Area A would include exterior security lighting throughout the sites. The lighting fixtures would be 35 feet tall and would be energy efficient, in compliance with CBC Title 24 requirements. The lights would be shielded and/or recessed so that glare and reflections are confined to each site's boundaries and directed downward and away from adjoining residential properties and public roadways. Once the final design and placement of the light sources are identified, as required by the Specific Plan, a photometric lighting plan will be prepared for each of the four development sites; the photometric lighting plan will project the illumination levels at the property lines of the surrounding light sensitive uses and public rights-of-way to ensure that the planned lighting will not exceed the five-tenths foot-candles limit at residential property lines. Once constructed and prior to the operation of each development, in accordance with Development Code Section 83.07.030, light measurements would be conducted to confirm that measured illumination at residential property lines and rights-of-way would be less than five-tenths foot-candles. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I265: Nina Radoi

Nina Radoi, ninaradoi@icloud.com, Bloomington, 92316, 9098731147

I265.1

I do not want anymore warehouses in Bloomington. To many wherehouses to much traffic what we need is a grocery store not wherehouse

Response to Letter I265: Nina Radoi, undated

Comment I265.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is too much traffic and Bloomington needs a grocery store.

Response I265.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I266: Donna Wagoner (1 page)

Donna Wagoner, donnaralphjames@yahoo.com, Bloomington, 92316, 9098772085

I do not want anymore warehouses in Bloomington. Enough

I266.1

Response to Letter I266: Donna Wagoner, undated

Comment I266.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I266.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I267: Cain Trevino (1 page)

Cain Trevino, bluster345@gmail.com, Irvine, 92617

I267.1

I do not want anymore warehouses in Bloomington. no more warehouses

Response to Letter I267: Cain Trevino, undated

Comment I267.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I267.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I268: Valerie Tuyu (1 page)

Valerie Tuyu, Valerietuyu@gmail.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. They should not be build in residential areas and near schools

I268.1

Response to Letter I268: Valerie Tuyu, undated

Comment I268.1: This comment states that the commenter does not want any more warehouses in Bloomington and they should not be built in residential areas near schools.

Response I268.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I269: Concepcion Ramirez (1 page)

Concepcion Ramirez, Conniee1232@gmail.com, Bloomington, 92316, 9095507610

I do not want anymore warehouses in Bloomington. I feel like they're hurting our city with pollution especially building so close to the schools specifically Bloomington high school. They're basically kicking Bloomington residents out with all the warehouses they're building the traffic is only going to get worse and kids are walking down these streets home from school and it won't be safe for them anymore

I269.1

Response to Letter I269: Concepcion Ramirez, undated

Comment I269.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses lead to pollution near schools. The comment states that developers are kicking residents out. The comment states that warehouses would lead to increased traffic, which would not be safe for kids walking home from schools.

Response I269.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

As discussed in Section 5.13, *Population and Housing*, property owners within the development footprint would voluntarily sell their property and would be compensated by the Applicant. At the time future development is proposed in Planning Area B, property owners have the option to voluntarily sell their property and would be compensated by the future development's applicants. Property owners would not be forced to sell their properties, either through harassment or eminent domain.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As shown on Figure 3-4, Project trucks would utilize Specific Plan-established truck routes and would be directed away from existing residential neighborhoods. Furthermore, the proposed Project would implement PDF AQ-22, which would require the Project Applicant/Developer/Owner to post signs at every truck exit driveway providing directional information to the truck route. The Bloomington Business Park

Specific Plan prohibits commercial truck parking on local streets. Should trucks utilize residential streets for driving or parking, they would be subject to citation from law enforcement. Additionally, as detailed in the Draft EIR for Impact TR-1, starting on page 5.15-6, sidewalks currently exist on Cedar Avenue intermittently on both side of the roadway, on Santa Ana Avenue intermittently on the north side of the roadway, on Jurupa Avenue on the north side east of Linden Avenue. Implementation of the Specific Plan would include roadway improvements within the Specific Plan area that would provide for new sidewalks where none exist currently, thereby improving pedestrian safety by improving facilities and the sidewalk network. Furthermore, the Project would include a Community Benefits Agreement, which would provide funding for regular maintenance of community facilities. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

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Letter I270: Jose Montes (2 pages)

Jose Montes, Sovek1872@gmail.com, Bloomington, 92316, 9094407369 *No estoy de* I270.1

acuerdo que haya mas bodegas en Bloomington. Nesecitamos un market grande I270.1 cont.

Response to Letter I270: Jose Montes, undated

Comment I270.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I270.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I271: Francisco Ramirez (1 pages)

Francisco Ramirez, pancho2514@gmail.com, Bloomington, 92316 , 19092448300

I do not want anymore warehouses in Bloomington. More traffic for school and for everybody not safe at all

I271.1

Response to Letter I271: Francisco Ramirez, undated

Comment I271.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses lead to more traffic, which is not safe for anyone.

Response I271.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I272: Juan Lasso (1 page)

Juan Lasso, jlasso81@gmail.com, Bloomington, 92316, 9095800934

I do not want anymore warehouses in Bloomington. They are destroying our communities. I guarantee none of the developers or people that are approving this project live near this area . I will Love for this people to visit cedar ave after 3 pm so they can see how bad the traffic is .. we will not sell our community for a few jobs that do not benefit anyone in our community. My question to them is what would they do if a developer shows up to their community and try to build warehouses? Would they allow it ??? Well neither are we !

I272.1

Response to Letter I272: Juan Lasso, undated

Comment I272.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses are destroying communities. The comment states that none of the people approving or developing the Project live in the area. The comment further states that the traffic is really bad and the jobs do not benefit the community.

Response I272.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I273: Maritza Gomez (1 page)

Maritza Gomez, Mglasso2385@gmail.com, Bloomington, 92316, 9092786366

I do not want anymore warehouses in Bloomington. I feel very stressed and frustrated because we have enough truck traffic already. Everyday its hard to go out my mobile home park to the store or anywhere due to the high truck traffic we get starting at 2:30-5:00 sometimes even 6pm. It's hard to go in and out. It's ridiculous how bad the traffic has gotten. I can't imagine how much worse it will get with the new project that wants to be done. My worst fear is having a medical emergency or any emergency and not be able to get out due to the traffic that blocks our entry.

I273.1

Response to Letter I273: Martiza Gomez, undated

Comment I273.1: This comment states that the commenter does not want any more warehouses in Bloomington and that there is a lot of truck traffic currently and it is hard to travel in Bloomington because of all of the congestion.

Response I273.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I274: Lawrence Saldana (1 page)

Lawrence Saldana, lsaldana5@roadrunner.com, Bloomington, 92316

I do not want anymore warehouses in Bloomington. Truck exhaust, employees vehicles exhaust in my experience cause lung damage. The local freeway overpasses are too full even now already. Local residents have to time trips on overpasses just right to avoid the extreme traffic. And I just don't like warehouses blocking the view everywhere.

I274.1

Response to Letter I274: Lawrence Saldana, undated

Comment I274.1: This comment states that the commenter does not want any more warehouses in Bloomington and that truck exhaust can cause lung damage. The comment states that freeway overpasses are too congested already and the commenter does not like warehouses blocking the view.

Response I274.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As discussed under Impact AE-1, there are no designated scenic viewpoints near the Specific Plan Area and Upzone Site that provide unobstructed viewsheds of the San Bernardino and San Gabriel Mountains and Jurupa Hills. Public views of the ridgelines of these resources at or near the Specific Plan and Upzone Site occur along public roadways, but they are mostly obstructed and fragmented by intervening building structures, utility poles, trees, and other elements of the built environment. Therefore, implementation of the proposed Specific Plan, including development of Planning Area A, Opening Year Development – Options 1 and 2 with the proposed industrial business park, future development of Planning Area B, and rezoning of the Upzone Site would not significantly affect scenic views of the San Bernardino and San Gabriel Mountains and Jurupa Hills. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I275: Jose Jimenez (2 pages)

Jose Jimenez, Jrookj@gmail.com, San Bernardino, 92406, 9096931750

I do not want anymore warehouses in Bloomington. Warehouses are an invasion by large corporations into out communities bringing pollution to our homes and schools and tearing up

I275.1

our already fragile infrastructure.

I275.1 cont.

Response to Letter I275: Jose Jimenez, undated

Comment I275.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses are bringing in pollution and tearing up roadways.

Response I275.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

Furthermore, as discussed in Section 3.0, *Project Description,* development of the Specific Plan would include road improvements to Jurupa Avenue, Linden Avenue, Maple Avenue, Locust Avenue, Laurel Avenue and Santa Ana Avenue. As such, the proposed Project would actually benefit the community by providing road improvements to previously damaged roads and would ensure that roadway infrastructure is capable of supporting the increase in truck trips from the proposed Project. Furthermore, the Project would include a Community Benefits Agreement, which would provide funding for regular maintenance of community facilities. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I276: Cinthya Cerrato (1 page)

Cinthya Cerrato, cinthya.cer@gmail.com, BLOOMINGTON, 92316, 9095781551

I do not want anymore warehouses in Bloomington. I feel upset and frustrated. This will impact the traffic, our air quality, and the safety of our community.

I276.1

Response to Letter I276: Cinthya Cerrato, undated

Comment I276.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses will impact traffic, air quality, and overall safety of the community.

Response I276.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I277: Javier Cerrato (1 page)

Javier Cerrato, jcerrato@quadc.org, Bloomington, 92316, 2133325088

I do not want anymore warehouses in Bloomington. Very upsetting that you would build next to schools an parks. The air quality will change and the traffic will increase. And it will invite more crime into our city.

I277.1

Response to Letter I277: Javier Cerrato, undated

Comment I277.1: This comment states that the commenter does not want any more warehouses in Bloomington and that it is upsetting that the Project would be built next to schools and parks. The comment states that the air quality will change and traffic and crime will increase.

Response I277.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

The comment related to the warehouses resulting in an increase in crime is speculative in nature, is unrelated to CEQA, and does not warrant a response. Furthermore, as discussed under Impact PS-2 on page 5.14-9, property tax revenue generated by development of the Project and would provide funding for police services and would help to offset the Project's increase in the demand for services; the Project would additionally include funding of additional San Bernardino County Sheriff's Deputy for the Bloomington Area. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I278: Santino Lojero (1 page)

Santino Lojero, lojerosantino@gmail.com, Pomona, 91766

I do not want anymore warehouses in Bloomington. Warehouses are harmful to the local communities and create dependency on them over time while also increasing health disparages.

I278.1

Response to Letter I278: Santino Lojero, undated

Comment I278.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses are harmful to local communities and result in health disparities.

Response I278.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I279: Maddhi Jayagoda (1 page)

Maddhi Jayagoda, mjayagoda@gmail.com, Los Angeles, 90026, 6267800717

I do not want anymore warehouses in Bloomington. It breaks my heart because I know the short and long term impact warehouse development will have on those communities, who are dismissed and forgotten in these types of projects, which may be beneficial for some but completely life altering for others. It's a complete eradication of way of life for the people who have lived, raised the children, and wish to continue to thrive in the area. Even though I am not a Bloomington Resident myself, I acknowledge and appreciate the hard work community advocates are doing to help the individuals and families in Bloomington.

I279.1

Response to Letter I279: Maddhi Jayagoda, undated

Comment I279.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter knows the short term and long-term impacts warehouse developments have. The comment states that warehouses completely change the way of life for residents.

Response I279.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I280: Harold Cifuentes (1 page)

Harold Cifuentes, hcifuen7777@gmail.com, Bloomington, 92316, 19097142530

I do not want anymore warehouses in Bloomington. Warehouses bring pollution and more traffic to the area. It also would bring down property value of the homes.

I280.1

Response to Letter I280: Harold Cifuentes, undated

Comment I280.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses increase pollution and traffic while bringing down property values.

Response I280.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As further discussed in Master Response 1, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of property values. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to property values is not provided. The comment does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I281: Joslyn Santana (1 page)

Joslyn Santana, josana821@gmail.com, Rancho Cucamonga, 91730, 9092432744

I do not want anymore warehouses in Bloomington. The warehouse development in Bloomington is an environmental justice issue! We don't need higher rates of illness/disease in our region, air quality doesn't recognize "man-made" borders. Developers don't care about the community impact their having, or listening to community members' stories. **I281.1**

Response to Letter I281: Joslyn Santana, undated

Comment I281.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the increase in warehouse development is an environmental justice issue. Furthermore, the comment states that Bloomington does not need high rates of illness form pollution. The comment states developers do not care about the impact on the community.

Response I281.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. The commenter is referred to Master Response 4 for a discussion of environmental justice. The comment does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I282: Raylene Borrego (1 page)

Raylene Borrego, Rayleneborrego@yahoo.com, Grand terrace, 9232, 9094991250

I do not want anymore warehouses in Bloomington. It is a wicked problem that contributes to horrible air quality that negatively impacts residents health and well being.

I282.1

Response to Letter I282: Raylene Borrego, undated

Comment I282.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses lead to bad air quality which impacts residents' health.

Response I282.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I283: Samuel Armando & Castro Marron (1 page)

Samuel Armando/Castro Marrón, samsquatch27@gmail.com, San Bernardino, 92407
9099973485

Ido not want anymore warehouses in Bloomington. Warehouses are bad jobs, poison the air, and displace people/plants/animals.

I283.1

Response to Letter I283: Samuel Armando & Castro Marron, undated

Comment I283.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses provide bad jobs, result in air pollution, and displace people, plants, and animals.

Response I283.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

As discussed in Section 5.13, *Population and Housing*, property owners within the development footprint would voluntarily sell their property and would be compensated by the Applicant. At the time future development is proposed in Planning Area B, property owners have the option to voluntarily sell their property and would be compensated by the future development's applicants. Property owners would not be forced to sell their properties, either through harassment or eminent domain. As discussed in Section 5.4, *Biological Resources,* the Specific Plan Area is comprised of seven types of vegetation communities and land covers: Developed lands, Disturbed lands, Disturbed California Buckwheat scrub, Eucalyptus Woodland, Nursery, Ornamental, and Upland Mustard Fields. With implementation of Mitigation Measures BIO-1 through BIO-8 and existing regulations, impacts to biological species, included habitat for species, were determined to be less than significant.

This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I284: Ricardo Olea (1 page)

Ricardo Olea, ricardoj.olea@gmail.com, Ontario, 91761,

I284.1

I do not want anymore warehouses in Bloomington. Warehouse development in Bloomington is unsustainable and raises many social equity concerns.

Response to Letter I284: Ricardo Olea, undated

Comment I284.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouse development raises many social equity issues.

Response I284.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As further discussed in Master Response 1, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of social equity issues. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. For an additional discussion regarding environmental justice, the commenter is referred to Master Response 4. The comment does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I285: Valerie Martinez (1 page)

Valerie Martinez, valeriemartinez172@gmail.com, Bloomington, 92316, (951) 500-1668 *I*

do not want anymore warehouses in Bloomington. Because we want to keep our little town.

I285.1

Response to Letter I285: Valerie Martinez, undated

Comment I285.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I285.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I286: Arthur Levine (2 pages)

Arthur Levine, artmaxlev@gmail.com, Anaheim, 92802, 9177348108

I do not want anymore warehouses in Bloomington. I think that it is a total waste of land and space. It causes truck traffic, air pollution, loss of habitat, loss of agriculture land, loss of green space, while increasing heat island effect and exacerbating the negative impacts of climate change. Every acre that is paved and developed for warehouses is a loss of potential land and space to protect clean air, clean soil, grow healthy food, protect biodiversity, and preserve open

I286.1

green spaces. Warehouses cause more harm than good and disproportionately harm communities of color for the benefit of people who don't even live in the communities they build in. This is injustice. I would much rather see development of nature trails, planting urban forest, preservation of agriculture, wildlife habitat restoration, and other benefits that are chosen by and for community members of Bloomington.

I286.1 cont.

Response to Letter I286: Arthur Levine, undated

Comment I286.1: This comment states that the commenter does not want any more warehouses in Bloomington and warehouses cause traffic, air pollution, loss of habitat, loss of agricultural land, loss of green space, while increasing the heat island effect. The comment states that warehouses cause more harm than good and disproportionately impact communities of color. The comment states that the commenter would rather see development nature trails, planting an urban forest, preserving agriculture, wildlife habitat restoration, and other benefits for community members in Bloomington.

Response I286.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

As discussed in Section 5.4, *Biological Resources,* the Specific Plan Area is comprised of seven types of vegetation communities and land covers: Developed lands, Disturbed lands, Disturbed California Buckwheat scrub, Eucalyptus Woodland, Nursery, Ornamental, and Upland Mustard Fields. With implementation of Mitigation Measures BIO-1 through BIO-8 and existing regulations, impacts to biological species, included habitat for species, were determined to be less than significant. The comment does not provide evidence of any additional impacts or increased severity of impacts related to biological resources than what is disclosed in the Draft EIR.

As discussed starting on page 5.2-8 under Impact AG-1, the Specific Plan Area includes 0.04 acre of prime farmland and 23.55 acres of farmland of statewide importance. This mapped area is entirely within Planning Area A and includes a commercial palm tree nursery. However, this area is not considered actively productive agricultural lands, and the Project would not conflict with Countywide Plan Policy NR-7.1, which protects economically viable and productive agricultural lands. Moreover, CWP EIR Impact 5.2-1 acknowledges growth in Bloomington and states that implementation of the Countywide Plan could convert up to 35 acres of mapped farmlands in Bloomington to nonagricultural land use. Project implementation would cause the removal of 23.59 acres of mapped farmland and reduce the acreage of farmland in Bloomington to 11.4 acres. In accordance with Countywide Plan Policy NR-7.2 and Public Resources Code Section 21061.2, an agricultural resource evaluation was prepared for the Project. The evaluation was prepared pursuant to the California Agricultural LESA Model and considers six factors, including two land evaluation factors that measure the quality of the soil on the agricultural land and four site assessment factors that measure the Project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. As discussed in Appendix B, the mapped area contains Delhi Fine Sand, which is rated as a fair-quality soil for agriculture, and Tujunga loamy sand, which is rated as a good-quality soil for agriculture. Additionally, though there is water available at the mapped area, the site does not meet the minimum size requirement of 40 acres, and it is not surrounded by other agricultural operations. Consequently, the mapped area received a LESA score of 43 (Land Evaluation Score of 29 and a Site Assessment Score of 14) out of a 100-point scale. According to the LESA Model Significance thresholds, sites receiving a score of between 40 and 59 points are considered significant only if both the Land Evaluation and Site Assessment weighted factor subscores are each greater than or equal to 20 points. Since only the Land Evaluation subtotal exceeded 20 points and the Site Assessment score did not, the Project's conversion of the prime farmland and farmland of statewide importance to nonagricultural use is not considered significant. As the Project has complied with Policy NR-7.2 and the conversion of the site's farmlands to nonagricultural is not considered significant, Project impacts on the conversion of mapped farmlands to non-agricultural uses were determined to be less than significant.

In regard to relative contributions to the urban heat island effect, there is the potential for the Project to contribute to the effect as it would add additional pavement to the Specific Plan Area. However, as discussed on page 40 of the Specific Plan, the proposed and future buildings would have to adhere to Design Guidelines, which would require buildings to be light colored the majority of the proposed Specific Plan warehouse. Additionally, pursuant to Section 4.8 of the Specific Plan, development shall incorporate sustainable design features such as using white roofs for solar reflectivity and utilization of shade structures and trees with large canopies in order to reduce heat island effects. Therefore, the Project would not significantly contribute to the urban heat island effect. The comment provides a general opinion that the Project would result in an urban heat island effect, which would negatively impact the community, and does not raise any specific concerns with the adequacy of the Draft EIR.

As further discussed in Master Response 1, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of disproportionate impacts to communities of color. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. For an additional discussion regarding environmental justice, the commenter is referred to Master Response 4. The comment does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

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LETTER I287: Anysia Aguirre (1 page)

Anysia Aguirre, anysia@icucpico.com, San Bernardino, 92410,

I do not want anymore warehouses in Bloomington. Stop building warehouses in our cities

I287.1

Response to Letter I287: Anysia Aguirre, undated

Comment I287.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I287.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I288: Cristina Canales (1 page)

Cristina Canales, Cristinajcanalesf@gmail.com, Jurupa Valley, 92509, 9514725026

I do not want anymore warehouses in Bloomington. I think that building warehouses in Bloomington is a terrible idea. The IE is already the HUB of warehouse industry and our pollution is so much worse in the last few years because of it. I don't think that the community of Bloomington should be destroyed just for more warehouses to be built. Bloomington was unincorporated for years and already receives very little support for better infrastructure and funding. Many of the streets are not even paved. The people living in Bloomington are not disposable. Their homes and their lives matter and they should not be displaced just to make room for more warehouses. I urge these developers to please think about how unsustainable building warehouses is. It is not helping our communities, it's just killing us slowly.

I288.1

Response to Letter I288: Cristina Canales, undated

Comment I288.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the warehouse boom has increased pollution in the Inland Empire. The comment states that Bloomington does not receive enough support for infrastructure or funding. The comment states that homes and people should not be displaced for warehouse developments.

Response I288.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I289: Nataly Morales (1 page)

Nataly Morales, nmora011@ucr.edu, Fontana, 92335, 9092515580

I do not want anymore warehouses in Bloomington. Horrible. It's so unfortunate that residents have to be displaced for warehouse development. Residents are in need of other things than warehouses. New Warehouses cause horrible pollution for Bloomington residents which affects their health. Many say jobs are created locally through warehouses but it's not the truth more Bloomington residents commute to their jobs anyway so new warehouse development are not solving any issues. So please stop warehouse development.

I289.1

Response to Letter I289: Nataly Morales, undated

Comment I289.1: This comment states that the commenter does not want any more warehouses in Bloomington and that it is unfortunate that residents have to be displaced for warehouse development. The comment states that warehouses lead to pollution which negatively impacts health. The comment states that Bloomington residents currently commute to their jobs.

Response I289.1: As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

As detailed in the Impact POP-1 discussion that begins on page 5.13-8, based on the proposed building square footages, the Opening Year Development – Option 1 would generate 1,769 jobs and the Opening Year Development – Option 2 would generate 2,270 jobs. Based on Tables 5.13-1 and 5.13-5, the workforce demand of up to 2,270 employees could be filled by persons residing in unincorporated County, including from Bloomington, and the surrounding areas. Additionally, the immediate availability in the labor pool in the vicinity of the Specific Plan Area is not expected to be constrained due to the current 7.7 percent unemployment rate in the County (EDD, 2021). As mentioned, implementation of the Specific Plan would contribute toward a more balanced jobs-to-housing ratio (see Table 5.13-5 of the Draft EIR), and as such, the available labor pool in the County as well as in Bloomington would adequately meet the Specific Plan's employment demands without directly resulting in new residents or unplanned population growth. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I290: Wendi Mejia (1 page)

Wendi Mejia, Wendijunejia@gmail.com, Riverside, 92507,

I do not want anymore warehouses in Bloomington. I stand in solidarity with the community of Bloomington. No more warehouses! We need HOUSING.

I290.1

Response to Letter I290: Wendi Mejia, undated

Comment I290.1: This comment states that the commenter does not want any more warehouses in Bloomington and the commenter stands in solidarity with Bloomington.

Response I290.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I291: Janet Perez (1 page)

Janet Perez, jperez_0526@yahoo.com, Moreno Valley, 92553, 9518077523

I do not want anymore warehouses in Bloomington. it is unjust and unfair the detrimental effects that are taking place in the community due to the warehouses in the area

I291.1

Response to Letter I291: Janet Perez, undated

Comment I291.1: This comment states that the commenter does not want any more warehouses in Bloomington and that it is unfair that warehouses negatively impact the community.

Response I291.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I292: Grecia Lizaola (1 page)

Grecia Lizaola, islandsxx24@gmail.com, Coachella, 92336, 7605487529

I do not want anymore warehouses in Bloomington. Warehouse development in Bloomington is harmful not only to its residents, but also to the surrounding environment. Why is it that commercial development is prioritized over the health of the community? Commercial development is just one facet of the destruction that capitalism brings. This is a prime example of putting profits over people.

I292.1

Response to Letter I292: Grecia Lizaola, undated

Comment I292.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouse development is harmful to Bloomington residents and surrounding communities. The comment questions why warehouse development is prioritized over the health of individuals and that capitalism results in destruction.

Response I292.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I293: Katherine Ferwerda (1 page)

Katherine Ferwerda, katherine@socialstudystore.com, Los Angeles, 90065, 2137001811

I do not want anymore warehouses in Bloomington. Warehouses destroy critical land that needs to be regenerated and used for farming. Soil is a carbon sink, exactly what we need to combat climate change. We need to add as much carbon into our atmosphere as possible! Besides that, the Central Valley farmland is drying up and agriculture will not be sustainable there much longer. Warehouses bring heavy traffic and more poor air quality to an area already suffering. There could be plenty of jobs in the regenerative farming sector that would pay as much as a warehouse worker, but the health benefits would be dramatically greater.

I293.1

Response to Letter I293: Katherine Ferwerda, undated

Comment I293.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouses take up land that should be used for farming. The comment states that soil is a carbon sink, and we need to add as much carbon to our atmosphere as possible. The comment states that the Central Valley is drying and agriculture activities are not sustainable there. The comment states that warehouses bring in heavy traffic and air pollution on an area that could be used for regenerative agriculture.

Response I293.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed starting on page 5.2-8 under Impact AG-1, the Specific Plan Area includes 0.04 acre of prime farmland and 23.55 acres of farmland of statewide importance. This mapped area is entirely within Planning Area A and includes a commercial palm tree nursery. However, this area is not considered actively productive agricultural lands, and the Project would not conflict with Countywide Plan Policy NR-7.1, which protects economically viable and productive agricultural lands. Moreover, CWP EIR Impact 5.2-1 acknowledges growth in Bloomington and states that implementation of the Countywide Plan could convert up to 35 acres of mapped farmlands in Bloomington to nonagricultural land use. The 35 acres includes the 23.59 acres in the Specific Plan Area. Project implementation would cause the removal of 23.59 acres of mapped farmland and reduce the acreage of farmland in Bloomington to 11.4 acres. In accordance with Countywide Plan Policy NR-7.2 and Public Resources Code Section 21061.2, an agricultural resource evaluation was prepared for the Project. The evaluation was prepared pursuant to the California Agricultural LESA Model and considers six factors, including two land evaluation factors that measure the quality of the soil on the agricultural land and four site assessment factors that measure the Project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. As discussed in Appendix B, the mapped area contains Delhi Fine Sand, which is rated as a fair-quality soil for agriculture, and Tujunga loamy sand, which is rated as a good-quality soil for agriculture. Additionally, though there is water available at the mapped area, the site does not meet the minimum size requirement of 40 acres, and it is not surrounded by other agricultural operations. Consequently, the mapped area received a LESA score of 43 (Land Evaluation Score of 29 and a Site Assessment Score of 14) out of a 100-point scale. According to the LESA Model Significance thresholds, sites receiving a score of between 40 and 59 points are considered significant only if both the Land Evaluation and Site Assessment weighted factor subscores are each greater than or equal to 20 points. Since only the Land Evaluation subtotal exceeded 20 points and the Site Assessment score did not, the Project's conversion of the prime farmland and farmland of statewide importance to nonagricultural use is not considered significant. As the Project has complied with Policy NR-7.2 and the conversion of the site's farmlands to nonagricultural is not considered significant, Project impacts on the conversion of mapped farmlands to non-agricultural uses were determined to be less than significant.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted

intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

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LETTER I294: Guadalupe Dolan (2 pages)

Guadalupe Dolan, lupe@icucpico.com, San Bernardino, 92404

I do not want anymore warehouses in Bloomington. For my elementary and middle school experience I went to a small school where I got to create a lot of memories and honestly I like to think of that school as my childhood, last year it was torn down to build a warehouse. Knowing that it was torn to build a place where my community wouldn't be getting paid a fair wage and would increase the air pollution which would lead to an increase in health issues is

I294.1

heartbreaking. A warehouse should not replace a school, they should be located far away from schools and communities. This is why I'm here advocating for no more warehouses in Bloomington, thank you.

I294.1 cont.

Response to Letter I294: Guadalupe Dolan, undated

Comment I294.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the school that the commenter went to was torn down to build a warehouse last year. The comment states that warehouses do not pay workers a fair wage and result in air pollution that leads to health issues. The comment states that warehouses should not be located near homes or schools.

Response I294.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. This comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I295: Anthony Gomez (1 page)

Anthony Gomez, Gmez1300@gmail.com, San Bernardino, 92407

I do not want anymore warehouses in Bloomington. It's unfortunate that people of color communities continue to face the health effects of blatant environmental racism that would ensue following warehouse development in Bloomington.

I295.1

Response to Letter I295: Anthony Gomez, undated

Comment I295.1: This comment states that the commenter does not want any more warehouses in Bloomington and it is unfortunate that people of color continue to face health effects from warehouse development. The comment states that warehouse development in Bloomington is blatant environmental racism.

Response I295.1: For a discussion regarding environmental justice, the commenter is referred to Master Response 4. This comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I296: Femila Manoj (1 page)

Femila Manoj, femila.manoj@gmail.com, Riverside, 92507, 6362816797,

I296.1

Ido not want anymore warehouses in Bloomington. Meh

Response to Letter I296: Femila Manoj, undated

Comment I296.1: This comment states that the commenter does not want any more warehouses in Bloomington.

Response I296.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I297: Stephanie Acosta (1 page)

Stephanie Acosta, Stephanieramos808@yahoo.com, Bloomington, 92316, 9096319258 *I do not want anymore warehouses in Bloomington. Upset they're building around our schools* **I297.1**

Response to Letter I297: Stephanie Acosta, undated

Comment I297.1: This comment states that the commenter does not want any more warehouses in Bloomington and the commenter is upset that warehouses are getting built around schools.

Response I297.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I298: Ada Trujillo (1 page)

Ada Trujillo, adat2013.at@gmail.com, SAN BERNARDINO, 92410, 19095713309

No estoy de acuerdo que haya mas bodegas en Bloomington. Yo no estoy de acuerdo que en Bloomington este lleno de bodegas y no quiero mas bodegas en areas residenciales no cerca de escuelas me parece que estan construyendo bodegas cerca de la comunidad de la que ellos (industria) creen que no merecemos respirar aire saludable, los que permiten que estas bodegas esten tan cerca de donde vivimos tambien nos estan faltando el respeto y no creen que deben respetar nuestra salud nos estan fallando al permitir que nuestros patios y escuelas esten junto a bodegas que cansan tanto peligro a nuestras vidas

I298.1

Response to Letter I298: Ada Trujillo, undated

Comment I298.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the commenter believes industrial developers feel that residents do not deserve clean air. The comment states that the County and developers are not respecting residents or residents' health by allowing warehouses near residences and schools.

Response I298.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

LETTER I299: Joshua Siegel (1 page)

Joshua Siegel, jsiegel@cpp.edu, los angeles, 90039

I do not want anymore warehouses in Bloomington. Warehouse development increases pollution from diesel trucks and removes agricultural land that feeds the community -- all for non-local corporate profit.

I299.1

Response to Letter I299: Joshua Siegel, undated

Comment I299.1: This comment states that the commenter does not want any more warehouses in Bloomington and that warehouse development increases pollution from diesel trucks and removes agricultural land that feeds the community.

Response I299.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

As discussed starting on page 5.2-8 under Impact AG-1, the Specific Plan Area includes 0.04 acre of prime farmland and 23.55 acres of farmland of statewide importance. This mapped area is entirely within Planning Area A and includes a commercial palm tree nursery. However, this area is not considered actively productive agricultural lands, and the Project would not conflict with Countywide Plan Policy NR-7.1, which protects economically viable and productive agricultural lands. Moreover, CWP EIR Impact 5.2-1 acknowledges growth in Bloomington and states that implementation of the Countywide Plan could convert up to 35 acres of mapped farmlands in Bloomington to nonagricultural land use. The 35 acres includes the 23.59 acres in the Specific Plan Area. Project implementation would cause the removal of 23.59 acres of mapped farmland and reduce the acreage of farmland in Bloomington to 11.4 acres. In accordance with Countywide Plan Policy NR-7.2 and Public Resources Code Section 21061.2, an agricultural resource evaluation was prepared for the Project. The evaluation was prepared pursuant to the California Agricultural LESA Model and considers six factors, including two land evaluation factors that measure the quality of the soil on the agricultural land and four site assessment factors that measure the Project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. As discussed in Appendix B, the mapped area contains Delhi Fine Sand, which is rated as a fair-quality soil for agriculture, and Tujunga loamy sand, which is rated as a good-quality soil for agriculture. Additionally, though there is water available at the mapped area, the site does not meet the minimum size requirement of 40 acres, and it is not surrounded by other agricultural operations. Consequently, the mapped area received a LESA score of 43 (Land Evaluation Score of 29 and a Site Assessment Score of 14) out of a 100-point scale. According to the LESA Model Significance thresholds, sites receiving a score of between 40 and 59 points are considered significant only if both the Land Evaluation and Site Assessment weighted factor subscores are each greater than or equal to 20 points. Since only the Land Evaluation subtotal exceeded 20 points and the Site Assessment score did not, the Project's conversion of the prime farmland and farmland of statewide importance to nonagricultural use is not considered significant. As the Project has complied with Policy NR-7.2 and the conversion of the site's

farmlands to nonagricultural is not considered significant, Project impacts on the conversion of mapped farmlands to non-agricultural uses were determined to be less than significant. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

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LETTER I300: Joaquin Castillejos (1 page)

Joaquin Castillejos, Joaquincastillejos117@gmail.com, Bloomington, 92316

Bloomington is beautiful and should stay beautiful. Our community is being displaced and pushed out to give way for more warehouse development disregarding the pollution, contamination, traffic, and division that these developments impose on the surrounding communities. With the Bloomington Specific Plan specifically, we are facing our community being completely divided and our way of life being erased. Not only that but many people in the area are being forced to sell or are renters that are being pushed out with no compensation. According to SB 330 every occupant must be compensated or given help if they are being pushed out and I don't see this reflected with this Bloomington Specific Plan. I also noticed that the EIR is claiming that there are no effects from the project but according to studies on diesel pollution and the enviroscreen there is definitely going to be long term effects on the surrounding communities and schools. Bloomington does not deserve to suffer the impacts from projects that do not benefit us.

I300.1

Response to Letter I300: Joaquin Castillejos, undated

Comment I300.1: This comment states that the commenter does not want any more warehouses in Bloomington and the community is being displaced to provide for more warehouse development which leads to pollution, traffic, and community division. The comment states that people are being forced to sell or are renters who are pushed out with no compensation. The comment states that according to SB 330 every occupant must be compensated or given help relocating. The comment states that the EIR is claiming that there will be no significant effects, but there will be long term effects based on other studies.

Response I300.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant. As such, the comment was incorrect in stating that the Draft EIR does not identify any significant effects as the Draft EIR identifies these impacts as significant and unavoidable.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact LU-1 starting on page 5.11-6, similar to the Specific Plan Area, surrounding uses on the west, north, and east include intermixed small to large scale industrial, commercial, residential, and institutional that are variable in density and orientation. South of the site is a park and open space that are underlain by the former Crestmore disposal site. The landfill remains passively vented for methane buildup. Although it is identified as not being a health risk to existing or proposed surrounding uses, its historic operations contribute volatile organic compounds to the groundwater (see Impact Haz-2), and it

continues to be monitored by the San Bernardino County Local Enforcement Agency (SBCLEA). Project implementation would remove adjacent sensitive residential uses proximate to the landfill and develop the Specific Plan Area between the former landfill and uses north of the Specific Plan Area. In addition, as mentioned above, there is an existing industrial building located directly east of the Project site on 34.53 acres. Moreover, truck trips generated by the Project would not enter the community north of the Specific Plan Area; truck trips would access the Specific Plan Area from existing public roads, including directly from Jurupa Avenue via Cedar Avenue, which is a designated local truck route and has access to Interstate-10 on the north and State Route-60 on the south. As the Project would be developed along the edge of a community, its development and operation would not physically divide it.

As discussed under Impact POP-2 starting on page 5.13-9, the construction of either Opening Year Development scenarios would result in the displacement of up to 78 residential structures. Buildout of Planning Area B would result in the removal of 39 residences when future developments are approved by the County. As the Project is a private development, eminent domain—which is the power of the government to purchase private property for a public use—would not be executed, property owners within the development footprint would voluntarily sell their property and be compensated by the Applicant. Residents would have the ability to relocate based on the availability of the housing stock in the region. According to the 2020 housing estimates provided by DOF, there are 514,630 housing units within San Bernardino County (DOF 2020). Additionally, as of mid-February 2022, Zillow.com—an online real estate and rental marketplace—reported 246 single-family properties listed for sale in the community of Bloomington and adjoining cities (11 units in Bloomington, 37 units in the City of Rialto, 149 units in the City of Fontana, and 49 units in the City of Jurupa Valley, which is in Riverside County). In addition, as of July 2022, Zillow.com reported 80 single-family and multi-family properties listed for rent in the community of Bloomington and adjoining cities (11 units in Bloomington, 11 units in the City of Rialto, 50 units in the City of Fontana, and 8 units in the City of Jurupa Valley, which is in Riverside County). Accordingly, there is an adequate local supply of replacement for-sale and rental housing for the displaced 78 dwellings in Planning Area A and 39 dwellings in Planning Area B who elect to sell their property. Furthermore, in compliance to SB 330, the Project would offset the loss of zoned residential capacity by upzoning another site (i.e., Upzone Site). Therefore, implementation of the Project would not displace people or housing and necessitate the construction of replacement housing elsewhere, and impacts would be less than significant. Furthermore, under SB330 neither the County nor the Applicant would be required to construct replacement housing for the Specific Plan Area that is rezoned from Residential Single with 1 Acre Lot Minimums and Additional Agriculture overlay (RS-1-AA) and Residential Single with 20,000 SF Lot Minimums (RS-20M) to Specific Plan (SP). The comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

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LETTER I301: Molly Green (1 page)

Molly Green, molly_Green@cjusd.net, Highland, 92346

I301.1

Warehouses are destroying the community in Bloomington.

Response to Letter I301: Molly Green, undated

Comment I301.1: This comment states that warehouses are destroying Bloomington

Response I301.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I302: Eric Mariscal (1 page)

Eric Mariscal, emariscal7@gmail.com, Bloomington, 92316
I feel that the amount of warehouses will result in adverse health effects for students. Folks with fewer resources have to pay the price of business development with little regard for their health.

I302.1

Response to Letter I302: Eric Mariscal, undated

Comment I302.1: The comment states that the proposed warehouses would result in health impacts for students. The comment states that people with fewer resources have to pay the price of business development.

Response I302.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I303: Jayn Mills (1 page)

Jayn Mills, rmills7077@aol.com, Bloomington, 92316
Warehouse development as well as truck gas stations and truck parking lots have already saturated our community creating a deterioration of the once family oriented agricultural lifestyle. Our neighborhood land values are dropping and the streets have become unsafe for our children due to a horrendous increase of truck traffic as well as the traffic created by the employees at these facilities. Add to this the poor air quality and noise created by the extended parking of big rigs on the streets for hours and days, most of the time with running engines and refrigerator units mot to mention the witness of drivers relieving themselves and dumping their garbage. This is not just occuring in the county, the cities surrounding county lines are allowing building of warehouses which have already, and acknowledged by the city of Rialto, created an overload of all forms of traffic on road ways not constructed to handle the load. Thus the negative feelings of seeing another development as this business park. It is overwhelming and unwelcomed by this citizen of a long established community residing in Bloomington.

I303.1

Response to Letter I303: Jayn Mills, undated

Comment I303.1: This comment states that warehouse development has saturated Bloomington and deteriorated the family-oriented agricultural lifestyle of the community. The comment states that land values are dropping and streets have become unsafe for children due to the increase in truck and employee traffic. The comment states that there is poor air quality and noise impacts from trucks parked on local streets. The comment states that trucks parked on local streets leave their engines running. The comment states that other jurisdictions are also allowing too many warehouses.

Response I303.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As further discussed in Master Response 1, CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project merits, including any economic and social effects of the Project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of community lifestyle. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to community lifestyle is not provided.

As shown on Figure 3-4, Project trucks would utilize County-established truck routes and would be directed away from existing residential neighborhoods. Furthermore, the proposed Project would implement PDF AQ-22, which would require the Project Applicant/Developer/Owner to post signs at every truck exit driveway providing directional information to the truck route. The Bloomington Business Park Specific Plan prohibits commercial truck parking on local streets. Should trucks utilize residential streets for driving or parking, they would be subject to citation from law enforcement. Additionally, as detailed in the Draft EIR for Impact TR-1, starting on page 5.15-6, sidewalks currently exist on Cedar Avenue intermittently on both side of the roadway, on Santa Ana Avenue intermittently on the north side of the roadway, on Jurupa Avenue on the north side east of Linden Avenue. Implementation of the Specific Plan would include roadway improvements within the Specific Plan area that would provide for new sidewalks where none exist currently, thereby improving pedestrian safety by improving facilities and the sidewalk network. Furthermore, the Project would include a Community Benefits Agreement, which would provide funding for regular maintenance of community facilities.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk

Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds.

In regard to noise, as detailed in the Impact NOI-1 discussion that begins on page 5.12-26 of the Draft EIR, each of the Project scenarios would implement PDF NOI-2, which would require 12- to 14-foot-high cement block walls at Sites 1 and 2 and 9-foot-high cement walls at Site 4. With implementation of PDF NOI-2, operational noise levels for all scenarios would not exceed the County's exterior noise level standards, as adjusted to reflect the ambient noise levels at all nearby sensitive receiver locations. Additionally, the increase in ambient noise levels would range from 0.1 to 3.0 dBA with the implementation of PDF NOI-2, which would not generate a significant daytime or nighttime operational noise level increase at nearby receiver locations.

As detailed in the Draft EIR in Section 5.12, *Noise,* starting on page 5.12-48, the proposed Project would generate traffic related noise from operation. As described in Section 3.0, *Project Description*, of the Draft EIR, the proposed Specific Plan buildings would be accessed from Laurel Avenue, Locust Avenue, and Maple Avenue. Tables 5.12-23 through 5.12-24 show that both the Opening Year with Project and General Plan Buildout with Project conditions would result in increases less than the 1.5 dBA CNEL threshold. Thus, off-site traffic noise impacts from the Project would be less than significant.

Furthermore, the Project would implement MM AQ-3 and PDF AQ-1 which require the Project Applicant/Developer/Operator to post signs identifying idling restrictions and contact information to report violations. The comment does not raise any specific concerns with the adequacy of the Draft EIR. No further response is required.

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LETTER I304: Rosa Murillo

Rosa Murillo, rosamurillo31@yahoo.com, Bloomington, 92316
No, no estoy de acuerdo que haya mas bodegas en Bloomington.

I304.1

Response to Letter I304: Rosa Murillo, undated

Comment I304.1: This comment states that the commenter does not want more warehouses in Bloomington.

Response I304.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I305: Rigo Murillo (1 page)

Rigo Murillo, rosamurillo31@yahoo.com, Bloomington, 92316
No, no estoy de acuerdo que haya mas bodegas en Bloomington.

I305.1

Response to Letter I305: Rigo Murillo, undated

Comment I305.1: This comment states that the commenter does not want more warehouses in Bloomington.

Response I305.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I306: Kimberly Conrad (1 page)

Kimberly Conrad, HippieHeart3@gmail.com, Bloomington, 92316
We don't want anymore pollution and truck traffic in our town. I don't want to see anymore ugly warehouses going up. We are a small residential town and we want to stay that way.

I306.1

Response to Letter I306: Kimberly Conrad, undated

Comment I306.1: This comment states that the commenter does not want more warehouses in Bloomington and does not want more pollution or truck traffic.

Response I306.1: Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I307: Cynthia Magana (1 page)

Cynthia Magana, meekobam1@gmail.com, Bloomington, 92316
It's horrible! I understand 'more jobs', but what about the families being displaced. The air quality is getting worse and traffic is already bad. I moved here years ago because of the open land and family homes. Now they are being demolished for warehouses. Really? These are people's lives, families, homes. My home. It's sad that what used to be beautiful views from from the Nature Center is now just buildings. I'm sure you can find other locations to put your warehouses. But please, don't do it here.

I307.1

Response to Letter I307: Cynthia Magana, undated

Comment I307.1: The comment states the Project is horrible. The comment states that the commenter understands that jobs will be created, but is concerned about families being displaced. The comment states that air quality is getting worse and the traffic is already bad. The comment states that previous views of nature have been replaced by buildings. The comment states that there are other locations to put warehouses.

Response I307.1: Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

There are no designated scenic viewpoints near the Specific Plan Area and Upzone Site that provide unobstructed viewsheds of the San Bernardino and San Gabriel Mountains and Jurupa Hills. Public views of the ridgelines of these resources at or near the Specific Plan and Upzone Site occur along public roadways, but they are mostly obstructed and fragmented by intervening building structures, utility poles, trees, and other elements of the built environment. Therefore, implementation of the proposed Specific Plan, including development of Planning Area A, Opening Year Development – Options 1 and 2 with the proposed industrial business park, future development of Planning Area B, and rezoning of the Upzone Site would not significantly affect scenic views of the San Bernardino and San Gabriel Mountains and Jurupa Hills. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I308: Nolby Cayetano (1 page)

Nolby Cayetano, nolby@yahoo.com, Bloomington, 92316
I have lived in Bloomington since 1990 and attended school from kinder at Mary B Lewis to graduation at Bloomington HS and love how our little town is full of the mexican culture. Now my kids attend Smith ES in Bloomington and will most likely graduate from Bloomington HS, as well. Over the years i've seen how city's like Rialto, Fontana and Ontario have transformed into warehouse city's and how semi trucks have taken over their streets to increase pollution and traffic. I am saddened by news that the same fate awaits Bloomington if our Supervisors don't listen to us, the citizens which voted to put them on the Board to represent us. Please remember you were elected by us to represent us so please vote against this project as requested by you constituents and remember to vote on our behalf and not based on your personal choice.

I308.1

Response to Letter I308: Nolby Cayetano, undated

Comment I308.1: This comment states that the commenter has lived in Bloomington since 1990, attended school in Bloomington, and now has kids at school in Bloomington. The comment states that the commenter has seen how other cities have been taken over by warehouses leading to increased pollution and traffic. The comment states that the Board of Supervisors were appointed by residents and should remember who elected them and to vote against the Project.

Response I308.1: Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I309: Vanessa Cayetano (1 page)

Vanessa Cayetano, Cayetanova@yahoo.com,, Bloomington, 92316
I moved to Bloomington in 2009 and bought my first house in 2010 also in the city of Bloomington. Over the years, I have noticed more and more traffic on Cedar Ave. I absolutely do not like the idea of many warehouses being built in our little town. This needs to stop. I have 4 children ages 2, 6,8 and 11. They love playing outdoors, riding their bikes, visiting our local parks. The air quality is only going to get worse. I used to live in the city of Ontario and the air polution is so bad there. That is one of the reasons why I wanted to move out of Ontario because of all the warehouses being built. I believe warehouses have a significant negative impact on the environment and on human health.

I309.1

Response to Letter I309: Vanessa Cayetano, undated

Comment I309.1: The comment states that the commenter moved to Bloomington in 2009 and has noticed more traffic on Cedar Avenue over the years. The comment states that the commenter does not want warehouses to be built in Bloomington as the commenter's children enjoy playing outside. The comment states that air quality will get worse, which would impact human health.

Response I309.1: As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I310: Georgette Villareal-Dollins (1 page)

Georgette Villareal-Dollins, GJVillareal@gmail.com, Bloomington, 92316

I am deeply saddened and concerned about the warehouse development in Bloomington. I am a Special Education teacher at Walter Zimmerman Elementary. THe culture and community that we have built at Zimmerman is very special. Many teachers have taught generations of students. I am worried that our enrollment numbers will continue to decline to the point that our beloved school will be closed. Families will no longer be able to walk to their elementary school--they will need to be bused to schools further away. All of this increased transportation (big rig trucks, school buses, and personal transport), will add to pollution issues.

I310.1

Response to Letter I310: Georgette Villareal-Dollins, undated

Comment I310.1: This comment states that the commenter is concerned about the warehouse development in Bloomington and that enrollment numbers at local schools continue to decline to the point where Walter Zimmerman Elementary school will be closed. The comment states that all of the increased transportation will add to pollution issues.

Response I310.1: Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. This comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I311: Marivel Angulo (1 page)

Marivel Angulo, user25@gmx.com, Bloomington, 92316
Building more warehouse space in Bloomington do very little to increase the living standards for families in the area. On the other hand it's a corporate give away to interests that are not part of the community. The people of Bloomington have vehemently opposed such projects but the officials we voted to represent our interests have sided with corporate interests above the will of their constituents. Please stop these projects and listen to the will of the residents.

I311.1

Response to Letter I311: Marivel Angulo, undated

Comment I311.1: This comment states that building more warehouses space will not help the living standards for families in the area. The comment states that community members have previously opposed warehouse projects, but officials that were elected side with corporate interests instead.

Response I311.1: This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I312: Jack Rubio (1 page)

Jack Rubio, oldmetallicarox@gmail.com, Bloomington, 92316-2512,

I do not want anymore warehouses in Bloomington. Our Community does not need more traffic and pollution especially around our Kids

I312.1

Response to Letter I312: Jack Rubio, undated

Comment I312.1: This comment states that the commenter does not want any more warehouses in Bloomington and that the community does not need more traffic or air pollution.

Response I312.1: Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion. However, effects of the proposed Project related to congestion are discussed in Appendix K1, Traffic Impact Assessment, to the Draft EIR. As discussed in Appendix K1, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections would be improved to below baseline conditions. Therefore, there would be no significant operational deficiencies at studied intersections in accordance with County guidelines.

As detailed in the Impact AQ-2 discussion that begins on page 5.3-31 of the Draft EIR, each of the Project scenarios would result in regional operational-source emissions that would exceed the thresholds of significance for VOC and NOx emissions after implementation of regulatory requirements and Mitigation Measures AQ-3 through AQ-8. However, as described on page 5.3-34 of the Draft EIR, the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable SCAQMD thresholds. Additionally, the majority of the Project's NOx emissions are derived from vehicle usage. Since neither the Project applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant.

As detailed in the Impact AQ-3 discussion that begins on page 5.3-44 of the Draft EIR, each of the Project scenarios would result in exposure of sensitive receivers to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Mobile Health Risk Assessment, included as Appendix C to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds. This comment provides the commenter's opinion and opposition to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

LETTER I313: Gary Grossich (2 pages)

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Good evening Aron,

I wanted to make sure my support of the Bloomington Business Park Specific Plan was on the record. The bottom line is that the benefits to our community of Bloomington far outweigh any negative impacts of the project. The 30 million dollars in important infrastructure improvements, the roughly million dollar a year revenue contribution to remain in Bloomington for community services, along with the 100's of jobs which will be created will be a catalyst for much needed community improvements. **I313.1**

The specific plan area was chosen by the Bloomington MAC in 2017. The reason this area was selected was that it was deemed to be the area of least impact to our community and bordered an already approved truck route. The MAC made it clear that any potential development of this area would only be supported if a developer could meet our goals of substantial revenue for services, major infrastructure improvements and robust job creation. This proposed development meets all the outlined goals. Quite frankly, the project is located in an area with quite a few blighted properties and many of the properties in this area currently contain unpermitted, illegal activities. In speaking with Code Enforcement recently, I was informed there are currently 17 open code enforcement cases, totaling almost 30 acres within the specific plan area. **I313.2**

Unlike other recent industrial projects which were approved without a full environmental impact report and without adequate outreach to our community, this project went above and beyond to meet those standards. **I313.3**

I would like to add a couple of other comments and address a few concerns. The Bloomington MAC made a commitment to our community that all trucking facilities, including warehouses, would be located along designated truck routes and would not pass directly by school sites. I want to make sure this project is conditioned to do everything possible, including physical impediments if necessary, to make sure trucks are unable to drive past school sites. **I313.4**

Another issue that the MAC has brought up is to keep the rural feel of Bloomington wherever possible. I've personally asked the development team to include equestrian trails and western style split rail fencing around as much of the project as possible and want to make sure those features are incorporated into the final product. **I313.5**

The other issue I'd like to address is the development agreement. The purpose of this project was to bring much needed revenue, infrastructure improvements and jobs to Bloomington. It was clear that the annual revenue contribution for services was to stay in Bloomington and eventually be merged into a future Bloomington CFD or CSD to enable our community to eventually start working toward city hood. I want to make sure that the Bloomington MAC has input into how the revenue from this project is spent, so I want to make sure verbiage is included in the DA that the revenue generated by this project will be presented to the MAC for their input and recommendation on how the money is spent. **I313.6**

In closing, I want to reiterate my wholehearted support of this important project for the future of our community. I313.7

Sincerely,
Gary Grossich
Vice Chair
Bloomington Municipal advisory Council

Response to Letter I313: Gary Grossich, dated December 16, 2021

Comment I313.1: This comment provides an introduction to the comment letter and states that the commenter is in support of the Project. The comment further states that the benefits of the Project far outweigh the negative impacts as the Project would provide 30 million dollars in infrastructure improvements, a million dollars a year for community services in Bloomington, and hundreds of jobs.

Response I313.1: The comment provides the commenter's support to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required.

Comment I313.2: This comments states that the Specific Plan Area was chosen by the Bloomington Municipal Advisory Committee (MAC) in 2017 as it was deemed to be the area of least impact to the community and borders a truck route. The MAC has made it clear that they would only support a development in the area if the developer can meet the MAC's goals of revenue, infrastructure improvements, and job creation, which the Project meets. The comment states that the Project is in an area with blighted properties and with properties that contain unpermitted, illegal activities. The comment states that Code Enforcement has 17 open cases in the Specific Plan Area.

Response I313.2: As discussed in Section 4.0, *Environmental Setting,* of the Draft EIR, the Specific Plan Area covers 213 acres and consists of 118 parcels and 117 dwelling units. It is generally flat with a slight downward slope toward the south-southeast. The Specific Plan Area is currently developed with a mix of rural residential, commercial, and light industrial. Single-family residences, a church, and vacant commercial building front the surrounding streets. The rear portions of the properties are generally unpaved dirt or grass, and some have outbuildings/businesses on the rear (backyard portion) of the properties. Accessory uses and businesses include commercial nurseries, truck transportation yards, equestrian ranches, personal auto repair yards, animal care and kennels, and vehicle and equipment storage facilities. Some of the parcels have a degraded visual character due to industrial type storage and assorted debris piles, including soil and trash. The comment provides the commenter's support to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I313.3: This comment states that unlike prior industrial projects, this Project completed a full Environmental Impact Report and adequate community outreach.

Response I313.3: The comment provides the commenter's support to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required.

Comment I313.4: This comment states that the Bloomington MAC made a commitment to the community that all projects would be located along designated truck routes and would not pass by school sites. This comment states that the commenter wants to make sure that the Project is conditioned to do everything possible to make sure trucks are unable to drive past school sites.

Response I313.4: As shown on Figure 3-4, Project trucks would utilize County-established truck routes and would be directed away from existing residential neighborhoods. Furthermore, the proposed Project would implement PDF AQ-22, which would require the Project Applicant/Developer/Owner to post signs at every truck exit driveway providing directional information to the truck route. The Bloomington Business Park Specific Plan prohibits commercial truck parking on local streets. Should trucks utilize residential streets for driving or parking, they would be subject to citation from law enforcement. As described, the Project is taking multiple actions to prevent trucks from utilizing residential streets or travelling in close proximity to schools. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided.

Comment I313.5: This comment states that the MAC would like to keep the rural feel of Bloomington wherever possible. The comment states that the commenter has asked the development to include equestrian trails and western style split rail fencing around as much of the Project as possible.

Response I313.5: The comment is noted, and the Project will comply with all applicable design standards pursuant to the Bloomington Business Park Specific Plan and County Development Code. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required.

Comment I313.6: This comment states that the purpose of the Project was to bring needed revenue into Bloomington through a future Community Facilities District or Community Standards District to enable the community to work toward cityhood. The comment states that the commenter would like to make sure that the Bloomington Mac has input on how the revenue from the Project is spent and that there is language in the Development Agreement that revenue from the Project will be presented to the MAC for their input.

Response I313.6: The comment has been noted and the Applicant and County will continue to work with the Bloomington MAC to ensure that the Community Benefits Agreement is appropriate for the Project. The comment does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required.

Comment I313.7: This comment reiterates the commenter's support for the Project.

Response I313.7: The comment provides the commenter's support to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required.

LETTER I314: The RCH Group (1 page)

Hello Aron;

As part of our review of the Bloomington Business Park Specific Plan Project DEIR and we request the electronic files used to support the development of the health risk assessment (Appendix C2: Bloomington Business Park Mobile Source Health Risk Assessment, July 23, 2021). Please provide electronic versions, in their native format (i.e., excel, model-ready EMFAC and AERMOD files) supporting files cited within the following appendices:

Appendix 2.1: EMFAC Emissions Summary

Appendix 2.2: AERMOD Model Input/Output

Appendix 2.3: Risk Calculations

Please also provide supporting files used to develop the emission calculations, dispersion modeling, and risk calculations, to include but not limited to, EMFAC data files, terrain data, meteorological data, building downwash files, etc., with sufficient detail to allow for the review and duplication of cited results. The information must be in the native format in which created (i.e., excel, model-ready EMFAC and AERMOD files). We request that the information be provided by close of business of November 30, 2021.

I314.1

Much appreciated,

Mike Ratte
Senior Air Quality Scientist
The RCH Group
Seattle, WA

Response to Comment Letter I314: The RCH Group, dated November 23, 2021

Comment I314.1: This comment is requesting electronic files related to the EMFAC Emissions Summary, AERMOD Model Input/Output, and Risk Calculations for Appendix C2 to the Draft EIR, Bloomington Business Park Mobile Source Health Risk Assessment. The comment also requests the County to provide supporting files used in preparation of the Health Risk Assessment.

Response I314.1: The County and the Health Risk Assessment consultants for the proposed Project provided The RCH Group with the requested files for their use in reviewing the Draft EIR on November 29, 2021 via email. The comment does not raise any environmental concerns or questions related to the Draft EIR; therefore, no further response is warranted.

LETTER I315: Dien Lang (1 page)

RECEIVED
2021 OCT 19 AM 11:21
LAND USE SERVICES
ADMINISTRATION

October 12, 2021

Project Number = PROJ-2020-00204

Project Title = Bloomington Business Park Specific plan

Dear Aron Liang =

My name is DIEN LIANG and I live on 10991 Locust AVE, Bloomington, which is located within Specific plan of Bloomington Business Park, I am fully supportive of this plan as I am one of the sellers and wants the county to move forward with the approval so we can all have a better futur with the opportunity that this project brings to the residents and sellers. I lived here for Twenty years, and I did not see bloomington change.

I315.1

THANK YOU.

SINCERELY

DIEN LIANG

Response to Letter I315: Dien Lang, dated October 12, 2021

Comment I315.1: This comment provides an introduction to the comment letter and states that the commenter is in support of the Project. The comment further states that the County should approve the Project so that residents and sellers can have a better life.

Response I315.1: The comment provides the commenter's support to the Project and does not raise any specific concerns with the adequacy of the Draft EIR. Therefore, no further response is required or provided. This comment will be forwarded to County decisionmakers.

Chapter 3. Revisions to the Draft EIR

This section contains revisions to the Draft EIR based upon: (1) clarifications required to prepare a response to a specific comment; and/or (2) typographical errors. The provision of these additional mitigation measures does not alter any impact significance conclusions as disclosed in the Draft EIR. Changes made to the Draft EIR are identified here in strikeout text to indicate deletions and in underlined text to signify additions.

3.1 Revisions in Response to Written Comments and County Changes to Text

The following text has been revised in response to comments received on the Draft EIR and corrections identified by the County.

Chapter 1.0, Executive Summary

Executive Summary Page 1-1, second paragraph, has been revised as follows:

During the 45-day review period, the Draft EIR and draft Bloomington Business Park Specific Plan will be available for public review at the County's website: (http://cms.sbcounty.gov/lus/Planning/Environmental/Valley.aspx) or physically at the following location:

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

Table 1-5: Summary of Impacts, Mitigation Measures, and Level of Significance, on pages 1-7 through 1-62 has been revised as follows:

Table 1-5: Summary of Impacts, Mitigation Measures, and Level of Significance

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
5.1 Aesthetics				
Impact AE-1: The Project would not have a substantial adverse effect on a scenic vista.	**RR AE-2**: The County shall enforce adherence with the California Building Code, including provisions of the Building Energy Efficiency Standards related to lighting.	Less than significant	None required	Less than significant
Impact AE-2: The Project would not damage scenic resources, including, trees, rock outcroppings, and historic buildings within a state scenic highway.		No impact	None required	No impact
Impact AE-3: Development in the Specific Plan Area would create shade and shadow impacts on shadow-sensitive receptors.		Less than significant	None required	Less than significant
Impact AE-4: The Project would not create sources of light or glare that would adversely affect day and nighttime views in the area.		Less than significant	None required	Less than significant
Cumulative		Less than significant	None required	Less than significant
5.2 Agriculture and Forestry Resources				
Impact AG-1: The Project would convert California Resource Agency–designated prime farmland and farmland of statewide importance to non-agricultural use; however, impacts would not exceed the LESA Model threshold of significance.		Less than significant	None required	Less than significant
Impact AG-2: The Project would not conflict with existing zoning for agricultural use or with a Williamson Act contract.		Less than significant	None required	Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Impact AG-3: The Project would not conflict with existing zoning for or cause rezoning of forest land, timberland, or timberland zoned Timberland Production		No impact	None required	No impact
Impact AG-4: The Project would not result in the loss of forest land or conversion of forest land to non-forest use.		No impact	None required	No impact
Impact AG-5: The Project would not involve changes in the existing environment, which could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use.		Less than significant	None required	Less than significant
Cumulative		Less than significant	None required	Less than significant
5.3 Air Quality				
Impact AQ-1: The Project would conflict with or obstruct implementation of the applicable air quality plan	**RR AIR-1** New buildings are required to achieve the current California Building Energy and Efficiency Standards (Title 24, Part 6) and California Green Building Standards Code (CALGreen) (Title 24, Part 11). **RR AIR-2** Construction activities are required to adhere to Title 13 California Code of Regulations (CCR) Section 2499, which requires that nonessential idling of construction equipment is restricted to five minutes or less. **RR AIR-3** Construction activities in the South Coast Air Basin (SoCAB) will be conducted in compliance with any applicable South Coast Air Quality Management District	Potentially significant	**MM AQ-1: Super-Compliant Low VOC.** The construction plans and specifications shall state that the Project shall utilize "Super-Compliant" low VOC paints for nonresidential interior and exterior surfaces and low VOC paint for parking lot surfaces. Super-Compliant low VOC and low VOC paints have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD's Rule 1113. Super-Compliant low VOC paints shall be no more than 10g/L of VOC and low VOC paints shall be no more than 50 g/L of VOC. **MM AQ-2: Tier 4 Final.** The construction plans and specifications shall state that off-road diesel construction equipment rated at 50 horsepower (hp) or greater, complies with Environmental Protection Agency (EPA)/California Air Resources Board (CARB) Tier 4 Final off-road emissions standards or equivalent and shall ensure that all	Significant and Unavoidable
Impact AQ-2: The Project would result in a cumulatively considerable net increase of a criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.		Potentially significant		Significant and Unavoidable
Impact AQ-3: The Project would not expose sensitive receptors to substantial pollutant concentrations.		Potentially significant		Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	(SCAQMD) rules and regulations, including but not limited to: • Rules 201, 203, and 219, which regulate permits for installation and use of equipment that may generate air contaminants. • Rule 402, Nuisance, which states that a project shall not "discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property." Additionally, Rule 415, Odors from Rendering Facilities, requires nuisance odor at rending facilities be controlled. • Rule 403, Fugitive Dust, for controlling fugitive dust and avoiding nuisance. • Rule 445, for limiting the installment of wood-burning fireplaces. • Rule 1113, which limits the volatile organic compound content of architectural coatings. • Rule 1186, for controlling fugitive dust from vehicular travel on paved and unpaved roads.		construction equipment is tuned and maintained in accordance with the manufacturer's specifications. The Lead Agency shall conduct an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts. **MM AQ-3: Idling Regulations.** The Project plans and specifications shall include signs at loading dock facilities that include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for trucks drivers to restrict idling to no more than 5 minutes once the vehicle is stopped, the transmission is set to "neutral" or "park", and the parking brake is engaged pursuant to Title 13 of the California Code of Regulations, Section 2485; and 3) telephone numbers of the building facilities manager and CARB to report violations. Signs shall be installed prior to receipt of an occupancy permit. **MM AQ-4: Energy Efficient Vendor Trucks.** The Project plans and specifications shall include requirements (by contract specifications) that vendor trucks for the industrial buildings include energy efficiency improvement features through the Carl Moyer Program—including truck modernization, retrofits, and/or aerodynamic kits and low rolling resistance tires—to reduce fuel consumption. **MM AQ-5: Electric Vehicle Charging Stations and Carpool Parking**. The Project plans and specifications for the industrial buildings shall include electric vehicle charging stations and a minimum of 5 carpool parking spaces at each building for employees and the public to use.	

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	• Rule 1403, for minimizing asbestos emissions during building demolition. • Regulation IX, Standards of Performance for New Stationary Sources (NSPS), and XXIII, New Source Review. • Regulation XI, Source Specific Standards. • Regulation XX, Regional Clean Air Incentives Market (RECLAIM). • Regulation XVI, Mobile Source Offset Programs, and Regulation XXII, Mobile Source Emissions Reduction Programs (Rule 2202). **PDF AQ-1:** The Project Applicant/Developer/Operator shall post both interior and exterior facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, SCAQMD, and the building manager. **PDF AQ-2:** During Project grading operations, Project contractors shall limit the amount of daily grading disturbance area to not exceed the assumptions specified in the Draft EIR Air Quality Impact Analysis. **PDF AQ-3:** Project construction plans and specifications shall require on-road heavy-duty haul trucks to be model year 2010 or newer if diesel-fueled, ~~if such equipment is widely available and economically feasible.~~ pursuant to CARB's particulate matter filter requirements.		**MM AQ-6: Electric Interior Vehicles.** The Project plans and specifications for all of the industrial buildings shall include infrastructure to support use of electric-powered forklifts and/or other interior vehicles. The requirement that all on-site yard hostlers, yard equipment, forklifts, and pallet jacks shall be zero-emissions equipment, or equivalent language, shall be incorporated in all Project facility lease documents. Prior to issuance of a Certificate of Occupancy, facility owners or tenants shall provide documentation to the County of San Bernardino Planning Division and Business License Department verifying that signed lease documents incorporate the requirement that all on-site yard trucks/hostlers shall be zero-emissions equipment. **MM AQ-7: Transportation Management.** The Project plans and specifications for the industrial buildings shall require that a Transportation Management Association (TMA) or similar mechanism shall be established by the Project to encourage and coordinate carpooling. The TMA shall advertise its services to the building occupants. The TMA shall offer transit incentives to employees and shall provide shuttle service to and from public transit, should a minimum of 5 employees request and use such service from a transit stop at the same drop-off and/or pickup time. The TMA shall distribute public transportation information to its employees. The TMA shall provide electronic message board space for coordination rides.	
Impact AQ-4: The Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.		Less than significant	None required	Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Cumulative	**PDF AQ-4:** The Project shall provide electrical hook ups to the power grid, rather than use diesel-fueled generators, for electric construction tools, such as saws, drills and compressors, and shall use electric tools whenever feasible. **PDF AQ-5:** The construction plans and specifications shall prohibit off-road diesel powered construction equipment from being in the "on" position for more than 10 hours per day during Project construction. **PDF AQ-6:** During Project construction, the Project contractors shall keep all equipment maintenance records and data sheets, including design specifications and emission control tier classifications, onsite or at the contractor's office and shall furnish documents to the Lead Agency or other regulators, upon request. **PDF AQ-7:** The Project Applicant/Developer shall provide information on transit and ridesharing programs and services to construction employees. **PDF AQ-8:** The Project Applicant/Developer shall provide meal options onsite or shuttles between the construction site and nearby meal destinations for construction employees. **PDF AQ-9:** The Project Applicant/Developer/Tenant shall require that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2010 model-year emissions equivalent engine standards as currently defined in	Potentially significant	None required	Significant and Unavoidable

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators which own vehicles subject to Section 2025 shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and state upon request. **PDF AQ-10:** The Project Applicant/Developer/Tenant shall require that all heavy-duty trucks entering or operated on the Project site to be zero-emission beginning in 2030, if such trucks are commercially ~~widely~~ available ~~and economically feasible~~, as reasonably determined by the County Planning Division. **PDF AQ-11:** The Project Applicant/Developer/Tenant shall require all on-site equipment, such as forklifts and yard trucks, to be electric, propane or natural gas with the necessary electrical charging stations provided. **PDF AQ-12:** The Project Applicant/Developer/Owner shall require tenants to use zero-emission light- and medium-duty trucks as part of business operations, if such trucks are commercially ~~widely~~ available ~~and economically feasible~~, as reasonably determined by the County Planning Division. **PDF AQ-13:** The Project Applicant/Developer shall construct electric truck charging infrastructure consisting of infrastructure (i.e.,			

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	conduit) to support future installation of charging stations, when such trucks are commercially ~~widely~~ available~~ and economically feasible~~, as reasonably determined by the County Planning Division. **PDF AQ-14:** The Project Applicant/Developer shall construct electric light-duty truck charging infrastructure consisting of infrastructure (i.e., conduit) proportional, i.e., conduit for one charging station for every five light-duty truck parking spaces at the Project. **PDF AQ-15:** The Project Applicant/Developer shall install all necessary infrastructure (i.e., wiring, reinforced roofs) to allow solar photovoltaic systems on the project site to be installed in the future, with a specified electrical generation capacity, such as equal to the building's projected energy needs. **PDF AQ-16:** The Project Applicant/Developer/Owner shall require all stand-by emergency generators to be powered by a non-diesel fuel. **PDF AQ-17:** The Project owner shall require facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks. **PDF AQ-18:** The Project owner shall require operators to establish and promote a rideshare program that discourages single-occupancy			

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking. **PDF AQ-19:** The Project shall meet CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking. **PDF AQ-20:** The Project will achieve certification of compliance or demonstrate equivalency with LEED green building standards. **PDF AQ-21:** The Project Owner/Tenant shall provide meal options onsite or shuttles between the facility and nearby meal destinations. **PDF AQ-22:** The Project Applicant/Developer/Owner shall post signs at every truck exit driveway providing directional information to the truck route. **PDF AQ-23:** The Project Applicant/Developer/Owner shall require that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also, if the tenant/facility operator owns its own fleet of vehicles, subject to 13 California Code of Regulations section 2025, require such tenants/facility operators to maintain records on-site demonstrating compliance and make records available for			

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	inspection by the local jurisdiction, air district, and state upon request. **PDF AQ-24:** The Project Applicant/Developer/Owner shall encourage tenants to enroll in the United States Environmental Protection Agency's SmartWay program and encourage tenants to use carriers that are SmartWay carriers. **PDF AQ-25:** The Project Applicant/Developer/Owner shall provide tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets. **PDF AQ-26:** The Project Applicant/Developer/Owner shall identify a person to act as a community liaison concerning onsite construction activities and operations and provide contact information for the community liaison to the surrounding community. The contact of the community liaison shall be provided to the County Planning Division and posted on the construction site prior to issuance of a demolition permit. **PDF AQ-27:** The Project Applicant/Developer/Contractor shall include a note on grading plans that prohibits grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone in the Project area. Daily Air Quality Index forecasts for the next day of grading shall be checked via			

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	the airnow.gov system the day prior by the Project Contractor.			
5.4 Biological Resources				
IMPACT BIO-1: The Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.		Potentially significant	**MM BIO-1 Rare Plants:** Future projects proposed within the Specific Plan Area & Upzone Site (excluding Opening Year Development—Options 1 and 2 and offsite infrastructure areas) shall be surveyed to determine if any rare plant species have the potential to occur. If suitable habitat is present, a qualified biologist shall survey for sensitive plants during the appropriate time of year (i.e., when the species is readily identifiable, such as during its blooming period) prior to initiating construction activities in a given area. The focused surveys shall be conducted in accordance with published agency guidelines (CDFW 2009, CDFW 2000, USFWS 2000). If rare plants are identified and cannot be avoided, the project-level biological survey report would justify why species-specific mitigation is necessary and propose mitigation to reduce project impacts to a less than significant level. **MM BIO-2 Burrowing Owl:** Prior to commencement of construction activities (i.e., demolition, earthwork, clearing, and grubbing), habitat assessments to determine whether suitable burrows are present as defined by the Staff Report on Burrowing Owl Mitigation (CDFG 2012) shall be conducted within future projects proposed within the Specific Plan Area & Upzone Site (excluding Opening Year Development — Options 1 and 2 and offsite infrastructure areas). The assessment shall also include a 500-foot (150-meter) buffer around proposed development footprints. If suitable burrows are identified, focused surveys shall be conducted by a qualified biologist during	Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			the breeding season in accordance with the most recent CDFW guidelines. Take avoidance surveys shall be conducted within all areas of the Specific Plan Area & Upzone Site (including Opening Year Development—Options 1 and 2 and offsite infrastructure areas). The take avoidance surveys shall be conducted within 14 days and repeated 24 hours prior to construction activities (i.e., demolition, earthwork, clearing, and grubbing) to determine presence of burrowing owl (BUOW). If take avoidance surveys are negative and BUOW is confirmed absent, then ground-disturbing activities shall be allowed to commence, and no further mitigation would be required. If BUOW is observed during focused surveys and/or take avoidance surveys within any portion of the Study Area (including Opening Year Development—Options 1 and 2 and offsite infrastructure areas), active burrows shall be avoided by the project in accordance with the CDFW's Staff Report (CDFG 2012). The County shall be immediately informed of any BUOW observations. The Project applicant/developer shall consult with the County to determine how to mitigate the impacts to any burrows. If the County determines that active relocation is required, a BUOW Protection and Relocation Plan (plan) shall be prepared by a qualified biologist, which must be sent for approval by CDFW prior to initiating ground disturbance. The plan shall detail avoidance measures that shall be implemented during construction and passive or active relocation methodology. Relocation shall only occur between September 1 through January 31, outside of the breeding season. **MM BIO-3 Sensitive Bat Species**. Prior to commencement of construction activities,	

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			habitat assessments for sensitive bat species shall be conducted for all future projects proposed within the Specific Plan Area & Upzone Site (excluding Opening Year Development—Options 1 and 2 and offsite infrastructure areas). The following avoidance and minimization measures shall be implemented within all areas of the Specific Plan Area & Upzone Site that support suitable habitat for sensitive bat species. These measures shall also be implemented for Opening Year Development—Options 1 and 2 and offsite infrastructure areas since suitable habitat was identified. 1. Construction activities (i.e., earthwork, clearing, grubbing, etc.) shall occur from September 1 through March 31 and outside the bat maternity roosting season to the extent possible. 2. If construction activities are proposed within the bat maternity roosting season (April 1 through August 31), a qualified biologist experienced with bats shall conduct a pre-construction survey within all suitable habitat. The pre-construction survey shall be conducted 30 days prior to commencing construction/demolition activities and shall consist of two separate surveys conducted no more than a week apart. The second and final survey should be conducted no more than seven days prior to commencing construction/demolition activities. The pre-construction surveys should be conducted using a detector for echolocation calls, such as an	

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			Anabat bat detector system. The results of the pre-construction survey shall be documented by the qualified biologist. If the qualified biologist determines that no sensitive bat maternity roosts are present, the construction activities shall be allowed to proceed without any further requirements. If the qualified biologist determines that sensitive bat maternity roosts are present, the following avoidance and minimization measures shall be implemented: a. No construction activities may occur within 300 feet of any sensitive bat maternity roosts. A qualified biologist shall clearly delineate any bat maternity roosts and any required avoidance buffers, which shall be clearly marked with flags and/or fencing prior to the initiation of construction activities. b. If construction activities are proposed within 300 feet of a sensitive bat maternity roost, a biological monitor shall be required to observe the behavior of any roosting bats. The construction supervisor shall be notified if the construction activities appear to be altering	

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			the bats' normal roosting behavior. No construction activities will be allowed within 300 feet of bat maternity roosts until the additional minimization measures are taken, as determined by the biological monitor in coordination with the County. The biological monitor shall prepare written documentation of all monitoring activities and any additional minimization measures that were taken, which shall be submitted to the County at the completion of construction activities. **MM BIO-4 Sensitive Animals:** Future projects proposed within the Specific Plan Area & Upzone Site (excluding Opening Year Development—Options 1 and 2and offsite infrastructure areas) shall be surveyed for any other sensitive animal species that may be present. The project-level biological survey report shall analyze these projects' impacts on sensitive animal species and shall propose mitigation to reduce project impacts to a less than significant level. **MM WVLC BIO-1 Pre-Construction Focused Surveys of Proposed Conservation Area and Development Area to Confirm Absence of Special-Status Species.** Pre-construction Survey within the Proposed Development Area for Western Burrowing Owl. The project applicant shall retain a qualified biologist to conduct preconstruction surveys for burrowing owls no fewer than 14 days prior to any ground-disturbing	

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			activities, to be repeated 24 hours prior to grading. The preconstruction surveys shall be approved by the City of Fontana Director of Community Development and conducted in accordance with current survey protocols provided in the CDFW Staff Report on Burrowing Owl Mitigation (March 7, 2012). In the event a burrowing owl is found to be present on site during the preconstruction survey, the project applicant shall ensure that the applicable avoidance measures outlined in the CDFW Staff Report on Burrowing Owl Mitigation (March 7, 2012) are applied to the proposed project (e.g., avoid direct impacts on occupied burrows during nesting season). Any active avoidance measures during the breeding season must to be coordinated with CDFW. Pre-construction Nesting Bird Survey of the Proposed Development Area. Nesting birds are protected pursuant to the MBTA and California Fish and Game Code. If ground-disturbing activities or removal of any trees, shrubs, or any other potential nesting habitat are scheduled within the avian nesting season (January 1 to August 31), a preconstruction clearance survey for nesting birds shall be completed no more than 3 days prior to ground disturbance. This will ensure that no nesting birds adjacent to the construction area will be disturbed during construction. If nesting birds are found, an avoidance buffer no less than 300 feet shall be established around the nest until all young have fledged and the nest is confirmed by a qualified biologist to be no longer active.	
IMPACT BIO-2: The Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish		Potentially significant	**MM BIO-5 Sensitive Vegetation Communities:** Future projects proposed within the Specific Plan Area & Upzone Site (excluding Opening Year Development—Options 1 and 2 and offsite infrastructure areas) shall be surveyed for sensitive	Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
and Wildlife or US Fish and Wildlife Service.			vegetation communities as defined by CDFW. Impacts to sensitive vegetation communities shall first be avoided. Where avoidance is not feasible, sensitive vegetation communities shall be mitigated through habitat acquisition/preservation, restoration, and/or creation.	
IMPACT BIO-3: The Project would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.		Potentially significant	**MM BIO-6 Jurisdictional Resources:** A jurisdictional assessment shall be conducted for future projects proposed within the Specific Plan Area & Upzone Site (excluding Opening Year Development—Options 1 and 2 and offsite infrastructure areas). Jurisdictional resources shall be avoided when feasible. Where avoidance is not feasible, project-specific impacts to jurisdictional resources shall be addressed and mitigated by federal and state regulators via applicable consulting and permitting process. The types of mitigation required may include onsite or offsite preservation, enhancement, creation, and/or restoration. Mitigation is typically required at a 1:1 ratio or higher and to be accomplished in close proximity to the impacts or at least in the same watershed. Final requirements and locations are, however, subject to change during applicable consultation/permit processes required by the USACE, RWQCB, and CDFW. Best Management Practices (BMPs) to minimize and avoid impacts to jurisdictional resources during and after construction shall include, but are not limited to, the following: • Construction-related equipment will be stored in developed areas, outside of the drainage. No equipment maintenance will be done within or adjacent to the drainage.	Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			• Source control and treatment control BMPs will be implemented to minimize the potential contaminants that are generated during and after construction. Water quality BMPs will be implemented throughout the project to capture and treat potential contaminants. • Substances harmful to aquatic life will not be discharged into the drainage. All hazardous substances will be properly handled and stored. • A Storm Water Pollution Prevention Plan will be prepared to prevent sediment from entering the drainage during construction. • To avoid attracting predators during construction, the project will be kept clean of debris to the extent possible. All food-related trash items will be enclosed in sealed containers and regularly removed from site. • Construction personnel will strictly limit their activities, vehicles, equipment and construction material to the proposed project footprint, staging areas, and designated routes of travel. • Exclusion fencing will be installed to demarcate the limits of disturbance. The exclusion fencing should be maintained until the completion of construction activities.	
IMPACT BIO-4: The Project would not interfere substantially with the movement of any native resident or		Potentially significant	**MM BIO-7 Nesting Birds:** To the extent possible, construction activities (i.e., demolition, earthwork, clearing, and	Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.			grubbing) within the Specific Plan Area & Upzone Site, including Opening Year Development—Options 1 and 2 and offsite infrastructure areas, shall occur outside of the general bird nesting season for migratory birds, which is March 15 through August 31 for songbirds and January 1 through August 31 for raptors. If construction activities (i.e., earthwork, clearing, and grubbing) must occur during the general bird nesting season for migratory songbirds (March 15 through August 31) and raptors (January 1 to August 31), a qualified biologist shall perform a pre-construction survey of potential nesting habitat to confirm the absence of active nests belonging to migratory birds and raptors afforded protection under the MBTA and CFG Code. The pre-construction survey shall be performed no more than three days prior to the commencement of construction activities. The results of the pre-construction survey shall be documented by the qualified biologist. If construction is inactive for more than seven days, an additional survey shall be conducted. If the qualified biologist determines that no active migratory bird or raptor nests occur, the activities shall be allowed to proceed without any further requirements. If the qualified biologist determines that an active migratory bird or raptor nest is present, no impacts within 300 feet (500 feet for raptors) of the active nest shall occur until the young have fledged the nest and the nest is confirmed to no longer be active, or as determined by the qualified biologist. The biological monitor may modify the buffer or propose other recommendations in order to minimize disturbance to nesting birds.	
IMPACT BIO-5: The Project would not conflict with any local policies or		Potentially significant	**MM BIO-8 County Regulated Trees:** A tree survey shall be conducted for future projects	Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
ordinances protecting biological resources, such as a tree preservation policy or ordinance.			proposed within the Specific Plan Area (excluding Opening Year Development—Options 1 and 2 and offsite infrastructure areas). The survey shall be conducted by an ISA-certified arborist to identify trees regulated under the Section 88.01.070 of the County's Code of Ordinances. If regulated trees will be impacted by a project, a tree removal permit must be obtained prior to impacts.	
IMPACT BIO-6: The Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan.		Less than significant	None required	Less than significant
Cumulative		Potentially significant	MM BIO-1 through MM BIO-8	Less than significant
5.5 Cultural Resources				
Impact CUL-1: Initial development of the Specific Plan Area would not significantly impact a historical resource; however, future development may cause a substantial adverse change in the significance of a historical resource.	**RR CUL-2**Native American historical and cultural resources and sacred sites are protected under PRC Sections 5097.9 to 5097.991, which require that descendants be notified when Native American human remains are discovered and provide for treatment and disposition of human remains and associated grave goods. **RR CUL-5**If human remains are discovered within a project site, disturbance of the site must stop until the coroner has investigated and made recommendations for the treatment and disposition of the human remains to the person responsible for the excavation, or to his or her authorized representative. If the coroner has reason to believe the human remains are those of a Native American, he or she shall	Potentially significant	**Mitigation Measure CUL-1: Historical Resources Assessment for Future Development of Planning Area B of the Specific Plan and Upzone Site.** Prior to issuance of a grading permit, future development projects in Planning Area B of the Specific Plan or the Upzone Site shall include the preparation of a historical resources assessment prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history to verify that any buildings, structures, or objects over 45 years of age are not eligible for listing as a historical resource. The qualified architectural historian or historian shall conduct an evaluation of the potential historic resources in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation (OHP) and shall document the evaluation in a report meeting	Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	contact, by telephone within 24 hours, the Native American Heritage Commission (California Health and Safety Code Section 7050.5).		the State OHP guidelines or on Department of Parks and Recreation Series 523 forms. The report shall be submitted to the County Planning Department for review and concurrence.	
Impact CUL-2: Project construction could cause a substantial adverse change in the significance of an archaeological resource.		Potentially significant	**Mitigation Measure CUL-2: Archaeological Monitoring of All Developments in the Specific Plan Area and Upzone Site.** a) Prior to the issuance of each grading permit for the Specific Plan Area and Upzone Site, the Applicant or construction contractor shall provide evidence to the County of San Bernardino that a qualified professional archeologist meeting the Secretary of Interior's PQS for Archaeology (as defined in the Code of Federal Regulations, 36 CFR Part 61) has been retained to conduct monitoring of rough grading activities. The archaeologist shall have the authority to redirect earthmoving activities in the event that suspected cultural resources are unearthed during construction activities. b) The archaeologist shall prepare a Cultural Resources Monitoring and Treatment Plan, which would be approved by the County and describe processes for archaeological and tribal monitoring and for handling incidental discoveries of cultural resources for all ground-disturbing construction and pre-construction activities. The monitoring plan shall be provided to the San Manuel Band of Mission Indians and Gabrieleño Band of Mission Indians –	Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			Kizh Nation for review and comment, as detailed in MM TCR-2. Prior to the issuance of a grading permit, the Applicant or construction contractor shall provide evidence to the County of San Bernardino that all construction workers involved with grading and trenching operations have received training by the archaeologist to recognize archaeological resources, including tribal cultural resources, should such resources be unearthed during ground-disturbing construction activities. Pursuant to MM TCR-1, all Native American Tribal Representatives, including the San Manuel Band of Mission Indians and the Gabrieleño Band of Mission Indians – Kizh Nation, shall be allowed to attend the training session. c) The training of all construction workers involved with grading and trenching operations shall explain the importance and legal basis for the protection of significant archaeological resources. It will include a brief review of the cultural sensitivity of the construction area and the surrounding area; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be	

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			properly evaluated; and any other appropriate protocols. All new construction personnel involved with grading and trenching operations that begin work following the initial training session must take the training prior to beginning work; the archaeologist shall be available to provide the training on an as-needed basis. d) In the event archaeological resources (artifacts or features) are encountered during ground-disturbing activities, the construction supervisor shall be required by his contract to immediately halt and redirect grading operations within a 100-foot radius of the discovery and see identification and evaluation and evaluation of the suspected resource by the archaeologist. This requirement shall be noted on all grading plans and the construction contractor shall be obligated to comply with the note. e) After the archaeologist makes his/her initial assessment of the nature of the find, the archaeologist shall notify the Native American Tribal Representatives—including the San Manuel Band of Mission Indians Cultural Resources Department and the Gabrieleño Band of Mission Indians – Kizh Nation —as to provide Tribal input with regards to the significance and treatment. If it is not of Native American heritage, the archaeologist shall pursue either protection in place or recovery,	

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			salvage, and treatment of the deposits. Recovery, salvage, and treatment protocols shall be developed in accordance with applicable provisions of Public Resource Code Section 21083.2 and State CEQA Guidelines 15064.5 and 15126.4 in consultation with the County or a with a recognized scientific or educational repository, including the SCCIC. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources, consistent with CEQA Guidelines Section 15126.4(b)(3)(C). If unique archaeological resources cannot be preserved in place or left in an undisturbed state, recovery, salvage and treatment shall be required at the Applicant's expense. f) If a significant tribal cultural resource is discovered on the property, ground disturbing activities shall be suspended 50 feet around the resource until a tribal resource treatment plan is implemented. A tribal resource treatment plan shall be prepared and implemented, subject to approval by the County of San Bernardino, to protect the identified resource(s) from damage and destruction. The treatment plan shall contain a research design and data recovery program necessary to document the size and content of the	

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			discovery such that the resource(s) can be evaluated for significance under CEQA criteria. The research design shall list the sampling procedures appropriate to exhaust the research potential of the archaeological or tribal cultural resource(s) in accordance with current professional archaeology standards. The treatment plan shall require monitoring by the appropriate Native American Tribe(s) during data recovery and shall require that all recovered artifacts undergo basic field analysis and documentation or laboratory analysis, whichever is appropriate. At the completion of the basic field analysis and documentation or laboratory analysis, any recovered resource(s) shall be processed and curated according to current professional repository standards. The collections and associated records shall be donated to an appropriate curation facility, or, the artifacts may be delivered to the appropriate Native American Tribe(s) if that is recommended by the County of San Bernardino. A final report containing the significance and treatment findings shall be prepared by the archaeologist and submitted to the County of San Bernardino, the South Central Coastal Information Center (SCCIC) at California State University (CSU),	

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			Fullerton, and the appropriate Native American Tribe(s). **Mitigation Measure CUL-3: Archaeological Resources Assessment for Future Developments in Planning Area B of the Specific Plan and Upzone Site.** Prior to the issuance of a grading permit, future developments within Planning Area B of the Specific Plan and Upzone Site will be required to prepare archaeological resource assessments in accordance with the California Office of Historic Preservation: Archaeological Resources Management Report Guidelines, with the purpose to assess, avoid, and mitigate potential impacts to archeological and tribal cultural resources as set forth in CEQA Regulations: Appendix G. Archaeological resources assessments shall be performed under the supervision of an archaeologist that meets the Secretary of the Interior's PQS in either prehistoric or historic archaeology. The archaeological resources assessment for undeveloped, large open areas—including along Laurel Avenue within the Specific Plan and the northwest parcel of the Upzone Site—shall include a Phase I pedestrian survey, undertaken to locate any surface cultural materials that may be present. To the extent applicable, the archaeological resources assessment conducted for projects in the Specific Plan Area shall consider analysis and recommendations included in the Phase 1 CRA prepared for the Bloomington Business Park Specific Plan Project (Appendix E of this Draft EIR). In the event archaeological resources are identified by the archaeological resource assessment, Mitigation Measure CUL-2 shall apply.	

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Impact CUL-3: Project construction could disturb human remains interred outside of formal cemeteries.		Less than significant	None required	Less than significant
Cumulative		Potentially significant	MM CUL-1 through MM CUL-3	Less than significant
5.6 Energy				
Impact E-1: The Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation		Less than significant	None required	Less than significant
Impact E-2: The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency		No impact	None required	No impact
Cumulative		Less than significant	None required	Less than significant
5.7 Geology and Soils				
Impact GEO-1i: The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a mapped earthquake fault		No impact	None required	No impact
Impact GEO-1ii: The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.	**RR GEO-1 San Bernardino County Development Code: Building Code.** The Project will be designed and constructed in accordance with the San Bernardino County Development Code, which adopts the California Building Code (CBC) and California Residential Code (CRC), which are based on the International Building Code (IBC). New construction, alteration, or rehabilitation shall comply with applicable ordinances set forth by the County and/or by the most recent County building and seismic	Less than significant	None required	Less than significant
Impact GEO-1iii: The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.		Less than significant	None required	Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	codes in effect at the time of Project design. In accordance with County Development Code Title 8, Chapter 87.08, a geotechnical investigation is required that must evaluate soil classification, site geology, slope stability, soil strength, position and adequacy of load-bearing soils, the effect of moisture variation on soil-bearing capacity, compressibility, liquefaction, and expansiveness, as necessary, determined by the County Building Official. The geotechnical investigation must be prepared by registered professionals (i.e., California Professional Civil Engineer and as necessary a Professional Engineering Geologist). Recommendations of the report, as they pertain to structural design and construction recommendations for earthwork, grading, slopes, foundations, pavements, and other necessary geologic and seismic considerations, must be incorporated into the design and construction of the Project.			
Impact GEO-1iv: A portion of the Specific Plan Area is mapped as having moderate to high susceptibility for landslides		Potentially Significant	**Mitigation Measure GEO-1: Landslide Susceptibility Report.** Future development of structures within the area mapped as having moderate to high landslide susceptibility in Planning Area B of the Specific Plan shall prepare a landslide susceptibility investigation by registered professionals (i.e., California Professional Civil Engineer and as necessary a Professional Engineering Geologist). The investigation shall be prepared in accordance with requirements of the latest version of the California Building Code, and as warranted include design and	Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			construction recommendations to mitigate potential risks and impacts related to potential landslide hazards.	
Impact GEO-2: The Project would not result in substantial soil erosion or the loss of topsoil.	**RR HYD-1:** *See Hydrology and Water Quality* **RR HYD-3:** *See Hydrology and Water Quality*	Less than significant	None required	Less than significant
Impact GEO-3: A portion of the Specific Plan Area is mapped as having moderate to high susceptibility for landslides; the proposed Opening Year Development – Option 1 has collapsible soils.	**RR GEO-1:** CBC Compliance, listed above	Potentially significant	**Mitigation Measure GEO-1**, listed above. **Mitigation Measure GEO-2: Geotechnical Recommendations.** The Geotechnical Investigations completed for development of the Specific Plan Area outside of Opening Year—Option 1 and for development of the Upzone Site shall be submitted to the County of San Bernardino for review and approval. The approved recommendations shall be incorporated into the final design of the improvements proposed at the Specific Plan and implemented during construction. Any subsequent recommendations required by the Project's certified geotechnical engineer or engineering geologist shall be implemented to ensure the Project meets structural requirements of the California Building Code.	Less than Significant
Impact GEO-4: The Project would not be located on expansive soil, as defined in table 18-1-b of the uniform building code (1994) and would not create substantial direct or indirect risks to life or property.	**RR GEO-1:** CBC Compliance, listed above	No Impact	None required	No impact
Impact GEO-5: The Project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater		No impact	None required	No impact
Impact GEO-6: With monitoring during earthmoving construction activities, the	**RR CUL-3:** The removal, without permission, of any	Potentially significant	**Mitigation Measure GEO-3: Paleontological Resources.** Prior to grading	Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	paleontological site or feature is prohibited from lands under the jurisdiction of the state or any city, county, district, authority, or public corporation, or any agency thereof (PRC 5097.5). This applies to agencies' own activities, including construction and maintenance, and permit actions by others.		activities, the Applicant and/or its contractor shall retain a paleontologist selected from the County's list of qualified paleontologists or one who meets the qualifications of the Society of Vertebrate Paleontology standards as Project Paleontologist. The Project Paleontologist shall prepare a paleontological resource mitigation program (PRMP), monitor, salvage, and curate any recovered fossils associated with the Project area, should these be unearthed during ground disturbance within the Project area. Specifically, the Project Paleontologist shall: • Be present at the pre-grading conference to establish procedures for paleontological resource surveillance. • Monitor all ground disturbing activities in subareas where unit Qof_3 and Qof_1 are exposed and for ground disturbing activities that are four feet or greater below ground surface where unit Qyf_5 is exposed. The Project Paleontologist may reduce monitoring to spot checks or discontinue at his/her discretion if no intact and significant paleontological resources are encountered after the initial period of full-time monitoring. • Monitor excavations closely to quickly and professionally recover any fossil remains discovered while not impeding development. The purpose of the PRMP is to establish mitigation monitoring procedures and	

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			discovery protocols, based on industrywide best practices (Murphey et al., 2019) and shall include the following procedures: • Include a Worker's Environmental Awareness Program (WEAP) training. The WEAP shall be prepared prior to the start of ground disturbance and be presented in person by the Project Paleontologist to all field personnel to describe the types of fossils that may occur in sediments present within the construction areas and the procedures to follow if any are encountered. • Indicate where construction monitoring will be required for the Project and the frequency of required monitoring (i.e., full time, spot checks, etc.). • Address the collection and processing (e.g., wet- or dry-screening) of sediment samples to analyze for presence/absence of small-fraction and microscopic fossils. • Specify the process to be followed in the event paleontological resources are encountered, including ceasing all ground-disturbing activity within 50 feet of the area of the discovery. The Project Paleontologist shall examine the materials encountered, assess the nature and extent of the find, and recommend	

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			a course of action to further investigate and protect or recover and salvage those resources that have been encountered. • Describe the different reporting standards to be used for monitoring with negative findings versus monitoring resulting in fossil discoveries. • Provide details on what sediment samples should be collected, analyzed, and processed to determine the presence/absence of fossils in small-fraction and microscopic grain sizes within the Project area. Fossils uncovered during mitigation activities shall be deposited in an accredited and permanent scientific institution, such as the Western Science Center, for the benefit of current and future generations. • Specify the criteria for discarding specific fossil specimens. If the Project Paleontologist determines that impacts to a sample containing significant paleontological resources cannot be avoided by Project planning, then recovery may be applied. o Actions may include recovering a sample of the fossiliferous material prior to construction, monitoring work and halting construction if an important fossil needs to	

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			be recovered, and/or cleaning, identifying, and cataloging specimens for curation and research purposes. o Recovery, salvage and treatment shall be done at the applicant's expense. o All recovered and salvaged resources shall be prepared to the point of identification and permanent preservation by the paleontologist. o Resources shall be identified and curated into an established accredited professional repository. o The Project Paleontologist shall have a repository agreement in hand prior to initiating recovery of the resource.	
Cumulative	**RR GEO-1:** CBC Compliance	Potentially significant	MM GEO-1 through MM GEO-3	Less than significant
5.8 Greenhouse Gases				
Impact GHG-1: The Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.	**RR GHG-1** New buildings are required to achieve the current California Building Energy and Efficiency Standards (Title 24, Part 6) and California Green Building Standards Code (CALGreen) (Title 24, Part 11). **RR GHG-2** Construction activities are required to adhere to Title 13	Potentially significant	**Mitigation Measure GHG-1: GHG Reduction Measures** Prior to issuance of building permits for each building, the Project applicant shall provide documentation to the County of San Bernardino Building Department demonstrating that the improvements and/or buildings subject to the building permit application include measures from the 2021 County of San Bernardino	Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	California Code of Regulations (CCR) Section 2499, which requires that nonessential idling of construction equipment is restricted to five minutes or less. **RR GHG-3** New development in the unincorporated County of San Bernardino is required to comply with the San Bernardino County GHG Reduction Plan. The 2011 GHG Reduction Plan also directs the County to implement GHG reduction measures to align the County with the GHG reduction goals of AB 32. **RR GHG-4** The County of San Bernardino requires land uses in the unincorporated area to adhere to the state's Model Water Efficient Landscape Ordinance. **RR GHG-5** The County of San Bernardino adheres to the requirements of AB 341, AB 1826, and SB 1383. The County of San Bernardino Solid Waste Management Division manages landfill capacity and implements programs to divert waste from landfills, which includes recycling and organics/food waste collection. AB 341 requires business that generate 4 cubic yards of waste or more per week (including multifamily with five or more units) to arrange for recycling services. AB 1826 requires business to recycle their organic waste depending on how much waste they generate per week and also requires the County to implement an organic waste recycling program for business (including multifamily of five or more uses). SB 1383 requires that operates of landfills achieve		Greenhouse Gas Reduction Plan Screening Tables (June 2021), as needed to achieve the required 100 points. Specific measures may be substituted for other measures that achieve an equivalent amount of GHG reduction, subject to the County of San Bernardino Building Department approval.	
Impact GHG-2: The Project would conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.		Less than significant	Not required	Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	reductions in short-lived climate pollutants and establishes a target to achieve a 50 percent reduction in statewide disposal of organic waste from 2014 levels by 2020 and 75 percent reduction from 2014 levels by 2025. AB 1383 also establishes an additional target that not less than 20 percent of currently disposed edible food is recovered for human consumption by 2025. PDF AQ-1 through PDF AQ-25, included in Section 5.3, *Air Quality*.			
Cumulative		Potentially significant	MM GHG-1	Less than significant
5.9 Hazards and Hazardous Materials				
IMPACT HAZ-1: The Project would not create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials.	**RR HAZ-1 Transportation of Hazardous Waste.** Hazardous materials and hazardous wastes will be transported to and/or from the projects developed under the Countywide Plan in compliance with any applicable state and federal requirements, including the U.S. Department of Transportation regulations listed in the Code of Federal Regulations (CFR) (Title 49, Hazardous Materials Transportation Act); California Department of Transportation standards; and the California Occupational Safety and Health Administration standards. **RR HAZ-2 Resource Conservation and Recovery Act.** Hazardous waste generation, transportation, treatment, storage, and disposal will be conducted in compliance with the Subtitle C of the Resource Conservation and Recovery Act (RCRA) (Code of Federal Regulations, Title 40, Part 263), including the management of	Less than significant.	None required	Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	nonhazardous solid wastes and underground tanks storing petroleum and other hazardous substances. The San Bernardino County Fire Protection District serves as the designated Certified Unified Program Agency (CUPA) and which implements state and federal regulations for the following programs: (1) Hazardous Materials Release Response Plans and Inventory Program, (2) California Accidental Release Prevention (CalARP) Program, (3) Aboveground Petroleum Storage Act Program, and (4) UST Program (5) Hazardous Waste Generator and Onsite Hazardous Waste Treatment Programs (6) Hazardous Materials Management Plan and Hazardous Material Inventory Statement Program.			
IMPACT HAZ-2: The Project could create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment.	**RR HAZ-3 California UST Regulations.** Underground storage tank (UST) repairs and/or removals will be conducted in accordance with the California UST Regulations (Title 23, Chapter 16 of the California Code of Regulations). Any unauthorized release of hazardous materials will require release reporting, initial abatement, and corrective actions that will be completed with oversight from the Regional Water Quality Control Board, Department of Toxic Substances Control, San Bernardino County Fire Protection District, South Coast Air Quality Management District, and/or other regulatory agencies, as necessary. Use of	Potentially Significant	**MM HAZ-1 Soil Management Plan (SMP).** The Project Applicant shall retain a qualified environmental consultant to prepare a SMP for all contaminated soils identified as environmental conditions in the Phase 1 and Phase 2 Environmental Site Assessments (Phases 1 and 2 ESAs) prepared for proposed development within the Specific Plan. The SMP shall be submitted to the San Bernardino County Fire Department, Hazardous Materials Division (SBCFD / HMD) for review and approval prior to the commencement of excavation and grading activities. The SMP shall be implemented during excavation and grading activities of the impacted area to ensure that contaminated soils are properly identified, excavated, and disposed of off-site, as follows:	Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	existing USTs will also have to be conducted (i.e., used, maintained and monitored) in accordance with the California UST Regulations (Title 23, Chapter 16 of the California Code of Regulations). **RR HAZ-4 ACMs and LBPs.** Demolition activities that have the potential to expose construction workers and/or the public to asbestos-containing materials (ACMs) or lead-based paint (LBP) will be conducted in accordance with applicable regulations, including, but not limited to: • South Coast Air Quality Management District's Rule 1403 • California Health and Safety Code (Section 39650 et seq.) • California Code of Regulations (Title 8, Section 1529) • California Occupational Safety and Health Administration regulations (California Code of Regulations, Title 8, Section 1529 [Asbestos] and Section 1532.1 [Lead]) • Code of Federal Regulations (Title 40, Part 61 [asbestos], Title 40, Part 763 [asbestos], and Title 29, Part 1926 [asbestos and lead]) **RR HAZ-5 Removal of Hazardous Materials.** The removal of hazardous materials, such as polychlorinated biphenyls (PCBs), mercury-containing light ballast, and mold, will be completed in accordance with applicable		▪ The SMP shall address field screening, air monitoring, impacted soil excavation and segregation, confirmation sampling, stockpile management and sampling, impacted soil disposal, backfill, import soil sampling and tracking, and documentation. ▪ The SMP shall be prepared and executed in accordance with South Coast Air Quality Management District (SCAQMD) Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil. During excavation, Rule 1166 requires that soils identified as contaminated shall be sprayed with water or another approved vapor suppressant, or covered with sheeting during periods of inactivity of greater than an hour, to prevent contaminated soils from becoming airborne. Under Rule 1166, contaminated soils shall be transported from the Project Site by a licensed transporter and disposed of at a licensed storage/treatment facility to prevent contaminated soils from becoming airborne or otherwise released into the environment. ▪ Prior to the commencement of grading and excavation, the Phases 1 and 2 ESAs shall be submitted to reported to the SBCFD / HMD for review and comment. The recommendations of the SBCFD / HMD shall be incorporated in the SMP. After approval by SBCFD/HMD, the recommendations contained in all Phase 1 and 2 ESAs shall be incorporated into the SMP. ▪ A qualified environmental consultant shall be present on the Project Site during grading and excavation	

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	regulations pursuant to 40 CFR 761 (PCBs), 40 CFR 273 (mercury-containing light ballast), and 29 CFR 1926 (molds) by workers with the hazardous waste operations and emergency response (HAZWOPER) training, as outlined in 29 CFR 1910.120 and 8 CCR 5192. **RR HAZ-6 California Code of Regulations (Title 8, Section 1541).** New construction, excavations, and/or new utility lines within 10 feet or crossing existing high-pressure pipelines, natural gas/petroleum pipelines, or electrical lines greater than 60,000 volts will be designed and constructed in accordance with the California Code of Regulations (Title 8, Section 1541)		activities in the known or suspected locations of contaminated soils and shall be on call at other times as necessary, to monitor compliance with the SMP and to actively monitor the soils and excavations for evidence of contamination. ▪ During the Project's excavation phase, the Project Applicant shall remove and properly dispose of impacted materials in accordance with the provisions of the SMP. If soil is stockpiled prior to disposal, it will be managed in accordance with the Project's Storm Water Pollution Prevention Plan, prior to its transfer for treatment and/or disposal. All impacted soils would be properly treated and disposed of in accordance with South Coast Air Quality Management District (SCAQMD) Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil, as well as applicable requirements of the Santa Ana Regional Water Quality Control Board. **MM HAZ-2 Health and Safety Plan.** Given the presence of known soil contamination on at least a portion of the proposed development area within the Specific Plan, a Health and Safety Plan shall be prepared in compliance with OSHA Safety and Health Standards (29 Code of Federal Regulations 1910.120) and Cal/OSHA requirements (CCR Title 8, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719) and submitted for review by the SBCFD / HMD. The Health and Safety Plan shall be submitted to the SBCFD / HMD for review and approval prior to the commencement of excavation and grading. The Health and Safety Plan shall address, as	

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			appropriate, safety requirements that would serve to avoid significant impacts or risks to workers or the public in the event that elevated levels of subsurface gases are encountered during grading and excavation and shall include any applicable recommendations contained in all Phase 1 and Phase II ESAs, after the ESAs are approved by SBCFD/HMD. The Health and Safety Plan shall address potential vapor encroachment from the soil contamination, and workers shall be trained to identify exposure symptoms and implement alarm response. The Health and Safety Plan shall have emergency contact numbers, maps to the nearest hospital, gas monitoring action levels, gas response actions, allowable worker exposure times, and mandatory personal protective equipment requirements. The Health and Safety Plan shall be signed by all workers involved in the removal of the contaminated soils to demonstrate their understanding of the risks of excavation.	
IMPACT HAZ-3: The Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.	**RR HAZ-1** Transportation of Hazardous Waste, above. **RR HAZ-2** Resource Conservation and Recovery Act, above. **RR HAZ-3** California UST Regulations, above.	Less than significant	None required	Less than significant
IMPACT HAZ-4: The Specific Plan Area contains properties included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 that could cause a significant hazard to the public or the environment.		Less than significant	None required	Less than significant
IMPACT HAZ-5: The Project would not result in a safety hazard or excessive noise for people residing or working in the Project area for a project located within an airport land use plan or,				

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
where such a plan has not been adopted, be within two miles of a public airport or public use airport.				
IMPACT HAZ-5: The Project would not result in a safety hazard or excessive noise for people residing or working in the Project area for a project located within an airport land use plan or, where such a plan has not been adopted, be within two miles of a public airport or public use airport.		No impact	None required	No impact
IMPACT HAZ-6: The Project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.		Less than significant	None required	Less than significant
Cumulative	RR HAZ-1, HAZ-2, HAZ-3, HAZ-4, HAZ-5, HAZ-6, above.	Potentially significant	MM HAZ-1 and MM HAZ-2, above.	Less than significant
5.10 Hydrology and Water Quality				
Impact WQ-1: The Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.	**RR WQ-1: NPDES/SWPPP.** Prior to issuance of any grading or demolition permits, the applicant shall provide the County Building and Safety Division evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and	Less than significant	None required	Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	reporting plan for the construction site. **RR WQ-2: WQMP.** Prior to the approval of the Grading Plan and issuance of Grading Permits a completed Water Quality Management Plan (WQMP) shall be submitted to and approved by the Public Works Department. The WQMP shall be submitted using the Riverside County Stormwater Program's model form and shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development project in order to minimize the adverse effects on receiving waters.			
Impact WQ-2: The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.		Less than significant	None required	Less than significant
Impact WQ-3: The Project would not substantially alter the existing drainage pattern of the area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.	**RR WQ-1:** NPDES/SWPPP, listed above **RR WQ-2:** WQMP, listed above	Less than significant	None required	Less than significant
Impact WQ-4: The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner	**RR WQ-1:** NPDES/SWPPP, listed above **RR WQ-2:** WQMP, listed above	Less than significant	None required	Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.				
Impact WQ-5: The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.	**RR WQ-1:** NPDES/SWPPP, listed above **RR WQ-2:** WQMP, listed above	Less than significant	None required	Less than significant
Impact WQ-6: The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows		Less than significant	None required	Less than significant
Impact WQ-7: The Project would not be located in flood hazard, tsumani, or seiche zones, risk release of pollutants due to project inundation.		No impact	None required	No impact
Impact WQ-8: The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	**RR WQ-1:** NPDES/SWPPP, listed above **RR WQ-2:** WQMP, listed above	Less than significant	None required	Less than significant
Cumulative	RR WQ-1 and RR WQ-2, listed above.	Less than significant	None required	Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
5.11 Land Use and Planning				
Impact LU-1: The Project would not physically divide an established community.	RR GHG-1 through RR GHG-4, above. **RR LU-1 The County of San Bernardino Development Code:** The County's Development Code (Title 8 of the County Code of Ordinances) provides the basis for zoning designations and development regulations in unincorporated areas	Less than significant	None required	Less than significant
Impact LU-2: The Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.		Less than significant	None required	Less than significant
Cumulative		Less than significant	None required	Less than significant
5.12 Noise				
Impact NOI-1: The Project would not generate a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	**RR-NOI-1** The California Building Code (CBC), Title 24, Part 2, Volume 1, Chapter 12, Interior Environment, Section 1207.11.2, Allowable Interior Noise Levels, requires that interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room. The noise metric is evaluated as either the day-night average sound level (Ldn) or the community noise equivalent level (CNEL), consistent with the noise element of the local general plan. The California Green Building Standards Code (CALGreen), Chapter 5, Division 5.5, has additional requirements for insulation that affect exterior-interior noise transmission for nonresidential structures: Pursuant to Section 5.507.4.1, Exterior Noise Transmission, Prescriptive Method, wall and roof-ceiling assemblies making up the building or addition	~~Potentially~~ Less than significant	None. ~~**MM NOI-1: Industrial/Warehousing Operational Noise:** Construction Plans, specifications, and permits for development of Development Sites 2 and 4 shall include development of the following walls that shall be completed prior to receipt of certificates of occupancy or operational permits for industrial/warehousing uses on Development Sites 2 and 4:~~ • ~~Development Site 2: a 12-foot-tall masonry wall shall be constructed along the entire northern perimeter of Development Site 2, and 14-foot-high masonry walls shall be constructed along Locust Avenue and Maple Avenue to screen the truck trailer parking and loading dock areas.~~ • ~~Development Site 4: a 9-foot-high masonry wall shall be constructed along the perimeter of the truck trailer lot to screen the truck trailer parking lot.~~	Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Impact NOI-2: The Project would not generate excessive groundborne vibration or groundborne noise levels.	envelope or altered envelope and exposed to the noise source shall meet a composite sound transmission class (STC) rating of at least 50 or a composite outdoor-indoor transmission class (OITC) rating of no less than 40, with exterior windows of a minimum STC of 40 or OITC of 30 within a 65 dBA CNEL noise contour of an airport, or within a 65 dBA CNEL or Ldn noise contour of a freeway, expressway, railroad, industrial source, or fixed-guideway source, as determined by the noise element. Where noise contours are not readily available, buildings exposed to a noise level of 65 dBA Leq for one hour during any hour of operation shall have building, addition, or alteration exterior wall and roof-ceiling assemblies that are exposed to the noise source meet a composite STC rating of at least 45 (or OITC 35), with exterior windows of a minimum of STC 40 (or OITC 30). Prior to issuance of building permits for projects that include sensitive receptors and are located in ambient noise environments exceeding the "Normally Acceptable" noise and land use compatibility standards shown in Table 5.12-2, the project applicant shall submit an acoustical study to the County of San Bernardino that demonstrates that the proposed residential building design would provide an interior noise level of 45 dBA CNEL or less for residential uses, as required by the California Building Code, or acceptable levels	Potentially Significant	**Mitigation Measure NOI-1~~2~~: Construction Vibration:** Construction Plans, specifications, and permits for construction activities within the Specific Plan area and Upzone Site shall specify that large, loaded trucks, heavy mobile equipment greater than 80,000 pounds, and the use of jack hammers and soil compaction equipment are not to be used within 20-feet of occupied sensitive receiver locations. Construction activities within 20 feet of noise sensitive uses shall utilize small rubber-tired or alternative equipment to reduce construction related vibration below the County's threshold of 0.2 in/sec PPV at sensitive receiver locations.	Less than significant
Impact NOI-3: The Project would not expose people residing or working in the Project area to excessive noise levels.		No Impact	None required	No Impact

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	for nonresidential uses per CALGreen standards. Acceptable methods for reducing noise exposure may include, but are not limited to: • Noise barriers, berms, or other noise reduction techniques could be constructed to reduce noise transmission where reasonable and feasible. Final design of such barriers should be completed during project level review. • Alternative noise reduction techniques could be implemented, such as repaving streets with "quiet" pavement types, including open-grade rubberized asphaltic concrete. The use of quiet pavement can reduce noise levels by up to 7 dBA, depending on the existing pavement type, traffic speed, traffic volumes, and other factors. • Traffic-calming measures to slow traffic, such as speed bumps. • Adequate building sound insulation, such as sound-rated windows and doors, on a case-by-case basis as a method of reducing noise levels in interior spaces.			

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	RR-NOI-2 San Bernardino County Development Code, Construction Noise Sources. Section 83.01.080 establishes standards concerning acceptable noise levels for both noise-sensitive land uses and noise-generating land uses. It prohibits construction activities between 7:00 PM and 7:00 AM on weekdays, or at any time on Sunday or a federal holiday. **RR-NOI-3** San Bernardino County Development Code, Stationary Noise Sources. Section 83.01.080 establishes standards for stationary noise sources in Table 83-2. **RR-NOI-4** San Bernardino County Development Code Mobile Noise Sources. Section 83.01.080 establishes standards for mobile noise sources in Table 83-3 including: • Limiting construction to the daytime hours between 7 AM to 7 PM on Monday through Friday and 9 AM to 6PM on Saturday,. Construction is prohibited on Sundays. **RR-NOI-5** San Bernardino County Development Code Vibration. Section 83.01.090 prohibits vibration that can be felt without the aid of instruments or produces a particle velocity greater than or equal to two-tenths inch per second peak particle velocity (i.e., 0.20 in/sec PPV) at or beyond the lot line of the source. Exceptions are made for temporary construction,			

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	maintenance, repair, or demolition activities between 7:00 AM and 7:00 PM, except Sundays and federal holidays; and motor vehicles not under control of the industrial or commercial use **PDF NOI-1: Construction Noise Plan.** Prior to the issuance of a grading permit, the following notes be included on grading plans and building plans. Project contractors shall be required to ensure compliance with the notes and permit periodic inspection of the construction site by County staff or its designee to confirm compliance. These notes also shall be specified in bid documents issued to prospective construction contractors. 1. Construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturer's standards. Project Construction Contractors County of San Bernardino Land Use Services Department Prior to grading permit issuance 2. Construction contractors shall place all stationary construction equipment so that all emitted noise is generated toward the center of the site and away from the noise sensitive receivers nearest the Project site. Project Construction Contractors County of San Bernardino Land Use Services Department Prior to grading permit issuance 3. Construction contractors shall locate equipment staging areas on			

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	the Project site in locations that will create the greatest feasible distance between construction related noise sources and noise sensitive receivers nearest the Project site. Project Construction Contractors County of San Bernardino Land Use Services Department Prior to grading permit issuance 4. Construction contractors shall ensure that delivery trucks/haul trucks use designated truck route(s) if possible. **NOI-2: Industrial/Warehousing Operational Noise:** Construction Plans, specifications, and permits for development of Development Sites 1, 2, and 4 shall include development of the following walls that shall be completed prior to receipt of certificates of occupancy or operational permits for industrial/warehousing uses on Development Sites 1, 2, and 4: • Development Site 1: a 12-foot-tall masonry wall shall be constructed along the entire northern perimeter of Development Site 1. • Development Site 2: a 12-foot-tall masonry wall shall be constructed along the entire northern perimeter of Development Site 2, and 14-foot-high masonry walls shall be constructed along Locust Avenue and			

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	Maple Avenue to screen the truck trailer parking and loading dock areas. • Development Site 4: a 9-foot-high masonry wall shall be constructed along the perimeter of the truck trailer lot to screen the truck trailer parking lot.			
Cumulative		Less than significant	None required	Less than significant
5.13 Population and Housing				
Impact POP-1: The Project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).		Less than significant	None required	Less than significant
Impact POP-2: The Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.		Less than significant	None required	Less than significant
Cumulative		Less than significant	None required	Less than significant
5.14 Public Services				
Impact PS-1: The Project would not result in substantial adverse physical impacts associated with fire protection services or the provision of new or physically altered fire station facilities.		Less than significant	None required	Less than significant
Impact PS-2: The Project would not result in substantial adverse physical impacts associated with police services or the provision of new or physically altered police facilities.		Less than significant	None required	Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Impact PS-3: The Project would not result in substantial adverse physical impacts associated with school services or the provision of new or physically altered school facilities.		Less than significant	None required	Less than significant
Impact PS-4: The Project would not result in substantial adverse physical impacts associated with park and recreational services or the provision of new or physically altered park facilities.		Less than significant	None required	Less than significant
Impact PS-5: The Project would not result in substantial adverse physical impacts associated with other government services or the provision of new or physically altered public facilities.		Less than significant	None required	Less than significant
Cumulative		Less than significant	None required	Less than significant
5.15 Transportation				
Impact TR-1: The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.		Less than significant	None required	Less than significant
Impact TR-2: The Project would not conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).		Less than significant	None required	Less than significant
Impact TR-3: The Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).		Less than significant	None required	Less than significant
Impact TR-4: The Project would not result in inadequate emergency access.		Less than significant	None required	Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Cumulative		Less than significant	None required	Less than significant
5.16 Tribal Cultural Resources				
Impact TCR-1: The Project would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).	**RR TCR-1** Per AB 52, within 14 days of deciding to undertake a project or determining that a project application is complete, the lead agency must provide formal written notification to all tribes who have requested it. **RR TCR-2** Native American historical and cultural resources and sacred sites are protected under PRC Sections 5097.9 to 5097.991, which require that descendants be notified when Native American human remains are discovered and provide for treatment and disposition of human remains and associated grave goods. **RR CUL-5** If human remains are discovered within a project site, disturbance of the site must stop until the coroner has investigated and made recommendations for the treatment and disposition of the human remains to the person responsible for the excavation, or to his or her authorized representative. If the coroner has reason to believe the human remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. (California Health and Safety Code Section 7050.5)	Potentially significant	Mitigation Measures CUL-2 and CUL-3, listed above. **Mitigation Measure TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities** A. The Project Applicant/Developer shall retain a Native American monitor from (or approved by) the San Manuel Band of Mission Indians and the Gabrieleno Band of Mission Indians-Kizh Nation ("Tribes"). The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject Project, at all Project locations (i.e., both on-site and any off-site locations that are included in the Project description/definition and/or required in connection with the Project, such as public improvement work). "Ground-disturbing activity" includes, but is not limited to, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. Monitors from the San Manuel Band of Mission Indians and the Gabrieleno Band of Mission Indians-Kizh Nation shall provide Native America monitoring services on a rotating basis. B. The Project Applicant/Developer shall provide documentation of its retention of a Native American monitor, as provided in Mitigation Measure TCR-1, to the County Planning Department (?) prior to the earlier of the commencement of any ground-disturbing activity for the project, or the issuance of any permit necessary to commence a ground-disturbing activity. C. The Project Applicant/Developer shall provide the Tribe with a minimum of 15 days	Less than significant
Impact TCR-2: The Project would not cause a substantial adverse change in the significance of a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, that considers the significance of the resource to a California Native American tribe.		Potentially significant		Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			advance written notice of the commencement of any project ground-disturbing activity so that the Tribe has sufficient time to secure and schedule a monitor for the project. D. The Project Applicant/Developer shall hold at least one pre-construction sensitivity/educational meeting prior to the commencement of any ground-disturbing activities, where at a senior member of the Tribe(s) will inform and educate the Project's construction and managerial crew and staff members (including any Project subcontractors and consultants) about the TCR mitigation measures and compliance obligations, as well as places of significance located on the Project site (if any), the appearance of potential TCRs, and other informational and operational guidance to aid in the Project's compliance with the TCR mitigation measures. The Native American Tribe(s) shall be notified of and allowed to attend the pre-grading meeting with the County and Project construction contractors and/or monitor all Project mass grading and trenching activities. In the event that suspected tribal cultural resources are unearthed, the Native American Tribe(s) shall have the authority to redirect earth moving activities in the affected area. E. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc.,	

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			(collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Project applicant/Lead Agency upon written request. F. Native American monitoring for the Project shall conclude upon the latter of the following: (1) written confirmation from a designated Project point of contact to the Tribe representatives that all ground-disturbing activities and all phases that may involve ground-disturbing activities on the project site and at any off-site Project location are complete; or (2) written notice by the Tribe to the Project Applicant/Developer and the County Planning Department that no future, planned construction activity and/or development/construction phase (known by the Tribe at that time) at the Project site and at any off-site project location possesses the potential to impact TCRs. G. Any and all archaeological or cultural documents created as a part of the Project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the Project Applicant/Developer and the County Planning Department for dissemination to the San Manuel Band of Mission Indians and the Gabrieleno Band of Mission Indians-Kizh Nation. The County Planning Department and/or Project Applicant/Developer shall, in good faith, consult with both Tribes until all ground disturbing activities of the Project are completed. **Mitigation Measure TCR-2: Discovery of TCRs, Human Remains, and/or Grave Goods** A. Upon the discovery of a TCR, all construction activities in the immediate vicinity	

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			of the discovery (i.e., not less than the surrounding 50 feet) shall cease. The Mission Indians and Gabrieleno Band of Mission Indians-Kizh Nation and the San Manuel Band of Mission Indians Cultural Resources Department shall be contacted regarding any cultural resources discovered during construction activities and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. No Project construction activities shall resume in the surrounding 50 feet of the discovered TCR unless and until the Tribe has completed its assessment/evaluation/recovery of the discovered TCR and surveyed the surrounding area. Should the find be deemed significant, as defined by CEQA, a Cultural Resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with the Mission Indians and Gabrieleno Band of Mission Indians-Kizh Nation and San Manuel Band of Mission Indians, and all subsequent finds shall be subject to this Plan. The Project Applicant/Developer shall comply with all provisions of the Plan. The Plan shall allow for a Native American monitor to be present that represents Tribes until all ground disturbance activities occurring at the Project site, including offsite areas, are completed, should they elect to place a monitor on-site. B. The appropriate Tribe will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate in its discretion, per the Cultural Resources Monitoring and Treatment Plan, and for any purpose the Tribe deems appropriate, including but not limited to, educational, cultural and/or historic purposes.	

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			C. If Native American human remains and/or grave goods are discovered or recognized on the Project site or at any off-site project location, then all construction activities shall immediately cease within a 200' radius. Native American "human remains" are defined to include "an inhumation or cremation, and in any state of decomposition or skeletal completeness." (Pub. Res. Code § 5097.98 (d)(1).) Funerary objects, referred to as "associated grave goods," shall be treated in the same manner and with the same dignity and respect as human remains. (Pub. Res. Code § 5097.98 (a), d)(1) and (2).) D. Any discoveries of human skeletal material or human remains shall be immediately reported to the County Coroner (Health & Safety Code § 7050.5(c); 14 Cal. Code Regs. § 15064.5(e)(1)(B)), and all ground-disturbing project ground-disturbing activities on site and in any other area where the presence of human remains and/or grave goods are suspected to be present, shall immediately halt and remain halted until the coroner has determined the nature of the remains. (14 Cal. Code Regs. § 15064.5(e).) If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed. E. Thereafter, construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or grave goods, if, per the Cultural Resources Monitoring and Treatment Plan and the Tribes' discretion, resuming construction activities at that	

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			distance is acceptable and provides the Project manager express consent of that determination (along with any other mitigation measures the Tribal monitor and/or archaeologist deems necessary). (14 Cal. Code Regs. § 15064.5(f).) F. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or grave goods. G. Any historic archaeological material that is not Native American in origin (non-TCRs) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes. **Mitigation Measure TCR-3: Procedures for Burials, Funerary Remains, and Grave Goods:** A. Inadvertent Discovery of Native American Human Remains: Public Resources Code §5097.98 This code invests the NAHC with the authority to designate a Most Likely Descendant (MLD) when Native American human remains and any associated grave items are inadvertently discovered. Any discovery of human remains and/or grave goods discovered and/or recovered shall be kept confidential to prevent further disturbance. B. If the discovery of human remains includes four (4) or more burials, the discovery	

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			location shall be treated as a cemetery and a separate treatment plan shall be created. C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated "grave goods" (aka, burial goods or funerary objects) are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later, as well as other items made exclusively for burial purposes or to contain human remains. Cremations will either be removed in bulk or by means necessary to ensure complete recovery of all sacred materials. D. In the case where discovered human remains cannot be fully recovered (and documented) on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to divert the Project while keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. E. In the event preservation in place is not possible despite good faith efforts by the Project applicant/developer and/or landowner, before ground-disturbing activities may resume on the Project site, the landowner shall arrange a designated site location within the footprint of the Project for the respectful reburial of the human remains and/or ceremonial objects. The site of reburial/repatriation shall be agreed upon	

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			by the Tribe and the landowner, and shall be protected in perpetuity. F. Each occurrence of human remains and associated grave goods will be stored using opaque cloth bags. All human remains, grave goods, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items will be retained and shall be reburied within six months of recovery. G. The Tribes will work closely with the Project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.	
Cumulative		Potentially significant	Mitigation Measures CUL-2, CUL-3, and TCR-1 through TCR-3, listed above.	Less than significant
5.17 Utilities and Service Systems				
Impact UT-1: The Project would not require or result in the relocation or construction of new water facilities, the construction or relocation of which could cause significant environmental effects.		Less than significant	None required	Less than significant
Impact UT-2: The Project would have sufficient water supplies available to serve the Project and reasonably		Less than significant	None required	Less than significant

Impact	Regulatory Requirements/ Project Design Features	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
foreseeable development during normal, dry, and multiple dry years.				
Impact UT-3: The Project would not require or result in the construction of new or expanded wastewater facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects.		Less than significant	None required	Less than significant
Impact UT-4: The Project would result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments.		Less than significant	None required	Less than significant
Impact UT-5: The Project would not require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.		Less than significant	None required	Less than significant
Impact UT-6: The Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.		Less than significant	None required	Less than significant
Impact UT-7: The Project would comply with federal, state, and local statutes and regulations related to solid waste.		No impact	None required	No impact
Cumulative		Less than significant	None required	Less than significant

Chapter 3, Project Description

Pages 3-11 to 3-12, Roadway Improvements, is revised as follows:

Roadway Improvements

Jurupa Avenue

~~The Project would change the classification of Jurupa Avenue from Maple Avenue to Locust Avenue segment to Major Highway through a Policy Plan Amendment.~~ The Project would improve the north side of Jurupa Avenue to its ultimate half-width along the frontage of Sites 1 and 2. The following improvements would be installed:

- 6-foot-wide curb-adjacent sidewalk,
- Curb and gutter,
- Re-paving/widening the existing eastbound travel way, and
- Striping 25-foot-long two-way left-turn lanes, along westbound Jurupa Avenue to facilitate access to/from the driveways at Site 1 and Site 2.

Linden Avenue

~~The Project would change the classification of Linden Avenue south of the Walter Zimmerman Elementary School to Jurupa Avenue to Industrial Collector (60-foot-wide) through a Policy Plan Amendment.~~ The Project would improve the west side of Linden Avenue to its ultimate half-width along the frontage of Site 1. The following improvements would be installed:

- 6-foot-wide curb-adjacent sidewalk,
- Curb and gutter,
- Re-paving/widening the existing southbound travel way,
- Striping 25-foot-long left-turn lanes along northbound Linden Avenue, and
- Access driveways would be built along the west side of Linden Avenue, with truck and passenger vehicle access at the south driveway and passenger vehicle access at the north driveway.

Maple Avenue

~~The Project would change the classification of Maple Avenue south of Santa Ana Avenue to Jurupa Avenue to Industrial Collector (60-foot-wide) through a Policy Plan Amendment.~~ The Project would improve the street to its ultimate width along the frontage of Site 1 and Site 2. The following improvements would be installed:

- 6-foot-wide curb-adjacent sidewalk,
- Curb and gutter,
- Re-paving/widening the existing southbound travel way,
- Striping 25-foot-long left-turn lanes along northbound and southbound Maple Avenue, and
- Access driveways would be built along the east and west side of Maple Avenue, with truck and passenger vehicle access at the south driveways accessing Sites 1 and 2, passenger vehicle access on the north driveway on Site 1, and passenger vehicle and truck access at the north driveway accessing Site 2.

Locust Avenue

The Project would improve Locust Avenue to its ultimate width along the frontage of Site 2 and Site 3. The following improvements would be installed:

- 6-foot-wide curb-adjacent sidewalk,
- Curb and gutter,
- Re-paving/widening the existing eastbound travel way.

Laurel Avenue

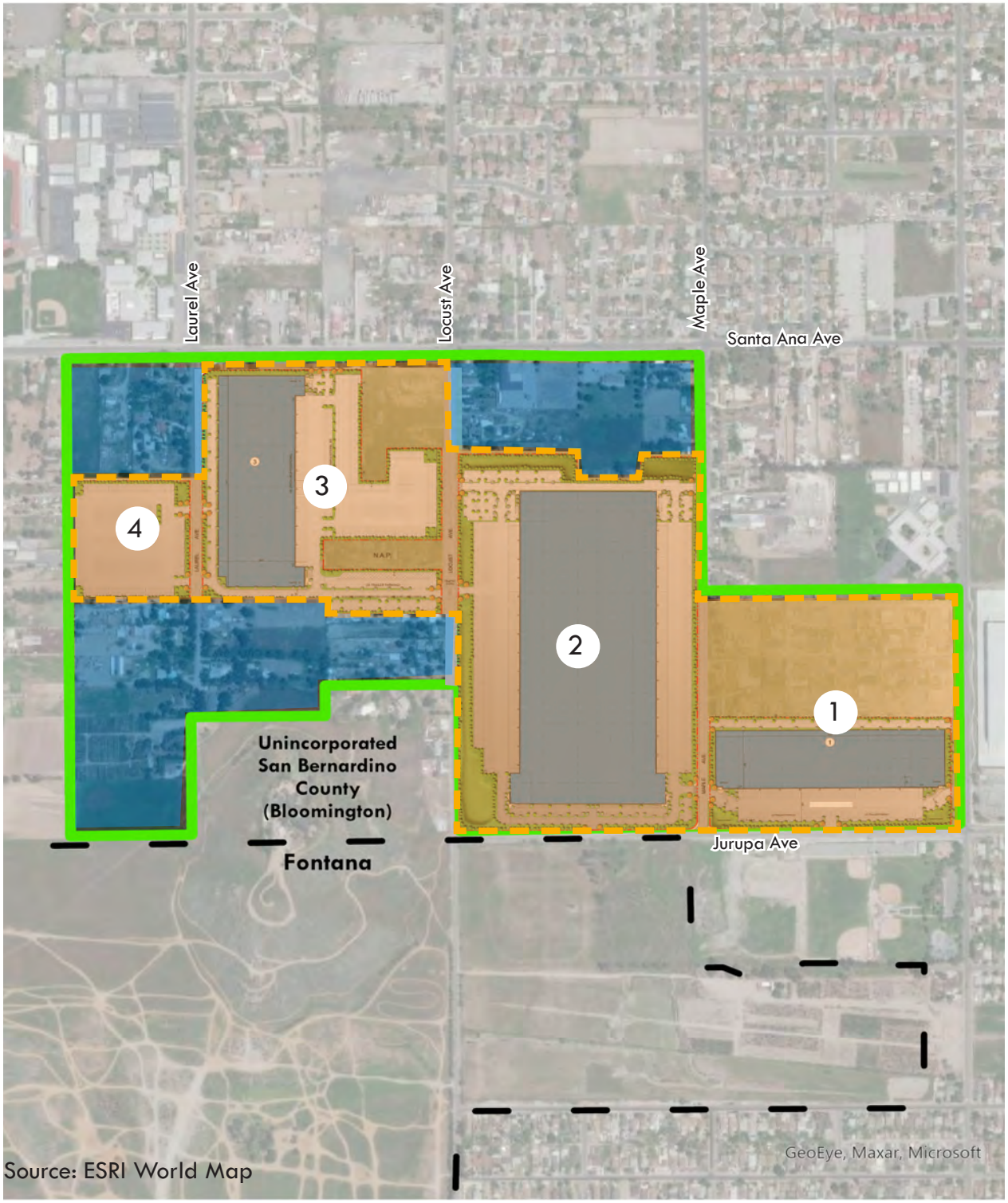
~~The Project would change the classification of Laurel Avenue south of Santa Ana Avenue to Jurupa Avenue to Industrial Collector (60-foot-wide) through a Policy Plan Amendment.~~ The Project would improve the street to its ultimate width along the frontage of Sites 3 and Site 4. The following improvements would be installed:

Table 3-8: Project Approvals/Permits, on Page 3-20, Section 3.7 Discretionary Approvals and Permits, is revised as follows:

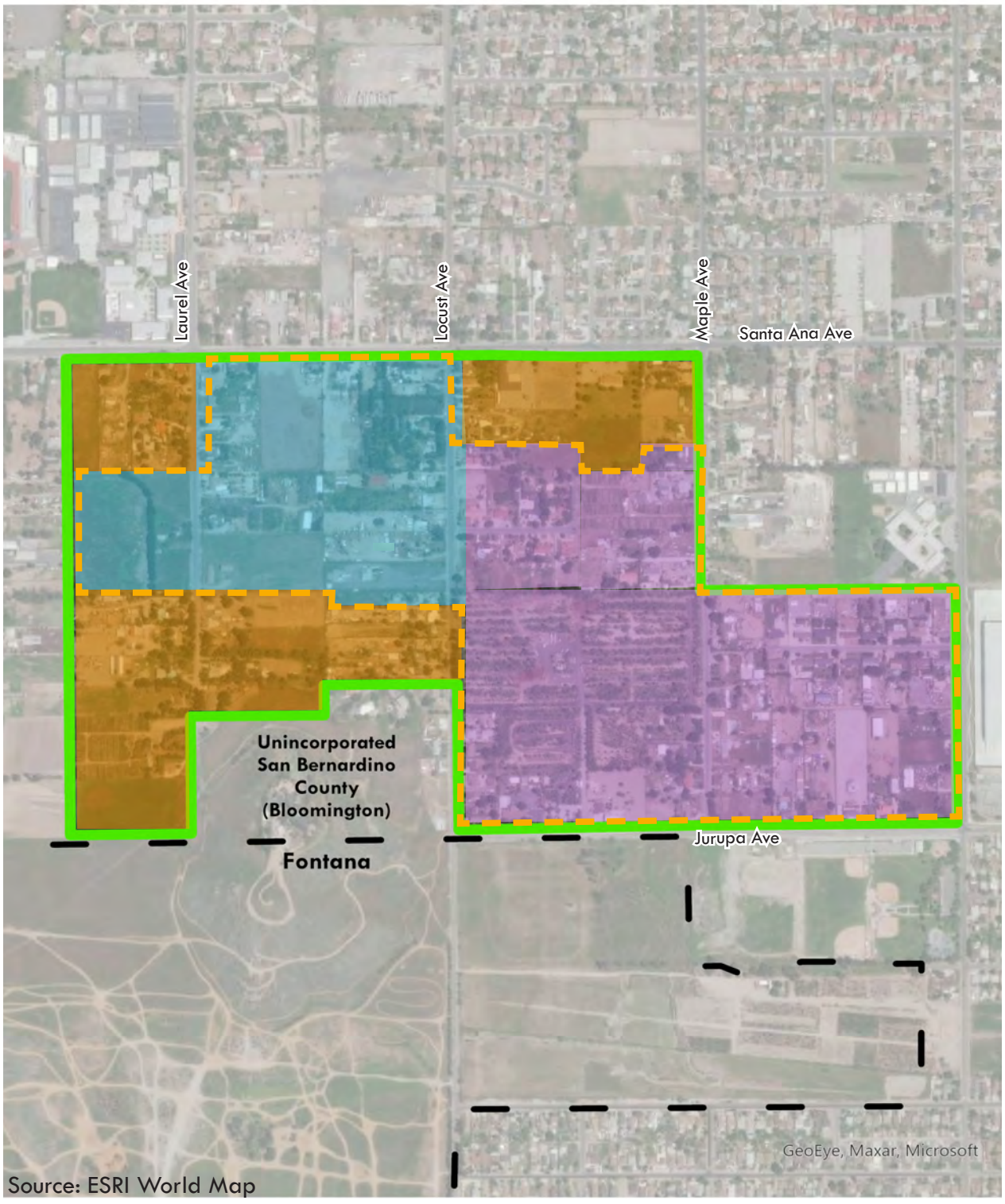
Public Agency	Approval and Decisions
Other/<u>Responsible</u> Agencies – Subsequent Approvals and Permits	
San Bernardino County Flood Control District	• Approvals for construction of storm water infrastructure and connection to municipal storm water system
West Valley Water District	• Approvals for construction of water infrastructure and connection to water distribution system
City of Rialto	• Administrative approvals for connections to off-site sewer infrastructure
Santa Ana Regional Water Quality Control Board	• Issuance of a Construction Activity General Construction Permit • Issuance of a National Pollutant Discharge Elimination System (NPDES) Permit • Approve WQMP
Southern California Edison	• Approve power pole removals and undergrounding of utilities
<u>South Coast Air Quality Management District</u>	• <u>Issuance of Permits to construct for stationary equipment</u>

Figure 3-3, Specific Plan Planning Areas, and Figure 3-25, Buildout Construction Phasing, are revised as follows:

Specific Plan Planning Areas



Buildout Construction Phasing



Section 5.1, Aesthetics

The second paragraph under Threshold AE-4, on Page 5.1-21 is revised as follows:

All development proposed within the Specific Plan Area would comply with its development standards (see Table 5.1-2, above); the San Bernardino County Development Code, which provide regulations and standards to minimize light pollution, glare, and light trespass, including Section 83.07.0530, which provides standards for glare and outdoor lighting for new development in the Valley Region; and RR AE-2, which enforces adherence with the California Building Code, including provisions of the CalGreen Building Energy Efficiency Standards related to lighting. Mandatory compliance with these regulations would ensure that developments within the Specific Plan would not cause a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

The final paragraph on Page 5.1-21 is revised as follows:

The proposed improvements in Planning Area A would include exterior security lighting throughout the sites. The lighting fixtures would be 35 feet tall and would be energy efficient, in compliance with CBC Title 24 requirements. The lights would be shielded and/or recessed so that glare and reflections are confined to each site's boundaries and directed downward and away from adjoining residential properties and public roadways. Once the final design and placement of the light sources are identified, as required by the Specific Plan, a photometric lighting plan will be prepared for each of the four development sites; the photometric lighting plan will project the illumination levels at the property lines of the surrounding light sensitive uses and public rights-of-way to ensure that the planned lighting will not exceed the five-tenths foot-candles limit at residential property lines. Once constructed and prior to the operation of each development, in accordance with Development Code Section 83.07.0530, light measurements would be conducted to confirm that measured illumination at residential property lines and rights-of-way would be less than five-tenths foot-candles. Adjustments to the lamp and/or additional shields would be installed to ensure the Project meets development standards. Therefore, light and glare impacts would be less than significant.

The final paragraph on Page 5.1-22 is revised as follows:

With respect to potential cumulative light and glare impacts, the Project would be required to comply with County of San Bernardino Development Code Section 83.07.0530, which set standards for exterior lighting/fixtures. Any development project in the cumulative study area would be required to comply with the light reduction requirements applicable in their respective jurisdiction. Although cumulative development in the Project's surrounding area is expected to introduce new sources of artificial lighting and potentially reflective materials, the required compliance with the governing development code requirements would ensure that future cumulative development does not introduce substantial sources of artificial lighting or glare. As such, the Project would not contribute to cumulatively considerable, adverse impacts to the existing daytime or nighttime views of the Project sites or their surroundings.

The third bullet on Page 5.1-23 is revised as follows:

- County Development Code Section 83.07.0530, Glare and Outdoor Light - Valley Region

Section 5.1.12 on Page 5.1-23 is revised as follows:

Impact AE-1. The Project would result in a less than significant impact to Impact AE-1. No mitigation is required.
Impact AE-2. No impact related to Impact AE-2 would occur. No mitigation is required.

Impact AE-3. The Project would result in a less than significant impact to Impact AE-3. No mitigation is required.
Impact AE-4: Upon the implementation of RR AE-2 and County Development Code Section 83.07.0530, Glare and Outdoor Light - Valley Region, Impact AE-4 would be reduced to less than significant.

Section 5.3, Air Quality

Table 5.3-2, on Page 5.3-14, is revised as follows:

Table 5.3-2: Air Quality Monitoring Summary 2017-2020~~19~~

Pollutant	Standard	Year			
		2017	2018	2019	2020
O_3					
Maximum Federal 1-Hour Concentration (ppm)		0.137	0.141	0.124	0.151
Maximum Federal 8-Hour Concentration (ppm)		0.118	0.111	0.109	0.111
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	33	38	41	56
Number of Days Exceeding State/Federal 8-Hour Standard	> 0.070 ppm	49	69	67	89
CO					
Maximum Federal 1-Hour Concentration	> 35 ppm	1.6	1.9	2.7	1.7
Maximum Federal 8-Hour Concentration	> 20 ppm	1.3	1.1	1.0	1.2
NO_2					
Maximum Federal 1-Hour Concentration	> 0.100 ppm	0.069	0.063	0.076	0.053
Annual Federal Standard Design Value		0.018	0.018	0.017	0.017
PM_{10}					
Maximum Federal 24-Hour Concentration (µg/m^3)	> 150 µg/m^3	75	64	88	61
Annual Federal Arithmetic Mean (µg/m^3)		39.3	34.1	34.8	35.8
Number of Days Exceeding Federal 24-Hour Standard	> 150 µg/m^3	0	0	0	0
Number of Days Exceeding State 24-Hour Standard	> 50 µg/m^3	7	9	12	6
$PM_{2.5}$					
Maximum Federal 24-Hour Concentration (µg/m^3)	> 35 µg/m^3	39.20	29.20	46.50	46.10
Annual Federal Arithmetic Mean (µg/m^3)	> 12 µg/m^3	12.04	11.13	10.84	11.95
Number of Days Exceeding Federal 24-Hour Standard	> 35 µg/m^3	1	0	2	1

Source: AQ, 2021 (Appendix C) and http://www.aqmd.gov/docs/default-source/air-quality/historical-data-by-year/aq2020card_final.pdf?sfvrsn=4.

Section 5.3.3, Environmental Setting, on Page 5.3-15, is revised as follows:

ENVIRONMENTAL JUSTICE

The Specific Plan area is partially located within an Environmental Justice Focus Area (EJFA) as shown in Figure 5.3-0, *Project Proximity to Environmental Justice Area.*

Table 5.3-3a: Bloomington Pollution Burden Scores by Census Tract

Census Tract	Low Income	Percentile and Quartile Rank			Scores in the Upper Quartile	
		Composite Score	Pollution Score	Population Score	Pollution Factors	Population Factors
Bloomington-Colton						
6071002601 Bloomington	Yes	71	99	36	AQ | TR | TD | CS | HZ | SW	
6071003605 Bloomington	Yes	68	51	72	AQ | DW	UE
6071003606 Bloomington	Yes	83	91	74	AQ | DW | TD | HZ	ED | POV | UE | HB
6071004001 Bloomington	Yes	86	91	68	AQ | TD | HZ	ED | UE
6071004003 Bloomington	Yes	98	97	86	AQ | DW | GW | HZ | SW	LB | ED | POV | UE | LI
6071003403 Bloomington	Yes	72	57	74	AQ	LB | ED | POV | UE
6071004004 (COL)	Yes	98	100	78	AQ | DW | TD | CS | GW | HZ | SW	LB | ED | POV | UE
6071003302 Bloomington	Yes	85	88	70	AQ | DW | TR | TD	LB | ED | LI | POV | UE
6071006601 (COL)	Yes	95	93	97	AQ | DW | TD	AS | LB | CVD | ED | LI | POV | UE

Sources: OEHHA, CalEnviroScreen, version 3, 2016.

Rankings:

Quartile 1 = Good	Quartile 2 = Moderate	Quartile 3 = Poor	Quartile 4 = Challenged

Variables in the CES model:

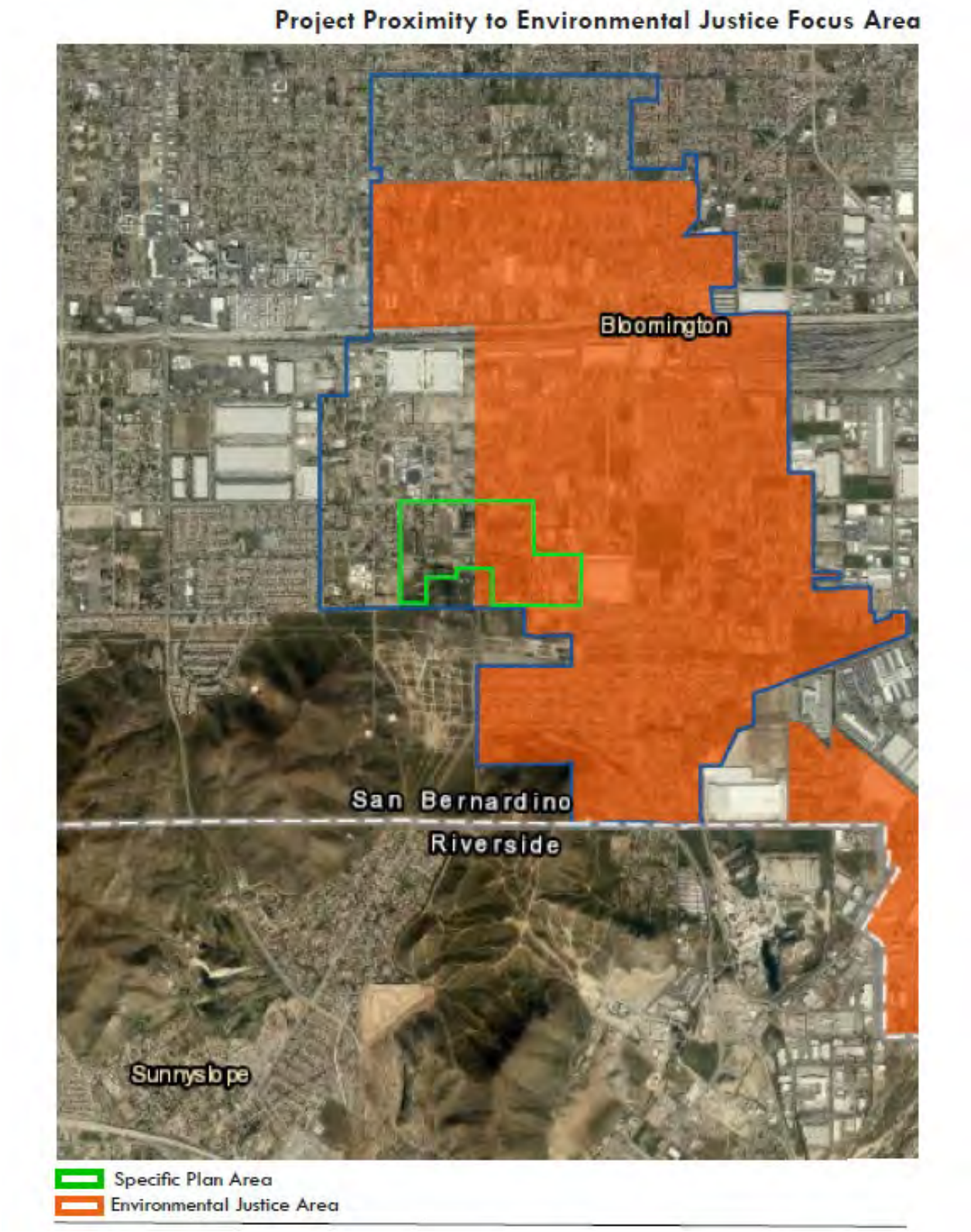
Pollution Exposure	Environmental Effects	Sensitive Population	Socioeconomic Factors
AQ = Air Quality (incl. Ozone, PM2.5, diesel PM)	CS = Toxic Cleanup Sites	AS = Asthma	LI = Linguistic Isolation
	GW: Groundwater Threats	LB = Low Birth Weight	POV = Poverty
DW = Drinking Water	HZ = Hazardous Waste	CVD = Heart Disease	UE = Unemployment
TR = Toxic Releases	IW = Impaired Waters		HB = Housing Burden
TD = Traffic Density	SW = Solid Waste Sites/Facilities		ED = Educational Attainment

As shown in Table 5.3-3a, above, the majority of census tracts in Bloomington have high composite and pollution burden scores. Whether measured by a composite, pollution, or population score, nearly all tracts measure in the upper quartile. The Project site is located in Census Tracts 6071004001 and 6071002601. Census Tract 6071004001 has a Composite Score of 86 and a Pollution Score of 91, while Census Tract 6071002601 has a Composite Score of 71 and Pollution Score of 99. Census Tract 6071004001 is located within a County EJFA. It should be noted that the Composite Score includes other environmental and socioeconomic indicators, not just air quality emissions. These indicators are: Pesticides, Toxic Releases, Traffic, Drinking Water Contaminants, Lead in Housing, Cleanups, Groundwater Threats, Hazardous Waste, Impaired Water, Solid Waste, Education, Housing Burden, Linguistic Isolation, Poverty, and Unemployment.

In terms of pollution burden, the Project site has similar levels of air pollution emissions within the EJFA and adjacent to the EJFA as shown in Table 5.3-3b, Air Pollution Setting, EJFA Comparison.

Table 5.3-3b: Air Pollution Setting, EJFA Comparison

Census Tract Number	Location	Ozone	PM 2.5	Diesel PM
6071004001 (within EJFA)	Specific Plan Area	97	91	80
6071002601	Specific Plan Area	95	94	78



Bloomington Business Park Specific Plan Project Draft EIR **Figure 5.3-0**

Text following the 4th paragraph on Page 5.3-7, Section 5.3.2.3 Regional Regulations, is revised as follows:

The Draft 2022 AQMP has been prepared by SCAQMD and has been released for public review but has not yet been finalized or adopted by either SCAQMD or CARB as of the time of this writing in September 2022. The Draft 2022 AQMP builds upon measures already in place from previous AQMPs and includes a variety of additional proposed strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emission technologies, when cost-effective and feasible, and low NOx technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard, which is the most stringent standard to date.

Paragraph 3, on Page 5.3-31, Impact AQ-1, is revised as follows:

Accordingly, the 2016 AQMP does not specifically reflect the proposed land use designation for the Specific Plan Area or Upzone Site, and buildout of these areas under the Project is consistent with the Standard LDC and would not be greater than assumed by SCAG's regional forecast projections and also the AQMP growth projections. In order to exceed the growth assumptions, the Project would have to increase the intensity of development to the degree it would result in the entire Bloomington area of the County to be reclassified as Compact LDC. As detailed in Section 5.13, *Population and Housing*, the development of up to 3,235,836 SF of industrial and business park uses by the Project would generate 2,709 jobs that would positively contribute to employment, as the current unemployment rate in the County is 7.7 percent (EDD 2021) and would be consistent with SCAG's 2020 RTP/SCS unincorporated area growth projections. The Specific Plan would contribute toward a more balanced jobs-to-housing ratio (see Draft EIR Table 5.13-5), and as such, the available labor pool in the County as well as in Bloomington would adequately meet the Specific Plan's employment demands without directly resulting in new residents or unplanned population growth. Hence, the Project would not result in conditions consistent with a Compact LDC. The area would continue to be auto oriented, not highly mixed use, and would consist of large single uses. The area would not become a highly walkable mix of retail, commercial, and various types of residential development. Therefore, the proposed Project would not result in reclassifying the Bloomington area to a Compact LDC. Therefore, the Specific Plan is consistent with the SCAQMD 2016 AQMP and would not result in an impact related to Criterion No.1.

In addition, the Project is consistent with the currently proposed Draft 2022 AQMP. As detailed previously, the proposed Draft 2022 AQMP builds upon measures already in place from previous AQMPs and includes a variety of additional proposed strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emission technologies, when cost-effective and feasible, and low NOx technologies in other applications), best management practices (BMPs), co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard. The land use and growth effects related to the proposed Draft 2022 AQMP would be consistent with those described previously related to the existing 2016 AQMP. The Project would positively contribute to employment needs and contribute toward a more balanced jobs-to-housing ratio. Also, the PDFs included in the proposed Project are consistent with the proposed Draft 2022 AQMP by implementation of BMPs, zero emission technologies, and TDM measures. Therefore, the proposed Project is also consistent with the proposed Draft 2022 AQMP and would not result in an impact related to Criterion No.1.

Paragraph 2, on Page 5.3-32, Impact AQ-2, is revised as follows:

As shown in Table 5.3-7, emissions resulting from construction would exceed criteria pollutant thresholds for VOC and NOx in all three scenarios. Thus, Mitigation Measures AQ-1 and AQ-2 are included to require the

construction activities to utilize "Super-Compliant" low VOC paints that have ~~be~~ no more than 10g/L of VOC and low VOC paints in parking lots that have no more than 50g/L of VOC, which exceeds the regulatory VOC limits put forth by SCAQMD's Rule 1113 and require that off-road diesel ~~all~~ construction equipment greater than ~~1~~50 horsepower (>~~1~~50 HP) to be CARB certified ~~t~~Tier 4 Final or higher. With implementation of Mitigation Measures AQ-1 and AQ-2, emissions of VOC and NOx from construction activities would be reduced to below the SCAQMD significance thresholds in all three scenarios, and impacts would be less than significant as shown on Table 5.3-8.

Page 5.3-57. Section 5.3.9 Project Design Features, is revised as follows:

PDF AQ-3: Project construction plans and specifications shall require on-road heavy-duty haul trucks to be model year 2010 or newer if diesel-fueled pursuant to CARB's particulate matter filter requirements.[1]

Footnote 5 on Page 5.3-57, is revised as follows:

[5] Some of the Best Practices have not been agreed to, or have been modified, when such Best Practices do not constitute feasible ~~mitigation~~ measures.

Page 5.3-58. Section 5.3.9 Project Design Features, is revised as follows:

PDF AQ-10: The Project Applicant/Developer/Tenant shall require that all heavy-duty trucks entering or operated on the project site to be zero-emission beginning in 2030, if such trucks are commercially ~~widely~~ available ~~and economically feasible~~, as reasonably determined by the County Planning Division.

PDF AQ-12: The Project Applicant/Developer/Owner shall require tenants to use zero-emission light- and medium-duty trucks as part of business operations, if such trucks are commercially ~~widely~~ available ~~and economically feasible~~, as reasonably determined by the County Planning Division.

PDF AQ-13: The Project Applicant/Developer shall construct electric truck charging infrastructure consisting of infrastructure (i.e., conduit) to support future installation of charging stations, if such trucks are commercially ~~widely~~ available ~~and economically feasible~~, as reasonably determined by the County Planning Division.

PDF AQ-15: The Project Applicant/Developer shall install all necessary infrastructure (i.e., wiring, reinforced roofs) to allow solar photovoltaic systems on the project site to be installed in the future, with a specified electrical generation capacity in order to meet California Green Building Code Standards~~, such as equal to the building's projected energy needs~~.

Page 5.3-59. Section 5.3.9 Project Design Features, is revised as follows:

PDF AQ-26: The Project Applicant/Developer/Owner shall identify a person to act as a community liaison concerning onsite construction activities and operations and provide contact information for the community liaison to the surrounding community. The contact of the community liaison shall be provided to the County Planning Division and posted on the construction site prior to issuance of a demolition permit.

PDF AQ-27: The Project Applicant/Developer/Contractor shall include a note on grading plans that prohibits grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone in the Project area. Daily Air Quality Index forecasts for the next day of grading shall be checked via the airnow.gov system the day prior by the Project Contractor.

Page 5.3-59. Section 5.3.11 Mitigation Measures, is revised as follows:

MM AQ-1: Super-Compliant Low VOC

[1] California Air Resources Board. A Guide to California's Clean Air Regulations for Heavy-Duty Diesel Vehicles.

The construction plans and specifications shall state that the Project shall utilize "Super-Compliant" low VOC paints for nonresidential interior and exterior surfaces and low VOC paint for parking lot surfaces. Super-Compliant low VOC and low VOC paints have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD's Rule 1113. Super-Compliant low VOC paints shall be no more than 10 g/L of VOC and low VOC paints shall be no more than 50 g/L of VOC.

MM AQ-2: Tier 4 Final
The construction plans and specifications shall state that off-road diesel construction equipment rated at 50 horsepower (hp) or greater, complies with Environmental Protection Agency (EPA)/California Air Resources Board (CARB) Tier 4 Final off-road emissions standards or equivalent and shall ensure that all construction equipment is tuned and maintained in accordance with the manufacturer's specifications. The Lead Agency shall conduct an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.

MM AQ-6: Electric Interior Vehicles

The Project plans and specifications for all of the industrial buildings shall include infrastructure to support use of electric-powered forklifts and/or other interior vehicles. The requirement that all on-site yard hostlers, yard equipment, forklifts, and pallet jacks shall be zero-emissions equipment, or equivalent language, shall be incorporated in all Project facility lease documents. Prior to issuance of a Certificate of Occupancy, facility owners or tenants shall provide documentation to the County of San Bernardino Planning Division and Business License Department verifying that signed lease documents incorporate the requirement that all on-site yard trucks/hostlers shall be zero-emissions equipment.

Section 5.4, Biological Resources

Impact BIO-3 on pages 5.4-21 and 5.4-22 is revised as follows.

Less than Significant with Mitigation Incorporated.

Specific Plan Area

According to the USFWS National Wetland Inventory, no wetland features have been documented within or adjacent to the Specific Plan Area. Planning Area A does not support jurisdictional resources, including wetlands, marsh, vernal pool, etc., pursuant to Section 1602 of the California Fish and Game Code as regulated by the California Department of Fish and Wildlife (CDFW), pursuant to the Porter-Cologne Act, as regulated by the Santa Ana Regional Water Quality Control Board (RWQCB) and pursuant to Sections 404/401 of the Clean Water Act as regulated by the U.S. Army Corps of Engineers (USACE) and RWQCB, respectively. Therefore, no impacts to CDFW, USACE, or RWQCB jurisdiction would occur, and mitigation is not warranted.

Based on the general biological survey (which did not include a pedestrian survey) and aerial review, undertaken for Planning Area B, Planning Area B is not expected to support jurisdictional resources pursuant to Section 1602 of the California Fish and Game Code as regulated by CDFW, pursuant to the Porter-Cologne Act, as regulated by the RWQCB or Sections 404/401 of the Clean Water Act as regulated by USACE and RWQCB, respectively. However, future developments proposed in Planning Area B should be surveyed to confirm there are no resources under USACE or RWQCB jurisdiction. Therefore, MM BIO-6~~7~~ is included to require jurisdictional assessments for projects within Planning Area B. If resources under CDFW, USACE, and/or RWQCB jurisdiction are identified, impacts should be avoided where feasible. Where

avoidance is not feasible, project-specific impacts to jurisdictional resources will be applied by federal and state regulators via applicable consulting and permitting process. The types of mitigation required may include on-site or offsite preservation, enhancement, creation, and/or restoration. With implementation of MM BIO-6~~7~~, impacts to federally protected wetlands would be less than significant.

Upzone Site

According to the USFWS National Wetland Inventory, no wetland features have been documented within or adjacent to the Upzone Site (USFWS, 2021). Future development on the Upzone Site has the potential to impact wetlands if any are located on site at the time future development occurs. Therefore, future development within the Upzone Site will need to be surveyed for jurisdictional features prior to construction, as outlined in MM BIO-6~~7~~. With incorporation of MM BIO-6~~7~~, impacts to federally protected wetlands within the Upzone Site would be less than significant.

Section 5.5, Cultural Resources

Impact CUL-2 on page 5.5-12 is revised as follows:

Future Development – Specific Plan Buildout & Upzone Site

As described previously, previously recorded prehistoric and historical archaeological sites have been identified within Project region. Therefore, the Specific Plan Area and the Upzone Site are considered sensitive to archaeological resources. The Future Development and Upzone Site have had less ground disturbance, including the large open areas along Laurel Avenue in the Specific Plan and the northwest property in the Upzone Site. Therefore, it is possible that ground-disturbing construction activities in Planning Area B and in the Upzone Site could uncover archaeological resources, and impacts are potentially significant. As such, Mitigation Measure CUL-3 requires an archaeological resources assessment for future developments in Planning Area B of the Specific Plan and Upzone Site. In the event archaeological resources are identified by the archaeological resource assessment, Mitigation Measure CUL-2 shall apply. Mitigation Measure CUL-2 requires archaeological monitoring for all developments within the Specific Plan Area and Upzone Site that would reduce potential archeological impacts to a less than significant level.

Section 5.12, Noise

The last 3 sentences of the last paragraph on Page 5.12-27, Impact NOI-1, is revised as follows:

Although construction noise impacts would be less than the 80 dBA threshold and less than significant, sensitive receptors adjacent to the Project site will be exposed to higher noise levels. To reduce construction noise on ~~impacts to~~ the residential uses adjacent to the maximum extent feasible, PDF NOI-1 would be incorporated into the Project to require construction best management practices related to noise. ~~With inclusion of PDF NOI-1, i~~ Impacts related to construction noise would be less than significant.

Paragraph 1 on Page 5.12-35, Impact NOI-1, is revised as follows:

Operation

Less than Significant ~~with Mitigation Incorporated~~

Specific Plan Area & Upzone Site

To present the potential worst-case noise conditions, this analysis assumes the proposed industrial uses would be operational 24 hours per day, seven days per week. Consistent with similar warehouse uses, the business operations of the proposed Specific Plan would primarily be conducted within the enclosed buildings, except for traffic movement, parking, as well as loading and unloading of trucks at designated loading bays. The on-site industrial use-related noise sources are expected to include: loading dock activity, trailer activity, truck movements, roof-top air conditioning units, parking lot vehicle movements, and trash enclosure activity. As described previously, the Specific Plan area is near existing residences, which are sensitive receivers. The locations of operational noise sources are shown on Figures 5.12-10 through 5.12-12.

Paragraphs 2 and 4 on Page 5.12-43, Impact NOI-1, is revised as follows:

Operational Noise Standard Compliance

Tables 5.12-8 and 5.12-9 shows the estimated Opening Year – Option 1 operational noise levels with the proposed 14-foot-high cement block walls at Site 2 and 9-foot-high cement walls at Site 4, as shown on Figure 5.12-10, and included as PDF NOI-2~~Mitigation Measure NOI-1~~. Table 5.12-8 shows that the daytime hourly noise levels at the off-site receiver locations are expected to range from 52.3 to 55.8 dBA Leq.

Table 5.12-10 shows that these operational noise levels would not exceed the County's exterior noise level standards, as adjusted to reflect the ambient noise levels at all nearby sensitive receiver locations. Thus, operational impacts related to the Opening Year – Option 1 would be less than significant with implementation of PDF NOI-2 ~~mitigation~~.

Paragraph 1 on Page 5.12-44, Impact NOI-1, is revised as follows:

Table 5.12-11 and 5.12-12 shows the estimated Opening Year – Option 2 operational noise levels with the proposed 9-foot and 14-foot-high cement block walls at sites 2 and 4, as shown on Figure 5.12-11 and included as PDF NOI-2~~Mitigation Measure NOI-1~~. Table 5.12-11 shows that the daytime hourly noise levels at the off-site receiver locations are expected to range from 47.7 to 52.9 dBA Leq.

Paragraphs 1 and 2 on Page 5.12-45, Impact NOI-1, are revised as follows:

Table 5.12-13 shows that these operational noise levels would not exceed the County's exterior noise level standards, as adjusted to reflect the ambient noise levels at all nearby sensitive receiver locations. Thus, operational impacts related to the Opening Year – Option 2 would be less than significant with implementation of PDF NOI-2~~mitigation~~.

Tables 5.12-14 and 5.12-15 shows the estimated Future Development Area - Specific Plan Buildout operational noise levels with the proposed 9-foot and 14-foot-high cement block walls at sites 2 and 4, as shown on Figure 5.12-12, and included as PDF NOI-2~~Mitigation Measure NOI-1~~. Table 5.12-14 shows that the daytime hourly noise levels at the off-site receiver locations are expected to range from 47.9 to 55.8 dBA Leq.

Paragraphs 1 and 2 on Page 5.12-46, Impact NOI-1, are revised as follows:

Table 5.12-16 shows that these operational noise levels would not exceed the County's exterior noise level standards, as adjusted to reflect the ambient noise levels at all nearby sensitive receiver locations. Thus, operational impacts related to the Future Development Area - Specific Plan Buildout would be less than significant with implementation of PDF NOI-2~~mitigation~~.

To evaluate if noise from operation of the proposed Specific Plan would result in a substantial increase in ambient noise levels, operational noise levels were combined with the existing ambient noise levels measurements at the nearby receiver locations. The difference between the combined Specific Plan operational and ambient noise levels describes the noise level increases to the existing ambient noise

environment. As indicated on Tables 5.12-17 through 5.12-22, the increase in noise would range from 0.1 to 3.0, which would not generate a significant daytime or nighttime operational noise level increase at the nearby receiver locations. Therefore, impacts would be less than significant with implementation of PDF NOI-2~~mitigation~~.

Paragraph 2 on Page 5.12-50, Impact NOI-2, is revised as follows:

Tables 5.12-26 through 5.12-28 present the expected Project related vibration levels at the nearby receiver locations. At distances ranging from 11 feet to 276 feet from construction activities (at the construction site boundaries), construction vibration levels are estimated to range from 0.002 to 0.305 in/sec PPV and would exceed the County of San Bernardino 0.2 in/sec PPV threshold for vibration at OYD1-R4 from the Opening Year – Option 1, SP-R6 from the Future Development Area - Specific Plan Buildout, and residences that are within 20 feet of construction of the Upzone Site. Therefore, Mitigation Measure NOI-1~~2~~ is included, which would require a 20-foot buffer zone that would restrict the use of large, loaded trucks, heavy mobile equipment greater than 80,000 pounds, and the use of jack hammers within 20-feet of occupied sensitive receiver locations represented by OYD1-R4, SP-R6, and those within 20-feet of the Upzone Site.

Paragraph 1 on Page 5.12-51, Impact NOI-2, is revised as follows:

As shown on Table 5.12-29 and 5.12-30, with implementation of Mitigation Measure NOI-1~~2~~, construction vibration levels would be reduced to 0.124 in/sec PPV, which would satisfy the 0.2 in/sec PPV threshold for vibration and reduce impacts to a less than significant level. Therefore, loaded trucks and all heavy mobile equipment greater than 80,000 pounds, and jack hammers are prohibited from use during construction activities within 20 feet of noise sensitive uses. Instead, small rubber-tired or alternative equipment, as well as soil compaction equipment shall be used during construction. Impacts related to construction vibration would be less than significant with mitigation.

Page 5.12-54, Section 5.12.9 Project Design Features, is revised as follows:

PDF NOI-1: Construction Noise Plan. Prior to the issuance of a grading permit, the following notes be included on grading plans and building plans. Project contractors shall be required to ensure compliance with the notes and permit periodic inspection of the construction site by County staff or its designee to confirm compliance. These notes also shall be specified in bid documents issued to prospective construction contractors.

1. Construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturer's standards. ~~Project Construction Contractors County of San Bernardino Land Use Services Department Prior to grading permit issuance~~
2. Construction contractors shall place all stationary construction equipment so that all emitted noise is generated toward the center of the site and away from the noise sensitive receivers nearest the Project site. ~~Project Construction Contractors County of San Bernardino Land Use Services Department Prior to grading permit issuance~~
3. Construction contractors shall locate equipment staging areas on the Project site in locations that will create the greatest feasible distance between construction related noise sources and noise sensitive receivers nearest the Project site. ~~Project Construction Contractors County of San Bernardino Land Use Services Department Prior to grading permit issuance~~
4. Construction contractors shall ensure that delivery trucks/haul trucks use designated truck route(s) if possible.

PDF NOI-2: Industrial/Warehousing Operational Noise: Construction Plans, specifications, and permits for development of Development Sites 1, 2, and 4 shall include development of the following walls that shall be completed prior to receipt of certificates of occupancy or operational permits for industrial/warehousing uses on Development Sites 1, 2, and 4:

- Development Site 1: a 12-foot-tall masonry wall shall be constructed along the entire northern perimeter of Development Site 1.
- Development Site 2: a 12-foot-tall masonry wall shall be constructed along the entire northern perimeter of Development Site 2, and 14-foot-high masonry walls shall be constructed along Locust Avenue and Maple Avenue to screen the truck trailer parking and loading dock areas.
- Development Site 4: a 9-foot-high masonry wall shall be constructed along the perimeter of the truck trailer lot to screen the truck trailer parking lot.

Page 5.12-55, Section 5.12.10 Level of Significance Before Mitigation, is revised as follows:

No impact related to Impact NOI-3 would occur from implementation of the Project. Impact NOI-1 would be less than significant with incorporation of PDF NOI-1 and PDF NOI-2. Without mitigation, Impact~~s NOI-1 and~~ NOI-2 would be **potentially significant.**

Page 5.12-55, Section 5.12.11 Mitigation Measures, is revised as follows:

~~**Mitigation Measure NOI-1: Industrial/Warehousing Operational Noise:** Construction Plans, specifications, and permits for development of Development Sites 2 and 4 shall include development of the following walls that shall be completed prior to receipt of certificates of occupancy or operational permits for industrial/warehousing uses on Development Sites 2 and 4:~~

- ~~Development Site 2: a 12-foot-tall masonry wall shall be constructed along the entire northern perimeter of Development Site 2, and 14-foot-high masonry walls shall be constructed along Locust Avenue and Maple Avenue to screen the truck trailer parking and loading dock areas.~~
- ~~Development Site 4: a 9-foot-high masonry wall shall be constructed along the perimeter of the truck trailer lot to screen the truck trailer parking lot.~~

Mitigation Measure NOI-1~~2~~: Construction Vibration: Construction Plans, specifications, and permits for construction activities within the Specific Plan area and Upzone Site shall specify that large, loaded trucks, heavy mobile equipment greater than 80,000 pounds, and the use of jack hammers and soil compaction equipment are not to be used within 20-feet of occupied sensitive receiver locations. Construction activities within 20 feet of noise sensitive uses shall utilize small rubber-tired or alternative equipment to reduce construction related vibration below the County's threshold of 0.2 in/sec PPV at sensitive receiver locations.

Section 5.13, Population and Housing

Paragraph 4, on Page 5.13-8, Impact POP-1, is revised as follows:

Construction. Construction of either the proposed Opening Year Development – Option 1 or Opening Year Development – Option 2 would result in a temporary increased demand for construction workers. This Draft EIR assumes that construction of both phases (all four development sites) would commence concurrently in the fourth quarter of 2021, and the proposed development would be in operation by the fourth quarter of 2022. Based on the CalEEMod run for the proposed Opening Year Development – Option 1, c~~C~~onstruction could require up to 1,294 construction workers during this 12-month period (Appendix C4). Development of Planning Area B would require fewer construction workers than that for Planning Area A as less overall building square footage would be allowed in Planning Area B. Workers are anticipated to come from the surrounding jurisdictions and commute daily to the jobsite. Although it is possible that the demand for workers could induce some people to move to the region, this consideration would be de minimis, relative to the total number of construction workers in the region. According to the U.S. Census Bureau, 68,852 individuals are

employed in the construction industry in San Bernardino County. The supply of general construction labor in the vicinity of the Specific Plan Area is not expected to be constrained due to the current 7.7 percent unemployment rate in the County and the temporary nature of construction projects (EDD, 2021). As such, the existing labor pool could meet the construction needs of the Specific Plan, and this labor pool would increase with the continued projected growth of Bloomington and the Valley Region. Therefore, implementation of the Specific Plan would not induce substantial unplanned population growth directly or indirectly through construction employment that could cause substantial adverse physical changes in the environment. Impacts would be less than significant.

Paragraph 2, on Page 5.13-8, Impact POP-1, is revised as follows:

Based on the proposed building square footages, the Opening Year Development – Option 1 would generate 1,769 jobs and the Opening Year Development – Option 2 would generate 2,270 jobs. Based on Tables 5.13-1 and 5.13-5, the workforce demand of up to 2,270 employees could be filled by persons residing in unincorporated County, including from Bloomington, and the surrounding areas. Additionally, the immediate availability in the labor pool in the vicinity of the Specific Plan Area is not expected to be constrained due to the current 7.7 percent unemployment rate in the County, which equates to approximately 75,700 unemployed individuals (EDD, 2021). Overall, buildout of the entire Specific Plan based on the allowed FAR would result in the need for approximately 2,709 jobs, which would represent approximately 19 percent of the employment growth in unincorporated San Bernardino County (SCAG, 2020). Furthermore, should the entire projected employment requirement for the proposed Project be filled by individuals relocating to unincorporated San Bernardino County, the projected population increase would represent 6 percent of the projected population growth by 2045 (SCAG, 2020). As such, both the estimated job increase, and potential population increase would be within the projected growth for the region.

Section 5.14, Public Services

Paragraph 1, on Page 5.14-9, Impact PS-2, is revised as follows:

Impacts to police services are considered significant if Project implementation would result in inadequate staffing levels, response times, and/or increased demand for services that would require the construction of new or expansion of existing sheriff~~policies~~ facilities.

Section 5.15, Transportation

Second to Last Paragraph, on Page 5.15-4, Section 5.15.5, Methodology, is revised as follows:

SB 743 requires the California Governor's Office of Planning and Research to amend the State CEQA Guidelines to provide an alternative to LOS as the metric for evaluating transportation impacts under CEQA. Particularly within areas served by transit, SB 743 requires the alternative criteria to promote the reduction of greenhouse gas emissions, development of multimodal transportation networks, and diversity of land uses. The alternative metric for transportation impacts detailed in the State CEQA Guidelines is VMT. Jurisdictions had until July 1, 2020, to adopt and begin implementing VMT thresholds for traffic analysis. As outlined in State CEQA Guidelines Section 15064.3, except as provided for roadway capacity transportation projects, a project's effect on automobile delay shall not constitute a significant environmental impact. Therefore, in order to comply with CEQA Guidelines Section 15064.3, impacts associated with automobile delay are not analyzed in this Draft EIR. ~~However, based upon various San Bernardino Countywide Plan policies which address levels of service (LOS), in Section 5.11, the Land Use and Planning impacts section of this EIR, there is discussion of the Project's consistency with these Countywide Plan policies.~~

Appendix C1, Air Quality Impact Analysis

Paragraph 2, on Page 3, in Section ES.3.1 Construction Source MMs, is revised as follows:

The Project construction-source emissions have the potential to exceed SCAQMD regional thresholds for Volatile Organic Compounds (VOCs) and nitrogen oxides (NOX) emissions prior to mitigation. Mitigation Measure (MM) AQ-1 is designed to reduce Project construction-source VOCs and MM AQ-2 is designed to reduce construction source NOX. After application of MM AQ-1 and MM AQ-2, Project construction-source emissions will not exceed SCAQMD regional thresholds for VOC or NOX emissions. Thus, the Project would result in a less than significant impact associated with construction activities.

Chapter 4. Mitigation Monitoring and Reporting Program

4.1 Introduction

The California Environmental Quality Act (CEQA) requires a lead or public agency that approves or carries out a project for which an Environmental Impact Report has been certified which identifies one or more significant adverse environmental effects and where findings with respect to changes or alterations in the project have been made, to adopt a "…reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment" (CEQA, Public Resources Code Sections 21081, 21081.6).

A Mitigation Monitoring and Reporting Program (MMRP) is required to ensure that adopted mitigation measures are successfully implemented for the Bloomington Business Park Project (Project). The County of San Bernadino is the Lead Agency for the Project and is responsible for implementation of the MMRP. This report describes the MMRP for the Project and identifies the parties that will be responsible for monitoring implementation of the individual mitigation measures in the MMRP.

4.2 Mitigation Monitoring and Reporting Program

The MMRP for the Project will be active through all phases of the Project, including design, construction, and operation. The attached table identifies the mitigation program required to be implemented by the County for the Bloomington Business Park Specific Plan Project. The table identifies the Project Design Features; Regulatory Requirements (RRs); and mitigation measures required by the Count to mitigate or avoid significant adverse impacts associated with the implementation of the Project, the timing of implementation, and the responsible party or parties for monitoring compliance.

The MMRP also includes a column that will be used by the compliance monitor (individual responsible for monitoring compliance) to document when implementation of the measure is completed. As individual Plan, Program, Policies; and mitigation measures are completed, the compliance monitor will sign and date the MMRP, indicating that the required actions have been completed.

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TABLE 4-1: MITIGATION MONITORING AND REPORTING PROGRAM
THE BLLOMINGTON BUSINESS PARK SPECIFIC PLAN PROJECT EIR

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
AESTHETICS			
RR AE-2: The following measure shall be incorporated into construction plans and specifications: The County shall enforce adherence with the California Building Code, including provisions of the Building Energy Efficiency Standards related to lighting.	In Construction Plans and Specifications. Prior to Building Permits.	County of San Bernadino Building and Safety Division	
AIR QUALITY			
RR AIR-1: New buildings are required to achieve the current California Building Energy and Efficiency Standards (Title 24, Part 6) and California Green Building Standards Code (CALGreen) (Title 24, Part 11).	In Construction Plans and Specifications. Prior to Building Permits	County of San Bernardino Building and Safety Division	
RR AIR- 2: Construction activities are required to adhere to Title 13 California Code of Regulations (CCR) Section 2499, which requires that nonessential idling of construction equipment is restricted to five minutes or less.	In Construction Plans and Specifications. Prior to Demolition Permits.	County of San Bernadino Building and Safety Division	
RR AIR-3: Construction activities in the South Coast Air Basin (SoCAB) will be conducted in compliance with any applicable South Coast Air Quality Management District (SCAQMD) rules and regulations, including but not limited to: • Rules 201, 203, and 219, which regulate permits for installation and use of equipment that may generate air contaminants. • Rule 402, Nuisance, which states that a project shall not "discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property." Additionally, Rule 415, Odors from Rendering Facilities, requires nuisance odor at rending facilities be controlled.	In Construction Plans and Specifications. Prior to Demolition Permits	County of San Bernadino Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
• Rule 403, Fugitive Dust, for controlling fugitive dust and avoiding nuisance. • Rule 1113, which limits the volatile organic compound content of architectural coatings. • Rule 1186, for controlling fugitive dust from vehicular travel on paved and unpaved roads. • Rule 1403, for minimizing asbestos emissions during building demolition. • Regulation IX, Standards of Performance for New Stationary Sources (NSPS), and XXIII, New Source Review. • Regulation XI, Source Specific Standards. • Regulation XX, Regional Clean Air Incentives Market (RECLAIM). Regulation XVI, Mobile Source Offset Programs, and Regulation XXII, Mobile Source Emissions Reduction Programs (Rule 2202).			
PDF AQ-1: The Project Applicant/Developer/Operator shall post both interior and exterior facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, SCAQMD, and the building manager.	In Construction Plans and Operational Specifications. Prior to Certificates of Occupancy.	County of San Bernadino Building and Safety Division	
PDF AQ-2: During Project grading operations, Project contractors shall limit the amount of daily grading disturbance area to not exceed the assumptions specified in the Draft EIR Air Quality Impact Analysis.	In Construction Plans and Specifications. Prior to Grading Permits.	County of San Bernadino Building and Safety Division	
PDF AQ-3: Project construction plans and specifications shall require on-road heavy-duty haul trucks to be model year 2010 or newer if diesel-fueled, if such equipment is widely available and economically feasible, pursuant to CARB's particulate matter filter requirements.	In Construction Plans and Specifications. Prior to Demolition Permits.	County of San Bernadino Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
PDF AQ-4: The Project shall provide electrical hook ups to the power grid, rather than use diesel-fueled generators, for electric construction tools, such as saws, drills and compressors, and shall use electric tools whenever feasible.	In Construction Plans and Specifications. Prior to Demolition Permits.	County of San Bernadino Building and Safety Division	
PDF AQ-5: The construction plans and specifications shall prohibit off-road diesel-powered construction equipment from being in the "on" position for more than 10 hours per day during Project construction.	In Construction Plans and Specifications. Prior to Demolition Permits.	County of San Bernadino Building and Safety Division	
PDF AQ-6: During Project construction, the Project contractors shall keep all equipment maintenance records and data sheets, including design specifications and emission control tier classifications, onsite or at the contractor's office and shall furnish documents to the Lead Agency or other regulators, upon request.	In Construction Plans and Specifications. Prior to Demolition Permits.	County of San Bernadino Building and Safety Division	
PDF AQ-7: The Project Applicant/Developer shall provide information on transit and ridesharing programs and services to construction employees.	In Construction Plans and Specifications. Prior to Demolition Permits.	County of San Bernadino Building and Safety Division.	
PDF AQ-8: The Project Applicant/Developer shall provide meal options onsite or shuttles between the construction site and nearby meal destinations for construction employees.	In Construction Plans and Specifications. Prior to Demolition Permits.	County of San Bernadino Building and Safety Division	
PDF AQ-9: The Project Applicant/Developer/Tenant shall require that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2010 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators which own vehicles subject to Section 2025 shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and state upon request.	Prior to Certificates of Occupancy	County of San Bernadino Building and Safety Division	
PDF AQ-10: The Project Applicant/Developer/Tenant shall require that all heavy-duty trucks entering or operated on the project site to be zero-emission beginning in 2030, if such trucks are commercially available, as reasonably determined by the County Planning Division.	Prior to Certificates of Occupancy	County of San Bernadino Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
PDF AQ-11: The Project Applicant/Developer/Tenant shall require all on-site equipment, such as forklifts and yard trucks, to be electric, propane or natural gas with the necessary electrical charging stations provided.	Prior to Certificates of Occupancy	County of San Bernadino Building and Safety Division	
PDF AQ-12: The Project Applicant/Developer/Owner shall require tenants to use zero-emission light- and medium-duty trucks as part of business operations, if such trucks are commercially available, as reasonably determined by the County Planning Division.	Prior to Certificates of Occupancy	County of San Bernadino Building and Safety Division	
PDF AQ-13: The Project Applicant/Developer shall construct electric truck charging infrastructure consisting of infrastructure (i.e., conduit) to support future installation of charging stations, when such trucks are commercially available, as reasonably determined by the County Planning Division.	In Construction Plans and Specifications. Prior to Building Permits	County of San Bernadino Building and Safety Division	
PDF AQ-14: The Project Applicant/Developer shall construct electric light-duty truck charging infrastructure consisting of infrastructure (i.e., conduit) proportional, i.e., conduit for one charging station for every five light-duty truck parking spaces at the Project.	In Construction Plans and Specifications. Prior to Building Permits	County of San Bernadino Building and Safety Division	
PDF AQ-15: The Project Applicant/Developer shall install all necessary infrastructure (i.e., wiring, reinforced roofs) to allow solar photovoltaic systems on the project site to be installed in the future, with a specified electrical generation capacity in order to meet California Green Building Code Standards.	In Construction Plans and Specifications. Prior to Building Permits	County of San Bernadino Building and Safety Division	
PDF AQ-16: The Project Applicant/Developer/Owner shall require all stand-by emergency generators to be powered by a non-diesel fuel.	In Construction Plans and Specifications. Prior to Building Permits	County of San Bernadino Building and Safety Division	
PDF AQ-17: The Project owner shall require facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.	Prior to Certificates of Occupancy	County of San Bernadino Building and Safety Division	
PDF AQ-18: The Project owner shall require operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.	Prior to Certificates of Occupancy	County of San Bernadino Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
PDF AQ-19: The Project shall meet CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.	In Construction Plans and Specifications. Prior to Building Permits	County of San Bernadino Building and Safety Division	
PDF AQ-20: The Project will achieve certification of compliance or demonstrate equivalency with LEED green building standards.	In Construction Plans and Specifications. Prior to Building Permits	County of San Bernadino Building and Safety Division	
PDF AQ-21: The Project Owner/Tenant shall provide meal options onsite or shuttles between the facility and nearby meal destinations.	Prior to Certificates of Occupancy	County of San Bernadino Building and Safety Division	
PDF AQ-22: The Project Applicant/Developer/Owner shall post signs at every truck exit driveway providing directional information to the truck route.	Prior to Certificates of Occupancy	County of San Bernadino Building and Safety Division	
PDF AQ-23: The Project Applicant/Developer/Owner shall require that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also, if the tenant/facility operator owns its own fleet of vehicles, subject to 13 California Code of Regulations section 2025, require such tenants/facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.	During Operations.	County of San Bernadino Building and Safety Division	
PDF AQ-24: The Project Applicant/Developer/Owner shall encourage tenants to enroll in the United States Environmental Protection Agency's SmartWay program and encourage tenants to use carriers that are SmartWay carriers.	Prior to Certificate of Occupancy	County of San Bernadino Building and Safety Division	
PDF AQ-25: The Project Applicant/Developer/Owner shall provide tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.	Prior to Certificate of Occupancy	County of San Bernadino Building and Safety Division	
PDF AQ-26: The Project Applicant/Developer/Owner shall identify a person to act as a community liaison concerning onsite construction activities and operations and provide contact information for the community liaison to the surrounding community. The contact of the community liaison shall be provided to the County Planning Division and posted on the construction site prior to issuance of a demolition permit.	In Construction Plans and Specifications. Prior to Grading Permits	County of San Bernadino Planning Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
PDF AQ-27: The Project Applicant/Developer/Contractor shall include a note on grading plans that prohibits grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone in the Project area. Daily Air Quality Index forecasts for the next day of grading shall be checked via the airnow.gov system the day prior by the Project Contractor.	In Construction Plans and Specifications. Prior to Grading Permits	County of San Bernadino Building and Safety Division	
MM AQ-1: Super-Compliant Low VOC. The construction plans and specifications shall state that the Project shall utilize "Super-Compliant" low VOC paints for nonresidential interior and exterior surfaces and low VOC paint for parking lot surfaces. Super-Compliant low VOC and low VOC paints have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD's Rule 1113. Super-Compliant low VOC paints shall be no more than 10g/L of VOC and low VOC paints shall be no more than 50 g/L of VOC.	In Construction Plans and Specifications. Prior to Building Permits.	County of San Bernadino Building and Safety Division	
MM AQ-2: Tier 4 Final. The construction plans and specifications shall state that off-road diesel construction equipment rated at 50 horsepower (hp) or greater, complies with Environmental Protection Agency (EPA)/California Air Resources Board (CARB) Tier 4 Final off-road emissions standards or equivalent and shall ensure that all construction equipment is tuned and maintained in accordance with the manufacturer's specifications. The Lead Agency shall conduct an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further.	In Construction Plans and Specifications. Prior to Demolition Permits	County of San Bernadino Building and Safety Division	
MM AQ-3: Idling Regulations. The Project plans and specifications shall include signs at loading dock facilities that include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for trucks drivers to restrict idling to no more than 5 minutes once the vehicle is stopped, the transmission is set to "neutral" or "park", and the parking brake is engaged pursuant to Title 13 of the California Code of Regulations, Section 2485; and 3) telephone numbers of the building facilities manager and CARB to report violations. Signs shall be installed prior to receipt of an occupancy permit.	In Construction Plans and Specifications. Prior to Certificates of Occupancy	County of San Bernadino Building and Safety Division	
MM AQ-4: Energy Efficient Vendor Trucks. The Project plans and specifications shall include requirements (by contract specifications) that vendor trucks for the industrial buildings include energy efficiency	In Operational Specifications. Prior to	County of San Bernadino Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
improvement features through the Carl Moyer Program—including truck modernization, retrofits, and/or aerodynamic kits and low rolling resistance tires—to reduce fuel consumption.	Certificates of Occupancy		
MM AQ-5: Electric Vehicle Charging Stations and Carpool Parking. The Project plans and specifications for the industrial buildings shall include electric vehicle charging stations and a minimum of 5 carpool parking spaces at each building for employees and the public to use.	In Construction Plans and Specifications. Prior to Building Permit	County of San Bernadino Building and Safety Division	
MM AQ-6: Electric Interior Vehicles. The Project plans and specifications for all of the industrial buildings shall include infrastructure to support use of electric-powered forklifts and/or other interior vehicles. The requirement that all on-site yard hostlers, yard equipment, forklifts, and pallet jacks shall be zero-emissions equipment, or equivalent language, shall be incorporated in all Project facility lease documents. Prior to issuance of a Certificate of Occupancy, facility owners or tenants shall provide documentation to the County of San Bernardino Planning Division and Business License Department verifying that signed lease documents incorporate the requirement that all on-site yard trucks/hostlers shall be zero-emissions equipment.	In Construction Plans and Specifications. Prior to Building Permit	County of San Bernadino Building and Safety Division	
MM AQ-7: Transportation Management. The Project plans and specifications for the industrial buildings shall require that a Transportation Management Association (TMA) or similar mechanism shall be established by the Project to encourage and coordinate carpooling. The TMA shall advertise its services to the building occupants. The TMA shall offer transit incentives to employees and shall provide shuttle service to and from public transit, should a minimum of 5 employees request and use such service from a transit stop at the same dropoff and/or pickup time. The TMA shall distribute public transportation information to its employees. The TMA shall provide electronic message board space for coordination rides.	Prior to Certificates of Occupancy.	County of San Bernadino Building and Safety Division	
BIOLOGICAL RESOURCES			
MM BIO-1: Rare Plants. Future projects proposed within the Specific Plan Area & Upzone Site (excluding Opening Year Development—Options 1 and 2 and offsite infrastructure areas) shall be surveyed to determine if any rare plant species have the potential to occur. If suitable habitat is present, a qualified biologist shall survey for sensitive plants during the appropriate time of year (i.e., when the species is readily identifiable, such as during its	In Construction Plans and Specifications. Prior to Demolition Permits	County of San Bernadino Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
blooming period) prior to initiating construction activities in a given area. The focused surveys shall be conducted in accordance with published agency guidelines (CDFW 2009, CDFW 2000, USFWS 2000). If rare plants are identified and cannot be avoided, the project-level biological survey report would justify why species-specific mitigation is necessary and propose mitigation to reduce project impacts to a less than significant level.			
MM BIO-2: Burrowing Owl. Prior to commencement of construction activities (i.e., demolition, earthwork, clearing, and grubbing), habitat assessments to determine whether suitable burrows are present as defined by the *Staff Report on Burrowing Owl Mitigation* (CDFG 2012) shall be conducted within future projects proposed within the Specific Plan Area & Upzone Site (excluding Opening Year Development—Options 1 and 2 and offsite infrastructure areas). The assessment shall also include a 500-foot (150-meter) buffer around proposed development footprints. If suitable burrows are identified, focused surveys shall be conducted by a qualified biologist during the breeding season in accordance with the most recent CDFW guidelines. Take avoidance surveys shall be conducted within all areas of the Specific Plan Area & Upzone Site (including Opening Year Development—Options 1 and 2 and offsite infrastructure areas). The take avoidance surveys shall be conducted within 14 days and repeated 24 hours prior to construction activities (i.e., demolition, earthwork, clearing, and grubbing) to determine presence of burrowing owl (BUOW). If take avoidance surveys are negative and BUOW is confirmed absent, then ground-disturbing activities shall be allowed to commence, and no further mitigation would be required. If BUOW is observed during focused surveys and/or take avoidance surveys within any portion of the Study Area (including Opening Year Development—Options 1 and 2 and offsite infrastructure areas), active burrows shall be avoided by the project in accordance with the CDFW's Staff Report (CDFG 2012). The County shall be immediately informed of any BUOW observations. The Project applicant/developer shall consult with the County to	In Construction Plans and Specifications. Prior to Demolition Permits.	County of San Bernadino Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
determine how to mitigate the impacts to any active burrows. If the County determines that active relocation is required, a BUOW Protection and Relocation Plan (plan) shall be prepared by a qualified biologist, which must be sent for approval by CDFW prior to initiating ground disturbance. The plan shall detail avoidance measures that shall be implemented during construction and passive or active relocation methodology. Relocation shall only occur between September 1 through January 31, outside of the breeding season.			
MM BIO-3: Sensitive Bat Species. Prior to commencement of construction activities, habitat assessments for sensitive bat species shall be conducted for all future projects proposed within the Specific Plan Area & Upzone Site (excluding Opening Year Development—Options 1 and 2 and offsite infrastructure areas). The following avoidance and minimization measures shall be implemented within all areas of the Specific Plan Area & Upzone Site that support suitable habitat for sensitive bat species. These measures shall also be implemented for Opening Year Development— Options 1 and 2 and offsite infrastructure areas since suitable habitat was identified. 1. Construction activities (i.e., earthwork, clearing, grubbing, etc.) shall occur from September 1 through March 31 and outside the bat maternity roosting season to the extent possible. 2. If construction activities are proposed within the bat maternity roosting season (April 1 through August 31), a qualified biologist experienced with bats shall conduct a pre-construction survey within all suitable habitat. The pre-construction survey shall be conducted 30 days prior to commencing construction/demolition activities and shall consist of two separate surveys conducted no more than a week apart. The second and final survey should be conducted no more than seven days prior to commencing construction/demolition activities. The pre-construction surveys should be conducted using a detector for echolocation calls, such as an Anabat bat detector system. The results of the pre-construction survey shall be documented by the qualified biologist.	In Construction Plans and Specifications. Prior to Demolition Permits.	County of San Bernadino Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
If the qualified biologist determines that no sensitive bat maternity roosts are present, the construction activities shall be allowed to proceed without any further requirements. If the qualified biologist determines that sensitive bat maternity roosts are present, the following avoidance and minimization measures shall be implemented: A. No construction activities may occur within 300 feet of any sensitive bat maternity roosts. A qualified biologist shall clearly delineate any bat maternity roosts and any required avoidance buffers, which shall be clearly marked with flags and/or fencing prior to the initiation of construction activities. If construction activities are proposed within 300 feet of a sensitive bat maternity roost, a biological monitor shall be required to observe the behavior of any roosting bats. The construction supervisor shall be notified if the construction activities appear to be altering the bats' normal roosting behavior. No construction activities will be allowed within 300 feet of bat maternity roosts until the additional minimization measures are taken, as determined by the biological monitor in coordination with the County. The biological monitor shall prepare written documentation of all monitoring activities and any additional minimization measures that were taken, which shall be submitted to the County at the completion of construction activities.			
MM BIO-4: Sensitive Animals. Future projects proposed within the Specific Plan Area & Upzone Site (excluding Opening Year Development—Options 1 and 2 and offsite infrastructure areas) shall be surveyed for any other sensitive animal species that may be present. The project-level biological survey report shall analyze these projects' impacts on sensitive animal species and shall propose mitigation to reduce project impacts to a less than significant level.	In Construction Plans and Specifications. Prior to Demolition Permits.	County of San Bernadino Building and Safety Division	
MM BIO-5: Sensitive Vegetation Communities. Future projects proposed within the Specific Plan Area & Upzone Site (excluding Opening Year Development—Options 1 and 2 and offsite infrastructure areas) shall be	In Construction Plans and Specifications. Prior to Demolition Permits.	County of San Bernadino Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
surveyed for sensitive vegetation communities as defined by CDFW. Impacts to sensitive vegetation communities shall first be avoided. Where avoidance is not feasible, sensitive vegetation communities shall be mitigated through habitat acquisition/preservation, restoration, and/or creation.			
MM BIO-6: Jurisdictional Resources. A jurisdictional assessment shall be conducted for future projects proposed within the Specific Plan Area & Upzone Site (excluding Opening Year Development—Options 1 and 2 and offsite infrastructure areas). Jurisdictional resources shall be avoided when feasible. Where avoidance is not feasible, project-specific impacts to jurisdictional resources shall be addressed and mitigated by federal and state regulators via applicable consulting and permitting process. The types of mitigation required may include onsite or offsite preservation, enhancement, creation, and/or restoration. Mitigation is typically required at a 1:1 ratio or higher and to be accomplished in close proximity to the impacts or at least in the same watershed. Final requirements and locations are, however, subject to change during applicable consultation/permit processes required by the USACE, RWQCB, and CDFW. Best Management Practices (BMPs) to minimize and avoid impacts to jurisdictional resources during and after construction shall include, but are not limited to, the following: • Construction-related equipment will be stored in developed areas, outside of the drainage. No equipment maintenance will be done within or adjacent to the drainage. • Source control and treatment control BMPs will be implemented to minimize the potential contaminants that are generated during and after construction. Water quality BMPs will be implemented throughout the project to capture and treat potential contaminants. • Substances harmful to aquatic life will not be discharged into the drainage. All hazardous substances will be properly handled and stored.	In Construction Plans and Specifications. Prior to Demolition Permits.	County of San Bernadino Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
• A Storm Water Pollution Prevention Plan will be prepared to prevent sediment from entering the drainage during construction. • To avoid attracting predators during construction, the project will be kept clean of debris to the extent possible. All food-related trash items will be enclosed in sealed containers and regularly removed from site. • Construction personnel will strictly limit their activities, vehicles, equipment and construction material to the proposed project footprint, staging areas, and designated routes of travel. • Exclusion fencing will be installed to demarcate the limits of disturbance. The exclusion fencing should be maintained until the completion of construction activities.			
MM BIO-7: Nesting Birds. To the extent possible, construction activities (i.e., demolition, earthwork, clearing, and grubbing) within the Specific Plan Area & Upzone Site, including Opening Year Development—Options 1 and 2 and offsite infrastructure areas, shall occur outside of the general bird nesting season for migratory birds, which is March 15 through August 31 for songbirds and January 1 through August 31 for raptors. If construction activities (i.e., earthwork, clearing, and grubbing) must occur during the general bird nesting season for migratory songbirds (March 15 through August 31) and raptors (January 1 to August 31), a qualified biologist shall perform a pre-construction survey of potential nesting habitat to confirm the absence of active nests belonging to migratory birds and raptors afforded protection under the MBTA and CFG Code. The pre-construction survey shall be performed no more than three days prior to the commencement of construction activities. The results of the pre-construction survey shall be documented by the qualified biologist. If construction is inactive for more than seven days, an additional survey shall be conducted.	In Construction Plans and Specifications. Prior to Demolition Permits.	County of San Bernadino Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
If the qualified biologist determines that no active migratory bird or raptor nests occur, the activities shall be allowed to proceed without any further requirements. If the qualified biologist determines that an active migratory bird or raptor nest is present, no impacts within 300 feet (500 feet for raptors) of the active nest shall occur until the young have fledged the nest and the nest is confirmed to no longer be active, or as determined by the qualified biologist. The biological monitor may modify the buffer or propose other recommendations in order to minimize disturbance to nesting birds.			
MM BIO-8: County Regulated Trees. A tree survey shall be conducted for future projects proposed within the Specific Plan Area (excluding Opening Year Development—Options 1 and 2 and offsite infrastructure areas). The survey shall be conducted by an ISA-certified arborist to identify trees regulated under the Section 88.01.070 of the County's Code of Ordinances. If regulated trees will be impacted by a project, a tree removal permit must be obtained prior to impacts.	In Construction Plans and Specifications. Prior to Demolition Permits.	County of San Bernadino Building and Safety Division	
MM WVLC BIO-1:Pre-Construction Focused Surveys of Proposed Conservation Area and Development Area to Confirm Absence of Special-Status Species. *Pre-construction Survey within the Proposed Development Area for Western Burrowing Owl.* The Project applicant shall retain a qualified biologist to conduct preconstruction surveys for burrowing owls no fewer than 14 days prior to any ground-disturbing activities, to be repeated 24 hours prior to grading. The preconstruction surveys shall be approved by the City of Fontana Director of Community Development and conducted in accordance with current survey protocols provided in the CDFW Staff Report on Burrowing Owl Mitigation (March 7, 2012). In the event a burrowing owl is found to be present on site during the preconstruction survey, the project applicant shall ensure that the applicable avoidance measures outlined in the CDFW Staff Report on Burrowing Owl Mitigation (March 7, 2012) are applied to the proposed project (e.g., avoid direct impacts on occupied burrows during nesting season). Any active avoidance measures during the breeding season must to be coordinated with CDFW.	In Construction Plans and Specifications. Prior to Demolition Permits.	County of San Bernadino Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
Pre-construction Nesting Bird Survey of the Proposed Development Area. Nesting birds are protected pursuant to the MBTA and California Fish and Game Code. If ground-disturbing activities or removal of any trees, shrubs, or any other potential nesting habitat are scheduled within the avian nesting season (January 1 to August 31), a preconstruction clearance survey for nesting birds shall be completed no more than 3 days prior to ground disturbance. This will ensure that no nesting birds adjacent to the construction area will be disturbed during construction. If nesting birds are found, an avoidance buffer no less than 300 feet shall be established around the nest until all young have fledged and the nest is confirmed by a qualified biologist to be no longer active			
CULTURAL RESOURCES			
RR CUL-2: Native American historical and cultural resources and sacred sites are protected under PRC Sections 5097.9 to 5097.991, which require that descendants be notified when Native American human remains are discovered and provide for treatment and disposition of human remains and associated grave goods.	In Construction Plans and Specifications. Prior to Grading Permits	County of San Bernadino Building and Safety	
RR CUL-5: If human remains are discovered within a project site, disturbance of the site must stop until the coroner has investigated and made recommendations for the treatment and disposition of the human remains to the person responsible for the excavation, or to his or her authorized representative. If the coroner has reason to believe the human remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (California Health and Safety Code Section 7050.5).	In Construction Plans and Specifications. Prior to Grading Permits	County of San Bernadino Building and Safety	
MM CUL-1: Historical Resources Assessment for Future Development of Planning Area B of the Specific Plan and Upzone Site. Prior to issuance of a grading permit, future development projects in Planning Area B of the Specific Plan or the Upzone Site shall include the preparation of a historical resources assessment prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history to verify that any buildings, structures, or objects over 45 years of age are not eligible for listing as a	In Construction Plans and Specifications. Prior to Demolition Permits.	County of San Bernadino Planning Division and Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
historical resource. The qualified architectural historian or historian shall conduct an evaluation of the potential historic resources in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation (OHP) and shall document the evaluation in a report meeting the State OHP guidelines or on Department of Parks and Recreation Series 523 forms. The report shall be submitted to the County Planning Department for review and concurrence.			
MM CUL-2: Archaeological Monitoring of All Developments in the Specific Plan Area and Upzone Site. a) Prior to the issuance of each grading permit for the Specific Plan Area and Upzone Site, the Applicant or construction contractor shall provide evidence to the County of San Bernardino that a qualified professional archeologist meeting the Secretary of Interior's PQS for Archaeology (as defined in the Code of Federal Regulations, 36 CFR Part 61) has been retained to conduct monitoring of rough grading activities. The archaeologist shall have the authority to redirect earthmoving activities in the event that suspected cultural resources are unearthed during construction activities. b) The archaeologist shall prepare a Cultural Resources Monitoring and Treatment Plan, which would be approved by the County and describe processes for archaeological and tribal monitoring and for handling incidental discovery of cultural resources for all ground-disturbing construction and pre-construction activities. The monitoring plan shall be provided to the San Manuel Band of Mission Indians and Gabrieleño Band of Mission Indians – Kizh Nation for review and comment, as detailed in MM TCR-2. Prior to the issuance of a grading permit, the Applicant or construction contractor shall provide evidence to the County of San Bernardino that all construction workers involved with grading and trenching operations have received training by the archaeologist to recognize archaeological resources, including tribal cultural resources, should such resources be unearthed during ground-disturbing construction activities. Pursuant to MM TCR-1, all Native American Tribal	In Construction Plans and Specifications. Prior to Demolition Permits	County of San Bernadino Planning Division and Building and Safety Division	

Representatives, including the San Manuel Band of Mission Indians and the Gabrieleño Band of Mission Indians – Kizh Nation, shall be allowed to attend the training session. c) The training of all construction workers involved with grading and trenching operations shall explain the importance and legal basis for the protection of significant archaeological resources. It will include a brief review of the cultural sensitivity of the construction area and the surrounding area; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. All new construction personnel involved with grading and trenching operations that begin work following the initial training session must take the training prior to beginning work; the archaeologist shall be available to provide the training on an as-needed basis. d) In the event archaeological resources (artifacts or features) are encountered during ground-disturbing activities, the construction supervisor shall be required by his contract to immediately halt and redirect grading operations within a 100-foot radius of the discovery and see identification and evaluation and evaluation of the suspected resource by the archaeologist. This requirement shall be noted on all grading plans and the construction contractor shall be obligated to comply with the note. e) After the archaeologist makes his/her initial assessment of the nature of the find, the archaeologist shall notify the Native American Tribal Representatives—including the San Manuel Band of Mission Indians Cultural Resources Department and the Gabrieleño Band of Mission Indians – Kizh Nation —as to provide Tribal input with regards to the significance and treatment. If it is not of Native American heritage, the archaeologist shall pursue either protection in place or recovery, salvage, and treatment of the deposits. Recovery, salvage, and treatment protocols shall be developed in accordance with applicable provisions of Public Resource Code Section 21083.2 and State CEQA Guidelines 15064.5 and 15126.4 in consultation with the County or a with a recognized scientific or educational repository, including the SCCIC. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be			

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
the preferred means to avoid impacts to archaeological resources qualifying as historical resources, consistent with CEQA Guidelines Section 15126.4(b)(3)(C). If unique archaeological resources cannot be preserved in place or left in an undisturbed state, recovery, salvage and treatment shall be required at the Applicant's expense. f) If a significant tribal cultural resource is discovered on the property, ground disturbing activities shall be suspended 50 feet around the resource until a tribal resource treatment plan is implemented. A tribal resource treatment plan shall be prepared and implemented, subject to approval by the County of San Bernardino, to protect the identified resource(s) from damage and destruction. The treatment plan shall contain a research design and data recovery program necessary to document the size and content of the discovery such that the resource(s) can be evaluated for significance under CEQA criteria. The research design shall list the sampling procedures appropriate to exhaust the research potential of the archaeological or tribal cultural resource(s) in accordance with current professional archaeology standards. The treatment plan shall require monitoring by the appropriate Native American Tribe(s) during data recovery and shall require that all recovered artifacts undergo basic field analysis and documentation or laboratory analysis, whichever is appropriate. At the completion of the basic field analysis and documentation or laboratory analysis, any recovered resource(s) shall be processed and curated according to current professional repository standards. The collections and associated records shall be donated to an appropriate curation facility, or the artifacts may be delivered to the appropriate Native American Tribe(s) if that is recommended by the County of San Bernardino. A final report containing the significance and treatment findings shall be prepared by the archaeologist and submitted to the County of San Bernardino, the South Central Coastal Information Center (SCCIC) at California State University (CSU), Fullerton, and the appropriate Native American Tribe(s).			

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
Mitigation Measure CUL-3: Archaeological Resources Assessment for Future Developments in Planning Area B of the Specific Plan and Upzone Site. Prior to the issuance of a grading permit, future developments within Planning Area B of the Specific Plan and Upzone Site will be required to prepare archaeological resource assessments in accordance with the California Office of Historic Preservation: Archaeological Resources Management Report Guidelines, with the purpose to assess, avoid, and mitigate potential impacts to archeological and tribal cultural resources as set forth in CEQA Regulations: Appendix G. Archaeological resources assessments shall be performed under the supervision of an archaeologist that meets the Secretary of the Interior's PQS in either prehistoric or historic archaeology. The archaeological resources assessment for undeveloped, large open areas—including along Laurel Avenue within the Specific Plan and the northwest parcel of the Upzone Site—shall include a Phase I pedestrian survey, undertaken to locate any surface cultural materials that may be present. To the extent applicable, the archaeological resources assessment conducted for projects in the Specific Plan Area shall consider analysis and recommendations included in the Phase 1 CRA prepared for the Bloomington Business Park Specific Plan Project (Appendix E of the Draft EIR). In the event archaeological resources are identified by the archaeological resource assessment, Mitigation Measure CUL-2 shall apply.	In Construction Plans and Specifications. Prior to Demolition Permits.	County of San Bernardino Building and Safety Division	
GEOLOGY AND SOILS			
RR GEO-1: San Bernardino County Development Code: Building Code. The Project will be designed and constructed in accordance with the San Bernardino County Development Code, which adopts the California Building Code (CBC) and California Residential Code (CRC), which are based on the International Building Code (IBC). New construction, alteration, or rehabilitation shall comply with applicable ordinances set forth by the County and/or by the most recent County building and seismic codes in effect at the time of Project design. In accordance with County Development Code Title 8, Chapter 87.08, a geotechnical investigation is required that must evaluate soil classification, site geology, slope stability, soil strength, position and	In Construction Plans and Specifications. Prior to Building Permits	County of San Bernadino Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
adequacy of load-bearing soils, the effect of moisture variation on soil-bearing capacity, compressibility, liquefaction, and expansiveness, as necessary, determined by the County Building Official. The geotechnical investigation must be prepared by registered professionals (i.e., California Professional Civil Engineer and as necessary a Professional Engineering Geologist). Recommendations of the report, as they pertain to structural design and construction recommendations for earthwork, grading, slopes, foundations, pavements, and other necessary geologic and seismic considerations, must be incorporated into the design and construction of the Project.			
Mitigation Measure GEO-1: Landslide Susceptibility Report. Future development of structures within the area mapped as having moderate to high landslide susceptibility in Planning Area B of the Specific Plan shall prepare a landslide susceptibility investigation by registered professionals (i.e., California Professional Civil Engineer and as necessary a Professional Engineering Geologist). The investigation shall be prepared in accordance with requirements of the latest version of the California Building Code, and as warranted include design and construction recommendations to mitigate potential risks and impacts related to potential landslide hazards.	In Construction Plans and Specifications. Prior to Building Permits.	San Bernardino County Building and Safety Division	
Mitigation Measure GEO-2: Geotechnical Recommendations. The Geotechnical Investigations completed for development of the Specific Plan Area outside of Opening Year—Option 1 and for development of the Upzone Site shall be submitted to the County of San Bernardino for review and approval. The approved recommendations shall be incorporated into the final design of the improvements proposed at the Specific Plan and implemented during construction. Any subsequent recommendations required by the Project's certified geotechnical engineer or engineering geologist shall be implemented to ensure the Project meets structural requirements of the California Building Code.	In Construction Plans and Specifications. Prior to Building Permits.	San Bernardino County Building and Safety Division	
Mitigation Measure GEO-3: Paleontological Resources. Prior to grading activities, the Applicant and/or its contractor shall retain a paleontologist selected from the County's list of qualified paleontologists or one who meets the qualifications of the Society of Vertebrate Paleontology standards as Project Paleontologist. The Project Paleontologist shall prepare a	In Construction Plans and Specifications. Prior to Building Permits.	San Bernardino County Planning Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
paleontological resource mitigation program (PRMP), monitor, salvage, and curate any recovered fossils associated with the Project area, should these be unearthed during ground disturbance within the Project area. Specifically, the Project Paleontologist shall: • Be present at the pre-grading conference to establish procedures for paleontological resource surveillance. • Monitor all ground disturbing activities in subareas where unit Qof_3 and Qof_1 are exposed and for ground disturbing activities that are four feet or greater below ground surface where unit Qyf_5 is exposed. The Project Paleontologist may reduce monitoring to spot checks or discontinue at his/her discretion if no intact and significant paleontological resources are encountered after the initial period of full-time monitoring. • Monitor excavations closely to quickly and professionally recover any fossil remains discovered while not impeding development. The purpose of the PRMP is to establish mitigation monitoring procedures and discovery protocols, based on industrywide best practices (Murphey et al., 2019) and shall include the following procedures: • Include a Worker's Environmental Awareness Program (WEAP) training. The WEAP shall be prepared prior to the start of ground disturbance and be presented in person by the Project Paleontologist to all field personnel to describe the types of fossils that may occur in sediments present within the construction areas and the procedures to follow if any are encountered. • Indicate where construction monitoring will be required for the Project and the frequency of required monitoring (i.e., full time, spot checks, etc.).			

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
• Address the collection and processing (e.g., wet- or dry-screening) of sediment samples to analyze for presence/absence of small-fraction and microscopic fossils. • Specify the process to be followed in the event paleontological resources are encountered, including ceasing all ground-disturbing activity within 50 feet of the area of the discovery. The Project Paleontologist shall examine the materials encountered, assess the nature and extent of the find, and recommend a course of action to further investigate and protect or recover and salvage those resources that have been encountered. • Describe the different reporting standards to be used for monitoring with negative findings versus monitoring resulting in fossil discoveries. • Provide details on what sediment samples should be collected, analyzed, and processed to determine the presence/absence of fossils in small-fraction and microscopic grain sizes within the Project area. Fossils uncovered during mitigation activities shall be deposited in an accredited and permanent scientific institution, such as the Western Science Center, for the benefit of current and future generations. • Specify the criteria for discarding specific fossil specimens. If the Project Paleontologist determines that impacts to a sample containing significant paleontological resources cannot be avoided by Project planning, then recovery may be applied. o Actions may include recovering a sample of the fossiliferous material prior to construction, monitoring work and halting construction if an important fossil needs to be recovered, and/or cleaning, identifying, and cataloging specimens for curation and research purposes. o Recovery, salvage and treatment shall be done at the applicant's expense. o All recovered and salvaged resources shall be prepared to the point of identification and permanent preservation by the paleontologist.			

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
o Resources shall be identified and curated into an established accredited professional repository. o The Project Paleontologist shall have a repository agreement in hand prior to initiating recovery of the resource.			
GREENHOUSE GASSES			
RR GHG-1: New buildings are required to achieve the current California Building Energy and Efficiency Standards (Title 24, Part 6) and California Green Building Standards Code (CALGreen) (Title 24, Part 11). The 2016 Building Energy Efficiency Standards and CALGreen are effective starting on January 1, 2017 while the 2019 standards are effective starting January 1, 2020. The Building Energy Efficiency Standards and CALGreen are updated tri-annually, and may ultimately require zero net energy (ZNE) construction.	In Construction Plans and Specifications. Prior to Building Permits	County of San Bernadino Building and Safety Division	
RR GHG-2: Construction activities are required to adhere to Title 13 California Code of Regulations (CCR) Section 2499, which requires that nonessential idling of construction equipment is restricted to five minutes or less.	In Construction Plans and Specifications. Prior to Demolition Permits	County of San Bernadino Building and Safety Division	
RR GHG-3: New development in the unincorporated County of San Bernardino is required to comply with the San Bernardino County GHG Reduction Plan. The 2011 GHG Reduction Plan also directs the County to implement GHG reduction measures to align the County with the GHG reduction goals of AB 32.	In Construction Plans and Specifications. Prior to Building Permits	County of San Bernadino Building and Safety Division	
RR GHG-4: The County of San Bernardino requires land uses in the unincorporated area to adhere to the state's Model Water Efficient Landscape Ordinance.	In Construction Plans and Specifications. Prior to Building Permits	County of San Bernadino Building and Safety Division	
RR GHG-5: The County of San Bernardino adheres to the requirements of AB 341, AB 1826, and SB 1383. The County of San Bernardino Solid Waste Management Division manages landfill capacity and implements programs to divert waste from landfills, which includes recycling and organics/food waste collection. AB 341 requires business that generate 4 cubic yards of waste or more per week (including multifamily with five or more units) to arrange for	In Construction Plans and Specifications. Prior to Certificates of Occupancy	County of San Bernadino Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
recycling services. AB 1826 requires business to recycle their organic waste depending on how much waste they generate per week and also requires the County to implement an organic waste recycling program for business (including multifamily of five or more uses). SB 1383 requires that operates of landfills achieve reductions in short-lived climate pollutants and establishes a target to achieve a 50 percent reduction in statewide disposal of organic waste from 2014 levels by 2020 and 75 percent reduction from 2014 levels by 2025. AB 1383 also establishes an additional target that not less than 20 percent of currently disposed edible food is recovered for human consumption by 2025.			
MM GHG-1: GHG Reduction Measures. Prior to issuance of building permits for each building, the Project Applicant shall provide documentation to the County of San Bernardino Building Department demonstrating that the improvements and/or buildings subject to the building permit application include measures from the 2021 County of San Bernardino Greenhouse Gas Reduction Plan Screening Tables (June 2021), as needed to achieve the required 100 points. Specific measures may be substituted for other measures that achieve an equivalent amount of GHG reduction, subject to the County of San Bernardino Building Department approval.	In Construction Plans and Specifications. Prior to Building Permits	County of San Bernadino Building and Safety Division	
HAZARDS AND HAZARDOUS MATERIALS			
RR HAZ 1: Transportation of Hazardous Waste. Hazardous materials and hazardous wastes will be transported to and/or from the projects developed under the Countywide Plan in compliance with any applicable state and federal requirements, including the U.S. Department of Transportation regulations listed in the Code of Federal Regulations (CFR) (Title 49, Hazardous Materials Transportation Act); California Department of Transportation standards; and the California Occupational Safety and Health Administration standards.	In Construction Plans and Specifications. Prior to Building Permits	County of San Bernadino Building and Safety Division	
RR HAZ-2: Resource Conservation and Recovery Act. Hazardous waste generation, transportation, treatment, storage, and disposal will be conducted in compliance with the Subtitle C of the Resource Conservation and Recovery Act (RCRA) (Code of Federal Regulations, Title 40, Part 263), including the	In Construction Plans and Specifications. Prior to Building Permits	County of San Bernadino Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
management of nonhazardous solid wastes and underground tanks storing petroleum and other hazardous substances. The San Bernardino County Fire Protection District serves as the designated Certified Unified Program Agency (CUPA) and which implements state and federal regulations for the following programs: (1) Hazardous Materials Release Response Plans and Inventory Program, (2) California Accidental Release Prevention (CalARP) Program, (3) Aboveground Petroleum Storage Act Program, and (4) UST Program (5) Hazardous Waste Generator and Onsite Hazardous Waste Treatment Programs (6) Hazardous Materials Management Plan and Hazardous Material Inventory Statement Program.			
RR HAZ-3: California UST Regulations. Underground storage tank (UST) repairs and/or removals will be conducted in accordance with the California UST Regulations (Title 23, Chapter 16 of the California Code of Regulations). Any unauthorized release of hazardous materials will require release reporting, initial abatement, and corrective actions that will be completed with oversight from the Regional Water Quality Control Board, Department of Toxic Substances Control, San Bernardino County Fire Protection District, South Coast Air Quality Management District, and/or other regulatory agencies, as necessary. Use of existing USTs will also have to be conducted (i.e., used, maintained and monitored) in accordance with the California UST Regulations (Title 23, Chapter 16 of the California Code of Regulations).	In Construction Plans and Specifications. Prior to Demolition Permits.	County of San Bernadino Building and Safety Division	
RR HAZ-4: ACMs and LBPs: Demolition activities that have the potential to expose construction workers and/or the public to asbestos-containing materials (ACMs) or lead-based paint (LBP) will be conducted in accordance with applicable regulations, including, but not limited to: • South Coast Air Quality Management District's Rule 1403 • California Health and Safety Code (Section 39650 et seq.) • California Code of Regulations (Title 8, Section 1529) • California Occupational Safety and Health Administration regulations (California Code of Regulations, Title 8, Section 1529 [Asbestos] and Section 1532.1 [Lead]) • Code of Federal Regulations (Title 40, Part 61 [asbestos], Title 40, Part 763 [asbestos], and Title 29, Part 1926 [asbestos and lead])	In Construction Plans and Specifications. Prior to Demolition Permits	County of San Bernadino Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
RR HAZ-5: Removal of Hazardous Materials. The removal of hazardous materials, such as polychlorinated biphenyls (PCBs), mercury-containing light ballast, and mold, will be completed in accordance with applicable regulations pursuant to 40 CFR 761 (PCBs), 40 CFR 273 (mercury-containing light ballast), and 29 CFR 1926 (molds) by workers with the hazardous waste operations and emergency response (HAZWOPER) training, as outlined in 29 CFR 1910.120 and 8 CCR 5192.	In Construction Plans and Specifications. Prior to Demolition Permits	County of San Bernadino Building and Safety Division	
RR HAZ-6: California Code of Regulations (Title 8, Section 1541): New construction, excavations, and/or new utility lines within 10 feet or crossing existing high-pressure pipelines, natural gas/petroleum pipelines, or electrical lines greater than 60,000 volts will be designed and constructed in accordance with the California Code of Regulations (Title 8, Section 1541).	In Construction Plans and Specifications. Prior to Grading Permits	County of San Bernadino Building and Safety Division	
RR HAZ-10: San Bernardino County Fire Hazard Abatement (FHA) Program. The FHA program shall enforce the fire hazard requirements outlined in San Bernardino County Code Sections 23.0301 to 23.0319.	In Construction Plans and Specifications. Prior to Building Permits	County of San Bernadino Building and Safety Division	
MM HAZ-1 Soil Management Plan (SMP): The Project Applicant shall retain a qualified environmental consultant to prepare a SMP for all contaminated soils identified as environmental conditions in the Phase 1 and Phase 2 Environmental Site Assessments (Phases 1 and 2 ESAs) prepared for proposed development within the Specific Plan. The SMP shall be submitted to the San Bernardino County Fire Department, Hazardous Materials Division (SBCFD / HMD) for review and approval prior to the commencement of excavation and grading activities. The SMP shall be implemented during excavation and grading activities of the impacted area to ensure that contaminated soils are properly identified, excavated, and disposed of off-site, as follows: • The SMP shall address field screening, air monitoring, impacted soil excavation and segregation, confirmation sampling, stockpile management and sampling, impacted soil disposal, backfill, import soil sampling and tracking, and documentation. • The SMP shall be prepared and executed in accordance with South Coast Air Quality Management District (SCAQMD) Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil. During excavation, Rule 1166 requires that soils identified as	In Construction Plans and Specifications. Prior to Grading Permits	County of San Bernadino Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
contaminated shall be sprayed with water or another approved vapor suppressant, or covered with sheeting during periods of inactivity of greater than an hour, to prevent contaminated soils from becoming airborne. Under Rule 1166, contaminated soils shall be transported from the Project Site by a licensed transporter and disposed of at a licensed storage/treatment facility to prevent contaminated soils from becoming airborne or otherwise released into the environment. • Prior to the commencement of grading and excavation, the Phases 1 and 2 ESAs shall be submitted to reported to the SBCFD / HMD for review and comment. The recommendations of the SBCFD / HMD shall be incorporated in the SMP. After approval by SBCFD/HMD, the recommendations contained in all Phase 1 and 2 ESAs shall be incorporated into the SMP. • A qualified environmental consultant shall be present on the Project Site during grading and excavation activities in the known or suspected locations of contaminated soils and shall be on call at other times as necessary, to monitor compliance with the SMP and to actively monitor the soils and excavations for evidence of contamination. During the Project's excavation phase, the Project Applicant shall remove and properly dispose of impacted materials in accordance with the provisions of the SMP. If soil is stockpiled prior to disposal, it will be managed in accordance with the Project's Storm Water Pollution Prevention Plan, prior to its transfer for treatment and/or disposal. All impacted soils would be properly treated and disposed of in accordance with South Coast Air Quality Management District (SCAQMD) Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil, as well as applicable requirements of the Santa Ana Regional Water Quality Control Board.			
MM HAZ-2: Health and Safety Plan. Given the presence of known soil contamination on at least a portion of the proposed development area within the Specific Plan, a Health and Safety Plan shall be prepared in compliance with OSHA Safety and Health Standards (29 Code of Federal Regulations 1910.120) and Cal/OSHA requirements (CCR Title 8, General Industry	In Construction Plans and Specifications. Prior to Grading Permits	County of San Bernadino Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719) and submitted for review by the SBCFD / HMD. The Health and Safety Plan shall be submitted to the SBCFD / HMD for review and approval prior to the commencement of excavation and grading. The Health and Safety Plan shall address, as appropriate, safety requirements that would serve to avoid significant impacts or risks to workers or the public in the event that elevated levels of subsurface gases are encountered during grading and excavation and shall include any applicable recommendations contained in all Phase 1 and Phase II ESAs, after the ESAs are approved by SBCFD/HMD. The Health and Safety Plan shall address potential vapor encroachment from the soil contamination, and workers shall be trained to identify exposure symptoms and implement alarm response. The Health and Safety Plan shall have emergency contact numbers, maps to the nearest hospital, gas monitoring action levels, gas response actions, allowable worker exposure times, and mandatory personal protective equipment requirements. The Health and Safety Plan shall be signed by all workers involved in the removal of the contaminated soils to demonstrate their understanding of the risks of excavation.			
HYDROLOGY AND WATER QUALITY			
RR WQ-1: NPDES/SWPPP. Prior to issuance of any grading or demolition permits, the applicant shall provide the County Building and Safety Division evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.	In Construction Plans and Specifications. Prior to Demolition and Grading Permits	County of San Bernadino Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
RR WQ-2: WQMP. Prior to the approval of the Grading Plan and issuance of Grading Permits a completed Water Quality Management Plan (WQMP) shall be submitted to and approved by the Public Works Department. The WQMP shall be submitted using the San Bernardino County Stormwater Program's model form and shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development project in order to minimize the adverse effects on receiving waters.	In Construction Plans and Specifications. Prior to Grading Permits	County of San Bernadino Building and Safety Division	
LAND USE AND PLANNING			
RR LU-1 The County of San Bernardino Development Code: The County's Development Code (Title 8 of the County Code of Ordinances) provides the basis for zoning designations and development regulations in unincorporated areas.	In Construction Plans and Specifications. Prior to Building Permits	County of San Bernadino Planning Division and Building and Safety Division	
NOISE			
RR-NOI-1: The California Building Code (CBC), Title 24, Part 2, Volume 1, Chapter 12, Interior Environment, Section 1207.11.2, Allowable Interior Noise Levels, requires that interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room. The noise metric is evaluated as either the day-night average sound level (Ldn) or the community noise equivalent level (CNEL), consistent with the noise element of the local general plan. The California Green Building Standards Code (CALGreen), Chapter 5, Division 5.5, has additional requirements for insulation that affect exterior-interior noise transmission for nonresidential structures: Pursuant to Section 5.507.4.1, Exterior Noise Transmission, Prescriptive Method, wall and roof-ceiling assemblies making up the building or addition envelope or altered envelope and exposed to the noise source shall meet a composite sound transmission class (STC) rating of at least 50 or a composite outdoor-indoor transmission class (OITC) rating of no less than 40, with exterior windows of a minimum STC of 40 or OITC of 30 within a 65 dBA CNEL noise contour of an airport, or within a 65 dBA CNEL or Ldn noise contour of a freeway, expressway, railroad, industrial source, or fixed-guideway source, as determined by the noise element. Where noise contours are not readily available, buildings exposed to a noise level of 65 dBA Leq for one hour during any hour of operation shall have building, addition, or alteration	In Construction Plans and Specifications. Prior to Building Permits	County of San Bernadino Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
exterior wall and roof-ceiling assemblies that are exposed to the noise source meet a composite STC rating of at least 45 (or OITC 35), with exterior windows of a minimum of STC 40 (or OITC 30). Prior to issuance of building permits for projects that include sensitive receptors and are located in ambient noise environments exceeding the "Normally Acceptable" noise and land use compatibility standards (shown in Table 5.12-2), the project applicant shall submit an acoustical study to the County of San Bernardino that demonstrates that the proposed residential building design would provide an interior noise level of 45 dBA CNEL or less for residential uses, as required by the California Building Code, or acceptable levels for nonresidential uses per CALGreen standards. Acceptable methods for reducing noise exposure may include, but are not limited to: • Noise barriers, berms, or other noise reduction techniques could be constructed to reduce noise transmission where reasonable and feasible. Final design of such barriers should be completed during project level review. • Alternative noise reduction techniques could be implemented, such as repaving streets with "quiet" pavement types, including open-grade rubberized asphaltic concrete. The use of quiet pavement can reduce noise levels by up to 7 dBA, depending on the existing pavement type, traffic speed, traffic volumes, and other factors. • Traffic-calming measures to slow traffic, such as speed bumps. • Adequate building sound insulation, such as sound-rated windows and doors, on a case-by-case basis as a method of reducing noise levels in interior spaces.			
RR NOI-2: San Bernardino County Development Code, Construction Noise Sources. Section 83.01.080 establishes standards concerning acceptable noise levels for both noise-sensitive land uses and noise-generating land uses. It prohibits construction activities between 7:00 PM and 7:00 AM on weekdays, or at any time on Sunday or a federal holiday.	In Construction Plans and Specifications. Prior to Demolition, Grading, and Building Permits	County of San Bernadino Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
RR NOI-3: San Bernardino County Development Code, Stationary Noise Sources. Section 83.01.080 establishes standards for stationary noise sources in Table 83-2.	In Construction Plans and Specifications. Prior to Demolition, Grading, and Building Permits	County of San Bernadino Building and Safety Division	
RR NOI-4: San Bernardino County Development Code Mobile Noise Sources. Section 83.01.080 establishes standards for mobile noise sources in Table 83-3 including: • Limiting construction to the daytime hours between 7 AM to 7 PM on Monday through Friday and 9 AM to 6 PM on Saturday. Construction is prohibited on Sundays.	In Construction Plans and Specifications. Prior to Demolition, Grading, and Building Permits	County of San Bernadino Building and Safety Division	
RR NOI-5: San Bernardino County Development Code Vibration. Section 83.01.090 prohibits vibration that can be felt without the aid of instruments or produces a particle velocity greater than or equal to two-tenths inch per second peak particle velocity (i.e., 0.20 in/sec PPV) at or beyond the lot line of the source. Exceptions are made for temporary construction, maintenance, repair, or demolition activities between 7:00 AM and 7:00 PM, except Sundays and federal holidays; and motor vehicles not under control of the industrial or commercial use.	In Construction Plans and Specifications. Prior to Demolition, Grading, and Building Permits	County of San Bernadino Building and Safety Division	
PDF NOI-1: Construction Noise Plan. Prior to the issuance of a grading permit, the following notes be included on grading plans and building plans. Project contractors shall be required to ensure compliance with the notes and permit periodic inspection of the construction site by County staff or its designee to confirm compliance. These notes also shall be specified in bid documents issued to prospective construction contractors. 1. Construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturer's standards. 2. Construction contractors shall place all stationary construction equipment so that all emitted noise is generated toward the center of the site and away from the noise sensitive receivers nearest the Project site. 3. Construction contractors shall locate equipment staging areas on the Project site in locations that will create the greatest feasible distance between noise sensitive receivers nearest the Project site.	In Construction Plans and Specifications. Prior to Demolition, Grading, and Building Permits	County of San Bernadino Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
4. Construction contractors shall ensure that delivery trucks/haul trucks use designated truck route(s) if possible.			
PDF NOI-2: Industrial/Warehousing Operational Noise: Construction Plans, specifications, and permits for development of Development Sites 1, 2, and 4 shall include development of the following walls that shall be completed prior to receipt of certificates of occupancy or operational permits for industrial/warehousing uses on Development Sites 1, 2, and 4: • Development Site 1: a 12-foot-tall masonry wall shall be constructed along the entire northern perimeter of Development Site 1. • Development Site 2: a 12-foot-tall masonry wall shall be constructed along the entire northern perimeter of Development Site 2, and 14-foot-high masonry walls shall be constructed along Locust Avenue and Maple Avenue to screen the truck trailer parking and loading dock areas. • Development Site 4: a 9-foot-high masonry wall shall be constructed along the perimeter of the truck trailer lot to screen the truck trailer parking lot.	In Construction Plans and Specifications. Prior to Building Permits.	County of San Bernadino Building and Safety Division	
MM NOI-1: Construction Vibration: Construction Plans, specifications, and permits for construction activities within the Specific Plan area and Upzone Site shall specify that large, loaded trucks, heavy mobile equipment greater than 80,000 pounds, and the use of jack hammers and soil compaction equipment are not to be used within 20-feet of occupied sensitive receiver locations. Construction activities within 20 feet of noise sensitive uses shall utilize small rubber-tired or alternative equipment to reduce construction related vibration below the County's threshold of 0.2 in/sec PPV at sensitive receiver locations.	In Construction Plans and Specifications. Prior to Demolition, Grading, and Building Permits	County of San Bernadino Building and Safety Division	
TRIBAL CULTURAL RESOURCES			
RR TCR-1: Per AB 52, within 14 days of deciding to undertake a project or determining that a project application is complete, the lead agency must provide formal written notification to all tribes who have requested it.	In Construction Plans and Specifications. Prior to Demolition, Grading, and Building Permits	County of San Bernadino Planning Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
RR TCR-2: Native American historical and cultural resources and sacred sites are protected under PRC Sections 5097.9 to 5097.991, which require that descendants be notified when Native American human remains are discovered and provide for treatment and disposition of human remains and associated grave goods.	In Construction Plans and Specifications. Prior to Grading Permits	County of San Bernadino Planning Division and Building and Safety Division	
MM TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities A. The Project Applicant/Developer shall retain a Native American monitor from (or approved by) the San Manuel Band of Mission Indians and the Gabrieleno Band of Mission Indians-Kizh Nation ("Tribes"). The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject Project, at all Project locations (i.e., both on-site and any off-site locations that are included in the Project description/definition and/or required in connection with the Project, such as public improvement work). "Ground-disturbing activity" includes, but is not limited to, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. Monitors from the San Manuel Band of Mission Indians and the Gabrieleno Band of Mission Indians-Kizh Nation shall provide Native America monitoring services on a rotating basis. B. The Project Applicant/Developer shall provide documentation of its retention of a Native American monitor, as provided in Mitigation Measure TCR-1, to the County Planning Department prior to the earlier of the commencement of any ground-disturbing activity for the project, or the issuance of any permit necessary to commence a ground-disturbing activity. C. The Project Applicant/Developer shall provide the Tribe with a minimum of 15 days advance written notice of the commencement of any project ground-disturbing activity so that the Tribe has sufficient time to secure and schedule a monitor for the project. D. The Project Applicant/Developer shall hold at least one pre-construction sensitivity/educational meeting prior to the commencement of any ground-disturbing activities, where at a senior member of the Tribe(s) will inform and educate the Project's construction and managerial crew and staff members	In Construction Plans and Specifications. Prior to Grading Permits	County of San Bernardino Planning Division and Building and Safety Division	

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
(including any Project subcontractors and consultants) about the TCR mitigation measures and compliance obligations, as well as places of significance located on the Project site (if any), the appearance of potential TCRs, and other informational and operational guidance to aid in the Project's compliance with the TCR mitigation measures. The Native American Tribe(s) shall be notified of and allowed to attend the pre-grading meeting with the County and Project construction contractors and/or monitor all Project mass grading and trenching activities. In the event that suspected tribal cultural resources are unearthed, the Native American Tribe(s) shall have the authority to redirect earth moving activities in the affected area. E. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Project applicant/Lead Agency upon written request. F. Native American monitoring for the Project shall conclude upon the latter of the following: (1) written confirmation from a designated Project point of contact to the Tribe representatives that all ground-disturbing activities and all phases that may involve ground-disturbing activities on the project site and at any off-site Project location are complete; or (2) written notice by the Tribe to the Project Applicant/Developer and the County Planning Department that no future, planned construction activity and/or development/construction phase (known by the Tribe at that time) at the Project site and at any off-site project location possesses the potential to impact TCRs. G. Any and all archaeological or cultural documents created as a part of the Project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the Project Applicant/Developer and the County Planning Department for dissemination to the San Manuel Band of Mission Indians and			

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
the Gabrieleno Band of Mission Indians-Kizh Nation. The County Planning Department and/or Project Applicant/Developer shall, in good faith, consult with both Tribes until all ground disturbing activities of the Project are completed.			
MM TCR-2: Discovery of TCRs, Human Remains, and/or Grave Goods A. Upon the discovery of a TCR, all construction activities in the immediate vicinity of the discovery (i.e., not less than the surrounding 50 feet) shall cease. The Mission Indians and Gabrieleno Band of Mission Indians-Kizh Nation and the San Manuel Band of Mission Indians Cultural Resources Department shall be contacted regarding any cultural resources discovered during construction activities and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. No Project construction activities shall resume in the surrounding 50 feet of the discovered TCR unless and until the Tribe has completed its assessment/evaluation/recovery of the discovered TCR and surveyed the surrounding area. Should the find be deemed significant, as defined by CEQA, a Cultural Resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with the Mission Indians and Gabrieleno Band of Mission Indians-Kizh Nation and San Manuel Band of Mission Indians, and all subsequent finds shall be subject to this Plan. The Project Applicant/Developer shall comply with all provisions of the Plan. The Plan shall allow for a Native American monitor to be present that represents Tribes until all ground disturbance activities occurring at the Project site, including offsite areas, are completed, should they elect to place a monitor on-site. B. The appropriate Tribe will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate in its discretion, per the Cultural Resources Monitoring and Treatment Plan, and for any purpose the Tribe deems appropriate, including but not limited to, educational, cultural and/or historic purposes. C. If Native American human remains and/or grave goods are discovered or recognized on the Project site or at any off-site project location, then all construction activities shall immediately cease within a 200' radius. Native American "human remains" are defined to include "an inhumation or	In Construction Plans and Specifications. Prior to Grading Permits	County of San Bernadino Planning Division and Building and Safety Division	

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cremation, and in any state of decomposition or skeletal completeness." (Pub. Res. Code § 5097.98 (d)(1).) Funerary objects, referred to as "associated grave goods," shall be treated in the same manner and with the same dignity and respect as human remains. (Pub. Res. Code § 5097.98 (a), d)(1) and (2).) D. Any discoveries of human skeletal material or human remains shall be immediately reported to the County Coroner (Health & Safety Code § 7050.5(c); 14 Cal. Code Regs. § 15064.5(e)(1)(B)), and all ground-disturbing project ground-disturbing activities on site and in any other area where the presence of human remains and/or grave goods are suspected to be present, shall immediately halt and remain halted until the coroner has determined the nature of the remains. (14 Cal. Code Regs. § 15064.5(e).) If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed. E. Thereafter, construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or grave goods, if, per the Cultural Resources Monitoring and Treatment Plan and the Tribes' discretion, resuming construction activities at that distance is acceptable and provides the Project manager express consent of that determination (along with any other mitigation measures the Tribal monitor and/or archaeologist deems necessary). (14 Cal. Code Regs. § 15064.5(f).) F. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or grave goods. G. Any historic archaeological material that is not Native American in origin (non-TCRs) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.			

Regulatory Requirement /Project Design Feature/ Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
MM TCR-3: Procedures for Burials, Funerary Remains, and Grave Goods. A. Inadvertent Discovery of Native American Human Remains: Public Resources Code §5097.98 This code invests the NAHC with the authority to designate a Most Likely Descendant (MLD) when Native American human remains and any associated grave items are inadvertently discovered. Any discovery of human remains and/or grave goods discovered and/or recovered shall be kept confidential to prevent further disturbance. B. If the discovery of human remains includes four (4) or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created. C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated "grave goods" (aka, burial goods or funerary objects) are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later, as well as other items made exclusively for burial purposes or to contain human remains. Cremations will either be removed in bulk or by means necessary to ensure complete recovery of all sacred materials. D. In the case where discovered human remains cannot be fully recovered (and documented) on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to divert the Project while keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. E. In the event preservation in place is not possible despite good faith efforts by the Project applicant/developer and/or landowner, before ground-disturbing activities may resume on the Project site, the landowner shall arrange a designated site location within the footprint of the Project for the respectful reburial of the human remains and/or ceremonial objects. The site of reburial/repatriation shall be agreed upon by the Tribe and the landowner, and shall be protected in perpetuity.	In Construction Plans and Specifications. Prior to Grading Permits	County of San Bernadino Planning Division and Building and Safety Division	

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F. Each occurrence of human remains and associated grave goods will be stored using opaque cloth bags. All human remains, grave goods, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items will be retained and shall be reburied within six months of recovery. G. The Tribes will work closely with the Project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.			