Duke Warehouse at Slover and Alder Project

SCH No. 2021120526



January 2024

Final Environmental Impact Report

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FINAL
ENVIRONMENTAL IMPACT REPORT
DUKE WAREHOUSE AT SLOVER AND ALDER PROJECT
SAN BERNARDINO COUNTY, CALIFORNIA
STATE CLEARINGHOUSE NO. 2021120526

PREPARED FOR:

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PREPARED BY:

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January 2024

TABLE OF CONTENTS

Section Page

1.0 INTRODUCTION 1-1

SECTION 1.1, FORMAT OF THE FINAL EIR 1-1
SECTION 1.2, CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES 1-2

2.0 RESPONSE TO COMMENTS 2-1

3.0 REVISIONS TO THE DRAFT EIR 3-1

4.0 MITIGATION AND MONITORING PROGRAM 4-1

SECTION 4.1, INTRODUCTION 4-1
SECTION 4.2, MITIGATION MONITORING AND REPORTING PROGRAM 4-1

Final EIR Appendices:

Appendix A Air Quality GHG Energy and HRA Analysis
Appendix B Construction HRA Emissions Summary
Appendix C Safety Study
Appendix D TIA

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 Duke Warehouse at Slover and Alder 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 June 30, 2022 and ended on August 22, 2022. 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: CalEnviroScreen

Air Quality analysis was completed pursuant to South Coast Air Quality Management District (SCAQMD) methodology for cumulative impacts, which involves thresholds that were adopted by the SCAQMD and does not involve the use of CalEnviroscreen. Some comments to the Draft EIR express concerns related to the pollution burden identified by the CalEnviroScreen tool including the associated asthma rates that are higher than 83% of the census tracts in California, the Project site being within the 70th Percentile Risk Score, and the disproportionate health impacts to persons in the area, as established in recent years by OEHHA per CalEnviroScreen. With regard to CalEnviroScreen, this tool was developed by the Office of Environmental Health Hazard Assessment (OEHHA) and the California Environmental Protection Agency (CalEPA) to:

- To identify California's most environmentally burdened and vulnerable communities.
- To assist CalEPA's boards and departments with decisions, such as prioritizing resources and cleanup activities.
- Disadvantaged communities in California are targeted for investment of proceeds from the State's cap-and-trade program. CalEPA designated census tracts with the highest CalEnviroScreen scores as disadvantaged communities for investing cap-and-trade proceeds.
- Used by CalEPA's Environmental Justice Task Force and other state entities as guidance in allocating grants and in other decisions.

As it applies to CEQA, CalEPA advises:

- The CalEnviroScreen Tool scoring results are not directly applicable to the cumulative impacts analysis required under the California Environmental Quality Act (CEQA).
- Information provided by this tool cannot be used as a substitute for an analysis of the cumulative impacts of any specific project for which an environmental review is required by CEQA.
- The tool assesses environmental factors and effects on a regional or communitywide basis and cannot be used in lieu of performing an analysis of the potentially significant impacts of any specific project.
- A Lead Agency must determine independently whether a proposed project's impacts may be significant under CEQA based on the evidence before it, using its own discretion and judgment. The tool's results are not a substitute for this required analysis.
- The tool considers some social, health, and economic factors that may not be relevant when doing an analysis under CEQA.
- The tool's output should not be used as a focused risk assessment of a given community or site. It cannot predict or quantify specific health risks or effects associated with cumulative exposures identified for a given community or individual.

While CalEnviroScreen can assist CalEPA in prioritizing resources and helping promote greater compliance with environmental laws, it does have several limitations. The tool's output provides a relative ranking of communities based on a selected group of available datasets, through the use of a summary score. Unlike the health risk assessments prepared for the proposed Project, a CalEnviroScreen score is not an expression of health risk and does not provide quantitative information on increases in cumulative impacts for specific sites or projects. Further, as a comparative screening tool, the results do not provide a basis for determining when differences between scores are significant in relation to public health or the environment. Accordingly, CalEnviroScreen is not intended to be used as a health or ecological risk assessment for a specific area or site. Therefore, the fact that the Project is located in an area that CalEnviroScreen identifies as in a higher percentile for pollution burden is not indicative of a CEQA impact.

As detailed on page 5.2-7 of the Draft EIR, SCAQMD attains and maintains air quality conditions in the South Coast Air Basin (Basin) through a comprehensive program of planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues. The clean air strategy of SCAQMD includes preparation of plans for attainment of ambient air quality standards, adoption and enforcement of rules and regulations concerning sources of air pollution, and issuance of permits for stationary sources of air pollution. The County utilizes the SCAQMD thresholds for all projects in order to provide a uniform analysis of all projects. As discussed on page 5.2-23 of the Draft EIR, SCAQMD's CEQA air quality methodology provides that any projects resulting in daily emissions that exceed any of the thresholds in Table 5.2-4 of the Draft EIR would be considered to have both an individually (project-level) and cumulatively significant air quality impact. SCAQMD has also developed localized significance thresholds (LSTs) that 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 standards, and thus would not cause or contribute to localized air quality impacts As discussed in Table 5.2-8 and 5.2-9, construction and operational emissions would not exceed SCAQMD thresholds. In addition, as shown in Table 5.2-10 and 5.2-11, the Project would not exceed construction or operational localized thresholds.

Master Response 2: Environmental Justice

Comments were received expressing concerns that the Project is inconsistent with the Hazards Element (Environmental Justice) of the Countywide Plan because the Project will disproportionately affect the census tract that is already affected by existing air quality pollution levels, that the Project will disproportionately expose low-income and Latinx households to toxic air emissions, resulting in discriminatory effect based on race and income.

As discussed in Section 5.2, *Air Quality*, of the Draft EIR, the majority of census tracts in the Bloomington Community 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 census tracts within the Environmental Justice Focus Area (EJFA) are listed on Draft EIR page 5.2-22 of Section 5.2, *Air Quality*. The Project site is located in Census Tract 6071002601and has a Composite Score of 71 which is below the Composite Score of 75 to be identified as an EJFA. Also, Figure 5.2-1 from the Draft EIR shows that the Project site is not located within an EJFA.

The Project's consistency with County environmental justice policies is provided in Table 5.10-3 in Section 5.10, *Land Use and Planning*, which details that the Project would be consistent with applicable Countywide Plan Hazards Element policies related to Environmental Justice. In addition, a discussion of the environmental justice focus areas has been included in Chapter 3, *Errata* of this Final EIR.

Master Response 3: Construction and Operational Health Risk Assessment

Comments were received expressing concerns regarding the Project's health risk impacts. As detailed in the Draft EIR Impact AQ-3 discussion that begins on page 5.2-32, a Construction Health Risk Assessment (HRA) (Appendix K to the Draft EIR) and Operational Health Risk Assessment (Appendix B to the Draft EIR) were prepared pursuant to SCAQMD and OEHHA guidelines. SCAQMD recommends using a 10 in one million cancer risk threshold. A risk level of 10 in one million implies a likelihood that up to 10 people, out of one million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the levels of toxic air contaminants over a specified duration of time.

As discussed in Section 5.2, *Air Quality*, of the Draft EIR, the Project would not result in any construction health risks to surrounding residence. As discussed on page 5.2-32 of Section 5.2, *Air Quality*, the land use with the greatest potential exposure to Project construction DPM source emissions is Location R7 (shown on Figure 5.2-2) which is located approximately 29 feet south of the Project site at an existing residence located at 17834 Otilla Street. R7 is placed at the private outdoor living area (backyard) facing the Project site. At the maximum incremental cancer risk attributable to Project construction DPM source emissions is estimated by the Construction Health Risk Assessment modeling to be 0.98 in one million with implementation of Mitigation Measure AQ-1 requiring the use of Tier 4 construction equipment, 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 threshold of 1.0. All other receptors would experience less risk than what is identified for this location. 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, and impacts would be less than significant.

An operational Health Risk Analysis, included as part of Appendix B to the Draft EIR, was prepared to evaluate the operational health risk impacts as a result of exposure to DPM as a result of heavy-duty diesel trucks traveling to and from the Project site, maneuvering onsite, and entering and leaving the site during operation of the proposed industrial uses. Table 5.2-12 in Draft EIR Section 5.2, Air Quality, provides a summary of the calculated operational diesel emission concentrations at the nearest sensitive receptors. Receptor 8 is located at Bloomington High School, south of the Project site, and all other receptors are located at nearby residential structures. Table 5.2-12 in Section 5.2, *Air Quality*, shows that the cancer risk from the proposed Project's operational DPM emissions would be as high as 1.4 per million persons at the closest residential structure to the Project site boundary. The TAC concentrations at the nearby sensitive receptors would be below the SCAQMD's threshold of 10 per million persons. Therefore, operation of the proposed Project would result in a less than significant impact related to the cancer risk from TAC emissions.

Therefore, based on the results of the construction and operational Health Risk Assessments prepared for the Project, the Project would not expose sensitive receptors within the Bloomington community to substantial pollutant concentrations.

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
Agencies		
A1	Colton Joint Unified School District	August 22, 2022
A2	San Bernardino County Department of Public Works	August 16, 2022
Organizations		
O1	Californians Allied for a Responsible Economy	August 22, 2022
O2	Center for Community Action and Environmental Justice	August 22, 2022
O3	Concerned Neighbors of Bloomington	August 22, 2022
O4	Peoples Collective for Environmental Justice	August 22, 2022
O5	Blum Collins	August 9, 2022
O6	Sierra Club	August 23, 2022
Individuals		
I1	Ana Carlos	August 22, 2022
I2	Annie Whiteker	August 22, 2022
I3	Connor Squellati	August 22, 2022
I4	Effren Perez	August 22, 2022
I5	Emmanuel Perez	August 22, 2022
I6	Eze Miguel Iheanacho	August 22, 2022
I7	Gary Grossich	August 22, 2022
I8	Irma Garcia	August 22, 2022
I9	Jorge Perez	August 22, 2022
I10	Jorge Perez	August 22, 2022
I11	Jose Becerra	August 22, 2022
I12	Jose Garcia	August 22, 2022
I13	Lily and Lizeth Gutierrez	August 22, 2022
I14	Maria Perez	August 22, 2022
I15	Mary Rios	August 22, 2022
I16	Multiple Residents	August 22, 2022
I17	Rahul Niranjan	August 22, 2022
I18	Selena Lopez	August 22, 2022

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LETTER A1: Colton Joint Unified School District (29 pages)

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 22, 2022

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

Via E-mail: Aron.Liang@lus.sbcounty.gov
Subject: Comments on Draft Environmental Impact Report for Proposed Duke Warehouse at Slover and Alder Project (PROJ-2021-00081, State Clearinghouse #2021120526)

Dear Mr. Liang:

Colton Joint Unified School District (District) appreciates the opportunity to submit comments on the Draft Environmental Impact Report (DEIR) for the proposed Duke Warehouse at Slover and Alder project (State Clearinghouse #2021120526). The District previously submitted comments on the Project Application and responded to the Notice of Preparation (see Attachment A).

The proposed development is a 259,481-square-foot, high-cube warehouse distribution facility with 38 trailer truck docks and 85 trailer truck stalls on 13.23 acres, located south of Slover Avenue and east of Alder Avenue, in unincorporated Bloomington, San Bernardino County (Project). The Project site has a land use designation of Limited Industrial (LI) and is zoned Community Industrial (IC). It is adjacent to sensitive land uses, i.e., residences, to the south and west, and 340 feet north of Bloomington High School. It is anticipated that Project truck trips will pass by Slover Mountain High School, as they access the Interstate-10 ramps on Cedar Avenue. Table 1 lists District schools within one mile of the Project site:

A1.1

Table 1
District Schools Within One Mile of Project

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

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Project Description

1) **Project Improvements on West Side of Alder Avenue.** DEIR Section 3.5, *Description of the Project*, provides that the northwest driveway on Alder Avenue would be available for trailer truck access. Use of this driveway may require indirect, offsite improvements that would cause environmental impacts that have not been addressed in the DEIR. It is unclear whether truck use would be limited to right-in and -out only or if full access would be allowed. We understand the Project would require roadway improvements to the planned width of the eastern half of Alder Avenue, adjacent to the Project site. However, it is not clear whether improvements would be required on the western half of the same segment of Alder Avenue.

   As shown in the below photo, the western half of the Alder Avenue right-of-way operates one narrow lane and contains power lines and private residential yards with existing improvements. If southbound vehicles on Alder Avenue would be allowed to turn left onto the Project's northwest driveway, which is approximately 175 feet south of the intersection, it would appear that there would be inadequate queueing pockets for left turn movements from Alder Avenue into the northwest driveway and also to westbound Slover Avenue. Would the Project require the widening of the western half of Alder Avenue? If so, would the power lines be relocated, and would the Project require the taking of private property? These activities and actions, if required as a part of the Project, would need to be evaluated and disclosed in the DEIR. Alternatively, as provided in the District's response to the Project's Notice of Preparation (Attachment A), the County should consider prohibiting trailer trucks from accessing both Project driveways on Alder Avenue; this would minimize potential pedestrian and Project trailer/truck conflicts on Alder Avenue; see Comment 13. A1.2



View of Alder Avenue, south of Slover Avenue. Note the narrowing of the southbound lane where the truck is parked. Without improvements to the western half of Alder Avenue, southbound vehicles on Alder Avenue turning left into the Project's driveways on Alder Avenue may cause indirect traffic delay.

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2) **Project Truck Routes.** As the Project is a warehouse distribution facility and a critical component of its operations would be trucking activities, the project description should include information on truck circulation on the Project site and offsite. Neither the DEIR Project Description, Transportation section, nor VMT Screening Analysis (DEIR Appendix J) identifies the Project's proposed offsite truck routes.

   a. Please include the Project's proposed truck routes and confirm their access onto the Project site in the DEIR Project Description.

   b. Please analyze the environmental effects that would be caused by Project truck operations on the proposed truck routes, including, but not limited to roadway intersection and segment impacts, pedestrian safety, and diesel emissions generated along the truck routes.

A1.3

Related Projects for Cumulative Impact Analysis

3) **Flawed Cumulative Impact Analysis.** Each environmental topic in DEIR Section 5, includes discussion of cumulative impacts. Some are based on whether the Project complies with adopted plans and policies. Other cumulative impact analyses are based on related projects in unincorporated Bloomington, City of Fontana, and City of Jurupa Valley. DEIR Section 5.0 mentions a list of cumulative projects listed in DEIR Table 4-8, but this table is missing. Without this information, it is unclear which related projects have been included in the cumulative impact analysis and whether the DEIR captures all cumulative effects. Therefore, the cumulative analysis provided for each environmental topic addressed in the EIR is inadequate. Please note, the District previously requested in our Response to the Notice of Preparation the following:

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

Without information on related projects, neither decisionmakers at the Lead Agency nor the public can appreciate whether the Project's incremental effects would be cumulatively considerable. The DEIR deprives the public of a meaningful opportunity to discuss and critique the Project's cumulative impacts. The DEIR must be updated to include a list of related projects used for cumulative analysis and recirculated for public review with this information provided.

A1.4

Air Quality and Health Risk Assessment

The District has serious concerns about the health risks and hazards associated with emissions from truck operations. The District retained BlueScape Environmental to peer review the air quality analysis and

A1.5

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health risk assessment. BlueScape primarily reviewed the DEIR Appendix B *Air Quality, Energy, Greenhouse Gas Emissions and Health Risk Assessment Impact Analysis*[1][2] and the Appendix K *Slover/Alder Avenue Industrial Project Construction Health Risk Assessment*.[2] The focus of the technical review was on analysis that the DEIR failed to complete and technical assumptions that underreported emissions, which resulted in the DEIR not adequately disclosing Project-specific impacts, cumulative health risk impacts, and the localized criteria pollutant impacts on the community. BlueScape's review confirms the need for recirculation of revised analysis, per comments provided herein, and the high importance of enforcing appropriate mitigation for Project-related emissions impacts.

The Project would generate a large source of pollutant emissions that would expose members of the Bloomington community—including sensitive residents, school children and elderly that are already disproportionately burdened by multiple sources of pollution—to high levels of toxic and carcinogenic diesel exhaust or diesel particulate matter (DPM); particulate matter (PM) with aerodynamic diameter less than or equal to 10 microns or 2.5 microns (PM_{10} or $PM_{2.5}$); oxides of nitrogen (NO_x); and other pollutants, from construction and operations. A1.5

The primary concern is cancer risk and respiratory health impacts from these pollutants. During construction, diesel-powered equipment such as graders and bulldozers would be operated throughout the day. Fine dust emissions would be generated from earth dropped into piles and loaded onto haul trucks. These emissions would be particularly high, including at locations such as Bloomington High School, on both a maximum daily and annual basis. DPM, $PM_{2.5}$ and NO_x emissions will also result from traffic associated with the operation of proposed warehouse, with many heavy-duty diesel-fueled trucks travelling through the community.

Children's Health and Toxic Air Pollution. Children, such as students at Bloomington High School or those residing near the Project location and its truck routes, are generally more susceptible to adverse health impacts from exposure to toxins than adults, according to the EPA Integrated Science Assessment for Particulate Matter.[3]

Children 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, the Office of Environmental Health Hazard Assessment (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 A1.6

[1] *Air Quality, Energy, Greenhouse Gas Emissions and Health Risk Assessment Impact Analysis – Slover/Alder Avenue Industrial Project Bloomington.* February 7, 2022.
[2] *Slover/Alder Avenue Industrial Project Construction Health Risk Assessment.* June 1, 2022.
[3] *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. p. 8-5. December 2009.

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updated the recommended air toxics health risk assessment procedures in February 2015.[4] Children breathe at a faster rate than adults per unit 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 (CARB) in a letter to San Bernardino County dated December 15, 2021.[5] 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 children, with impacts mitigated to the fullest extent feasible to protect children.

A1.6 Cont.

The Project proposes to conduct construction during daytime hours that overlap with the hours when classes at the nearby Bloomington High School would be in session, into the afternoon hours, when students use outdoor recreational facilities. Therefore, toxic emissions, dust, and odors from proposed Project construction and/or operation during these hours will likely be blown into the campus, classrooms, administrative buildings, and recreational facilities of Bloomington High School, as well as Slover Mountain High School, which is on the truck route to I-10 Freeway.

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.[6] In doing so, CARB 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.*"[7] The mixture of toxic gases and particles combine together to form DPM, which persons are exposed to when breathing emissions from diesel-fueled engines. DPM lodges in the 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

A1.7

[4] *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.
[5] Letter from R. Krieger, California Air Resources Board, to A. Liang, County of San Bernardino Land Use Services Department Planning Division, December 15, 2021.
[6] *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.
[7] Ibid. p. ES-1

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68% of the air toxics-related cancer risk to persons living in the Los Angeles Basin is due to exposure to diesel exhaust.[8] DPM is the toxic air contaminant of primary concern in the South Coast Air Basin.[9] The DPM emissions from the Project, therefore, contribute to an already existing high health burden from local and regional DPM emissions.

The health effects of exposure to PM emissions, especially fine and ultrafine particles including DPM and fugitive PM, is well documented in South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP).[10] 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 referenced in the AQMD, 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. A1.7 Cont.

Oxides of nitrogen (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.[11] According to CalEnviroScreen 4.0, the census tract one block east of the site (just east of Locust Avenue) is associated with an asthma rate that is higher than 83% of the census tracts in California.[12] The Project site is located in an area that yields the 70th Percentile Risk Score, while a number of the Bloomington areas east are already subjected to the Highest (90th Percentile) Risk Score in CalEnviroScreen. As such, the Project will impact all of these SB535 disadvantaged communities that are already disproportionately burdened by multiple sources of pollution.

4) **Health-Protective Significance Thresholds for Students.** To protect children attending school and living near the Project construction and operations, the County must utilize health-protective air quality impact significance thresholds to provide an added measure of protection for children and A1.8

[8] *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.
[9] *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.
[10] Final 2016 AQMP, Appendix I, p.I-19 to I-49.
[11] Final AQMP Chapter 2, Table 2-1, p. 2-4.
[12] CalEnviroScreen 4.0, Office of Environmental Health Hazard Assessment, https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40, Accessed July 19, 2022.

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families living and attending school within one to two miles of Project construction and operations, including heavily traveled truck transportation routes.

The SCAQMD publishes CEQA review significance thresholds on their website.[13] These thresholds are generally acceptable for CEQA review, but are not sufficiently health-protective for children, asthmatics, or immunocompromised individuals living or attending school within one to two miles of large warehouse/industrial developments such as the Duke Warehouse. The high pollution from these types of 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.

A1.8 Cont.

For warehouse and related development projects, the County should use the health-protective thresholds summarized in Table 2 below for cancer risk impacts from DPM emissions during Project construction and operations, and for PM_{10} and $PM_{2.5}$ and NO_2 emissions from Project operations. The health impacts from these pollutants on children are of the utmost concern to the District and should be of the County. The recommended health-protective thresholds in Table 2 are compared with SCAQMD's CEQA significance thresholds. Lastly, based upon the OEHHA Guidelines[14] recommendation for reviewing short-term health impacts from construction projects and SCAQMD Rule 1401, the County should adhere to a more health-protective cancer risk significance threshold of 1 in one million for construction emission impacts.

A1.9

Table 2
Health-Protective Significance Thresholds
Compared To SCAQMD CEQA Significance Thresholds

Pollutant	Scenario/ Time Period	SCAQMD Air Quality Significance Thresholds [a]	Health-Protective Thresholds
Toxic Air Contaminants (TACs) Thresholds			
Diesel Particulate Matter	Construction	Maximum Incremental Cancer Risk ≥ 10 in 1 million	Maximum Incremental Cancer Risk ≥ 1 in 1 million [b]
	Operations		Maximum Incremental Cancer Risk ≥ 10 in 1 million [b]
Ambient Air Quality Standards for Criteria Pollutants			

[13] 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.
[14] *Air Toxics Hot Spots Program Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments*, Table 8.17. p. 8-18.

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Table 2
Health-Protective Significance Thresholds
Compared To SCAQMD CEQA Significance Thresholds

Pollutant	Scenario/ Time Period	SCAQMD Air Quality Significance Thresholds [a]	Health-Protective Thresholds
NO2	1-hour average	0.18 ppm (state) (Equivalent to 339 µg/m³)	20 µg/m³ [c]
	Annual arithmetic mean	• 0.03 ppm (state) (Equivalent to 56.4 µg/m³) • 0.0534 ppm (federal) (Equivalent to 100 µg/m³)	1.0 µg/m³ [c]
PM10	24-hour average	10.4 µg/m³ (construction)	5.0 µg/m³ [d]
		2.5 µg/m³ (operation)	2.5 µg/m³
	Annual average	1.0 µg/m³	1.0 µg/m³
PM2.5	24-hour average	10.4 µg/m³ (construction)	1.2 µg/m³ [e]
		2.5 µg/m³ (operation)	1.2 µg/m³ [e]
	Annual average	(no standard)	0.2 µg/m³ [e]

a. SCAQMD's Air Quality Significance Thresholds found at: www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf.
b. Lower review threshold for projects (or traffic from projects) in vicinity of schools, based upon SCAQMD Rule 1401 (www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf).
c. Most stringent Ambient Air Quality Standard and Allowable Change in Concentration from AQMD Rule 1303 Table A-2, found at www.aqmd.gov/docs/default-source/rule-book/reg-xiii/rule-1303-requirements.pdf.
d. Based on the 24-hour US EPA Prevention of Significant Deterioration (PSD) Significant Impact Level (SIL) for PM_{10}, found at Title 40, Volume 2 of *Code of Federal Regulations*, Section 51.165(b)(2): www.govinfo.gov/content/pkg/CFR-2011-title40-vol2/pdf/CFR-2011-title40-vol2-sec51-165.pdf.
e. EPA recommended Significant Impact Level (SIL) values for $PM_{2.5}$ found at: www.epa.gov/sites/default/files/2018-04/documents/sils_policy_guidance_document_final_signed_4-17-18.pdf.

A1.9 Cont.

5) Flawed Construction HRA. The DEIR construction HRA has flaws and technical errors, including potentially underestimating emissions from equipment used onsite during construction, placing too few receptor locations to assess health risk impacts, using incorrect modeling parameters, and using child exposure assumptions that are not considered to be health-protective. Construction activities will expose nearby residents and District schools such as Bloomington High 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 possibly significant risk of short-term health impairment and long-term disease, including cancer and asthma.

A1.10

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The DEIR failed to conduct a proper HRA for construction activities, including cancer and noncancer chronic and acute risk impacts from Project construction emissions. It is important to note that DEIR Appendix K (*Slover/Alder Avenue Industrial Project Construction Health Risk Assessment*, June 1, 2022) references the SCAQMD's *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis* (August 2003). The Mobile Source Guidance is nearly 20 years old and is outdated; the Guidance has not been updated for current CEQA regulation requirements, current SCAQMD and OEHHA modeling and health risk assessment guidance, and to account for industrial/population growth and the disproportionate health impacts to persons in the area, as established in recent years by OEHHA per CalEnviroScreen. The guidance was intended as interim as of 2003.

A1.10 Cont.

Onsite construction exhaust listed in Appendix 2.1 of Appendix K (Construction HRA) assumes Tier 4 equipment in the HRA analysis, claiming a 90% reduction in PM emissions, and therefore only uses one tenth of the amount listed in the CalEEMod output listed in Appendix B (AQ/GHG/Energy/HRA). This reduction may be reasonable if all equipment transitioned from Tier 2 or 3 to Tier 4, rather than transitioning from average equipment emissions assumed by CalEEMod (which would already include Tier 3 and 4 equipment). If Tier 4 equipment is to be claimed, it should be selected in the Construction Mitigation section of CalEEMod, to not over credit emission reductions. In addition, CalEEMod 2020.4.0 uses OFFROAD 2011 and EMFAC 2017 to estimate emissions. Because emission rates for some equipment/vehicle types may be higher for the same scenario year, the latest versions of these programs should be used (OFFROAD2021 and EMFAC2021) when modeling emissions. As a result of these issues, emissions may be underestimated.

A1.11

The receptor placement in the DEIR construction HRA is inadequate and may fail to locate the maximum residential cancer risk impacts. 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, should be used. Because emissions modeling incorporates many different elements, maximum impacts may occur in a location other than the closest off-site buildings.

The construction AERMOD setup uses two overlapping volume sources with a length of 611 feet. To properly and conservatively account for the areas where emissions will occur, these emissions sources would be better modeled as a single area source covering the entire area of construction.

A1.12

For the construction cancer risk calculations, the fraction of time at home (FAH) assumption was assumed to be 0.85 for the age bin of 0-2; this should be corrected to 1.0 for residents under age 16 (as per SCAQMD Guidelines). In addition, the daily breathing rate (DBR) assumption should be 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.[15] This DBR

[15] *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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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.

The 30-year cancer risk results for the assumed maximum exposed receptor was 0.98 in one million. With only the change of a corrected FAH, this would be 1.15 in one million, which would exceed the 1 in one million 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. A1.12 Cont.

6) **Flawed Operational HRA.** The DEIR failed to conduct a proper HRA for operational activities, including cancer and noncancer chronic and acute risk impacts from Project operational emissions. The DEIR operational HRA (in the DEIR Appendix B, *Air Quality, Energy, Greenhouse Gas Emissions and Health Risk Assessment Impact Analysis*, February 7, 2022) has flaws and technical errors including potentially underestimating truck traffic for the Project, using too few receptor locations to assess health risk impacts, and using child exposure assumptions that are not considered to be health-protective. As a result, the operational cancer risk impacts at school sites, especially at Bloomington High School, and the community may be underestimated. A1.13

There was no traffic impact analysis conducted for the Project; instead, a VMT screening analysis was done, using a daily Project trip generation of 1.4 trips/thousand square feet (KSF), with an assumed even split of traffic east and west on Slover Avenue. If these Project trips are split evenly along Slover Avenue, the heavy-duty diesel trucks would travel next to Slover Mountain High School on their way to I-10 Freeway, and if alternately routed down Alder Avenue, would travel next to Bloomington High School. A1.14

Trip rates from the latest ITE Trip Generation (11th Edition) were used but based solely on the footprint of the high-cube warehouse, rather than the typical Gross Floor Area (GFA); considering a 48-ft-tall warehouse as one story may be underestimating the traffic impacts. In addition, the Project description is listed as high-cube warehouse, with no tenants identified. If the Project were to be utilized as a high-cube fulfillment center, with 6.44 trips per KSF, rather than a high-cube transload facility, with 1.4 trips per KSF (see Table 4, below), then emissions would be significantly underestimated. A1.15

The receptor placement in the DEIR operational HRA is inadequate and fails to locate the maximum residential cancer risk impacts. 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, should be used. Because emissions modeling incorporates many different elements, maximum impacts may occur in a location other than the closest building. Because there are multiple loading docks which will be operated throughout the day, the point idling source in the A1.16

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center of the loading docks would be better represented by an area source covering the entirety of the docking area.

As mentioned prior, EMFAC2017 emission rates were used for vehicle emissions; this should be updated to EMFAC2021. Emission rates for some combinations of vehicle types and speeds are higher in EMFAC2021 than EMFAC2017 for the same scenario year. As a result, emissions and health risk impacts may be underestimated.

Assumed vehicle speeds (10 mph onsite and 40 mph offsite) may be too high. Due to the short distances between the driveways and the docks onsite, and the short distances between controlled intersections, these assumed speeds are more likely maximum speeds than average speeds. As a result, emissions and health risk impacts may be underestimated.

A1.16 Cont.

The cancer risk calculations are performed only for operations, over a 30-year exposure duration period. Because the impacts to residents and school children could be greater for combined construction and operational emissions, a separate cancer risk calculation should be performed, adding the combined impacts of construction and operations over a 30-year exposure period. In addition, the DBR assumption should be 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.[16] 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.

A1.17

The County should require the operational HRA to be updated to address these flaws and technical errors that may underreport emissions and impacts, mitigating any impacts above the SCAQMD-recommended cancer risk review threshold of 10 in one million.

7) **Lack of Operational Air Quality Impact Analysis for PM_{10}, $PM_{2.5}$, NO_2 and Other Emissions from Operations, Including Fugitive Dust and Fine Particulate from Diesel-fueled Vehicles.** The DEIR failed to conduct an air quality impact analysis (AQIA) for operational activities, including PM_{10}, $PM_{2.5}$, NO_2, 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, as is the case for Project operations. It is also important to note that the LST Guidance is nearly 15 years old and outdated; the Guidance has not been updated for current CEQA regulation requirements, SCAQMD and EPA modeling guidance, for the current ambient health standards, for recognized health thresholds (Table 2 above), and to account for industrial/population growth and disproportionate health impacts to persons in the area, as established in recent years by

A1.18

[16] *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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OEHHA per CalEnviroScreen. The District is concerned about this improper use of outdated Guidance and lack of analysis. The District is also concerned about 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 that will occur near schools.

The County should require a new mitigation analysis to show how operational impacts for these pollutants will be mitigated below CEQA significance thresholds. The impacts would be even greater if combined with cumulative projects such as recently constructed and future nearby warehouse projects, and impacts from the nearby I-10 freeway, major roads, and rail lines.

A1.18 Cont.

The DEIR is deficient by not including an AQIA. This is a serious omission. The County must prepare an AQIA for public review and comment, mitigating any impacts above the SCAQMD-recommended review significance thresholds. The AQIA should include Project site-related impacts, as well as impacts along truck routes.

8) **When a Cumulative Analysis is Performed, the Health Risk and Air Quality Impacts of Project Emissions Combined with Existing Emission Sources and Planned Projects may be Cumulatively Considerable.** The cancer risk calculations in the DEIR HRA do not address Project cumulative impacts with existing emission sources and planned projects within one to two miles of Project emission sources, such as the Bloomington Business Park Specific Plan; development of other existing (or planned) warehouses, and existing major roadways; railroads; freeways; and industrial operations nearby (see Comment 3). The health risk and air quality impacts in the community are expected to be much greater and may be cumulatively considerable with inclusion of the emissions from related projects and existing ambient conditions.

Nearby existing and future air toxic and criteria pollutant emission sources should be identified, and the cumulative health risk and air quality impacts from nearby projects should be included in the Duke Warehouse DEIR. The DEIR Appendix B Section 10.3 and Appendix K Section 1 improperly referenced the SCAQMD *White Paper on Potential Strategies to Address Cumulative Impacts from Air Pollution*[17] as the reason why a cumulative impact analysis should not be required for the Project. This White Paper was intended as a strategy review, is nearly 20 years old, and is thus outdated; it does not consider current CEQA or SCAQMD regulations and policies. The reference in the Addendum HRA and the White Paper refers to SCAQMD's decisions on the meaning of "cumulatively considerable" for projects where SCAQMD is the Lead Agency (which they are not in this case) and does not apply to decisions by the County of San Bernardino or any other entity as Lead Agency. The fact is that the County has not prepared adequate documentation in the record as required by CEQA to show that the Project is not cumulatively considerable. The County has not addressed the high pollution burden

A1.19

[17] White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf, August 2003.

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within the local disadvantaged communities, with consideration for the existing conditions and the impacts from many recently developed and other future projects. If such analysis finds the Project to be cumulatively considerable for air toxics health risk and/or criteria pollutant impacts, the County has not required fair share mitigation as required by CEQA. A1.19

Thus, the DEIR failed to address cumulative emissions, health risk and air quality impacts along truck routes at residential and school locations, including other industrial and warehouse projects within one to two miles such as the Bloomington Business Park Specific Plan, West Valley Logistics Center, railroads, major roadways, and freeways, which could contribute significantly to health impacts. Given the high concentration of existing and potential future air toxic emissions sources in the Bloomington area, any cumulative sources within at least one to two miles (and likely farther) from the site or from the main Project travel routes could contribute to significant impacts when combined with Project emissions. Use of a smaller distance to define other existing and future emission sources with cumulative impacts such as 1,000 feet would be inadequate. Any cumulative 30-year or 70-year cancer risk impacts in the community from the Project that are above a 10 in one million lifetime cancer risk calculations, or any criteria pollutant impacts exceeding the thresholds in Table 2 above, need to be fully mitigated to below that level. A1.20

9) As documented Above, the Project will incrementally contribute to the community's burden of truck traffic and related emissions. It is anticipated that the AQIA when prepared and revised HRA, updated based on comments provided herein, would show Project emissions encroaching onto the Bloomington High School campus. Accordingly, the District requests the County to condition the Applicant to implement a community benefit fund, similar to that identified in a settlement between the California Attorney General and the City of Fontana[18] for the purpose of reducing air quality impacts at the Bloomington and Slover Mountain High School campuses, as follows: A1.21

   - Improve indoor air quality by improving existing school facilities, including, but not limited to modernizing existing and constructing new structures that can accommodate new hospital-grade HVAC systems (with MERV 16+ filtration).
   - Improve outdoor air quality by constructing improvements along the perimeter of the campuses to limit emissions from entering, including, but not limited to green walls and landscaping, including the planting of staggered, mature evergreen trees that can reach a height of 45 feet.

[18] *See Sierra Club v. City of Fontana*, CIVSB2121605/CIVSB2121829 (July 23, 2021, California Superior Court, City of San Bernardino)

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Transportation and Pedestrian Safety

DEIR Impact TR-1 and DEIR Impact TR-3 are conclusory and lack analysis substantiating how the Project would not conflict with County plans concerning roadway, bicycle, and pedestrian facilities, and how the Project would not increase hazards due to trailer truck traffic accessing the Project's northwest driveway.

10) **Prepare a Traffic Impact Study (TIS).** A TIS was not prepared for the Project and DEIR. Based on criteria provided in Chapter 2, *Need For Transportation Impact Study*, of the *San Bernardino County Transportation Impact Study Guidelines dated July 9, 2019* (County TIS Guidelines), the Project requires a traffic study under the following criteria: A1.22

- If the project is located within 300 feet of… The intersection of two streets designated as Collector or higher in the County's General Plan or the Department's Master Plan, and
- If a project generates 100 or more trips without consideration of pass-by trips during any peak hour.

The Project is at the southeast intersection of Alder Avenue and Slover Avenue. According to the Countywide Plan Transportation & Mobility Element TM-1(A-E) Roadway Network Map, Alder Avenue is a designated Secondary Highway, and Slover Avenue is a designated Major Highway. Both streets have designations higher than Collector. The adjoining roadways meet the requirement for preparation of a Project TIS. A1.23

Furthermore, as substantiated in Comment 12, the DEIR underestimates potential traffic impacts with the use of a low trip generation rate. If a conservative trip generation rate were used, the Project could generate 1,758 passenger car equivalent (PCE) average daily trips (ADT) and 266 AM and 243 PM peak hour PCE trips (see Table 4, below), exceeding the 100+ trip threshold and warranting the preparation of a TIS.

The District requests that a TIS be prepared for the Project. The TIS must be completed in accordance with a scoping agreement, approved by the San Bernardino County Department of Public Works, Traffic Division and in accordance with County TIS Guidelines. The TIS should follow County TIS Guidelines Section 6, *Transportation Impact Study Format*, and include but not be limited to the following analysis: A1.24

a. **Cumulative Development (Related Projects) Analysis.** The TIS must incorporate traffic from proposed and approved related projects, as discussed in Comment 3 above, including San Bernardino County's proposed Bloomington Business Park Specific Plan project and the City of Fontana's proposed West Valley Logistics Center project, which proposes a substantial number of passenger vehicles using Alder Avenue and Locust Avenue.

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b. **Traffic Signal Warrant Analysis** must be conducted for the intersections on Slover Avenue at Alder Avenue and Laurel Avenue, completed in accordance with the California Manual on Uniform Traffic Control Devices.

c. **Site Access Analysis and Safety and Operation Improvement Analysis of all Four Driveways** must be conducted. The northwest driveway on Alder Avenue is roughly 175 feet south of the Alder Avenue/Slover Avenue intersection. The analysis must evaluate adjacent roadway improvements, including the western half of Alder Avenue, if needed (see Comment 1); queueing analysis of southbound Alder Avenue to turn left into the Project's northwest driveway and of northbound Alder Avenue to turn left onto westbound Slover Avenue; and site access improvements for heavy trucks during construction and operation of the Project to determine if adequate curb radii is available.

A1.24 Cont.

For purposes of pedestrian safety, because the Project is in close proximity to Bloomington High School and shares the same routes for vehicle and student access to the campus (i.e., Slover Avenue and Alder Avenue), the District requests analysis of both Slover Avenue intersections at Laurel Avenue and Alder Avenue, compliant with County TIS Guidelines Section 3.1.2, *Study Area Boundaries for LOS Assessment*. The TIS must identify roadway improvements to ensure vehicle, pedestrian, and bike safety. The TIS must be incorporated into the DEIR for recirculation and public review.

11) Select Appropriate Trip Generation Rate. DEIR Section 3.5, *Description of the Project*, describes the proposed high-cube building operations as "a warehouse distribution and logistics operator, a light manufacturer, or a similar industrial use." The Project proposes a speculative tenant, and the extent of operations is not clear. Nevertheless, the Project utilizes a trip generation rate that may substantially underestimate the site's potential passenger and truck trips. Table 3 shows trip generation rates for high-cube warehouse developments and land use categories mentioned in the DEIR project description.

Table 3
11th Edition (2021), ITE Trip Generation Manual Rates for
High-Cube Warehouses, Industrial Park, Manufacturing, and Warehouse Land Use Categories

Land Use Category	Trip Generation Rates from *Trip Generation Manual* (trips per 1,000 square feet)		
	ADT	AM Peak Hour	PM Peak Hour
Industrial Park (ITE LU Code 130)	3.37	0.34	0.34
Manufacturing (ITE LU Code 140)	4.75	0.68	0.74
Warehouse (ITE LU Code 150)	1.71	0.17	0.18

A1.25

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High-Cube Transload and Short-term Storage Warehouse (ITE LU Code 154)	1.40	0.08	0.10
High-Cube Fulfillment Center Warehouse: Sort (ITE LU Code 155)	6.44	0.87	1.20
High-Cube Fulfillment Center Warehouse: Non-Sort (ITE LU Code 155)	1.81	0.15	0.16
High-Cube Parcel Hub Warehouse (ITE LU Code 156)	4.63	0.70	0.64
High-Cube Cold Storage Warehouse (ITE LU Code 157)	2.12	0.11	0.12

Source: ITE *Trip Generation Manual*. 11th Edition, 2021.

A1.25 Cont.

As shown, the trip generation rates for the anticipated uses at the Project site range from 1.40 average daily trips (ADT) to 6.44 ADT. DEIR Table *5.12-1: Project Trip Generation,* and DEIR Appendix J, *Trip Generation and Vehicle Miles Traveled (VMT) Screening Analysis for the Project*, dated November 18, 2021, used the High-Cube Transload and Short-term Storage Warehouse trip generation rate to calculate Project trips. Neither report justifies why this rate was selected and/or its appropriateness for the Project. The DEIR applies the lowest trip generation rate for speculative operations and potentially underestimates traffic impacts, pedestrian safety hazards, as well as air quality impacts and health risks from TACs, as these two analyses are based on the number of Project truck trips on- and offsite. Use of the lower trip generation rate would also result in erroneous findings that the Project would not trigger a TIS and preparation of a VMT analysis.

12) **Traffic Control Required at Slover Avenue and Alder Avenue Intersection (DEIR Impact TR-1).** The District retained Michael Baker International to conduct a traffic impact assessment of the intersection of Slover Avenue at Alder Avenue, a two-way, stop control intersection adjacent to the Project site. As the DEIR was made available for public review during the summer, when school was out, new trip counts were not taken. Instead, trip counts collected on January 26, 2017, for the TIA for the Bloomington Business Center located on Slover Avenue, between Laurel Avenue and Locust Avenue, were used. The ITE High-Cube Parcel Hub Warehouse trip generation rate of 4.63 trips per 1,000 SF was applied, as well as the more likely opening year of 2024. As the operator is speculative, this trip rate was used as a reasonable, yet conservative representation of the potential Project operations as it roughly average of the ITE High-Cube Warehouse development trip rates, as well as average of the industrial and manufacturing land use rates. The Opening Year 2024 conditions assumed an ambient growth rate of 1% per year from 2017 to 2024 (7 years or 7% growth). The analysis is conservative, as it does not include trips from cumulative projects. Inclusion of related Project trips would increase the impacts reported herein. As shown in Table 4, the Project would generate 1,758 PCE ADT and 266 AM and 243 PM peak hour PCE trips.

A1.26

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Table 4
Project Trip Generation Table

Land Use	Units	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Trip Rates								
High-Cube Parcel Hub Warehouse	TSF	4.63	0.35	0.35	0.70	0.44	0.20	0.64
	259.481	1201	91	91	182	113	53	166
Passenger Vehicles	69%	829	63	63	125	78	37	115
2-Axle Trucks	6.80%	82	6	6	12	8	4	11
3-Axle Trucks	5.50%	66	5	5	10	6	3	9
4+ Axle Trucks	18.70%	225	17	17	34	21	10	31
TOTAL	100%	1201	91	91	182	113	53	166
	PCE Factor							
Passenger Vehicles	1.0	829	63	63	125	78	37	115
2-Axle Trucks	1.5	123	9	9	19	12	5	17
3-Axle Trucks	2.0	132	10	10	20	12	6	18
4+ Axle Trucks	3.0	674	51	51	102	63	30	93
TOTAL		1758	133	133	266	165	78	243

A1.26 Cont.

As shown in Table 5, the change in traffic delay during the AM peak hour would be 31.6 seconds and the change in delay during the PM peak hour would be 6.7 seconds; Synchro worksheets are available upon request. The Project would exceed the County's threshold of a 5 second delay for improvement of the intersection of Slover Avenue at Alder Avenue. According to the County TIA Guidelines, the Project would require improvements at this intersection, prior to the opening of the Project. The District requests the County to install a traffic signal at this intersection in order to improve not only traffic impacts, but also to enhance pedestrian safety. Therefore, the DEIR has not adequately addressed DEIR Impact TR-1 related to the Project's conformance with the County's programs, plans, and policies addressing roadway, bicycle, and pedestrian facilities.

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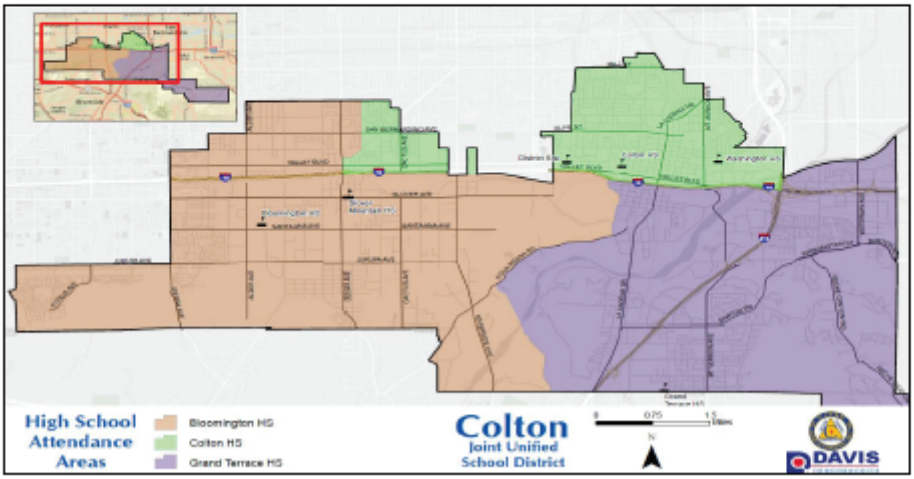
Table 5
Project Intersection Level of Service Summary

Study Intersection	Traffic Control	Existing Condition (Year 2017)		Opening Year 2024 Without Project Condition		Opening Year 2024 Plus Project Condition		Difference	
		AM Peak Hour Delay - LOS	PM Peak Hour Delay - LOS	AM Peak Hour Delay - LOS	PM Peak Hour Delay - LOS	AM Peak Hour Delay - LOS	PM Peak Hour Delay - LOS	AM Peak Hour Delay	PM Peak Hour Delay
Slover Ave / Alder Ave	Two-Way Stop Control	40.4 - E	41.8 - E	48.3 - E	55.4 - F	79.9 - F	62.1 - F	31.6	6.7

NOTE: Delay is expressed in seconds per vehicle.
LOS is Level of Service where LOS E and F is considered deficient operating conditions in San Bernardino County.
Delay for the Two-Way Stop Control is the worst approach delay (northbound approach)

A1.26 Cont.

13) **Pedestrian Safety Hazards Caused by Incompatible Uses (DEIR Impact TR-3).** The analysis provided in Impact TR-3 does not address the Project's transportation hazards due to incompatible uses. As shown in the below figure, Bloomington High School's attendance area (i.e., brown-shaded area) expands north of Interstate-10. Some students living north of the freeway walk to/from home and school along Slover Avenue, via either the Sierra Avenue or Cedar Avenue freeway underpasses.



A1.27

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The District is concerned with increased conflicts between pedestrian and vehicle/truck traffic at all four Project driveways and roadways traveled by students. As mentioned in Comment 1, the District requests the County prohibit trailer truck access on both driveways on Alder Avenue in an effort to reduce potential pedestrian and truck conflicts. If this cannot be done, the District requests the County evaluate pedestrian safety at Bloomington High School and Slover Mountain High School, including but not limited to the preparation of a Complete Streets Study for the southern Bloomington community and implement the required roadway improvements and to ensure pedestrian and bicycle facilities are properly implemented. A1.28

Alternatively, a Project-specific pedestrian safety hazards assessment should be prepared as a part of the DEIR to determine the Project's pedestrian safety hazards at Bloomington High School. This study should consider the following:

- Installation of a new school crosswalk with flashing lights at the intersection of Alder Avenue at Otilla Street. The lighted crosswalk would create a pedestrian route between Bloomington High School and Slover Avenue that would direct students away from the proposed driveways on Alder Avenue that would be used by Project trailer trucks.
- Install appropriate signage on Alder Avenue and Laurel Avenue to restrict heavy vehicles based on weight limits.
- Install traffic calming measures along Alder Avenue and Laurel Avenue, such as speed humps, roundabouts, etc. making the roads less desirable for trucks, i.e., added time to travel or difficult to maneuver. A1.29
- Establish a hotline for residents to notify the County if heavy vehicles frequently use the non-designated truck routes (Alder Avenue and Laurel Avenue).
- Evaluate pedestrian and vehicle conflicts at Project truck-accessed driveways; potential mitigation to minimize conflicts may include sounding a whistle when the gates open for trailer truck ingress/egress and stationary mirrors to improve drivers' sight of pedestrians about to cross the driveways.

As documented, DEIR Impact TR-3 does not adequately address the incompatibly of the Project and nearby school operations, as well as the potential pedestrian safety hazards at Project driveways and along passenger and truck routes. This analysis must be prepared, and the DEIR must be updated and recirculated for public review.

14) The Project will incrementally contribute to the community's burden of truck traffic and increase truck-pedestrian conflicts, including around Bloomington High School. The District requests the County to condition the Applicant to implement a community benefit fund (see Comment 9), for the

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payment of crossing guards at the intersections of Slover Avenue/Alder Avenue, Santa Ana Avenue/Alder Avenue, Santa Ana Avenue/Laurel Avenue, and any other locations deemed necessary by the pedestrian safety hazards assessment, including but not limited to the intersection of Alder Avenue/Otilla Street.

A1.29 Cont.

Recirculation of the DEIR

As demonstrated herein, the DEIR lacks analysis on the topics of air quality, health risk, and transportation facilities. The District has substantiated the need to update analysis related to these issues and has identified mitigation to reduce potentially significant impacts. The revised DEIR must be recirculated for public review in order to provide the public the opportunity to meaningfully comment on the Project's adverse effects and mitigation measures.

A1.30

Conclusion

Please contact the undersigned at 909.580.6642 or owen_chang@cjusd.net if you would like to further discuss the comments provided herein.

A1.31

Sincerely,

Owen Chang
Facilities & Energy Management Director

Cc: Dr. Frank Miranda, Superintendent

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January 21, 2022

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

Via email: Aron.Liang@lus.sbcounty.gov

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

Dear Mr. Liang:

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

Table 1. Colton Joint Unified School District Schools

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

A1.
32

1. Project Description

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

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

2. **Cumulative Impact Analysis**

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

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

   a. **Sensitive Receptors.** The project-level and cumulative analysis for air quality and health risk should assess the proposed Project's stationary emissions and mobile source emissions and how they may impact surrounding sensitive receptors, including District schools, especially Bloomington High School as it is 340 feet south of the Project site and Slover Mountain High School because it is located along the proposed Project's truck route.

   b. **Health-Protective Significance Thresholds.** The proposed Project is in a community with some of the highest pollution burden in all of California. Pollution burden represents the potential exposures to pollutants and the adverse environmental conditions caused by pollution. Warehouse developments generate a substantial amount of truck traffic and associated diesel particulate matter (DPM), which has the potential to adversely affect sensitive populations and their pollution burden, especially school-aged children, attending schools and living near these uses.

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

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

A1.32 Cont.

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

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

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

Pollutant	Scenario/Time Period	SCAQMD Air Quality Significance Thresholds	Health-Protective Thresholds
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
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

A1.32 Cont.

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

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

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

A1.3 2 Cont.

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

4. Noise

a. **Sensitive Receptors.** The noise analysis should identify residential uses and District schools as sensitive receptors and evaluate noise generated by increased truck traffic to and from the Project site, including Bloomington High School, which is 340 feet south of the Project site, and Slover Mountain High School, which is at the northeast corner of the Slover Avenue and Cedar Avenue intersection, along a likely truck route that would be used by the Project.

b. **Noise and Vibration Analyses.** The proposed Project has the potential to increase ambient noise and vibration levels and adversely affect sensitive populations. The proposed Project may degrade the ambient noise environment, disrupt the learning environment, and increase adverse health effects related to high levels of noise exposure at Bloomington High School and Slover Mountain High School, which is likely along the designated truck route. The noise and vibration analysis must determine the proposed Project's direct and indirect impacts, as well as cumulative impacts on indoor and outdoor noise at Bloomington High School and Slover Mountain High School

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Colton Joint Unified School District

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

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and mitigate the impacts accordingly.

5. **Transportation**

   a. **Increased Traffic.** The District has concerns related to the increased vehicle and truck traffic near its schools. With existing poor levels of service near freeway ramps and major intersections along Slover Avenue, the increase in traffic has the potential to disrupt and delay drop-off and pick-up activities at schools near the Project site (e.g., Bloomington High School) and along truck routes (e.g., Slover Mountain High School). The District requests that the environmental analysis prepared for the project address these issues and identify appropriate mitigation.

   b. **Pedestrian Safety.** The increase in traffic and operations will also impact pedestrian safety near District schools. Students who walk to and from school would be required to cross intersections that trailer trucks are likely to use. Please evaluate whether the intersections of Slover/Alder, Slover/Cedar, and Slover/Sierra have adequate pedestrian safety features and whether the proposed Project would impair safe routes to the schools listed on Table 1. Please also note, students walking to Bloomington High School may be required to cross the proposed Project's driveways. Therefore, we recommend that trailer trucks not use the driveways on Alder Avenue.

A1.32 Cont.

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

Sincerely,

Owen Chang

Owen Chang
Facilities & Energy Management Director

Cc: Dr. Frank Miranda, Superintendent

ATTACHMENT 'A'

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

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November 29, 2021

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

Via email: Aron.Liang@lus.sbcounty.gov

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

Dear Mr. Liang:

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

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

A1.33

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

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

cardiovascular disease in children.[1] CJUSD requests the County to consider the incompatible land uses between the proposed warehouse project and adjacent sensitive land uses.

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

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

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

A1.33 Cont.

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

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

[1] University of Southern California. Traffic-Related Pollution Linked to Early Markers for Cardiovascular Disease in Children. 2021, April 29. https://news.usc.edu/185647/auto-emissions-pollution-children-cardiovascular-disease-usc-research/
[2] California Department of Justice. Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse- best-practices.pdf
[3] California Air Resources Board (CARB), Air Quality and Land Use Handbook: A Community Health Perspective (April 2005), at ES-1. CARB staff has released draft updates to this siting and design guidance which suggests a greater distance may be warranted under varying scenarios; this document may be found on CARB's website and is entitled: "California Sustainable Freight Initiative: Concept Paper for the Freight Handbook" (December 2019).

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

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

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

Incompatible Land Uses. Land uses south of the Project site include rural residential, limited commercial, and two schools: Bloomington High School and Ruth O. Harris Middle School. Since the proposed Project would not be consistent with CARB's guidance to provide a minimum 1,000-foot buffer between warehouse facilities and the nearest sensitive receptors, the District requests that the County restrict all truck trailer access south of the Project site during construction and operation phases. All trucks should access the Project site from Slover Avenue and be restricted to travel south on Alder Avenue, which is the western boundary of the Project site and that dead ends at the foothill of Jurupa Hills Regional Park. This would limit not only diesel emissions dispersed to sensitive land uses south of the Project site, but also potential conflicts between vehicles and pedestrians at Bloomington High School and Harris Middle School. A1.33 Cont.

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

Sincerely,

Owen Chang

Owen Chang
Facilities & Energy Management Director

Cc: Dr. Frank Miranda, Superintendent
File

Response to Comment Letter A1: Colton Unified School District, dated August 22, 2022

Comment A1.1: This comment states that the commenter appreciates the opportunity to submit comments on the DEIR. The comment summarizes the proposed development as 259,481 square feet and states that the Project site has a land use designation of Limited Industrial (LI) and is zoned Community Industrial (IC). The comment also states that the Project site is adjacent to sensitive land uses including residences and Bloomington High School. The comment states that Project truck trips would pass by Slover Mountain High School as they access the Interstate-10 ramps on Cedar Avenue. The comment included Table 1 below to show the schools within one mile of the Project site.

Table 1
District Schools Within One Mile of Project

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

Response A1.1: The comment summarizes the project description and states the zoning. Slover Mountain High School buildings are approximately 570 east of Cedar Avenue. This comment is informative in nature and does not provide detailed concerns related to the analysis within the Draft EIR or raise any CEQA issues. Therefore, no further response is required or provided.

Comment A1.2: This comment states that the use of the driveway on Alder Avenue may require indirect offsite improvements that would cause environmental impacts that have not been addressed in the DEIR. The comment also states that it is unclear whether truck use would be limited to right-in and out or if full access would be allowed. The comment states that the commenter understands that the Project would require improvements to the planned width of the eastern half of Alder Avenue, adjacent to the Project site but it is not clear whether improvements would be required on the western half of the same segment of Alder Avenue.

The comment states the western half of the Alder Avenue right-of-way operates one narrow lane and contains power lines and private residential yards with existing improvements. The comment states that if southbound vehicles on Alder Avenue would be allowed to turn left onto the Project's northwest driveway which is approximately 175 feet south of the intersection, there would be inadequate queueing pockets for left turn movements from Alder Avenue into the northwest driveway and westbound Slover Avenue. The commenter asks if the Project would require the widening of westbound Slover Avenue and asks if the power lines would be relocated and require the taking of private property. The comment states that these activities and actions would need to be evaluated and disclosed in the DEIR. The commenter also states that the County should consider prohibiting trailer trucks from accessing both Project driveways on Alder Avenue as it would minimize potential pedestrian and Project trailer/truck conflicts on Alder Avenue. The following image was provided to show the View of Alder Avenue.



View of Alder Avenue, south of Slover Avenue. Note the narrowing of the southbound lane where the truck is parked. Without improvements to the western half of Alder Avenue, southbound vehicles on Alder Avenue turning left into the Project's driveways on Alder Avenue may cause indirect traffic delay.

Response A1.2: The Project would include frontage improvements along Slover and Alder Avenue and would not include improvements along the western half of Alder Avenue across the street from the Project site. Trucks would have full access to both driveways on Slover Avenue. As clarified in Final EIR Chapter 3, *Errata*, the driveway on Alder Avenue would be limited to passenger vehicle access only. There are no power lines along the Project frontages that would require undergrounding, as discussed in Section 3.0 of the Draft EIR. The driveway on Alder Avenue would only allow passenger vehicles. This comment does not provide any substantial evidence concerning an environmental impact. Thus, the Project would not require additional analysis in the DEIR and no further response is warranted.

Comment A1.3: The comment states that the project is a warehouse distribution facility and a critical component of its operations would be trucking activities. The comment requests information on truck circulation on the Project site and offsite and states that neither the project description, transportation section, or VMT screening analysis identifies the Project's proposed offsite truck routes. The comment asks that the Final EIR include the proposed truck routes and an analysis of all of the environmental effects that would be caused by Project truck operations on the proposed truck routes, including, but not limited to roadway intersection and segment impacts, pedestrian safety, and diesel emissions generated along the truck routes.

Response A1.3: As shown on Figure 3-6 in Chapter 3 of this Final EIR, Project trucks would utilize established truck routes as identified in the Focused Traffic Impact Analysis prepared for the County. As shown, trucks would be directed away from existing residential neighborhoods and Bloomington High School. Further, truck access would not be provided on the driveway on Alder Avenue, which would further limit any potential for trucks utilizing Alder Avenue for site access. In addition, a safety analysis was prepared which has been included as Appendix C to the Final EIR. As discussed in the Safety Study, a traffic signal was recommended to be added to the intersection of Slover and Alder Avenue to improve intersection safety.

This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. 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, including cumulative impacts, related to traffic congestion. However, a Focused Traffic Impact Analysis (FTIA) was prepared and included as Appendix D of the DEIR for informational purposes. As discussed in the FTIA, all intersections operate at a

satisfactory LOS except for the intersection of Slover Avenue and Alder Avenue. The Project would install a signal at Slover and Alder Avenues which would result in a satisfactory LOS at this intersection.

As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project 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 Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. The Operational Mobile Health Risk Assessment and Construction Health Risk Assessment were prepared pursuant to the guidelines set forth by SCAQMD and the Office of Environmental Health Hazard Assessment (OEHHA). In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

The EIR adequately discloses potential impacts related to trucks traveling to and from the Project site and no further response is warranted.

Comment A1.4: This comment states that each environmental topic in DEIR Section 5 includes discussion of cumulative impacts. Some are based on whether the Project complies with adopted plans and polices while other cumulative impact analyses are based on related projects in unincorporated Bloomington, City of Fontana, and City of Jurupa Valley. DEIR Section 5.0 mentions a list of cumulative projects listed in DEIR Table 4-8 but the table is missing. The comment states that without this information it is unclear which related projects have been included in the cumulative analysis and whether the DEIR captures all cumulative effects. The comment states that the cumulative analysis provided for each environmental topic addressed in the EIR is inadequate. The commenter added a portion of the response to the NOP as outlined below.

The comment states that to properly capture cumulative traffic and air quality impacts, related projects should include past, present, and reasonably foreseeable probable future projects that were not in operation when traffic counts were taken. The geographic area and related projects should include those in the Bloomington community and the City of Fontana and that would access the Interstate-10 ramps at Sierra Avenue and Cedar Avenue. The comment states that without information on related projects, neither decisionmakers at the Lead Agency nor the public can appreciate whether the Project's incremental effects would be cumulatively considerable. The commenter states that the DEIR deprives the public of a meaningful opportunity to discuss and critique the Project's cumulative impacts. The DEIR must be updated to include a list of related projects used for cumulative analysis and recirculated for public review with this information provided.

Response A1.4: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The Draft EIR prepared for the Project accurately analyzes potential cumulative impacts from the Project in conjunction with other industrial developments in the Project vicinity throughout the Draft EIR and specifically under the cumulative impacts section in each Chapter 5 section. As described throughout the Draft EIR, all of the potential impacts related to implementation of the Project would be less than significant or reduced to a less than significant level with implementation of mitigation measures that are imposed by the County of San Bernardino and effectively reduce environmental impacts.

As discussed in CEQA Guidelines Section 15130(b), a cumulative analysis can rely on either a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or a summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan.

The cumulative effect of the proposed Project taken into consideration with other development projects in the area would be limited, because the Project would develop the site consistent with the Countywide Plan land use designation, zoning classification, and County Ordinances, and would not result in substantial

effects to any environmental resource topic, as described throughout the Draft EIR document. The San Bernardino Countywide Plan EIR analyzed potential cumulative impacts related to the development of warehouses pursuant to Countywide Plan designations. As such, areawide cumulative impacts related to warehouse development, including cumulative impacts related to the Project were thoroughly analyzed in the Countywide Plan EIR, and an additional cumulative analysis was not required as part of the Draft EIR pursuant to CEQA Guidelines Section 15130(d). As discussed in Section 15130(d), no further cumulative impacts analysis is required when a project is consistent with a general, specific, master or comparable programmatic plan where the lead agency determines that the regional or areawide cumulative impacts of the proposed Project have already been adequately addressed.
In addition, projects that do not exceed the SCAQMD's project-specific thresholds are not considered to be cumulatively significant in terms of air quality. Since the Project would not exceed the SCAQMD health risk or air quality thresholds, the Project would not result in a cumulative air quality impact pursuant to SCAQMD guidance. This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. DEIR Section 5.0 has been revised in Chapter 3, Errata to remove reference to Table 4-8. Thus, no further analysis is required.

Comment A1.5: The comment states that the District has serious concerns about the health risks and hazards associated with emissions from truck operations. The comment states that the focus on technical review was on analysis that the DEIR failed to complete and technical assumptions that underreported emissions which resulted in the DEIR not adequately disclosing Project-specific impacts, cumulative health risk impacts, and the localized criteria pollutant impacts on the community. The comment states that BlueScape's review confirms the need for recirculation of revised analysis, per comments provided herein, and the high importance of enforcing appropriate mitigation for Project-related emissions impacts.

The comment states that the Project would generate a large source of pollutant emissions that would expose members of the Bloomington community including sensitive residents, school children and elderly that are already disproportionately burdened by multiple sources of pollution to high levels of toxic and carcinogenic diesel exhaust or diesel particulate matter (DPM), particulate matter (PM) oxides of nitrogen (NOx) and other pollutants from construction and operation.

The comment also states that the primary concern is cancer risk and respiratory health impacts from the pollutants. The comment states that during construction, diesel-powered equipment such as graders and bulldozers would be operated throughout the day. The comment also states that these emissions would be particularly high, including at locations such as Bloomington High School, on both a maximum daily and annual basis. DPM, PM2.5 and NOx emissions will also result from traffic associated with the operation of the proposed warehouse, with many heavy-duty diesel-fueled trucks travelling through the community.

Response A1.5: 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 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required. Refer to Response A1.3.

comment does not provide any substantial evidence that the Project would result in a significant environmental impact Thus, no further analysis is required.

Despite the differing opinion offered by commenter's consultant, the existence of disagreement among experts concerning the conclusions of an EIR or the propriety of the analytical methods employed in an EIR are not indicative of any deficiency. The County, as CEQA lead agency, is entitled to choose among conflicting expert opinions. (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal. 3d 376, 409; *Greenbaum v. City of Los Angeles* (1984) 153 Cal.App.3d at 412, 413; (*Browning-Ferris v. City Council* (1986) 181 Cal.App.3d 852 at 863).

Comment A1.6: This comment states that children at Bloomington High School or those residing near the Project location and its truck routes are generally more susceptible to adverse health impacts from exposure to toxins than adults. The comment also states that children under 18 undergo significant growth and development. The comment states that children need greater protection under California state laws. The comment states that the Office of Environmental Health Hazard Assessment prepared several technical support documents to update the methods for health risk assessors to use to review impacts at various life stages and update the recommended air toxics HRA procedures in February 2015. The comment states that children breathe at a faster rate than adults 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 (CARB) in a letter to San Bernardino County dated December 15, 2021. 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 children, with impacts mitigated to the fullest extent feasible to protect children.

The comment states that the Project proposes to conduct construction during daytime hours that overlap with the hours when classes at the nearby Bloomington High School would be in session and when students use outdoor recreational facilities. The comment also states that the toxic emissions, dust, and odors from proposed Project construction and/or operation during these hours will likely be blown onto the campus, classrooms, and facilities of Bloomington High School as well as Slover Mountain High School which is on the truck route to the I-10 freeway.

Response A1.6: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Refer to Response A1.3.

Comment A1.7: The comment states that 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. The comment states that CARB has designated diesel exhaust as a state-regulated Toxic Air Contaminant (TAC), based upon the determination that such exhaust is a human carcinogen.6 In doing so, CARB designated diesel exhaust as an air pollutant which may cause or contribute 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 mixture of toxic gases and fine particles combine together to form DPM which people are exposed to when breathing emissions from diesel-fueled engines. The comment describes that DPM delivers more than 16 potent substances known to cause cancer and states that diesel exhaust is also associated with long-term non-cancer immunological effects such as respiratory diseases. The comment states that high short-term exposures to diesel exhaust can lead to increased symptoms of irritation, compromised pulmonary function, and asthma. The comment states that DPM is the contaminant of primary concern in the South Coast Air Basin and DPM emissions from the Project contribute to an already high health burden from local and regional DPM emissions.

The comment states that the major health effects of exposure to PM emissions include increased mortality, respiratory disease, cardiovascular disease. The comment also states that 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. The comment states that greater mortality rates and respiratory effects are associated with smaller particles.

The comment states that Oxides of nitrogen (NOx) emissions include nitrogen oxide (NO) and nitrogen dioxide (NO2) from mobile source fuel combustion. As with particulate emissions, NO2 emissions have also been linked to respiratory effects. The SCAQMD AQMP Table 2-1 states NO2 has the potential to aggravate chronic respiratory disease in children with asthma. The comment also states that According to CalEnviroScreen 4.0, the census tract one block east of the site (just east of Locust Avenue) is associated with an asthma rate that is higher than 83% of the census tracts in California. The Project site is located in an area that yields the 70th Percentile Risk Score, while a number of the Bloomington areas east are

already subjected to the Highest (90th Percentile) Risk Score in CalEnviroScreen. The comment concludes by stating that the Project will impact all of these SB535 disadvantaged communities that are already disproportionately burdened by multiple sources of pollution.

Response A1.7: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed in Master Response 1, with regard to CalEnviroScreen, this tool was developed by OEHHA and the California Environmental Protection Agency (CalEPA). While CalEnviroScreen can assist CalEPA in prioritizing resources and helping promote greater compliance with environmental laws, it does have several limitations. The tool's output provides a relative ranking of communities based on a selected group of available datasets, through the use of a summary score. Unlike the health risk assessments prepared for the proposed Project, a CalEnviroScreen score is not an expression of health risk and does not provide quantitative information on increases in cumulative impacts for specific sites or projects. Further, as a comparative screening tool, the results do not provide a basis for determining when differences between scores are significant in relation to public health or the environment. Accordingly, CalEnviroScreen is not intended to be used as a health or ecological risk assessment for a specific area or site. Therefore, the fact that the Project is located in an area that CalEnviroScreen identifies as in a higher percentile for pollution burden is not indicative of a CEQA impact.
As discussed in Response A1.3 above and as detailed in the Impact AQ-2 discussion that begins on page 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required.

Comment A1.8: This comment states that the County must utilize health-protective air quality impact significance thresholds to provide an added measure of protection for children and families living and attending school within one or two miles of Project construction and operations, including heavily traveled truck transportation routes. The comment also states that the SCAQMD reviews significance thresholds on their website that are generally acceptable for CEQA review but are not sufficiently health-protective for children, asthmatics, or immunocompromised individuals living or attending school within one to two miles of large warehouse/industrial developments such as the Duke warehouse. The comment states that the high pollution from these types of 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.

Response A1.8: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. According to the State CEQA Guidelines, Lead Agencies have discretion to formulate their own significance thresholds. The County has adopted the use of the SCAQMD thresholds for all projects that are located within the South Coast Air Basin portion of the County. Specifically, the San Bernardino Countywide Plan Draft PEIR, June 2019, states on page 5.3.-21 "CEQA allows the significance criteria established by the applicable air quality management or air pollution control district to be used to assess impacts of a project on air quality. SCAQMD has established thresholds of significance for regional air quality emissions for construction activities and project operation." As such, the use of the SCAQMD thresholds is clearly defined and the use of the SCAQMD thresholds for all projects in the County (and Air Basin) provides for a uniform analysis of all projects. This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The Draft EIR includes air quality, health risk, and greenhouse gas analyses pursuant to SCAQMD methodology and the proposed Project information. In response to these analyses, one mitigation measure was applied, and the Project includes 25 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 additional analysis is not required.

Comment A1.9: This comment states that for warehouse and related development projects, the County should use the health-protective thresholds summarized in Table 2 below for cancer risk impacts from DPM emissions during Project construction and operations, and for PM10 and PM2.5 and NO2 emissions from Project operations. The comment also states health impacts from these pollutants on children are of the

utmost concern to the District and should be of the County. The comment states recommended health-protective thresholds in Table 2 are compared with SCAQMD's CEQA significance thresholds. The comment concludes by stating based upon the OEHHA Guidelines14 recommendation for reviewing short-term health impacts from construction projects and SCAQMD Rule 1401, the County should adhere to a more health-protective cancer risk significance threshold of 1 in one million for construction emission impacts. The comment includes the following tables:

Table 2
Health-Protective Significance Thresholds
Compared To SCAQMD CEQA Significance Thresholds

Pollutant	Scenario/ Time Period	SCAQMD Air Quality Significance Thresholds [a]	Health-Protective Thresholds
Toxic Air Contaminants (TACs) Thresholds			
Diesel Particulate Matter	Construction	Maximum Incremental Cancer Risk ≥ 10 in 1 million	Maximum Incremental Cancer Risk ≥ 1 in 1 million [b]
	Operations		Maximum Incremental Cancer Risk ≥ 10 in 1 million [b]
Ambient Air Quality Standards for Criteria Pollutants			

Table 2
Health-Protective Significance Thresholds
Compared To SCAQMD CEQA Significance Thresholds

Pollutant	Scenario/ Time Period	SCAQMD Air Quality Significance Thresholds [a]	Health-Protective Thresholds
NO2	1-hour average	0.18 ppm (state) (Equivalent to 339 µg/m³)	20 µg/m³ [c]
	Annual arithmetic mean	• 0.03 ppm (state) (Equivalent to 56.4 µg/m³) • 0.0534 ppm (federal) (Equivalent to 100 µg/m³)	1.0 µg/m³ [c]
PM10	24-hour average	10.4 µg/m³ (construction)	5.0 µg/m³ [d]
		2.5 µg/m³ (operation)	2.5 µg/m³
	Annual average	1.0 µg/m³	1.0 µg/m³
PM2.5	24-hour average	10.4 µg/m³ (construction)	1.2 µg/m³ [e]
		2.5 µg/m³ (operation)	1.2 µg/m³ [e]
	Annual average	(no standard)	0.2 µg/m³ [e]

a. SCAQMD's Air Quality Significance Thresholds found at: www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf.
b. Lower review threshold for projects (or traffic from projects) in vicinity of schools, based upon SCAQMD Rule 1401 (www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf).
c. Most stringent Ambient Air Quality Standard and Allowable Change in Concentration from AQMD Rule 1303 Table A-2, found at www.aqmd.gov/docs/default-source/rule-book/reg-xiii/rule-1303-requirements.pdf.
d. Based on the 24-hour US EPA Prevention of Significant Deterioration (PSD) Significant Impact Level (SIL) for PM_{10}, found at Title 40, Volume 2 of *Code of Federal Regulations*, Section 51.165(b)(2): www.govinfo.gov/content/pkg/CFR-2011-title40-vol2/pdf/CFR-2011-title40-vol2-sec51-165.pdf.
e. EPA recommended Significant Impact Level (SIL) values for $PM_{2.5}$ found at: www.epa.gov/sites/default/files/2018-04/documents/sils_policy_guidance_document_final_signed_4-17-18.pdf.

Response A1.9: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed in Response A1.8, Lead Agencies have discretion to formulate their own significance thresholds. In evaluating health risk resulting from Project construction- and operation-source DPM emissions, the applicable significance threshold of 10 in one million was selected, as recommended by SCAQMD. The commenters reference to "health protective thresholds" is unsupported and arbitrary. As such, the Air Quality analysis that has utilized the SCAQMD thresholds is adequate, and no additional analysis is required.

Comment A1.10: This comment states that the DEIR construction HRA has flaws and technical errors including potentially underestimating emissions from equipment used onsite during construction, placing too few receptor locations to assess health risk impacts, using incorrect modeling parameters, and using child exposure assumptions that are not considered to be health-protective. The comment also states that construction activities will expose nearby residents and District schools such as Bloomington High 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 possibly significant risk of short-term health impairment and long-term disease, including cancer and asthma. The comment also states that the DEIR failed to conduct a proper HRA for construction activities including cancer and noncancer chronic and acute risk impacts from Project construction emissions. The comment states that it is important to note that DEIR

Appendix K Mobile Source Guidance is nearly 20 years old and is outdated; the Guidance has not been updated for current CEQA regulation requirements, current SCAQMD and OEHHA modeling and health risk assessment guidance, and to account for industrial/population growth and the disproportionate health impacts to persons in the area, as established in recent years by OEHHA per CalEnviroScreen. The comment states that the guidance was intended as interim as of 2003.

Response A1.10: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The Draft EIR prepared an appropriate construction and operational health risk assessment. The commenter erroneously claims that the HRA for construction is "improper" without substantiating this claim. The commenter attempts to undermine SCAQMD modeling guidance, without providing substantial evidence to point to a more appropriate method. Aside from the age of the guidance, the commenter fails to provide evidence to discredit the SCAQMD's modeling guidance. Furthermore, the underlying emissions are derived from current models and risk calculations are consistent with the latest guidelines from OEHHA. Thus, the construction HRA does not require any revisions and no further response is required.

Comment A1.11: The comment states that onsite construction exhaust listed in Appendix 2.1 of Appendix K (Construction HRA) assumes Tier 4 equipment in the HRA analysis, claiming a 90% reduction in PM emissions, and therefore only uses one tenth of the amount listed in the CalEEMod output listed in Appendix B (AQ/GHG/Energy/HRA). The comment claims that this reduction may be reasonable if all equipment transitioned from Tier 2 or 3 to Tier 4, rather than transitioning from average equipment emissions assumed by CalEEMod (which would already include Tier 3 and 4 equipment). The commenter states if Tier 4 equipment is to be claimed, it should be selected in the Construction Mitigation section of CalEEMod, to not over credit emission reductions. In addition, CalEEMod 2020.4.0 uses OFFROAD 2011 and EMFAC 2017 to estimate emissions. Because emission rates for some equipment/vehicle types may be higher for the same scenario year, the latest versions of these programs should be used (OFFROAD2021 and EMFAC2021) when modeling emissions. The comment states that as a result of these issues, emissions may be underestimated.

Response A1.11: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The Draft EIR and underlying Construction HRA (Appendix K to the Draft EIR) correctly applied a 90% reduction commensurate with the reductions associated with Tier 4 construction equipment. As recommended by the commenter, the selection of Tier 4 was enabled in CalEEMod and the model was re-run. As shown in on page 5 of Appendix B to the Final EIR, the maximum annual unmitigated exhaust emissions would be 0.1208 tons per year. With implementation of Tier 4 equipment included as MM AQ-1, this is reduced to 0.0142 tons per year which is an approximate 90% reduction consistent with the Draft EIR and underlying Construction HRA.

Comment A1.12: The comment states that the receptor placement in the DEIR construction HRA is inadequate and may fail to locate the maximum residential cancer risk impacts. The comment suggests using 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. The comment states that because emissions modeling incorporates many different elements, maximum impacts may occur in a location other than the closest off-site buildings. The comment states that the construction AERMOD setup uses two overlapping volume sources with a length of 611 feet. The comment also states that to properly and conservatively account for the areas where emissions will occur, these emissions sources would be better modeled as a single area source covering the entire area of construction.

The comment also states the fraction of time at home (FAH) assumption was assumed to be 0.85 for the age bin of 0-2; this should be corrected to 1.0 for residents under age 16 (as per SCAQMD Guidelines). The comment states in addition, the daily breathing rate (DBR) assumption should be 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. The comment states that this DBR

assumption is higher, and therefore more health-protective, than the 80th percentile assumption typically used for ages 2 to 70. The comment states 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.

The comment states that the 30-year cancer risk results for the assumed maximum exposed receptor was 0.98 in one million. The comment also states that with only the change of a corrected FAH, this would be 1.15 in one million, which would exceed the 1 in one million health-protective cancer risk significance threshold for construction emission impacts. The comment states that 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.

Response A1.12: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The HRA appropriately places 31 discrete receptor locations in the vicinity of the Project and associated construction activities. As discussed in Appendix K to the Draft EIR, the maximum impact from construction activity occurs immediately adjacent to the east of the Project site as identified in the DEIR and underlying Construction HRA. A gridded receptor layout is not required as there is sufficient coverage with the discrete receptor placement included in the modeling, which discloses the maximum impact to off-site receptor locations. The use of overlapping volume sources is appropriate, and the commenter provides no substantial evidence or justification for the use of a single area source. In addition, SCAQMD's LST guidance utilizes multiple volume sources to represent exhaust-related emissions, consistent with the modeling in the HRA.

The daily breathing rate of 1,090 utilized in the construction HRA for the 0-2 age bin is representative of the 95th percentile breathing rate. Lastly, as noted by the commenter, even if the fraction of time at home (FAH) were adjusted to 1.0, this would result in a risk total of 1.15 in one million which is less than the applicable threshold of 10 in one million. As noted in Response A1.9, the commenter provides no basis for substantiating their arbitrary "health protective" threshold of 1 in one million, which is not consistent with SCAQMD's threshold recommendations. Thus, no additional analysis is required, and no further response is warranted.

Comment A1.13: This comment states that the DEIR failed to conduct a proper HRA for operational activities, including cancer and noncancer chronic and acute risk impacts from Project operational emissions. The comment also states that the DEIR operational HRA has flaws and technical errors including potentially underestimating truck traffic for the Project, using too few receptor locations to assess health risk impacts, and using child exposure assumptions that are not considered to be health protective. As a result, the operational cancer risk impacts at school sites, especially at Bloomington High School, and the community may be underestimated.

Response A1.13: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed in response to comment A1.15 below, the correct Project generated truck traffic was utilized. As detailed in Responses A1.9, above and A1.17 below, the appropriate health protective child exposure assumptions were utilized in the analysis. The results would not change with analyzing more receptors, since the worst-case receptor locations were already selected in AERMOD. However, in order to provide a complete response, the AERMOD model was re-run with a grid receptor added that covered the entire area on the south side of the project site, from the nearest homes to the majority of the Bloomington High School area. In addition, the building height analyzed in AERMOD was changed from 44 feet to 50 feet in the revised AERMOD model run and the revised pages from the Air Quality Analysis are included in Appendix A that show the changes in tracked changes. As shown in the revised AERMOD model run, the changes to the AERMOD model run did not result in a higher cancer risk at any analyzed receptor.

Comment A1.14: This comment states that there was no traffic impact analysis conducted for the Project; instead, a VMT screening analysis was done, using a daily Project trip generation of 1.4 trips/thousand square feet (KSF), with an assumed even split of traffic east and west on Slover Avenue. The comment claims if these Project trips are split evenly along Slover Avenue, the heavy-duty diesel trucks would travel next to Slover Mountain High School on their way to I-10 Freeway, and if alternately routed down Alder Avenue, would travel next to Bloomington High School.

Response A1.14: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Refer to Response A1.3 regarding current traffic analysis requirements under CEQA.

Comment A1.15: The comment states trip rates from the latest ITE Trip Generation (11th Edition) were used but based solely on the footprint of the high-cube warehouse, rather than the typical Gross Floor Area (GFA); considering a 48-ft-tall warehouse as one story may be underestimating the traffic impacts. The comment also states that the Project description is listed as high-cube warehouse, with no tenants identified. The comment states if the Project were to be utilized as a high-cube fulfillment center, with 6.44 trips per KSF, rather than a high-cube transload facility, with 1.4 trips per KSF (see Table 4, below), then emissions would be significantly underestimated.

Response A1.15: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The comment states that the trip generation was based on the building footprint, rather than the Gross Floor Area (GFA). However, the Project site plan clearly shows that the total square footage consists of the building footprint of 256,506 SF and mezzanine of 2,975 SF which totals 259,481 SF. The Project trip generation evaluates 259,481 SF and therefore does not underestimate the square footage of the project or underestimate the traffic impacts. Therefore, the trip generation would not need to be revised and no further analysis is required.

The comment also states that in the event that the Project were to be utilized as a high-cube fulfillment center, then emissions would be significantly underestimated. The land use analyzed in the traffic study is consistent with the Project description, which does not include use of the Project as a high-cube fulfillment center. The tenant would be consistent with the warehouse uses identified and analyzed throughout the Draft EIR. Thus, the Project does not require analysis of a high-cube fulfillment center and no further response is warranted.

Comment A1.16: This comment states that the receptor placement in the DEIR operational HRA is inadequate and requests a grid of 5-meter spacing near Project sites and roadways leading to the sites. The comment states that because emissions modeling incorporates many different elements, maximum impacts may occur in a location other than the closest building. The comment also states that the point idling source in the center of the loading docks would be better represented by an area source covering the entirety of the docking area.

The comment also states that the emission rates should be updated to EMFAC2021 and impacts may be underestimated because of it.

Response A1.16: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed above in response to Comment A1.13, the AERMOD model was re-run with a grid receptor added to the model which did not result in a higher cancer risk at any analyzed receptor. The revised HRA with the added grid receptor is included as Appendix A to the Final EIR. The truck idling emission methodology is described on page 52 of Appendix A and is based on the recommended methodology from the SCAQMD, which recommends idling be analyzed as a point source, in order to realistically analyze truck idling where the exhaust exits the truck engine via a vertical exhaust pipe at a high velocity. If the commenter's method of using an area source was utilized, the velocity and direction of the exhaust could not be analyzed, nor could the building downwash be analyzed, since the AERMOD model does not analyze building downwash effects from area sources. The use of the

EMFAC2017 model was selected, since only the initial EMFAC2022 v1.0.1 (that had not yet even been approved by CARB) was available at the time of the NOP (December 2021). On May 2, 2022 EMFAC2022 v1.0.2 was released that fixed a bug related to exhaust emissions, however the US EPA still has not approved EMFAC2022 and additional changes are expected to the model. As such, the EMFAC2017 still provides the most accurate available truck exhaust emissions rates. The vehicle speeds of 10 mph onsite and 40 mph offsite were utilized based on SCAQMD recommended modeling procedures. In addition, the 10 mph onsite is considered conservative, since the SCAQMD recommends using either 10 mph or 15 mph onsite and the 40 mph offsite is 5 mph slower than the speed limit of 45 mph on Slover Avenue.

Comment A1.17: This comment requests a separate cancer risk calculation be performed by adding the combined impacts of construction and operations over a 30-year exposure period. The comment also states that the DBR assumption should be adjusted to the 95th percentile for all age groups to provide a more conservative but realistic upper bound cancer risk calculation.

Response A1.17: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Combining the construction and operational cancer risks is only recommended by the SCAQMD for projects where construction activities exceed 5 years or for projects that are phased and construction and operational activities could be potentially occurring concurrently. Neither of these two conditions are anticipated to occur for the proposed Project, so the construction and operational HRAs were not combined. Regardless, the construction HRA found a cancer risk as high as 0.98 per million persons and the operational HRA found a cancer risk as high as 1.4 per million persons; therefore, the combined construction and operational cancer risk would be a worst-case of 2.4 per million persons, which is well below the 10 per million persons threshold. The breathing rates utilized in the analysis were based on the "Risk Assessment Procedures for Rules 1401, 1401.1 and 212" (SCAQMD, 2017). These rates require the use of the 95th percentile breathing rates for under 2 years old and 80th percentile breathing rate for all other ages, which provides for a very conservative analysis, since cancer risk analyses are based on 30 year averages. Thus, the HRA would not require additional analysis and no further response is warranted.

Comment A1.18: The comment states that the DEIR failed to conduct an air quality impact analysis (AQIA) for operational activities, including PM_{10}, $PM_{2.5}$, NO_2, SO_2 and CO emissions impacts. The commenter states that 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, as is the case for Project operations. The comment states that the LST guidance is nearly 15 years old and outdated and the District is concerned about the improper use of outdated guidance and lack of analysis. The comment states that the District is also concerned about short and long-term PM_{10} $PM_{2.5}$ and NO_2 impacts from truck diesel exhaust that will occur near schools. The comment requests that the County require a new mitigation analysis to show how operational impacts for these pollutants will be mitigated below CEQA significance thresholds. The comment also states that the DEIR Is deficient by not including a AQIA and is requesting that one is prepared for public review and comment.

Response A1.18: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The Commenter claims that an Air Quality Impact Analysis (AQIA), which is equivalent to a Local Air Quality Analysis should have been performed. Section 9.2 of the Air Quality Report (Appendix B to the Draft EIR) details the thresholds utilized for the Local Air Quality Analysis and since the project site is greater than 5 acres, this Section has utilized "The Fact Sheet for Applying CalEEMod to Localized Significance Thresholds" (SCAQMD 2015) that details SCAQMD-recommended methodology for how to use the Localized Significance Thresholds to analyze projects greater than 5 acres. As detailed above in Response to Comment A1.9, the County has adopted the SCAQMD thresholds for use in all projects in the County, which includes the Localized Significance Thresholds. As such, the Air Quality Report does not need to be revised and no further response is warranted.

Comment A1.19: This comment states that the cancer risk calculations in the DEIR HRA do not address Project cumulative impacts with existing emission sources and planned projects within one to two miles of Project emission sources, such as the Bloomington Business Park Specific Plan; development of other existing (or planned) warehouses, and existing major roadways; railroads; freeways; and industrial operations nearby (see Comment 3). The comment also states that health risk and air quality impacts in the community are expected to be much greater and may be cumulatively considerable with inclusion of the emissions from related projects and existing ambient conditions.

The comment requests that nearby existing and future air toxic and criteria pollutant emission sources should be identified, and the cumulative health risk and air quality impacts from nearby projects should be included in the DEIR. The comment states that the DEIR Appendix B Section 10.3 and Appendix K Section 1 improperly referenced the SCAQMD *White Paper on Potential Strategies to Address Cumulative Impacts from Air Pollution* as the reason why a cumulative impact analysis should not be required for the Project. The comment states that the County has not prepared adequate documentation in the record as required by CEQA to show that the Project is not cumulatively considerable. The comment mentions that the County has not addressed the high pollution burden within the local disadvantaged communities, with consideration for the existing conditions and the impacts from many recently developed and other future projects. The comment claims such analysis finds the Project to be cumulatively considerable for air toxics health risk and/or criteria pollutant impacts andthe County has not required fair share mitigation as required by CEQA.

Response A1.19: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The Commenter claims that the cancer risk calculations do not address cumulative impacts with existing and planned emission sources from within 1 to 2 miles of the Project site. Section 7.4 of the Air Quality Report details the results of the MATES IV Study where the SCAQMD modeled all TAC emissions sources in the Air Basin. The Air Quality Report (Appendix B of the Draft EIR) provides cancer risk levels segmented into one square kilometer areas, which found that the cancer risk from TAC emissions in the vicinity of the Project site is 243 per million persons, which is well below the average cancer risk for the Air Basin of 455 per million persons. In addition, Figure 5.2-1 from the Draft EIR shows that the Project site is not located within an Environmental Justice Focus Area (EJFA). For these reasons, the Commenter's claims that the cumulative health risk impacts are much greater is erroneous, and no further analysis is required.

Comment A1.20: This comment states that the DEIR fails to address cumulative emissions, health risk, and air quality impacts along truck routes at residential and school locations including other industrial and warehouse projects within one to two miles. The comment also states that any cumulative sources within at least one to two miles from the site or from the main Project travel routes could contribute significantly to health impacts when combined with Project emissions. The comment states that use of a smaller distance to define other existing and future emission sources with cumulative impacts such as 1,000 feet would be inadequate. The comment also states that any cumulative 30-year or 70-year cancer risks above a 10 in on million lifetime cancer risk calculations or any pollutant impacts exceeding the thresholds needs to be mitigated to below that level.

Response A1.20: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The Commenter claims that the DEIR failed to address cumulative emissions health risks and local air impacts along truck routes at residential and school locations within two miles of the Project site. As detailed in Response A1.19, SCAQMD found that the cumulative TAC concentrations in the vicinity of the Project site are well below the average for the Air Basin. As detailed above in Responses A1.13 and A1.16, the AERMOD was rerun with more receptors added per Commenter's request and there were no anomalies in the results. As discussed in Appendix A of the Final EIR, the highest concentrations of TAC Emissions were located in the closest proximity to the Project site. As such, modeling out to two miles did not find any higher impacts than what was already disclosed in the Draft EIR. As detailed in Response A1.9, the County utilizes the SCAQMD thresholds for all projects in

order to provide a uniform analysis of all projects. It should also be noted that Bloomington High School is accessed off of Laurel Avenue and Laurel Avenue has several signs that state trucks are restricted from driving on this road. Thus, no further analysis is required for cumulative emissions health risks and local air impacts.

Comment A1.21: This comment states that the Project will contribute to the community's burden of truck traffic and related emissions. The comment also states that the AQIA and revised HRA after being updated would show Project emissions encroaching into the Bloomington High School campus. The commenter requests the County to condition the Applicant to implement a community benefit fund for the purposes of reducing air quality impacts at the Bloomington and Solver Mountain High School campuses as follows:

- Improve indoor air quality by improving existing school facilities, including, but not limited to modernizing existing and constructing new structures that can accommodate new hospital grade HVAC systems (with MERV 16+ filtration).
- Improve outdoor air quality by constructing improvements along the perimeter of the campuses to limit emissions from entering, including, but not limited to green walls and landscaping, including the planting of staggered, mature evergreen trees that can reach a height of 45 feet.

Response A1.21: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The Commenter claims that with additional local air analysis and revisions to the HRA that the results will show a significant impact to the Bloomington High School campus and the Commenter requests a direct payment from the applicant to the School District. As detailed in Response to Comments A1.13 and A1.16, the AERMOD model was re-run with additional receptors that covered most of Bloomington High School and no new health risk impacts were found.

As detailed in the Impact AQ-2 discussion that begins on page 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required. Refer also to Response A1.3.
Thus, there is no nexus for requiring a community benefit fund for the purposes of reducing air quality impacts.

Comment A1.22: This comment states that DEIR Impact TR-1 and TR-3 are conclusory and lack analysis substantiating how the Project would not conflict with County plans concerning roadway, bicycle, and pedestrian facilities, and how the Project would not increase hazards due to trailer truck traffic accessing the Project's northwest driveway. The comment also states that a TIS was not prepared for the Project and DEIR. The comment states that a traffic study is required if a project is located within 300 feet of the intersection of two streets designated as Collector or higher in the County's General Plan and if a Project generates 100 or more trips without consideration of pass-by trips during any peak hour.

Response A1.22: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Refer to Response A1.3 regarding current traffic analysis requirements under CEQA.

Comment A1.23: The comment states that Alder Avenue is a designated secondary highway and Slover Avenue is a designated major highway and both adjoining roadways meet the requirement for preparation of a Project TIS. The comment also states that the DEIR underestimates potential traffic impacts with the use of a low trip generation rate. The comment also states that the Project could generate 1,758 passenger car equivalent (PCE) average daily trips (ADT) and 266 AM and 243 PM peak hour PCE trips exceeding the 100+ trip threshold and warranting the preparation of a TIS.

Response A1.23: Refer to Response A1.3.

Comment A1.24: The comment requests that a TIS be prepared for the Project. The comment states that the TIS must be completed in accordance with a scoping agreement approved by the San Bernardino County Department of Public Works Traffic Division and in accordance with County TIS Guidelines. The comment also states that the TIS should follow County TIS Guidelines Section 6, Transportation Impact Study Format, and include but not be limited to the following analysis:

- *Cumulative Development (Related Projects) Analysis*. The TIS must incorporate traffic from proposed and approved related projects, as discussed in Comment 3 above, including San Bernardino County's proposed Bloomington Business Park Specific Plan project and the City of Fontana's proposed West Valley Logistics Center project, which proposes a substantial number of passenger vehicles using Alder Avenue and Locust Avenue.
- *Traffic Signal Warrant Analysis* must be conducted for the intersections on Slover Avenue at Alder Avenue and Laurel Avenue, completed in accordance with the California Manual on Uniform Traffic Control Devices.
- *Site Access Analysis and Safety and Operation Improvement Analysis of all Four Driveways must be conducted*. The northwest driveway on Alder Avenue is roughly 175 feet south of the Alder Avenue/Slover Avenue intersection. The analysis must evaluate adjacent roadway improvements, including the western half of Alder Avenue, if needed (see Comment 1); queueing analysis of southbound Alder Avenue to turn left into the Project's northwest driveway and of northbound Alder Avenue to turn left onto westbound Slover Avenue; and site access improvements for heavy trucks during construction and operation of the Project to determine if adequate curb radii is available.

Response A1.24: Refer to Response A1.3 regarding current traffic analysis requirements under CEQA. The scope of work for the traffic study was reviewed and approved by the County. All deficiencies identified in the study are already deficient in the existing condition, therefore no new deficiencies would be identified by inclusion of a cumulative analysis. Furthermore, if cumulative projects were included, the baseline traffic volumes would be higher and therefore the project's fair-share contribution to traffic improvements would be less.

A traffic signal warrant analysis in accordance with the California Manual on Uniform Traffic Control Devices was conducted for the intersection of Alder Avenue/Slover Avenue as a part of the traffic study. The intersection of Laurel Avenue/Slover Avenue was not a part of the signal warrant analysis as this intersection was not a study intersection as per the County approved TIS scoping agreement. Furthermore, the intersection of Laurel Avenue/Slover Avenue was noted to be signalized as per traffic field visit and as per a Google Street survey, hence a signal warrant is not required.

The Project proposes a total of four driveways, two on Slover Ave and two on Alder Avenue. The approved TIS analyses truck traffic such that trucks would be allowed access only on Slover Avenue. 75% of the trucks would access the Project site through the west driveway on Slover Avenue and 25% of the trucks would access the project site through the east driveway on Slover Avenue. Passenger vehicle access was analyzed such that 25% of the vehicles would access the north and south driveway on Alder Avenue, and 75% of the passenger vehicles would access the project site through the east driveway on Slover Avenue.

The following queues were observed on Slover Avenue as a result of the analysis:

- A maximum queuing of 1 foot was noted on eastbound Slover Avenue for trucks and/or passenger vehicles making a right-turn entry into the Project driveways in both the existing and opening year conditions.
- A maximum queuing of 1 foot was noted on westbound Slover Avenue for trucks and/or passenger vehicles making a left-turn entry using the two-way-left-turn lane into the Project driveways in both the existing and opening year conditions.

- A maximum queuing of 1 foot was noted on the project driveways on Slover Avenue for trucks and/or passenger vehicles making a right-turn exit out of the Project site in both the existing and opening year conditions.
- A maximum queuing of 1 foot was noted on the Project driveways on Slover Avenue for trucks and/or passenger vehicles making a left-turn exit out of the Project site in both the existing and opening year conditions.

The following queues were observed on Alder Avenue as a result of the analysis:

- A maximum queuing of 3 feet was noted on southbound Alder Avenue for passenger vehicles making a left-turn entry into the Project driveways in both the existing and opening year conditions.
- A maximum queuing of 1 foot was noted onto northbound Alder Avenue in both the existing and opening year conditions.

The following queues were observed at the intersection of Alder Avenue/Slover Avenue post signal installation as a result of the analysis:

- A maximum queuing of 195 feet was noted for westbound vehicles on Slover Avenue making a left-turn onto Alder Avenue in both the existing and opening year conditions. The existing left-turn pocket lane on westbound Slover Avenue is currently 170 feet immediately followed with a two-way-left-turn lane which allows a safe queueing of 195 feet. Therefore, no queueing deficiencies are expected.
- A maximum queuing of 74 feet was noted for northbound vehicles on Alder Avenue making a left-turn onto Slover Avenue in both the existing and opening year conditions. No safety issues are expected as a result of this queueing.

The results of the analysis noted negligible queueing. No queueing deficiencies are expected during construction and operation. The roadway configuration of the western half of Alder Avenue is sufficient to accommodate roadway operations as a result of the project. The Project is conditioned to install a signal at the intersection of Alder Avenue/Slover Avenue and also to dedicate about 20 feet at Project frontage which would significantly improve intersection safety as further discussed in the Safety Study (Appendix C to the Final EIR). This would include the construction of sidewalk on the eastern side of Alder Avenue which will improve pedestrian and bike safety for high school students.

It should be noted that no project traffic will turn right or turn left from Slover Avenue onto Laurel Avenue. The intersection of Laurel Avenue/Slover Avenue is signalized with protected left-turns onto Laurel Avenue with crosswalks provided. As such, no safety issues to vehicles, pedestrians and bikes are noted at Laurel Avenue/Slover Avenue as a result of the project. Thus, no further analysis is required or warranted.

Comment A1.25: This comment states that the project description describes the proposed high-cube building operations as a "warehouse distribution and logistics operator, a light manufacturer or a similar industrial use." The comment also states that the Project proposes a speculative tenant and the extent of operations is not clear. The comment states that the Project utilizes a trip generation rate that may substantially underestimate the site's potential passenger and truck trips. The comment included Table 3 below to show the trip generation rates.

Table 3
11th Edition (2021), ITE Trip Generation Manual Rates for
High-Cube Warehouses, Industrial Park, Manufacturing, and Warehouse Land Use Categories

Land Use Category	Trip Generation Rates from *Trip Generation Manual* (trips per 1,000 square feet)		
	ADT	AM Peak Hour	PM Peak Hour
Industrial Park (ITE LU Code 130)	3.37	0.34	0.34
Manufacturing (ITE LU Code 140)	4.75	0.68	0.74
Warehouse (ITE LU Code 150)	1.71	0.17	0.18
High-Cube Transload and Short-term Storage Warehouse (ITE LU Code 154)	1.40	0.08	0.10
High-Cube Fulfillment Center Warehouse: Sort (ITE LU Code 155)	6.44	0.87	1.20
High-Cube Fulfillment Center Warehouse: Non-Sort (ITE LU Code 155)	1.81	0.15	0.16
High-Cube Parcel Hub Warehouse (ITE LU Code 156)	4.63	0.70	0.64
High-Cube Cold Storage Warehouse (ITE LU Code 157)	2.12	0.11	0.12

Source: ITE *Trip Generation Manual.* 11th Edition, 2021.

The comment states that the VMT Analysis and Trip Generation does not justify why this rate was selected and states that the DEIR applies the lowest trip generation rate for speculative operations and potentially underestimates traffic impacts, pedestrian safety, air quality, and health risk. The comment also states that using the lower trip rate would result in inaccurate findings that the Project would not trigger the need for a TIA or VMT analysis.

Response A1.25: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The comment states that the trip generation rates underestimate Project trips because the most conservative rates for High-Cube Fulfillment Center and High-Cube Parcel Hub were not used. Neither of these uses are proposed for the site, and in the event that a High-Cube Fulfillment Center or High-Cube Parcel Hub were proposed, the traffic and air quality analyses would need to be revised. Neither CEQA nor the County guidelines require the TIS to evaluate potential land uses that are not proposed as part of the proposed Project. 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. Therefore, no further analysis is required.

Comment A1.26: The comment requests traffic control at Slover Avenue and Alder Avenue intersection and states that trip counts collected on January 26, 2017 for the Bloomington Business Park were used for the TIA. The comment also states that the ITE high-cube parcel hub warehouse trip rate of 4.63 trips per 1,000 SF was applied and an opening year of 2024. The comment states that as the operator is speculative the trip rate was used as a reasonable yet conservative representation of the potential Project operations. The comment also states that analysis is conservative, as it does not include trips from cumulative projects. The comment states inclusion of related Project trips would increase the impacts reported herein. The comment includes Table 4 as shown below.

Table 4
Project Trip Generation Table

Land Use	Units	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Trip Rates								
High-Cube Parcel Hub Warehouse	TSF	4.63	0.35	0.35	0.70	0.44	0.20	0.64
	259.481	**1201**	**91**	**91**	**182**	**113**	**53**	**166**
Passenger Vehicles	69%	829	63	63	125	78	37	115
2-Axle Trucks	6.80%	82	6	6	12	8	4	11
3-Axle Trucks	5.50%	66	5	5	10	6	3	9
4+ Axle Trucks	18.70%	225	17	17	34	21	10	31
TOTAL	**100%**	**1201**	**91**	**91**	**182**	**113**	**53**	**166**
	PCE Factor							
Passenger Vehicles	1.0	829	63	63	125	78	37	115
2-Axle Trucks	1.5	123	9	9	19	12	5	17
3-Axle Trucks	2.0	132	10	10	20	12	6	18
4+ Axle Trucks	3.0	674	51	51	102	63	30	93
TOTAL		**1758**	**133**	**133**	**266**	**165**	**78**	**243**

The comment states that Table 5 shows that the change in traffic delay during the AM peak hour would be 31.6 seconds and the change in delay during the PM peak hour would be 6.7 seconds. The comment states that the Project would exceed the County's threshold of a 5 second delay for improvement of the intersection of Slover Avenue at Alder Avenue. The comment states that the Project would require improvements at the intersection prior to the opening of the Project. The comment concludes by stating the DEIR has not adequately addressed DEIR Impact TR-1 related to the Project's conformance with the County's programs, plans, and policies addressing roadway, bicycle, and pedestrian facilities since it has not installed a traffic signal at the intersection.

Response A1.26: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The comment requests that a traffic signal be installed at the intersection of Slover Avenue/Alder Avenue to improve traffic operations and enhance pedestrian safety. The Project will be conditioned to install a traffic signal at this location and the traffic study has been updated accordingly. In addition, all deficiencies identified in the study are already deficient in the existing condition; therefore, no new deficiencies would be identified by inclusion of a cumulative analysis. Therefore, no further response is warranted.

Comment A1.27: This comment states that the Project does not address transportation hazards due to incompatible uses. The comment includes a figure that shows the Bloomington High School's attendance area and states that students walk to/from home and school along Slover Avenue.

Response A1.27: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. A safety study was conducted and has been submitted for County Review and is included as Appendix C of the Final EIR. As discussed on page 6 of the Safety Study, paved sidewalks would be constructed on the west and north perimeter of the Project site as a part of the proposed Project which would provide high school students a safe space to walk to and from the school bus stop on Slover Avenue to Bloomington High. In addition, truck access would be provided by the two driveways on Slover Avenue and no truck access would be provided on Alder Avenue. Therefore, the Project would not result in a conflict with pedestrian safety. Therefore, no further response is required or provided.

Comment A1.28: The comment states the District is concerned with increased conflicts between pedestrian and vehicle/truck traffic at all four Project driveways and roadways traveled by students. The commenter requests the County prohibit trailer access on both driveways on Alder Avenue or to evaluate pedestrian safety at Bloomington High School and Slover Mountain High School.

Response A1.28: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Refer to Response A1.27.

Comment A1.29: This comment suggests that a Project-specific pedestrian safety hazards assessment should be prepared as a part of the DEIR to determine the Project's pedestrian safety hazards at Bloomington High School. The comment states that the study should include the following:

- Installation of a new school crosswalk with flashing lights at the intersection of Alder Avenue at Otilla Street. The lighted crosswalk would create a pedestrian route between Bloomington High School and Slover Avenue that would direct students away from the proposed driveways on Alder Avenue that would be used by Project trailer trucks.
- Install appropriate signage on Alder Avenue and Laurel Avenue to restrict heavy vehicles based on weight limits.
- Install traffic calming measures along Alder Avenue and Laurel Avenue, such as speed humps, roundabouts, etc. making the roads less desirable for trucks, i.e., added time to travel or difficult to maneuver.
- Establish a hotline for residents to notify the County if heavy vehicles frequently use the non-designated truck routes (Alder Avenue and Laurel Avenue).
- Evaluate pedestrian and vehicle conflicts at Project truck-accessed driveways; potential mitigation to minimize conflicts may include sounding a whistle when the gates open for trailer truck ingress/egress and stationary mirrors to improve drivers' sight of pedestrians about to cross the driveways.

The comment states that DEIR Impact TR-3 does not adequately address the incompatibility of the Project and nearby school operations as well as the potential pedestrian safety hazards at Project driveways and along passenger and truck routes. The comment also states that an analysis be prepared and the DEIR must be recirculated for public review.

Response A1.29: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed in Response A1.27, a safety study was conducted and has been submitted for County Review and has been included as Appendix C of the Final EIR. As discussed on page 6 of the Safety Study, paved sidewalks would be constructed on the west and north perimeter of the project site as a part of the proposed Project which would provide high school students a safe space to walk to and from the school bus stop on Slover Avenue to Bloomington High. The safety study also suggested that a traffic signal be added to the intersection of Alder Avenue and Slover Avenue which will be included as a condition of approval for the proposed Project. The additional requested improvements would not be warranted based on the results of the safety study prepared.

As discussed in Response A1.27 above and in Impact LU-1 on page 5.10-4, the Project is consistent with the County's land use designation and zoning designation with the approval of a conditional use permit to allow for warehousing and distribution uses. Thus, the Draft EIR would not need to be revised to address transportation hazards due to incompatible uses as the Project is consistent with the intended land use for the Project site and is in an area with multiple existing industrial uses. No further response is required or provided.

Comment A1.30: This comment states that the DEIR lacks analysis on the topics of air quality, health risk, and transportation. The comment states that the District has substantiated the need to update analysis and states that the DEIR must be recirculated for public review in order to provide the public the opportunity to comment on the Project's adverse effects and mitigation measures.

Response A1.30: 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 A1.31: This comment provides the contact information for Owen Chang and states that he is available to discuss any comments further.

Response A1.31: The comment is noted.

Comment A1.32: This comment includes the January 21, 2022 comment letter that the District submitted on the Notice of Preparation for the Project. The letter introduces the Project and shows the schools within one mile of the Project site. This comment summarizes the project description and requests that the project description includes the proposed truck routes. The comment states that the cumulative impacts should be properly analyzed. The comment also states that the air quality and health risk should assess the proposed Project's stationary emissions and mobile source emissions. The comment states that the Project is in a community with some of the highest pollution burden in all of California. The comment states that the proposed Project proximity to disadvantaged communities would further exacerbate local air quality and health effects. The comment also states that the District requests the proposed Project use health-protective significance thresholds and not standard thresholds provided by the South Coast Air Quality Management District. The comment requests the proposed Project consider contributing to the District's efforts to fund hospital-grade air purification systems at its schools, including at Bloomington High School and others. The comment states he proposed Project's cumulative air quality impact analysis should consider the metrics established in SCAQMD's WAIRE program to determine appropriate mitigation for project-level and cumulative air quality impacts.

The comment states that the noise analysis should identify residential uses and District schools as sensitive receptors and evaluate noise generated by increased truck traffic to and from the Project site. The comment also states that the proposed Project has the potential to increase adverse health effects related to high levels of noise exposure at Bloomington High School and Slover Mountain High School which is likely along the designated truck route.

The comment also states that the increase in traffic has the potential to disrupt and delay drop-off and pick-up activities at schools near the Project site.

Response A1.32: All comments received on the Notice of Preparation were taken into account in the preparation of the Draft EIR. This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Figure 3-6 in Chapter 3, *Errata*, outlines the truck routes for the proposed Project. As detailed in the Impact AQ-2 discussion that begins on page 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required. Refer also to Response A1.3.

The SCAQMD thresholds serve to determine whether or not a given project has a potentially significant project-level or cumulative impact. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. Thus, the project specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are not considered to be cumulatively significant. Since the Project would not exceed the SCAQMD health

risk or air quality thresholds, the Project would not result in a cumulative impact pursuant to SCAQMD guidance.

The Commenter requests that the noise analysis should identify residential uses and District schools as sensitive receptors and evaluate noise generated by increased truck traffic from the Project site. As detailed in Section 1.2 of the Noise Report, the homes 30 feet south of the project site are identified as the nearest sensitive receptors and Bloomington High School that is as near as 330 feet to the south of the Project site is identified as the nearest school. A discussion of potential impacts related to roadway noise is provided in Section 7.2 of the Noise Report, which found that the Project noise impacts to the nearby roads from Project generated traffic would be negligible. For the corner of Slover Avenue and Cedar Avenue, it is anticipated that approximately half of the Project-generated trips would travel through this intersection. As detailed in Section 7.2, the Project would at most increase the roadway ADT volume by 3.2 percent and in order to increase roadway noise by 3 dB the project would have to increase the roadway ADT volume by 100 percent. As such, the roadway noise impact created by the proposed project to Slover Mountain High School would be nominal. It should also be noted that Laurel Avenue, adjacent to Bloomington High School, has several signs on the road that restrict trucks from driving on this road, so no project generated truck traffic will be driving on Laurel Avenue.

The Commenter claims that the Project may degrade the ambient noise environment, disrupt the learning environment, and increase health effects related to high levels of noise and vibration exposure at Bloomington High School and Slover Mountain High School. Section 7.2 of the Noise Report (Appendix I of the Draft EIR) analyzed the roadway and onsite noise impacts created from the project to the nearby sensitive receptors that included Bloomington High School found the noise impacts to this school would be well below the County noise standards and well below existing ambient noise levels. As such, no significant noise impacts would occur at Bloomington High School from operation of the Project. Slover Mountain High School, which is located over a mile away from the Project site, is too far away to be impacted by noise and vibration created on the Project site. As such, the noise impacts to Slover Mountain High are limited to traffic noise that has been described above and which would be negligible. Section 7.3 of the Noise Report analyzed vibration impacts from the Project and found that at the nearest home the vibration level would be 0.002 inch per second PPV, which is at a level that is not perceptible and well below the County's 0.2 inch per second PPV threshold. Since both schools are located much further away, the vibration level would be much lower than what was calculated at the nearest home. Thus, no further noise analysis is required and no further response is warranted.

Comment A1.33: This letter provides a previous November 29, 2021 comment letter submitted to the County from the District. The comment states that there are six schools within a mile of the Project site and that the District is concerned about the health effects associated with truck-related pollution. The comment also states that CJUSD requests the County to consider the incompatible land uses between the proposed warehouse project and adjacent sensitive land uses. The comment includes the Department of Justice's Warehouse Projects Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. The commenter also requested the County consider the following project-specific features:

- Locate warehouse dock doors on the north side of the property, facing Slover Avenue.
- Locate truck trailer parking on the north side of the property, along Slover Avenue.
- Designate truck trailer driveways on Slover Avenue. Consider ingress-only from the eastern end of the property on Slover and egress-only from the western end of the property, either on Slover Avenue or Alder Avenue. If on Alder Avenue, trucks must be required to turn right only.
- Locate warehouse building(s) along the southern side of the property so it may act as a physical barrier between truck trailer operations and sensitive uses to the south of the property.
- Install a sound wall—with no gaps—on the south side of the property to further reduce hazardous noise and air emissions and impacts.

The commenter requests that the County consider prohibiting Project operation of transport refrigeration units since they are powered by diesel internal combustion engines. The comment also states that the

proposed Project would not be consistent with CARB's guidance to provide a minimum 1,000-foot buffer between warehouse facilities and the nearest sensitive receptors. The District requests that the County restrict all truck trailer access south of the Project site during construction and operation phases. All trucks should access the Project site from Slover Avenue and be restricted to travel south on Alder Avenue, which is the western boundary of the Project site and that dead ends at the foothill of Jurupa Hills Regional Park. The comment concludes by stating that the commenter looks forward to contributing more to the County's planning process.

Response A1.33: 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 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required. The Project does not include refrigerated uses. Thus, the Project would not require the use of TRUs. Refer to Response A1.22 regarding noise impacts. In addition, a 8-foot high solid wall would be placed at the southern boundary of the site. Refer also to Response A1.3.

The SCAQMD thresholds serve to determine whether or not a given project has a potentially significant project-level or cumulative impact. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. Thus, the project specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are not considered to be cumulatively significant. Since the Project would not exceed the SCAQMD health risk or air quality thresholds, the Project would not result in a cumulative impact pursuant to SCAQMD guidance.

As shown on Figure 3-6 (included in Chapter 3 of this Final EIR), both driveways on Slover Avenue would provide full access for trucks. The routes have been reviewed and approved by the County. Thus, no further response is warranted.

Letter A2: San Bernardino County Public Works (2 Pages)

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SAN BERNARDINO COUNTY

Department of Public Works
- Flood Control
- Operations
- Solid Waste Management
- Special Districts
- Surveyor
- Transportation

Brendon Biggs, M.S., P.E.
Director
Noel Castillo, P.E.
Assistant Director

Trevor Leja
Assistant Director

August 16, 2022

Transmitted Via Email
File: 10(ENV)-4.01

Aron Liang, Senior Planner
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RE: **CEQA –COUNTY OF SAN BERNARDINO NOTICE OF COMPLETION AND AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE DUKE WAREHOUSE AT SLOVER AND ALDER PROJECT**

Dear Mr. Liang:

Thank you for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on July 1, 2022** and pursuant to our review, we have the following comments for your consideration and inclusion to public record:

Flood Control Planning & Water Resources Division (Michael Fam, Chief, 909-387-8120):

A2.1

1. We are aware there may be storm drains in and around the site that may be affected by the proposed Project. When planning for or altering existing or future storm drains, be advised that the Project is subject to the San Bernardino County Comprehensive Storm Drain Plan No. 3-4, dated September 1997. It is to be used as a guideline for drainage in the area and is available in the County's Flood Control District offices. Any revision to the drainage should be reviewed and approved by the County Land Use Services Department. Should construction of new, or alterations to existing storm drains be necessary as part of the Proposed Project, their impacts and any required mitigation should be discussed within the Draft EIR before the document is adopted by the Lead Agency.

Permits/Operations Support Division (Fong Tse, Chief, 909-387-7995):

1. The site is located outside of the District's ROW. Based on the top view plans provided no permit is anticipated to be required at this time. However, any encroachment on the District's right-of-way or facilities, including but not limited to access, fencing and grading, utility crossings, landscaping, new and/or alteration to drainage connections will require a permit from the SBCFCD prior to start of construction. The necessity for permits, and any impacts associated with them, should be addressed in the Draft EIR prior to adoption and certification. If you have any questions regarding this process, please contact the FCD Permit Section at (909) 387-1863.

A2.2

BOARD OF SUPERVISORS
Col Paul Cook (Ret.) First District | Janice Rutherford Second District | Dawn Rowe Vice Chair, Third District | Curt Hagman Chairman, Fourth District | Joe Baca, Jr. Fifth District
Leonard X. Hernandez Chief Executive Officer

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

A2.2 Cont.

Sincerely,

Anthony Pham P.E.
Chief,
Environmental Management

Response to Comment Letter A2: San Bernardino County Public Works, dated August 16, 2022

Comment A2.1: This commenter thanks the County for the opportunity to comment on the proposed Project. The comment states that there may be storm drains in and around the site that may be affected by the proposed Project. The comment also states that the Project is subject to the San Bernardino County Comprehensive Storm Drain Plan No. 3-4 dated September 1997. The comment states that any revision to the drainage should be reviewed and approved by the County Land Use Services Department and any required mitigation should be discussed within the Draft EIR before the document is adopted by the Lead Agency.

Response A2.1: As discussed on page 5.9-7 of Section 5.9, *Hydrology and Water Quality*, of the Draft EIR the Santa Ana RWQCB issued the County a Municipal Separate Storm Sewer System (MS4) Permit which establishes pollution prevention requirements for planned developments. As discussed on page 5.9-13 of Section 5.9, *Hydrology and Water Quality*, the Project requires a SWPPP that would address site-specific drainage issues related to construction of the Project and includes best management practices to eliminate the potential of flooding or alteration of a drainage pattern during construction activities. New onsite storm drain water facilities would be installed that would retain 100 percent of the WQMP design capture volume. In addition, the use of the infiltration chamber and landscaping would regulate the rate and velocity of stormwater flows and would control the amount of discharge into the off-site drainage system. As determined by the Preliminary WQMP (Appendix H to the Draft EIR) and Preliminary Drainage Study (Appendix G to the Draft EIR), the proposed drainage improvements would adequately convey flows to the chamber and provide flood protection for the 100-year storm event via the two underground storm drain systems, Line- A and Line-B. As discussed in Section 5.9, impacts would be less than significant and mitigation measures would not be required. Di

Comment A2.2: The comment states that the Project site is located outside of the District's right-of-way (ROW). The comment states that any encroachment on the District's ROW or facilities would require a permit from the San Bernardino County Flood Control District (SBCFCD) prior to start of construction. The comment states the necessity for permits and any impacts associated with them shall be addressed in the Draft EIR. The commenter requests to be added to the circulation list for all Project notices and provides contact information should the County have any questions regarding the comment letter.

Response A2.2: The Project would not encroach into the District's ROW or facilities and would not require a permit from the SBCFCD. 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.

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August 22, 2022

Via Email and Overnight Mail
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Re: **Comments on the Draft Environmental Impact Report for the Duke Warehouse at Slover and Alder Project (Project No. PROJ-2021-00081; SCH No. 2021120526)**

Dear Mr. Liang:

We are writing on behalf of Californians Allied for a Responsible Economy ("CARECA") to provide comments on the Draft Environmental Impact Report[1] ("DEIR") prepared for the Duke Warehouse at Slover and Alder Project (Project No. PROJ-2021-00081; SCH No. 2021120526) ("Project"), proposed by Duke Realty Limited Partnership ("Applicant") and prepared by the County of San Bernardino ("County") pursuant to the California Environmental Quality Act ("CEQA").[2]. O1.1

The Project proposes to demolish existing residential and commercial structures to develop a new 259,481 square foot high-cube warehouse/distribution building and associated infrastructure including driveways, truck and passenger vehicle parking, landscaping, concrete screening walls, and stormwater drainage.

[1] County of San Bernardino, Draft Environmental Impact Report, Duke Warehouse at Slover and Alder Project SCH No. 2021120526 (June 30, 2022) (hereinafter "DEIR"), *available at* http://www.sbcounty.gov/uploads/LUS/Environmental/DUKE_WAREHOUSE_SLOVER_ALDER_DEIR/Slover%20and%20Alder%20Compiled%20DEIR%20(2).pdf
[2] Pub. Resources Code ("PRC") §§ 21000 *et seq.*
6231-004j

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The proposed Project consists of a 50-foot-tall warehouse/distribution building to the parapet and 48 feet to the roof with an outdoor truck court which would occupy approximately the northern third of the site. The Project building would include 5,000 square feet of office space, a 2,975 square foot mezzanine, and 38 dock doors along the north side of the building, facing Slover Avenue.

The Project site is located in the unincorporated community of Bloomington in the southwestern area of San Bernardino County's Valley Region. The Project site is bounded by Slover Avenue to the north and by Alder Avenue to the west. The Project site consists of seven rectangular parcels that together comprise 13.23 acres. The Assessor Parcel Numbers ("APN") for the site include 0256-031-07 through 10, and 0256-031- 17 through 19.

O1.1 Cont.

The Project requires a conditional use permit ("CUP") from the County to allow for warehousing and distribution uses.

We reviewed the DEIR and supporting documents with the assistance of air quality and hazardous resources expert James J. Clark, Ph.D., traffic and transportation expert Norman Marshall, M.S.[3] Based on our review and that of the technical experts, we conclude that the DEIR fails to comply with the requirements of CEQA.

As explained more fully below, the DEIR fails to provide an accurate Project description and environmental baseline upon which to measure the whole Project's reasonably foreseeable impacts. It also fails to analyze reasonably foreseeable uses at the Project site related to the potential truck trips generated by the Project during operation which will substantially affect the Project's impacts upon the environment. As a result, the DEIR does not accurately disclose and fails to mitigate potentially significant air quality, GHG, soil contamination, noise, transportation, and energy impacts. Further, the County cannot make the requisite findings under the County of San Bernardino Code to approve the Project's Conditional Use Permit. The County cannot approve the Project until the errors and omissions in the DEIR are remedied, and a revised DEIR is recirculated for public review and comment which fully discloses and mitigates the Project's potentially significant environmental and public health impacts.

O1.2

[3] **Exhibit A:** James Clark, Comments on Draft Environmental Impact Report (DEIR) For Duke Warehouse At Slover and Alder Project County of San Bernardino, State Clearing House Number 2021120526 (August, 15, 2022) (hereinafter "Clark Comments"); **Exhibit B:** Norman Marshall, Duke Warehouse at Slover and Alder (August 19, 2022) (hereinafter "Marshall Comments").
6231-004j

The technical comments provided by Dr. Clark and Mr. Marshall are submitted to the County in addition to the comments in this letter. Accordingly, the County must address and respond to their comments separately. O1.2 Cont.

I. STATEMENT OF INTEREST

CARECA is an unincorporated association of individuals and labor organizations that may be adversely affected by the potential public and worker health and safety hazards, and the environmental impacts of the Project. The coalition includes the District Council of Ironworkers, Southern California Pipe Trades DC 16, along with their members, their families, and other individuals who live and work in San Bernardino County.

CARECA advocates for protecting the environment and the health of their communities' workforces. CARECA seeks to ensure a sustainable construction industry over the long-term by supporting projects that offer genuine economic and employment benefits, and which minimize adverse environmental and other impacts on local communities.

Individual members of CARECA include County residents Derek Brill, Nicholas Corrigan, Justin Dempsey, and Anthony Diaz. These individuals live, work, recreate, and raise their families in the County and surrounding communities. Accordingly, they would be directly affected by the Project's environmental and health and safety impacts. Individual members may also work on the Project itself. They will be first in line to be exposed to any health and safety hazards that exist onsite. O1.3

In addition, CARECA has an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for its members. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for business and industry to expand in the region, and by making the area less desirable for new businesses and new residents. Indeed, continued environmental degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduce future employment opportunities.

6231-004j

II. LEGAL BACKGROUND

CEQA requires public agencies to analyze the potential environmental impacts of their proposed actions in an EIR.[4] "The foremost principle under CEQA is that the Legislature intended the act to be interpreted in such manner as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language."[5]

CEQA has two primary purposes. First, CEQA is designed to inform decisionmakers and the public about the potential significant environmental effects of a project.[6] "Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made. Thus, the EIR 'protects not only the environment but also informed self-government.'"[7] 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."[8] As the CEQA Guidelines explain, "[t]he EIR serves not only to protect the environment but also to demonstrate to the public that it is being protected."[9] O1.4

Second, CEQA requires public agencies to avoid or reduce environmental damage when "feasible" by requiring consideration of environmentally superior alternatives and adoption of all feasible mitigation measures.[10] The EIR serves to provide agencies and the public with information about the environmental impacts of a proposed project and to "identify ways that environmental damage can be avoided or significantly reduced."[11] If the project will have a significant effect on the environment, the agency may approve the project only if it finds that it has

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[4] PRC § 21100.
[5] *Laurel Heights Improvement Assn. v. Regents of Univ. of Cal ("Laurel Heights I")* (1988) 47 Cal.3d 376, 390 (internal quotations omitted).
[6] Pub. Resources Code § 21061; CEQA Guidelines §§ 15002(a)(1); 15003(b)-(e); *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 517 ("[T]he basic purpose of an EIR is to provide public agencies and the public in general with detailed information about the effect [that] a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to indicate alternatives to such a project.").
[7] *Citizens of Goleta Valley,* 52 Cal.3d at p. 564 (quoting *Laurel Heights I,* 47 Cal.3d at 392).
[8] *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810; *see also Berkeley Keep Jets Over the Bay v. Bd. of Port Comm'rs.* (2001) 91 Cal.App.4th 1344, 1354 ("*Berkeley Jets*") (purpose of EIR is to inform the public and officials of environmental consequences of their decisions *before* they are made).
[9] CEQA Guidelines § 15003(b).
[10] *Id.* § 15002(a)(2), (3); *see also Berkeley Jets,* 91 Cal.App.4th at 1354; *Citizens of Goleta Valley,* 52 Cal.3d at p. 564.
[11] CEQA Guidelines § 15002(a)(2).
6231-004j

"eliminated or substantially lessened all significant effects on the environment" to the greatest extent feasible and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns."[12]

While courts review an EIR using an "abuse of discretion" standard, "the reviewing court is not to 'uncritically rely on every study or analysis presented by a project proponent in support of its position. A clearly inadequate or unsupported study is entitled to no judicial deference."[13] As the courts have explained, a prejudicial abuse of discretion occurs "if the failure to include relevant information precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process."[14] "The ultimate inquiry, as case law and the CEQA guidelines make clear, is whether the EIR includes enough detail 'to enable who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.'"[15] O1.4 Cont.

III. THE DEIR FAILS TO ADEQUATELY DESCRIBE THE PROJECT

The DEIR does not meet CEQA's requirements because it fails to include an accurate, complete, and stable description of key Project components, rendering the DEIR's impact analysis inadequate. California courts have repeatedly held that "an accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR."[16] CEQA requires that a project be described with enough particularity that its impacts can be assessed.[17] Without a complete project description, the environmental analysis under CEQA is impermissibly limited, thus O1.5

[12] PRC § 21081(a)(3), (b); CCR §§ 15090(a), 15091(a), 15092(b)(2)(A), (B); *Covington v. Great Basin Unified Air Pollution Control Dist.* (2019) 43 Cal.App.5th 867, 883.
[13] *Berkeley Jets*, 91 Cal.App.4th at p. 1355 (emphasis added) (quoting *Laurel Heights I*, 47 Cal.3d at 391, 409, fn. 12).
[14] *Berkeley Jets*, 91 Cal.App.4th at p. 1355; *see also San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 722 (error is prejudicial if the failure to include relevant information precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process); *Galante Vineyards*, 60 Cal.App.4th at p. 1117 (decision to approve a project is a nullity if based upon an EIR that does not provide decision-makers and the public with information about the project as required by CEQA); *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 946 (prejudicial abuse of discretion results where agency fails to comply with information disclosure provisions of CEQA).
[15] *Sierra Club*, 6 Cal.5th at p. 516 (quoting *Laurel Heights I*, 47 Cal.3d at 405).
[16] *Stopthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, 17; *Communities for a Better Environment v. City of Richmond* ("*CBE v. City of Richmond*") (2010) 184 Cal.App.4th 70, 85–89; *County of Inyo v. City of Los Angeles* (3d Dist. 1977) 71 Cal.App.3d 185, 193.
[17] CCR § 15124; *see, Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1988) 47 Cal.3d 376, 192–193.
6231-004j

minimizing the project's impacts and undermining meaningful public review.[18] A lead agency may not hide behind its failure to obtain a complete and accurate project description.[19]

O1.5 Cont.

A. The DEIR Fails to Consistently Describe the Size of the Buildings to be Constructed

The DEIR contains conflicting and inconsistent descriptions of the size of the buildings to be constructed. This inconsistency skewed the results of the DEIR's analysis of air quality impacts and noise impacts, rendering them both unsupported. The DEIR states that the Project buildings will be 50 feet tall at the parapet with a 48 foot roof height.[20] However, the air quality analysis in DEIR Appendix B describes the Project's building to be 44 feet tall, which is in turn uses as the basis for the Project's building downwash calculations.[21] The air quality analysis depends on correct inputs regarding Project specifications, and in this case, the reduced building height used in the air quality modeling results in underestimated impacts from building downwash. Building downwash occurs as wind flows over and around a structure and impacts the dispersion of air pollutants.[22] The downwash effect can lead to higher ground level concentrations from emissions sources.[23] Dr. Clark explains that by increasing the height of the building results in an increased downwash effect translating to a higher concentration of pollution at receptors that are within the affected area.[24] The Project description must be consistent to accurately analyze the Project's impacts.

O1.6

B. The DEIR Fails to Describe Back Up Generators at the Project Site

The DEIR's Project design feature ("PDF") AQ-16 requires the Project Applicant/Developer/Owner to power all stand-by emergency generators, also known as back-up generators ("BUGs") with a non-diesel fuel.[25] However, back-up generators are not discussed anywhere else in the DEIR, and the DEIR's air quality analysis fails to assess the emissions from the alternatively fueled BUGs. By failing

[18] *Id.*
[19] *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 311 ("*Sundstrom*").
[20] DEIR, p. 1-1.
[21] DEIR, Appendix B, p. 49.
[22] Clark Comments, p. 7.
[23] Clark Comments, p. 7.
[24] Clark Comments, p. 7.
[25] DEIR, p. 5.2-38.
6231-004j

to include BUGs in the air quality analysis, the DEIR fails to account for all possible sources of emissions from Project operations. The County must address the additional impacts posed by operation of BUGs at the Project site in a revised DEIR. O1.6 Cont.

IV. THE DEIR FAILS TO DISCLOSE AND MEANINGFULLY DESCRIBE THE EXISTING ENVIRONMENTAL SETTING

The existing environmental setting is the starting point from which the lead agency must measure whether a proposed Project may cause a significant environmental impact.[26] CEQA defines the environmental setting as the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, from both a local and regional perspective.[27] An accurate and complete description of the setting for each environmental condition in the vicinity of the Project is critical to an accurate and meaningful evaluation of environmental impacts. Courts have made it clear that "[b]efore the impacts of a Project can be assessed, and mitigation measures considered, an [EIR] must describe the existing environment. It is only against this baseline that any significant environmental effects can be determined."[28] O1.7

A. The DEIR Fails to Inform Decisionmakers and the Public About Existing Adverse Health Conditions in Historically Burdened Communities Surrounding the Project Site Which Will Be Exacerbated by the Project O1.8

The DEIR fails to disclose the fact that census tract where the Project is located is already disproportionately affected by environmental pollution and experiences elevated levels of negative health effects. The Project will exacerbate these conditions by increasing localized levels of toxic air contaminants and GHG precursors.[29] By failing to disclose the baseline health conditions of communities in

[26] CEQA Guidelines § 15125(a); *see, e.g., Communities for a Better Environment v. S. Coast Air Quality Mgmt. Dist.* (2010) 48 Cal.4th 310, 316; *Fat v. City of Sacramento* (2002) 97 Cal.App.4th 1270, 1278 (citing Remy, et al.; Guide to the Calif. Environmental Quality Act (1999) p. 165).
[27] CEQA Guidelines §15125(a)(1); *Riverwatch v. City of San Diego* (1999) 76 Cal.App.4th 1428, 1453.
[28] *County of Amador,* 76 Cal.App.4th at p. 952.
[29] Clark Comments, p. 17.
6231-004j

the direct vicinity of the Project site, the DEIR fails to accurately assess the Project's health impacts, as well as the Project's consistency with environmental justice elements of the Countywide Plan.[30]

For purposes of analyzing a project's adverse environmental impacts under CEQA, "[t]he significance of an activity depends upon the setting."[31] Thus, a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant.[32] In order to accurately evaluate the severity of a project's health impacts, the DEIR's environmental setting should therefore describe both the background environmental burdens faced by impacted communities and any unique sensitivities of those communities to pollution. O1.8 Cont.

The DEIR states that the Project is considered "adjacent" to an environmental justice focus area ("EJFA").[33] The DEIR defines an EJFA as "an area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation."[34] An EJFA is an area where the community is ranked by the South Coast Air Quality Management District's ("SCAQMD") CalEnviroScreen 4.0 tool as being in the 75th percentile or higher based on the composite score of impacts on air quality emissions, pesticides, toxic releases, traffic, drinking water contaminants, lead in housing, cleanups, groundwater threats, hazardous waste, impaired water, and solid waste.[35] The DEIR states that the Project does not qualify as an EJFA due to having a composite score of 71.[36] However, because the composite score takes several factors not relevant to the Project's air quality impacts into account, the DEIR fails to detail the severity of air quality impacts in the census tract surrounding the Project. O1.9

[30] See e.g. DEIR, p. p. 5.2-10 (identifying Countywide Plan Hazards Element air quality policies related to environmental justice); see Countywide Plan, Goal HZ-3 Environmental Justice, available at https://countywideplan.com/policy-plan/hazards/ (last visited 8/22/2022). The Countywide Plan includes EJ policies which may be violated if the Project were approved with unmitigated significant health impacts on EJ communities surrounding the Project site, including, inter alia, Policy HZ-3.11 Public Health.
[31] *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 718.
[32] *Id.*; *see* CEQA Guidelines §§ 15125(a); 15126.2(a) (EIR shall analyze any significant environmental effects project might cause or risk exacerbating by bringing development and people into affected area).
[33] DEIR, p. 5.2-21.
[34] DEIR, p. 5.2-16.
[35] DEIR, p. 5.2-22.
[36] DEIR, p. 5.2-21.
6231-004j

According to data from CalEnviroScreen 4.0, the census tract for the Project site is in the top 5% in California being impacted by ozone; the top 6% in California being impacted by $PM_{2.5}$; the top 22% in California being impacted by DPM; and the top 15% in California being impacted by toxic releases.[37] While the DEIR does disclose this information, it fails to explain the relevance of the existing conditions surrounding the Project site and fails to analyze the extent to which the Project's impacts will exacerbate these existing conditions.

An agency is required to find that a "project may have a 'significant effect on the environment'" if, among other things, "[t]he environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly."[38] CEQA requires lead agencies to "identify critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds from being reached."[39] The fact that an area already is polluted makes it more likely that any additional, unmitigated pollution will be significant. O1.10

CEQA also requires the lead agency to consider cumulative impacts.[40] The term "cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.[41] The DEIR fails to consider the cumulative impacts from air emissions and health risks in these already overburdened communities.

Because the DEIR does not disclose relevant information pertaining to the existing environmental, health, and safety conditions facing the communities near the Project, it fails to provide decisionmakers and the public with an accurate characterization of the Project's environmental setting, rendering the DEIR's subsequent analysis of the Project' individual and cumulative air quality and public health impacts unsupported.

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[37] Clark Comments, p. 16.
[38] Pub. Res. Code § 21083(b)(3); *see also* CEQA Guidelines § 15126.2 (project may cause a significant effect by bringing people to hazards).
[39] Pub. Res. Code § 21000(d).
[40] *Id.* § 21083(b)(3).
[41] *Ibid.*
6231-004j

V. THE DEIR FAILS TO ADEQUATELY DISCLOSE AND MITIGATE POTENTIALLY SIGNIFICANT IMPACTS

An EIR must fully disclose all potentially significant impacts of a Project and implement all feasible mitigation to reduce those impacts to less than significant levels. The lead agency's significance determination with regard to each impact must be supported by accurate scientific and factual data.[42] An agency cannot conclude that an impact is less than significant unless it produces rigorous analysis and concrete substantial evidence justifying the finding.[43]

Moreover, the failure to provide information required by CEQA is a failure to proceed in the manner required by CEQA.[44] Challenges to an agency's failure to proceed in the manner required by CEQA, such as the failure to address a subject required to be covered in an EIR or to disclose information about a project's environmental effects or alternatives, are subject to a less deferential standard than challenges to an agency's factual conclusions.[45] In reviewing challenges to an agency's approval of an EIR based on a lack of substantial evidence, the court will 'determine de novo whether the agency has employed the correct procedures, scrupulously enforcing all legislatively mandated CEQA requirements.'[46] O1.11

Even when the substantial evidence standard is applicable to agency decisions to certify an EIR and approve a project, reviewing courts will not 'uncritically rely on every study or analysis presented by a project proponent in support of its position. A clearly inadequate or unsupported study is entitled to no judicial deference.'"[47]

A. The DEIR Fails to Adequately Disclose, Analyze, and Mitigate the Project's Potentially Significant Transportation Impacts

The DEIR concludes that the transportation impacts of the Project will be less than significant. However, the analysis does not consider the full range of possible uses for the site and underestimates truck and worker trip lengths. The DEIR fails to disclose and mitigate potentially significant transportation impacts, and thus fails as an informational document. O1.12

[42] 14 CCR § 15064(b).
[43] *Kings Cty. Farm Bur. v. Hanford* (1990) 221 Cal.App.3d 692, 732.
[44] *Sierra Club v. State Bd. Of Forestry* (1994) 7 Cal.4th 1215, 1236.
[45] *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 435.
[46] *Id., Madera Oversight Coal., Inc. v. County of Madera* (2011) 199 Cal. App. 4th 48, 102.
[47] *Berkeley Jets*, 91 Cal.App.4th at 1355.
6231-004j

1. The DEIR Fails to Consider Reasonably Foreseeable Traffic-Intensive Uses of the Project

To comply with CEQA, the lead agency must make "a reasoned and good faith effort to inform decision makers and the public" about the project's potential impacts.[48] This includes a meaningful analysis of all reasonably foreseeable project impacts, including the project's various allowed uses.[49] The DEIR's transportation section relies on the assumption that the Project will operate as a high-cube warehouse and does not consider reasonably foreseeable uses for the Project that would result in significantly greater traffic intensive uses of the site. However, the DEIR is clear that the eventual tenant at the building is unknown, which means that future tenants may reasonably include high intensity warehouse uses. By disregarding reasonably foreseeable uses that would result in significantly higher traffic from the Project, the DEIR thus fails to "reflect a good faith effort at full disclosure" as is required by CEQA.[50] O1.13

The DEIR evaluated the Project's transportation impacts based on the Institute of Transportation Engineers' ("ITE") publication *Trip Generation, 11th Edition* trip rates for a Land Use Category 154, High-Cube Transload and Short Term Storage Warehouse[51] which is defined as follows:

> A high-cube warehouse (HCW) is a building that typically has at least 200,000 gross square feet of floor area, has a ceiling height of 24 feet or more, and is used primarily for the storage and/or consolidation of manufactured goods (and to a lesser extent, raw materials) prior to their distribution to retail locations or other warehouses. A typical HCW has a high level of on-site automation and logistics management. The automation and logistics enable highly efficient processing of goods through the HCS.[52] O1.14

[48] *Berkeley Jets*, 91 Cal.App.4th at 1367.
[49] *Laurel Heights I*, 47 Cal.3d at 396.
[50] CEQA Guidelines § 15151; *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 721-722.
[51] DEIR, p. 5.12-6
[52] Marshall Comments, p. 2.
6231-004j

Mr. Marshall explains that the ITE outlines several other compatible uses of high cube warehouses which are: High Cube Fulfillment Center Warehouse ("Category 155"), High Cube Parcel Hub Warehouse ("Category 156") and High Cube Cold Storage Warehouse ("Category 157") which have significantly higher trip generation rates than Category 154.[53] O1.15

As Mr. Marshall details in his comments, the trip generation rate per 1,000 square feet of high-cube warehouse varies significantly across Categories 154 through 157. Here, the DEIR used the category for High-Cube warehouse with the lowest trip rate of 1.4 trips per 1,000 square feet resulting in a trip generation rate of 363 trips per day.[54] However, as Mr. Marshall explains, the trip generation rate used in the DEIR is on the low end of potential uses for the Project, and depending on the eventual tenant, trip generation could be as high as 6.44 trips per 1,000 square feet or 1,671 trips per day under ITE Category 155.[55] Additionally, a 2019 study of warehouse trip generation rates completed for the Western Riverside Council of Governments ("WRCOG Study")[56] analyzed actual trip generation rates from 16 warehouses in the Inland Empire region and found that the ITE Categories underestimate trip generation for fulfillment centers by 50 percent, with an average trip generation for fulfillment centers in Category 154 resulting in 2.2 trips per 1,000 square feet.[57] The WRCOG Study also details that the parcel hubs analyzed in the region generated as many as 14 trips per 1,000 square feet.[58] Mr. Marshall explains that the Project could generate as many as 3,633 trips per day if the Project were used as a parcel hub. O1.16

The DEIR relies on the least intensive use category for a high-cube warehouse to determine that the Project would generate 363 trips per day, substantially less than the most trip intensive reasonably foreseeable use of the Project. Based on Mr. Marshall's comments and the WRCOG Study, it is clear that the Project could generate significantly more trips per day if all reasonably forseeable uses were quantified. Underestimating the trip generation for the Project O1.17

[53] Marshall Comments, p. 2.
[54] DEIR, 5.12-6.
[55] Marshall Comments, p. 2.
[56] Western Riverside Council of Governments Technical Advisory Committee, Staff Report, High-Cube Warehouse Trip Generation Study and Proposed TUMF Calculation Handbook Update (February 21, 2019) (hereinafter "WRCOG Study") PDF, p. 53. *available at* https://wrcog.us/AgendaCenter/ViewFile/Agenda/_02212019-292
[57] *Id. PDF p. 43.*
[58] *Id, PDF p. 50.*
6231-004j

results in underestimation of the Project's potentially significant vehicle miles traveled ("VMT") as well as impacts to air quality, GHG emissions and noise impacts. The County must revise the DEIR based on the reasonably foreseeable trip generation rates for the Project. O1.17 O1.18

2. The DEIR Underestimates the Operational Trip Lengths of the Project

The DEIR states that the Project would generate 818,435 VMT per year from autos and 1,248,255 VMT from trucks.[59] The VMT generated from trucks is based on an estimated 40 miles traveled per truck trip. This estimate does not account for the distance that trucks must travel to service the Project. Mr. Marshall explains that the most accurate way to estimate average truck trip length is to calculate the distance to the ports, which are a common location from which goods are transported to warehouses like the Project's.[60] For example, the County recently completed a DEIR for the Duke Alabama and Palmetto Warehouse in 2019 which estimated an average truck trip length of 77 miles based on the distance of the Project to the Ports of Los Angeles and Long Beach.[61] O1.19

Here, the Project site is 65 miles from the Port of Long Beach and 66 miles from the Port of Los Angeles.[62] Therefore, a minimum average truck length of 65 miles should be used.[63] Mr. Marshall points out that a higher trip generation rate, and especially a higher truck trip generation rate, translates into higher estimated GHG emissions from the Project.[64] The Project's VMT, air quality and GHG impacts should be recalculated based on the higher average auto and truck trip lengths.

Furthermore, as discussed above, depending on the type of warehouse operation, the actual trip generation rate could be three times as many or more depending on the eventual tenant of the Project. An increased intensity of use would further compound the Project's VMT, air quality and GHG impacts, which the DEIR

[59] DEIR, p. 5.5-6.
[60] Marshall Comments, p. 11.
[61] San Bernardino County, DEIR Duke Alabama and Palmetto Warehouse DEIR, SCH 2019029078 (August 19, 2019) p. 4-3-16 *available at* https://files.ceqanet.opr.ca.gov/93435-2/attachment/VK0ZFLFmWno-mTmQUc1OLE3NoESo8LNoggSPQRh7_wTNRQdIlHmYJfGSuqC6ApCbG4IaL_oWZ2T6sZKs0
[62] Marshall Comments, p. 11.
[63] *Ibid.*
[64] *Ibid.*
6231-004j

fails to analyze. The County must correct the estimated distance traveled by trucks and analyze the Project's impacts based on actual distances trucks are expected to travel to service the Project. O1.19 Cont.

3. The VMT Threshold for the Project Site Underestimates Project Impacts

The DEIR relies on the San Bernardino County Transportation Authority ("SBCTA") VMT Screening Tool in order to determine that the Project is located in a low-VMT generating area.[65] Per the DEIR:

> "[A] low-VMT generating area is an area where the VMT/employee is not greater than four percent below the existing VMT per employee for the unincorporated County. Using the VMT Screening Tool, the VMT per employee in the Project zone is 16.3 which is 13.64 percent less than the unincorporated County VMT per employee of 18.9. Because the Project is located in a low-VMT generating area, the Project is presumed to have a less than significant impact on VMT, and no further VMT analysis is required.[66] O1.20

However, as Mr. Marshall points out in his comments, this threshold is misleading and does not consider the land uses surrounding the Project. The parcels directly north of the Project site, across Slover Road, would not pass the screening test as they are subject to the City of Fontana's screening threshold of 16.2 VMT per worker.[67] The reason for the difference in thresholds is because the Project site is included in the VMT screening area for the more rural unincorporated County rather than the urbanized areas surrounding the Project site. Mr. Marshall states that applying a threshold suited for rural VMT to the Project site is arbitrary and unsupported, and fails to satisfy a proper planning purpose given that Bloomington is just as urbanized as the adjacent incorporated cities of Fontana and Rialto.[68] As such, the DEIR should use the more appropriate 16.2 VMT per employee threshold to analyze the VMT impacts from the Project. If the lower threshold is applied, the Project would not pass under the threshold and additional VMT analysis would be required.

[65] DEIR, p. 5.12-6.
[66] DEIR, p. 5.12-6.
[67] Marshall Comments, p. 8.
[68] Marshall Comments, p. 8.
6231-004j

4. DEIR Fails to Accurately Analyze Employee Commute Distances

As discussed above the DEIR used the SCTBA VMT Screening Tool to determine that the Project would generate 16.3 VMT per employee.[69] However, this assumption fails to take into account data documenting current employee VMT in the inland empire.

Mr. Marshall conducted an analysis of employee VMT based on data compiled by the U.S. Census Bureau which publishes Longitudinal Employer-Household Dynamics ("LEHD") Origin-Destination Employment Statistics ("LODES") data that provide detailed geographic data about workers, jobs, and commutes at the Census Block level.[70] The LODES data tells a strikingly different story regarding employee commutes in the County than the assumptions used in the DEIR. First, it's clear from the data that employees currently travel an average 30.2 miles per day to reach their workplace.[71] Second, the warehouse industry is experiencing a decrease in available workers resulting in difficulty filling positions as reported by *Vox*.[72] According to a leaked memo from Amazon, the company expects to deplete the hiring pool for warehouse workers in the inland empire by 2022.[73] Mr. Marshall explains that Amazon's issues finding workers affects other warehouse employers that seek to emulate Amazon's business model, which means that the eventual tenant at the Project site will likely need to source labor from farther away.[74] O1.21

Publicly available VMT data demonstrates that employees will likely travel almost 100 percent further than estimated in the DEIR, and the DEIR lacks substantial evidence to support its reliance on the lower 16.2 VMT average. When calculated using the LODES data, there is clearly substantial evidence demonstrating that the Project's impacts from employee VMT are likely to be significant. The County must revise the DEIR to account for higher employee VMT and propose mitigation measures that will reduce the Project's significant impacts to transportation.

[69] DEIR, p. 5.12-6.
[70] Marshall Comments, p. 9.
[71] Marshall Comments, p. 11.
[72] Del Ray, Jason, *Vox,* Leaked Amazon memo warns the company is running out of people to hire (June 17, 2022) *available at* https://www.vox.com/recode/23170900/leaked-amazon-memo-warehouses-hiring-shortage
[73] *Ibid.*
[74] Marshall Comments, p. 9.
6231-004j

5. DEIR Fails to Require Effective Mitigation to Reduce Employee VMT

The DEIR must implement feasible mitigation measures to reduce VMT impacts. Mr. Marshall states that traditional transportation demand management ("TDM") strategies may be difficult at the Project site due to a lack of reliable public transit in the area, lack of bicycle infrastructure and sidewalks adjacent to the Project site.[75] However, the Project should require an employer-sponsored vanpool service which can be effective at transporting employees to and from the Project site.[76] O1.21

B. The DEIR Fails to Disclose, Analyze and Mitigate Potentially Significant Air Quality Impacts

The DEIR fails to disclose all potentially significant air quality impacts of the Project and does not implement all feasible mitigation to reduce those impacts to less than significant levels, in violation of CEQA. O1.22

1. The DEIR Underestimates Air Quality Impacts from Truck Trips

As discussed above, the DEIR underestimates the truck trip lengths for the Project. Analysis of the Project's anticipated actual truck trip length yields increased air quality impacts that are not discussed or analyzed in the DEIR. Dr. Clark found that using a reasonably foreseeable truck trip length of 65 miles, to account for travel from the Port of Los Angeles, increases the daily emissions of VOCs from 7.03 lbs per day to 7.31 lbs per day; the emissions of NO_x from 18.17 lbs per day to 25.41 lbs per day; the emissions of PM_{10} from 4.95 lbs per day to 6.69 lbs per day; and, the emissions of $PM_{2.5}$ from 1.52 lbs per day to 2.15 lbs per day.[77] Additionally, increasing the trip length from 40 miles to 65 miles increases the operational GHG emissions from 2,237.56 tons of CO_2e to 2,656 tons of CO_2e. These increased truck trip lengths are supported by substantial evidence from truck trip calculations used by the County in neighboring warehouse truck trip analyses.[78] By contrast, the DEIR's reliance on 40-mile trip lengths is based on unsupported assumptions from regulatory guidance, and lacks any supporting Project-specific O1.23

[75] Marshall Comments, p. 11.
[76] Marshall Comments, p. 11.
[77] Clark Comments, p. 7.
[78] See Clark Comments, p. 9 (referencing MIG. 2019. Duke Alabama and Palmetto Warehouse Draft Environmental Impact Report. Prepared for Count of San Bernardino. Appendix B Air Quality Analysis Technical Memorandum, at p. 3)
6231-004j

data or evidence. The County must revise the DEIR to calculate truck emissions based on reasonably foreseeable and accurate truck trip lengths, and must address the potentially significant impacts of the increased emissions with additional mitigation. O1.23 Cont.

2. The DEIR's Health Risk Analysis Omits Analysis of DPM Constituents

The DEIR fails to analyze the potentially significant health risk impacts from exposure to all toxic air contaminants contained in the gaseous form of diesel exhaust that will be emitted by diesel-powered construction equipment and on-road trucks. As Dr. Clark explains, diesel exhaust is composed of particulate matter as well as vapor.[79] The DEIR accounts for diesel particulate matter ("DPM"), which is a component of diesel exhaust, but does not account for the other vapor components of diesel emissions in its HRA. The DEIR thus fails as an informational document as it does not provide an analysis of the full range of the Project's potential health impacts. O1.24

A lead agency's significance determination must be supported by accurate scientific and factual data.[80] An agency cannot conclude that an impact is less than significant unless it produces rigorous analysis and concrete substantial evidence justifying the finding.[81] These standards apply to an EIR's analysis of the air quality impacts of a Project. O1.25

In *Sierra Club v. County of Fresno*, the California Supreme Court affirmed CEQA's mandate to protect public health and safety by holding that an EIR fails as an informational document when it fails to disclose the public health impacts from air pollutants that would be generated by a development project.[82] In *Sierra Club*, the Supreme Court held that the EIR for the Friant Ranch Project—a 942-acre master-planned, mixed-use development with 2,500 senior residential units, 250,000 square feet of commercial space, and open space on former agricultural land in north central Fresno County—was deficient as a matter of law in its informational discussion of air quality impacts as they connect to adverse human health effects.[83] As the Court explained, "a sufficient discussion of significant impacts requires not merely a determination of whether an impact is significant, O1.26

[79] Clark Comments, p. 8.
[80] 14 C.C.R. § 15064(b).
[81] *Kings County Farm Bureau*, 221 Cal.App.3d at 732.
[82] *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 518–522.
[83] *Id.* at 507–508, 518–522.
6231-004j

but some effort to explain the nature and magnitude of the impact."[84] The Court concluded that the County's EIR was inadequate for failing to disclose the nature and extent of public health impacts caused by the project's air pollution. The EIR failed to comply with CEQA because the public, after reading the EIR, "would have no idea of the health consequences that result when more pollutants are added to a nonattainment basin."[85] CEQA mandates discussion, supported by substantial evidence, of the nature and magnitude of impacts of air pollution on public health.[86]

In *Berkeley Jets*, the Court of Appeal held that an EIR must analyze the impacts from human exposure to toxic substances.[87] In that case, the Port of Oakland approved a development plan for the Oakland International Airport.[88] The EIR admitted that the Project would result in an increase in the release of TACs and adopted mitigation measures to reduce TAC emissions, but failed to quantify the severity of the Project's impacts on human health.[89] The Court held that mitigation alone was insufficient, and that the Port had a duty to analyze the health risks associated with exposure to TACs.[90] As the CEQA Guidelines explain, "[t]he EIR serves not only to protect the environment but also to demonstrate to the public that it is being protected."[91]

O1.26 Cont.

The failure to provide information required by CEQA makes meaningful assessment of potentially significant impacts impossible and is presumed to be prejudicial.[92] Challenges to an agency's failure to proceed in the manner required by CEQA, such as the failure to address a subject required to be covered in an EIR or to disclose information about a project's environmental effects or alternatives, are subject to a less deferential standard than challenges to an agency's factual

O1.27

[84] *Id.* at 519, citing *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497, 514–515.
[85] *Id.* at 518. CEQA's statutory scheme and legislative intent also include an express mandate that agencies analyze human health impacts and determine whether the "***environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly***." (Public Resources Code § 21083(b)(3) (emphasis added).) Moreover, CEQA directs agencies to "take immediate steps to identify any critical thresholds for the ***health and safety of the people*** of the state and take all coordinated actions necessary to prevent such thresholds being reached." (Public Resources Code § 21000(d) (emphasis added).)
[86] *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 518–522.
[87] *Berkeley Jets*, 91 Cal.App.4th at 1369–1371.
[88] *Id.* at 1349–1350.
[89] *Id.* at 1364–1371.
[90] *Id.*
[91] 14 C.C.R. § 15003(b).
[92] *Sierra Club v. State Bd. Of Forestry* (1994) 7 Cal.4th 1215, 1236–1237.
6231-004j

conclusions.[93] Courts reviewing challenges to an agency's approval of an EIR based on a lack of substantial evidence will "determine de novo whether the agency has employed the correct procedures, scrupulously enforcing all legislatively mandated CEQA requirements."[94]

CARB defines diesel exhaust as a complex mixture of inorganic and organic compounds that exists in gaseous, liquid, and solid phases.[95] CARB and the United States Environmental Protection Agency ("U.S. EPA") identify 40 components of diesel exhaust as suspected human carcinogens, including formaldehyde, 1,3-butadiene, and benzo[a]pyrene.[96] The gas and particle components both contribute to health risks.[97] The inhalation unit risk factor identified by OEHHA for use in risk assessments is for the DPM fraction of diesel exhaust and not the vapor phase components identified by CARB and U.S. EPA.[98] Here, the County only used the DPM fraction of diesel exhaust in its analysis of the construction and operational emissions and failed to analyze the full range of TAC impacts from the Project.[99] O1.27 Cont.

By failing to include an analysis of the additional TAC components of the Project's diesel exhaust, the DEIR does not provide a full picture of the Project's potential health risk impacts and fails as an informational document as required by CEQA. The County must update the HRA with the TAC impacts included and include the results in a revised and recirculated EIR.

3. DEIR improperly relies on Project Design Features to Reduce Emissions

The DEIR acknowledges the potential for air quality impacts from Project construction and operation. However, it concludes that there is a less than significant impact and does not include enforceable mitigation measures to protect the construction workers or nearby sensitive receptors.[100] Instead, the DEIR relies on project design features ("PDFs") that are intended to mitigate the Project's air quality impacts. This approach incorrectly dismisses the significance of the Project's actual, unmitigated air quality impacts. O1.28

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[93] *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 435.
[94] *Id.* (internal quotations omitted).
[95] Clark Comments, p. 9.
[96] *Ibid.*
[97] *Ibid.*
[98] *Ibid.*
[99] *Ibid.*
[100] DEIR, pp. 1-6 – 1-11.
6231-004j

CEQA defines mitigation as including any measures designed to avoid, minimize, rectify, reduce, or compensate for a significant impact.[101] The PDFs described in the DEIR are mitigation measures because they perform these functions. For example, PDF AQ-1's direction to have the Project applicant post signs notifying truck drivers of idling restrictions is clearly designed as mitigation to reduce the Project's air quality and GHG emissions impacts from idling trucks.[102] Similarly, PDF AQ-2's direction to limit the daily grading disturbance area to the area assumed in the DEIR's air quality impact analysis is designed to limit the fugitive dust emissions from grading and thereby reduce the Project's potential air quality and health risk impacts.[103] These measures are not otherwise required by other laws or regulations that apply to the Project. Therefore, implementation of these PDFs would rely exclusively on conditions imposed on the Project by the County. O1.29

CEQA requires that mitigation measures be fully enforceable through permit conditions, agreements or other legally binding instruments.[104] Because the County has not characterized PDFs as mitigation, they are not binding on the Applicant. Reliance on PDFs to reduce impacts therefore provides no assurance that the Applicant would later comply with the PDFs. The PDFs therefore fail to provide the binding mechanism required by CEQA to compel the Applicant's compliance with mitigation following Project approval.

The Court of Appeal reiterated that mitigation must be incorporated directly into a project's MMRP to be considered enforceable. In *Lotus v. Department of Transportation*,[105] an EIR approved by Caltrans contained several measures "[t]o help minimize potential stress on the redwood trees" during construction of a highway. Although those measures were clearly separate mitigation, the project proponents considered them "part of the project." The EIR concluded that due to the planned implementation of those measures, the project would not result in significant impacts. The Court disagreed, finding that the EIR had "disregard[ed] the requirements of CEQA" by "compressing the analysis of impacts and mitigation measures into a single issue." The Court continued, stating "[a]bsent a determination regarding the significance of the impacts... it is impossible to determine whether mitigation measures are required or to evaluate whether other more effective measures than those proposed should be considered."[106] O1.30

[101] 14 CCR § 15370.
[102] DEIR, p. 1-6.
[103] *Ibid.*
[104] 14 CCR §15126.4(a)(2).
[105] *Lotus v. Dep't of Transp.* (2014) 223 Cal. App. 4th 645, 651-52.
[106] *Id.*
6231-004j

Similar to the inadequate analysis contained in the *Lotus* EIR, the DEIR asserts that incorporation of PDFs AQ-1 through PDF AQ-25 would reduce the Project's potentially significant impacts.[107] This approach improperly "compress[es] the analysis of impacts and mitigation measures into a single issue." Even if the DEIR's conclusions were accurate, which is unclear, the PDFs must be incorporated into the Project's MMRP as formal mitigation measures in order to be factored into the County's ultimate significance findings. "Simply stating that there will be no significant impacts because the project incorporates 'special construction techniques' is not adequate or permissible."[108]

O1.30 Cont.

The County has a duty to disclose unmitigated impacts and analyze them before applying mitigation measures. As a result of its improper reliance on PDFs to reduce the Project's potentially significant impacts, the DEIR dismisses the potential risks to construction employees and nearby sensitive receptors that will be generated by the Project as less than significant. The DEIR must be revised and recirculated to include an accurate analysis of the Project's potential impacts, and to require that any and all mitigation measures that are intended to reduce the Project's impacts incorporated as binding mitigation in the Project's Mitigation Monitoring and Reporting Program ("MMRP").

O1.31

C. The DEIR Fails to Adequately Disclose, Analyze, and Mitigate the Project's Potentially Significant Hazardous Materials Impacts

A lead agency's significance determination must be supported by accurate scientific and factual data.[109] An agency cannot conclude that an impact is less than significant unless it produces rigorous analysis and concrete substantial evidence justifying the finding.[110] These standards apply to an EIR's analysis of public health impacts of a Project.

O1.32

The failure to provide information required by CEQA makes meaningful assessment of potentially significant impacts impossible and is presumed to be prejudicial.[111] Challenges to an agency's failure to proceed in the manner required by CEQA, such as the failure to address a subject required to be covered in an EIR or to disclose information about a project's environmental effects or alternatives, are subject to a less deferential standard than challenges to an agency's factual

[107] DEIR, p. 5.2-37.
[108] *Lotus v. Dep't of Transp.* (2014) 223 Cal. App. 4th 645, 651-52.
[109] CCR § 15064(b).
[110] *Kings County Farm Bureau*, 221 Cal.App.3d at 732.
[111] *Sierra Club v. State Bd. Of Forestry* (1994) 7 Cal.4th 1215, 1236–1237.
6231-004j

conclusions.[112] Courts reviewing challenges to an agency's approval of an EIR based on a lack of substantial evidence will "determine de novo whether the agency has employed the correct procedures, scrupulously enforcing all legislatively mandated CEQA requirements."[113] O1.32 Cont.

Here, the DEIR fails to analyze the impacts from disturbance of soils that could contain harmful pesticides and heavy metals. Dr. Clark found that the Project site is within the radius of parcels impacted by heavy metal fallout from the Kaiser Steel Mill. The Kaiser Steel Mill facility was an integrated steel production plant that the Kaiser Steel Corporation owned and operated from approximately 1942 to 1983.[114] Studies of the steel mill found that it emitted large quantities of carcinogenic compounds that will persist in the environment and that the emission controls on the plant were deficient.[115] The Project's soils could contain polycyclic organic matter ("POM"), arsenic, cadmium, and benzene in California.[116] Arsenic, cadmium, and POMs are not subject to degradation in the environment and are chemicals of potential concern for the area.[117]

O1.33

Additionally, the DEIR states that the Project site was previously used for agricultural purposes.[118] However, the DEIR fails to analyze the potential for hazardous pesticides to occur on site resulting in a deficient analysis of the potential hazards present on site. Disturbance of Project soils could result in the release of hazardous materials that would affect construction workers and sensitive receptors.

The County must conduct a Phase II environmental site assessment to analyze the existing contamination levels in Project's soils and include a binding cleanup plan to mitigate any potentially significant levels of hazardous materials before Project construction can begin. The County must assess the concentrations of contaminants (primarily polycyclic aromatic hydrocarbons and metals) that may be present in the soils of the Project site and calculate their associated health risks.

[112] *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 435.
[113] *Id.* (internal quotations omitted).
[114] Clark Comments, p. 18.
[115] Clark Comments, p. 18.
[116] Clark Comments, p. 18.
[117] Clark Comments, p. 18.
[118] DEIR, p. 3-1.
6231-004j

The County must correct this error in the hazardous materials section and health risk analysis of the DEIR and present the results in a revised environmental impact report. O1.33 Cont.

D. The DEIR Fails to Accurately Disclose and Analyze Energy Impacts

The DEIR is inadequate as an environmental document because it fails to properly disclose, analyze, and mitigate the Project's potentially significant impacts on energy use. The County cannot approve the Project until the DEIR is revised and recirculated to resolve these issues and comply with CEQA's requirements.

The DEIR concludes that the operational energy consumption by on-road vehicles will not result in a significant impact based on the VMT assumptions for the Project used in the DEIR's CalEEMod modeling.[119] As discussed above, the Project's VMT assumptions regarding employee VMT, and truck trip length and trip generation rates are substantially underestimated because they do not represent actual trip lengths by commercial vehicles or Project employees. The DEIRs' on-road vehicle energy consumption analysis is therefore similarly underestimated and unsupported. The DEIR's operational electricity use analysis contains similar errors due to its reliance on reduced warehouse sizes analyzed in the DEIR's CalEEMod modeling.[120] As discussed above, the CalEEMod modeling analyzed shorter warehouse buildings than described elsewhere in the DEIR (44-foot buildings versus 50-foot buildings), thereby underestimating both air emissions and energy consumption associated with the larger buildings. The DEIR's conclusion that the Project's operational energy use would be less than significant is therefore unsupported by substantial evidence. The County must revise the DEIR to analyze the Project's operational petroleum fuel usage in line with the Project's reasonably foreseeable on-road operations related vehicle trips, and to analyze the Project's operational energy consumption based on accurate building sizes. O1.34

[119] DEIR, p. 5.5-6.
[120] *Id.*
6231-004j

Additionally, the DEIR relies on vague thresholds to justify the finding that Project construction will not result in a significant impact. First, the DEIR states that the Project's construction is "not expected to result in demand for fuel greater on a per-unit-of-development basis than other development projects in Southern California."[121] Second, the DEIR states that the Project developer will demonstrate compliance with the California Air Resources Board("CARB") regulations in order to reduce fuel combustion and energy consumption.[122]

The first threshold cited is vague and not supported by substantial evidence. Reference to "other development projects in Southern California" does not set out a clear threshold for the Project to be measured against. Without a quantitative threshold to compare the Project, the public is unable to discern whether project energy consumption does, or does not, exceed applicable thresholds. Additionally, the second threshold is similarly vague because it lacks a clear threshold for the Project fuel combustion and energy consumption to be measured against. Finally, the County cannot rely on compliance with energy conservation measures to support a conclusion of less than significant energy consumption impacts.[123] The County must establish a clear threshold to measure the Project's energy impact against and recirculate the DEIR with the necessary information to determine if the Project will have a significant impact.

O1.34 Cont.

E. The DEIR Fails to Adequately Disclose, Analyze, and Mitigate the Project's Potentially Significant Noise Impacts

CEQA requires agencies to conduct noise analyses for projects that consider both the absolute noise levels expected, and the degree noise levels are expected to increase. Noise studies that rely on a single measure that excludes possible significant impacts from noise increases or noise extremes do not receive deference by reviewing courts.

O1.35

[121] DEIR, p. 5.5-4.
[122] DEIR, p. 5.5-5.
[123] *Ukiah Citizens for Safety First v. City of Ukiah ("Ukiah Citizens")* (2016) 248 Cal.App.4th 256, 264-65; *California Clean Energy Committee v. City of Woodland ("CCEC")* (2014) 225 Cal.App.4th 173, 211 (compliance with applicable regulations does not, by itself, constitute an adequate assessment of mitigation measures that can be taken to address the energy impacts during construction and operation of the project.)
6231-004j

In *King & Gardiner Farms, LLC v. County of Kern*, the Court of Appeal held that an agency cannot simply rely on compliance with local noise regulations to conclude there will be no significant noise impacts without considering the impacts of increases in noise.[124] The County approved an EIR for proposed zoning amendments to streamline oil and gas permitting.[125] The EIR included an analysis of noise impacts that determined significance based solely on whether the 65 decibel day-night average ("dBA DNL") threshold in the County General Plan would be exceeded.[126] The Court of Appeal reasoned that the County General Plan did not conclude that all increases in the magnitude of noise are insignificant until the 65 dBA DNL threshold is exceeded, so the General Plan "does not constitute substantial evidence that the magnitude of an increase in ambient noise is irrelevant."[127] Rather, an EIR's noise analysis should consider both the increase in noise level and the absolute noise level associated with a project in determining the significance of the project's noise impacts.[128] The Court of Appeal concluded that an agency cannot exclusively rely on "a single cumulative DNL metric for determining the significance of the project's noise impacts" while deciding "the magnitude of the increase in ambient noise is irrelevant."[129]

O1.36

In *Berkeley Jets*, the Court of Appeal invalidated the Port of Oakland's EIR for expansion of the Oakland Airport because of its reliance on an improper noise standard.[130] The EIR evaluated the significance of noise impacts based on whether the estimated level of sound would exceed 65 dB Community Noise Equivalent Level ("CNEL").[131] However, as the Court of Appeal explained, the CNEL metric—which averages noise over the course of a day—could not be the sole indicator of significant effects from noise because it does not provide a meaningful analysis of the "degree single overflights will create noise levels over and above the existing ambient noise level at a given location, and the community reaction to aircraft noise, including sleep disturbance."[132] Therefore, the Court concluded, a revised EIR with additional study of noise impacts from flights was necessary.[133]

O1.37

[124] *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 894.
[125] *Id.* at 829.
[126] *Id.* at 830, 889.
[127] *Id.* at 894.
[128] *Id.*
[129] *Id.*
[130] *Berkeley Jets*, 91 Cal.App.4th at 1381–1382.
[131] *Id.* at 1373.
[132] *Id.* at 1381–1382.
[133] *Id.* at 1382.
6231-004j

Here, the DEIR relies on the San Bernardino County Code §83.01.080(g)(3) which states that construction activity is considered exempt from the noise level standards between the hours of 7:00 a.m. to 7:00 p.m. except on Sundays and Federal holidays.[134] Based on the County's construction noise ordinance, the DEIR incorrectly establishes a threshold of significance as follows:

> "noise sources associated with construction activities are exempt from the County's established noise standards as long as the 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."[135]

O1.38

The DEIR states that 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." However, the ordinance referenced does not establish any limit on the allowed hours of construction, merely that construction noise is exempt if it is generated between those hours. The DEIR fails to include any mitigation measures restricting construction to the hours of 7:00 a.m. to 7:00 p.m. excluding Sundays or federal holidays, therefore, the DEIR cannot conclude that the Project will not result in a significant construction noise impact.

Additionally, the DEIR states that construction noise would be significant if noise at nearby sensitive receptors exceeds 80 dBA.[136] The DEIR states that the Project's construction noise would not exceed this threshold at nearby sensitive receptors based on the results of the Noise Impact Analysis included as Appendix K to the DEIR.[137] However, the DEIR contradicts itself by presenting data that construction equipment will exceed the 80 dBA threshold 50 feet away from the noise source during the Project's demolition, site preparation, grading, and building construction phases.[138] The nearest sensitive receptor to the Project, a single family residence at 17834 Otilla Street, is located approximately 29 feet south of the Project site.[139] This receptor will experience construction noise impacts that exceed the 80 dBA threshold as it is less than 50 feet away from the Project site, resulting in a significant unmitigated noise impact.

O1.39

[134] DEIR, p. 5.11-5.
[135] DEIR, p. 5.11-14.
[136] DEIR, p. 5.11-14.
[137] DEIR, p. 5.11-14.
[138] DEIR, p. 5.11-13, Table 5.11-5.
[139] DEIR, p. 5.2-32.
6231-004j

The DEIR states that the Developer has agreed to implement PDF NOI-1 "[t]o reduce construction impacts to the residential uses adjacent to the maximum extent feasible".[140] PDF NOI-1 is described as a "Construction Noise Plan, which would be incorporated into the Project to require construction best management practices including adding notes to be included on grading plans and building plans related to noise."[141] This PDF is not included as a mitigation measure in the DEIR and is therefore generally unenforceable under CEQA. Additionally, if it were enforceable, there is no evidence that the PDF would reduce construction noise impacts at nearby sensitive receptors. The County must revise the DEIR and include feasible and enforceable mitigation measures to reduce the Projects significant noise impacts. O1.40

VI. THE COUNTY LACKS SUBSTANTIAL EVIDENCE TO APPROVE THE PROJECT'S LOCAL LAND USE PERMITS

The Project requires a discretionary Conditional Use Permit ("CUP") and related ministerial approvals under local plans and codes.[142] The CUP requires the County to make findings regarding land use consistency and environmental factors. As discussed above, the DEIR fails to disclose the Project's potentially significant, unmitigated impacts on air quality, public health, noise, and transportation. As a result of these impacts, the County is unable to make the necessary findings to approve the Project's local land use permits. O1.41

A. The County Cannot Make the Required Findings for a Conditional Use Permit

The County's CUP process is set forth in the County Code.[143] The County Code explains that CUPs are subject to specific findings prior to approval.[144] In order for the Planning Commission to approve the CUP application they must make the following seven findings: O1.42

(1) The site for the proposed use is adequate in terms of shape and size to accommodate the proposed use and all landscaping, loading areas, open spaces, parking areas, setbacks, walls and fences, yards, and other required features pertaining to the application.

[140] DEIR, p. 5.11-14.
[141] DEIR, p. 5.11-14.
[142] DEIR, p. 3-27.
[143] San Bernardino Code §85.06.
[144] San Bernardino Code §85.06.040.
6231-004j

(2) The site for the proposed use has adequate access, which means that the site design incorporates appropriate street and highway characteristics to serve the proposed use.
(3) The proposed use will not have a substantial adverse effect on abutting property or the allowed use of the abutting property, which means that the use will not generate excessive noise, traffic, vibration, or other disturbance. In addition, the use will not substantially interfere with the present or future ability to use solar energy systems.
(4) The proposed use and manner of development are consistent with the goals, maps, policies, and standards of the General Plan and any applicable community or specific plan.
(5) There is supporting infrastructure, existing or available, consistent with the intensity of development, to accommodate the proposed development without significantly lowering service levels.
(6) The lawful conditions stated in the approval are deemed reasonable and necessary to protect the public health, safety, and general welfare.
(7) The design of the site has considered the potential for the use of solar energy systems and passive or natural heating and cooling opportunities.[145]

O1.42 Cont.

The County cannot make a finding that the Project will not have a substantial adverse effect on abutting property or the allowed use of the abutting property due to the Project's potentially significant, unmitigated impacts on air quality, public health, noise, and traffic. The potentially significant impacts resulting from the Project render the Project inconsistent with finding (3) above. Additionally, the County cannot find that the Project is consistent with the Hazards and Environmental Justice goals of the General Plan (finding (4)) until the County revises the DEIR to analyze (and mitigate, as appropriate) the Project's potentially significant health risk impacts on the pollution-burdened census tracts surrounding the Project stie. Therefore, the County cannot make the necessary findings to approve the Project's CUP until the deficiencies in the DEIR are corrected.

VII. CONCLUSION

For the reasons discussed above, the DEIR for the Project is wholly inadequate under CEQA. It must be thoroughly revised to provide legally adequate analysis of, and mitigation for, all of the Project's potentially significant impacts. These revisions will necessarily require that the DEIR be recirculated for additional public review. Until the DEIR has been revised and recirculated, as described herein, the County may not lawfully approve the Project.

O1.43

[145] San Bernardino Code §85.06.040.
6231-004j

Thank you for your attention to these comments. Please include them in the record of proceedings for the Project.

O1.43
Cont.

Sincerely,

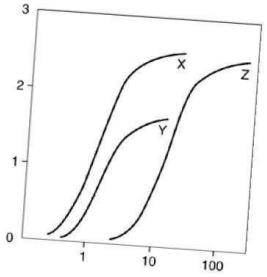
Kevin Carmichael

KTC:ljl

Exhibits

6231-004j

EXHIBIT A



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August 22, 2022

Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

Attn: Mr. Kevin Carmichael

Subject: Comments On Draft Environmental Impact Report (DEIR) For Duke Warehouse At Slover and Alder Project County of San Bernardino, State Clearing House Number 2021120526

Dear Mr. Carmichael:

At the request of Adams Broadwell Joseph & Cardozo (ABJC), Clark and Associates (Clark) has reviewed materials related to the June 30, 2022 County of San Bernardino's (the County's) DEIR of the above referenced project. O1.44

Clark's review of the materials in no way constitutes a validation of the conclusions or materials contained within the plan. If we do not comment on a specific item this does not constitute acceptance of the item.

Project Description:

According to the DEIR the conditional use permit (CUP) for the Project, known as the Duke Warehouse at Slover and Alder Project, would allow for warehousing and distribution (logistics) use. The Project would demolish existing residential and commercial structures to develop a new 259,481 square foot high-cube warehouse/distribution use. O1.45

The proposed Project consists of a 50-foot-tall warehouse/distribution building to the parapet and 48 feet to the roof with an outdoor truck court which would occupy approximately the northern third of the site. The Project building would include 5,000 square feet of office space, a 2,975 square foot mezzanine, and 38 dock doors along the north side of the building, facing Slover Avenue. Lot coverage would equate to 45% of the 13.23-acre Project site. The building would be joined by an outdoor, concrete truck court which would include 85 trailer stalls for loading and unloading.



Figure 1: Project Site Location

O1.45
Cont.

According to the DEIR,[1] the parcels that comprise the Project site have been used for many purposes ranging from agricultural production and residential use to commercial/industrial use, construction storage, and trailer parking in recent decades. The site contains two existing single-family residential structures and three commercial/industrial buildings that support businesses currently operating on the site.

O1.45 Cont.

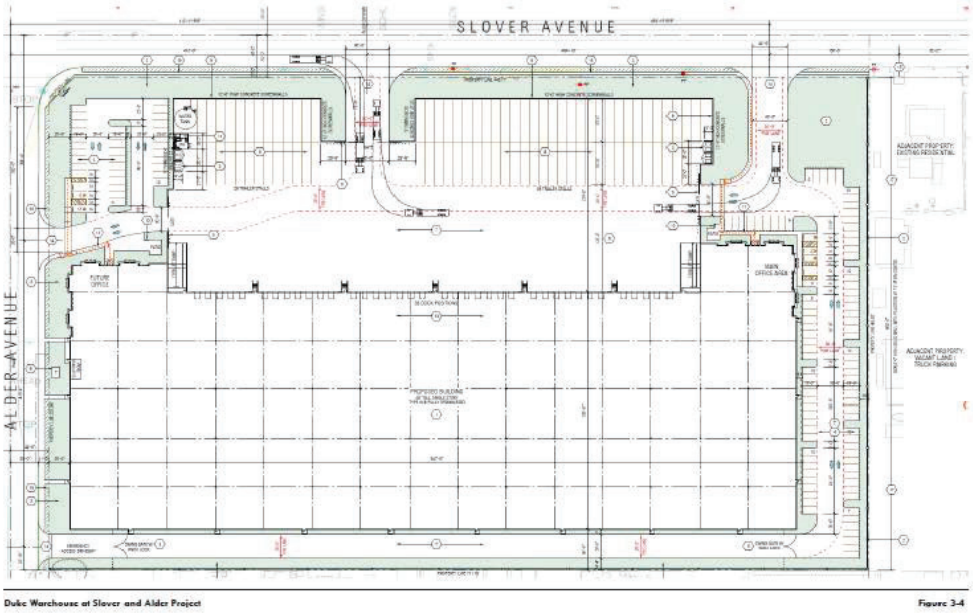


Figure 2: Conceptual Site Plan

According to the County's DEIR of the Project, the potentially significant impacts identified in the DEIR will be mitigated to less than significant levels. The conclusion from the County that the significant impacts can be mitigated is not supported by the facts of the Project. There are significant

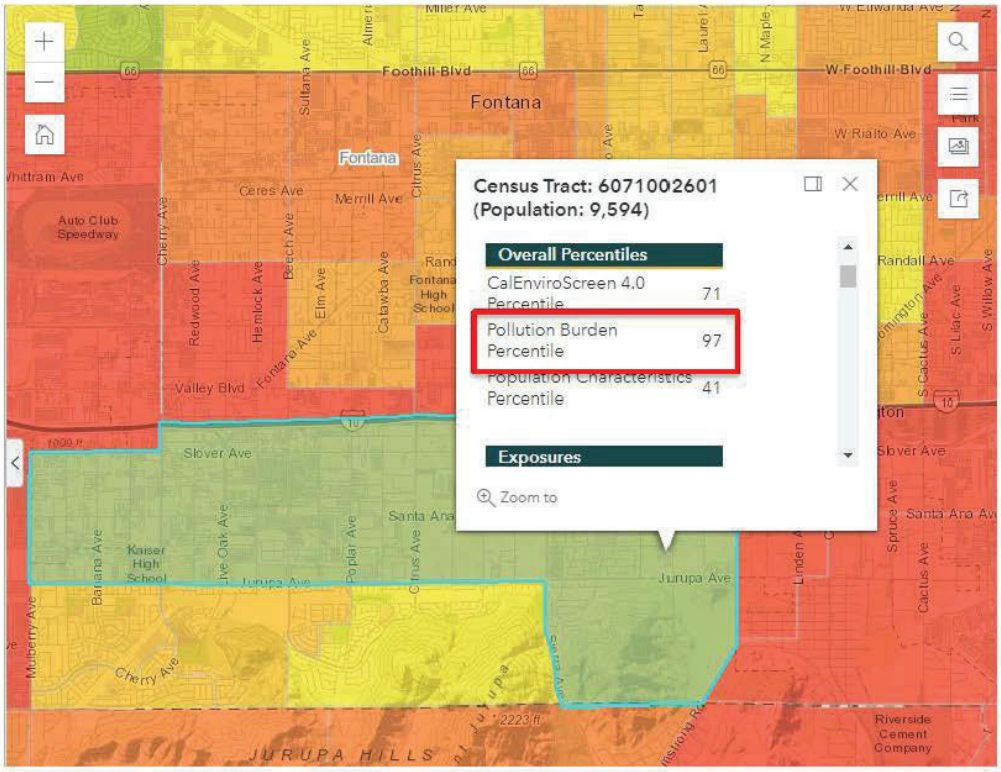
[1] County of San Bernardino. 2022. Draft Environmental Impact Report (DEIR) For Duke Warehouse At Slover and Alder Project County of San Bernardino, State Clearing House Number 2021120526. Dated June 30, 2022. Pg 3-1

impacts that are not addressed in the County's analysis that must be addressed in a revised environmental draft impact report (R-DEIR). O1.45 cont.

Specific Comments:

1. **The County's Air Quality Analysis Fails To Consider The Impact Of Adding Additional Ozone Precursors From The Vehicles Using The Facility Will Have On The Already Heavily Impacted Region.**

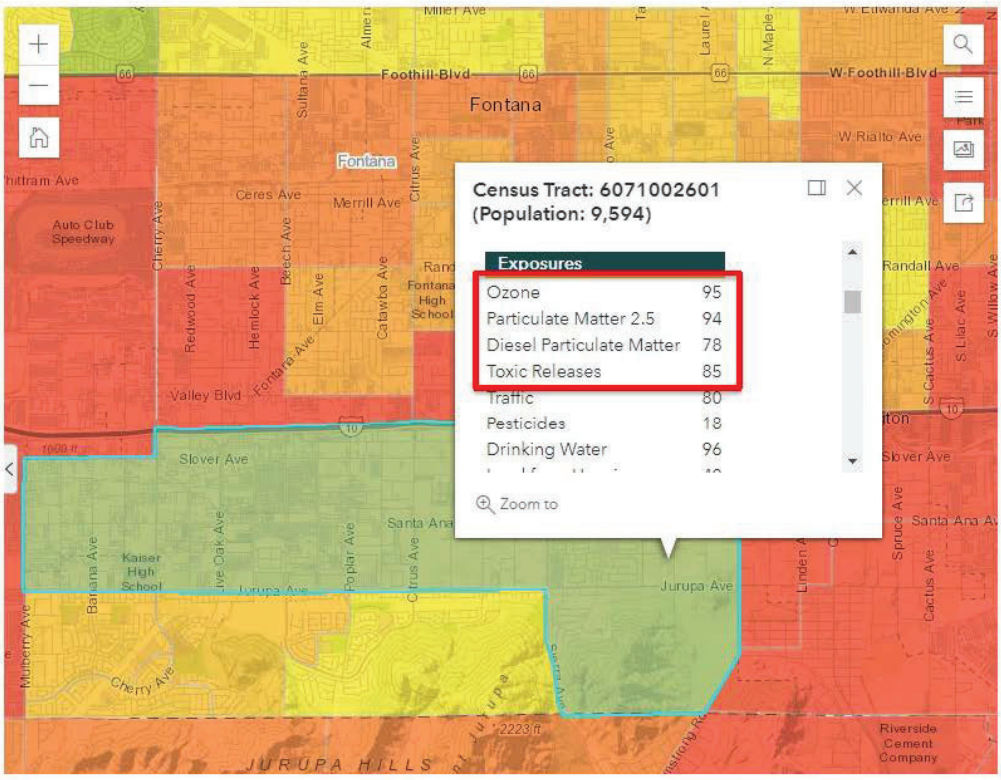
The County's analysis of pollutants in this section ignores substantial evidence that the census tract in which the Project Site resides is one of the worst areas in California for ozone, the principal air pollutant in smog, as well as other pollutants and toxic air contaminants. O1.46



O1.46 Cont.

Figure 1: CalEnviroScreen 4.0 Analysis Of Census Tract 6071002601

Based on the existing ozone measurements from the South Coast Air Quality Management District (SCAQMD), the CalEnviroScreen 4.0 reports that the census tract for the Project site is in the top 5% in California being impacted by ozone; the top 6% in California being impacted by $PM_{2.5}$; the top 22% in California being impacted by DPM; and the top 15% in California being impacted by toxic releases.



O1.46 Cont.

Important precursors for the formation of ozone are unburned hydrocarbons from vehicles and NO_x both of which are directly associated with the Project site. Increasing the number of sources of unburned hydrocarbons, NO_x, and diesel particulate exhaust in an area already severely impacted will exacerbate the existing adverse health conditions impacting people in the Bloomington census tract and increase pollution in the Southern California Air Basin (SCAB). The County must address these substantial impacts on the surrounding community and SCAB in a revised DEIR.

2. The Air Dispersion Model Used As The Basis of the Health Risk Analysis (HRA) Has A Flaw In The Building Height For The New Structure.

The air dispersion model used in the health risk analysis has a significant flaw - the model uses the wrong height for the new structure. The DEIR[2] states that the proposed Project consists of a 50-foot-tall warehouse/distribution building to the parapet and 48 feet to the roof with an outdoor truck court which would occupy approximately the northern third of the site. In the 2022 Slover/Alder Avenue Industrial Project, Air Quality, Energy, GHG, and HRA Impact Analysis prepared by Vista Environmental for the operational phase of the Project,[3] in order to account for building downwash (air turbulence caused by wind blowing over the proposed warehouse) attributes associated with the proposed project, the proposed warehouse structure was inputted into the AERMOD model as a polygonal building with a 44-foot height. O1.47

Building downwash occurs as the wind flows over and around buildings and impacts the dispersion of pollution from nearby stacks. A plume caught in the path of this flow is drawn into the wake, temporarily trapping it in a recirculating cavity. This downwash effect leads to higher ground-level concentration of chemicals emitted from sources. The downwash effect increases as the relative difference between the release height and top of the building increases.[4]

[2] County of San Bernardino. 2022. Draft Environmental Impact Report (DEIR) For Duke Warehouse At Slover and Alder Project County of San Bernardino, State Clearing House Number 2021120526. Dated June 30, 2022. Pg 1-1

[3] Vista Environmental. 2022. Air Quality, Energy, Greenhouse Gas Emissions, and Health Risk Assessment Impact Analysis Slover/Alder Avenue Industrial Project Bloomington. Prepared Vista Environmental for the County of San Bernardino. Pg 49

[4] The so-called good engineering practice height (GEP) of the source. The GEP is defined in Section 123 of the Clean Air Act as "the height necessary to ensure that emissions from a stack do not result in excessive concentrations of any air pollutant in the immediate vicinity of the source as a result of atmospheric downwash, eddies or wakes which may be created by the source itself, nearby structures or nearby terrain obstacles."

For the closest receptors to the site, the residences to the Project, this difference will create an additional air quality impact that is not accounted for in the County's analysis. In addition to incorporating the building downwash impacts of the Project buildings, the AERMOD model should also incorporate the building downwash for receptors near the Project. Receptors farther away will still be subject to the downwash effect given the assumed emission height release incorporated into the model. Guidance from authoritative bodies in California regarding the preparation of health risk assessments of mobile sources of diesel emissions[5] requires the inclusion of building heights and dimensions for building downwash calculations. The County should address the impact of this issue in a revised DEIR. O1.47 Cont.

3. The Average Truck Trip Length Of 40 Miles Used In The Air Quality Analysis Does Not Match The Length(s) Used To Support A Nearby Duke Warehouse.

According to the operational air quality analysis in the DEIR,[6] SCAQMD requires that truck trip length should be set to 40 miles in CalEEMod. This statement does not reflect the actual guidance, rather is reflects an averaged value of truck trips lengths from the Southern California Association of Governments (SCAG) generated in 2016. Guidance from SCAQMD does not require a 40-mile truck trip, rather as stated in the SCAQMD's Final Environmental Assessment and Adoption of Proposed Rule 2305 – Warehouse Indirect Source Rule (WAIRE), the trip length for Class 8 trucks (heavy duty multi-axle trucks) are assumed to travel 39.9 miles per trip based on modeling conducted for the 2016 Regional Transportation Plan (RTP) from SCAG and the 2016 Air Quality Management Plan O1.48

[5] SCAQMD. 2003. Health Risk Assessment Guidance For Analyzing Cancer Risks From Mobile Source Diesel Emissions. August, 2003. Page 2.

[6] Vista Environmental. 2022. Air Quality, Energy, Greenhouse Gas Emissions, and Health Risk Assessment Impact Analysis Slover/Alder Avenue Industrial Project Bloomington. Prepared Vista Environmental for the County of San Bernardino. Pg 43

(AQMP).[7] This misinterpretation of the averaged value from SCAG's model is another example of how the County's assumption are unsupported. The DEIR's reliance on the 40-mile trip length does not comport with the reality of where warehoused materials will ship from in the region. The 40-mile distance is insufficient to allow vehicles to travel to the major ports in the Southern California region – Los Angeles and Long Beach. It is also inconsistent with average truck trip lengths assumed in other County CEQA documents for similar warehouse projects.

O1.48 Cont.

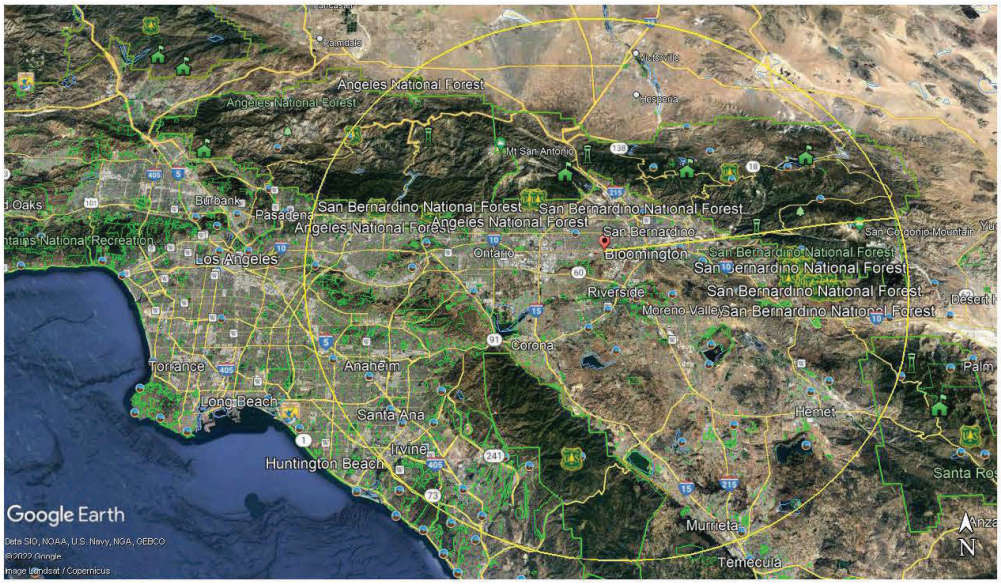


Figure 3: 40 Mile Radius From Slover and Alder Project Site

For example, in its 2019 DEIR of the Duke Realty Alabama and Palmetto Warehouse Project, SCH 2019029078, also submitted to the County of San Bernardino, an average truck trip length of

[7] SCAQMD. 2021. BOARD MEETING DATE: MAY 7, 2021 AGENDA NO. 27 pg 815. http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf

approximately 77 miles was assumed, which is the distance to the Ports of Los Angeles/Long Beach.[8] The Alabama/Palmetto Warehouse is located approximately 12 miles away from the Slover/Alder Project, therefore likely to have similar trip distances to the nearby ports.

O1.48 Cont.

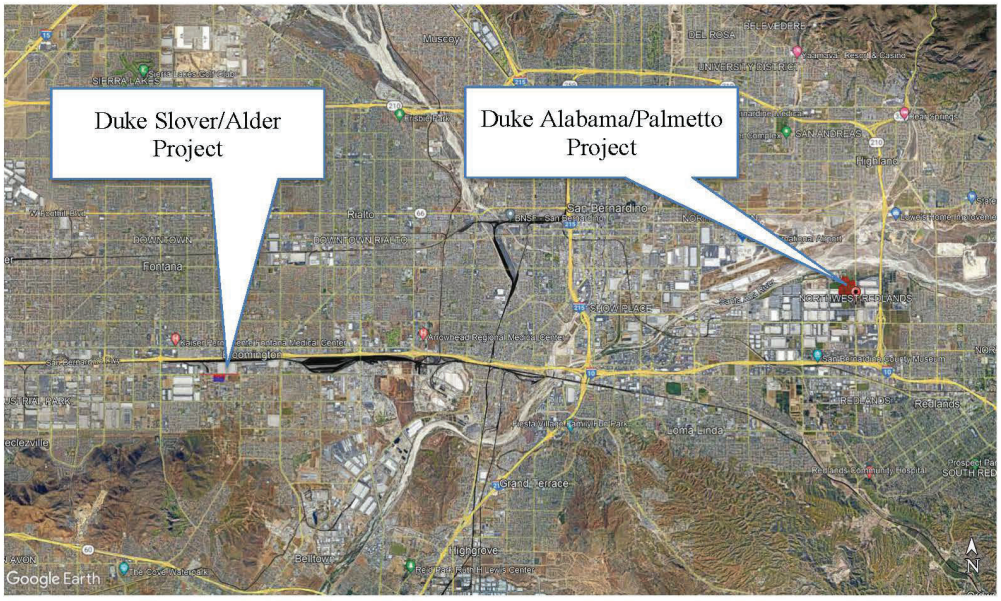


Figure 4: Locations of Duke Slover/Alder and Alabama/Palmetto Projects

The air quality analysis of the Slover/Alder Project must be updated to reflect the actual distance of the Project's average daily truck trips, a minimum of approximately 65 miles (the distance to the Port of Los Angeles). Using a 65-mile daily truck trip increases the Project's daily emissions of VOCs from 7.03 lbs per day to 7.31 lbs per day; the emissions of NO_x from 18.17 lbs per day to 25.41 lbs per day; the emissions of PM_{10} from 4.95 lbs per day to 6.69 lbs per day; and, the emissions

O1.49

[8] MIG. 2019. Duke Alabama and Palmetto Warehouse Draft Environmental Impact Report. Prepared for Count of San Bernardino. Appendix B Air Quality Analysis Technical Memorandum. Pg 3

of $PM_{2.5}$ from 1.52 lbs per day to 2.15 lbs per day (See CALEEMOD outputs in attached exhibit). With the GHG analysis, the impact is much greater than the criteria pollutants. Increasing the trip length from 40 miles to 65 miles increases the operational GHG emissions from 2,237.56 tons of CO_2e to 2,656 tons of CO_2e. While these sample calculations do not exceed regional threshold levels, they represent significant increases over the unsupported modeled concentrations set forth in the DEIR based on an 40-mile trip distance, and demonstrate that the DEIR substantially undercalculated truck emissions. Moreover, the Project's actual truck trips to port or rail stations which are farther than the Port of Los Angeles may be greater than 65 miles, further increasing pollutant emissions. The County cannot rely on unsupported and undercalculated emissions levels. The County must revise the DEIR's air quality and GHG analysis to calculate emissions using fact-based, reasonably foreseeable truck trip lengths.

O1.49 Cont.

4. **The Underlying Assumptions Regarding The Number of Vehicles Associated With Each Square Foot of Building Utilized In The Air Quality Analysis Reflects Only The Low End Of The ITE Guidance On High Cube Warehouses And Does Not Reflect The Range Of Values Reported By ITE .**

The County ignores the SCAQMD's recommendation to utilize a higher average daily vehicle trip rate per 1,000 square feet than the 1.40 trips per 1,000 square feet cited in the DEIR. The County's analysis cites the use of the 2016 study of High-Cube Warehouse Distribution Centers (HCWs) by the SCAQMD and Institute of Transportation Engineers (ITE)[9] included an analysis of high-cube warehouses (HCW) as a reason for using a different daily trip rate. An HCW was defined as a building that typically has at least 200,000 gross square feet of floor area, has a ceiling height of 24 feet or more, and is used primarily for the storage and/or consolidation of manufactured goods (and to a lesser

O1.50

[9] Institute of Transportation Engineers (2020).

extent, raw materials) prior to their distribution to retail locations or other warehouses

The choice of the daily trip rate has a profound impact on the calculated emissions for operational associated with the Project. The County's choice for the trip rate is at the lowest end of the values reported in the literature. The ITE manual includes a variety of average daily vehicle trips for HCWs which range from a low of 1.4 per 1,000 square feet for transload and short-term storage warehouses to a high of 6.44 trips per square feet for fulfillment center warehouses.[10] An averaged value of all the warehouse HCW types reported in the ITE manual would be 3.28 trips per 1,000 square feet. O1.50

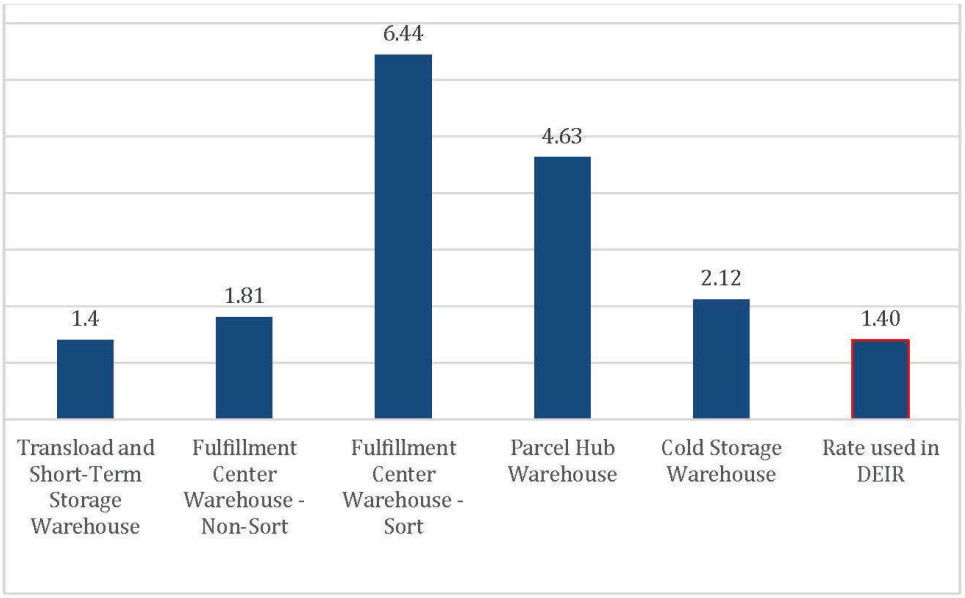


Figure 5: Trip rates per 1,000 square feet as reported in ITE manual

Using the ITE manual rates above, the proposed 259,481 square foot HCW Project could result in 363 O1.51

[10] Institute of Transportation Engineers (2020).

to 1,671 trips daily.

In the 2016 SCAQMD study, a value of 1.432 daily vehicle trips per 1,000 GSF is calculated for Transload and Short-term Storage HCWs. The study further states that, while the dataset for Transload and Short-term Storage HCWs is larger than those for Cold Storage HCWs, Fulfillment Center HCWs, and Parcel Hub HCWs, the relationship between building gross square footage and vehicle trips for Transload and Short-term HCWs *does not produce an acceptable level of correlation to develop a fitted curve equation (emphasis added)*. In a 2019 study of warehouse trip generation performed by WSP for the Western Riverside Council of Governments (WR-COG), the average daily trip rate was substantially higher (50% higher) than the SCAQMD study. WSP performed traffic counts at 16 warehouses, segmented between 11 fulfillment centers and 5 parcel hubs. The average daily trip rate across the 11 fulfillment centers was 2.13 per 1000 square feet. O1.51 Cont.

These studies suggest that the value used to justify the number of vehicle trips per day utilized by the County are not supportable, and the DEIR lacks any supporting evidence to justify its reliance on a 1.4 daily trip rate. Based on the evidence and reasonable calculations provided in the SCAQMD and WR-COG studies, the County should, at a minimum, re-evaluate the Project's operational emissions based on the recommended SCAQMD rate (1.68) or the newer WR-COG rate (2.13) in a revised DEIR.

5. The Operational HRA Fails to Evaluate all Components of Diesel Exhaust.

The HRA provided in Appendix B to the DEIR, only quantifies the health risk from exposure to Diesel Particulate Matter (DPM), and does not quantify the health risk from exposure to the other toxic air compounds released in diesel exhaust. Elsewhere, Appendix B details all of the other O1.52

components of diesel exhaust, demonstrating that the County had knowledge of these compounds yet failed to analyze them in the HRA.

O1.52 Cont.

Table A – Diesel Emission Pollutants that Cause Acute and Chronic Health Impacts

TAC	TAC Potency Factors (µg/m³)[1] Acute REL[2]	Chronic REL	Percent of DPM Emission Rate[3]	Target Organ Systems
1,3-Butadiene	660	140	0.51%	Development
Acetaldehyde	470	140	1.84%	Eyes, respiratory system (sensory irritation)
Acrolein	2.5	0.35	0.08%	Eyes, respiratory system
Arsenic	0.2	0.015	0.004%	Reproductive/developmental, cardiovascular system, nervous system
Benzene	27	3	0.44%	Hematologic system, immune system, reproductive/developmental
Cadmium	--	0.02	0.004%	kidney, respiratory system
Chlorobenzene	--	1,000	0.0005%	Eyes, respiratory system
Chromium (hexavalent)	--	0.2	0.001%	Respiratory system, hematologic system
Copper	100	--	0.01%	Respiratory system
Ethyl benzene	--	5	0.03%	Liver, kidney, developmental
Formaldehyde	55	9	4.07%	Eyes, immune system, respiratory
Hexane	--	200	0.06%	Nervous system
Hydrogen Chloride	2,100	9	0.44%	Eyes, respiratory system
Manganese	--	0.09	0.01%	Nervous system
Mercury	0.6	0.03	0.005%	Reproductive/developmental
Naphthalene	--	9	0.05%	Respiratory system
Nickel	0.2	002	0.01%	Immune system, respiratory system
Propylene	--	3000	1.10%	Respiratory System
Selenium	--	20	0.01%	Liver, cardiovascular system, nervous system
Toluene	37000	300	0.25%	Nervous system, eyes, respiratory system, reproductive/developmental
Xylene	22000	700	0.10%	Eyes, nervous and respiratory systems
DPM	--	5	--	Respiratory system

Notes:
[1] Potency factors obtained from: http://www.oehha.ca.gov/risk/ChemicalDB/index.asp
[2] REL = Reference Exposure Level
[3] Percentage of DPM Emission Rate calculated by dividing the pollutant's pounds per 1,000 gallons rate by the PM2.5 pounds per 1,000 gallons rate provided by the SDAPCD
Sources: SDAPCD, 2011 and OEHHA, 2014.

The County must assess the air quality impacts for all toxic air compounds that will be released during the construction and operational phases of the project. CARB[11] defines diesel exhaust as a

[11] CARB. 1998. Report to the Air Resources Board on the Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant, Part A, Public Exposure To, Sources and Emissions of Diesel Exhaust In California April 22, 1998. Pg A-1.

complex mixture of inorganic and organic compounds that exists in gaseous, liquid, and solid phases. CARB and U.S. EPA identify 40 components of the exhaust as suspected human carcinogens, including formaldehyde, 1,3-butadiene, and benzo[a]pyrene. The inhalation unit risk factor identified by OEHHA for use in risk assessments is for the particulate matter (DPM) fraction of diesel exhaust and not the vapor phase components identified by CARB and U.S. EPA. O1.52 Cont.

By omitting analysis of all potential TACs that will be released by the Project, the HRA underestimates the risk from diesel trucks and fails to consider any of the gasoline emission toxic air contaminants. Without a complete analysis of the TAC emissions from the Project, the County cannot say with any certainty whether the operational emissions will not exceed the 10 in 1,000,000 risk threshold or cancer burden value of 0.5. The County must address this underestimation of the health risk in a revised DEIR. O1.53

6. The Project Design Features (PDFs) For Air Quality Impacts Are Generally Unenforceable And Will Not Result in Significant Reductions in Air Quality Impacts.

The DEIR contains Project Design Features intended to reduce emissions from on-road heavy-duty haul trucks. However, the PDFs which apply to all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site are not enforceable and will not have a significant impact on NO_x and DPM emissions on site. O1.54

- 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.
- 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.

The existing PDFs used by the County assume that the air quality impacts are less than significant. Remodeling of the air quality emissions clearly demonstrates that using the corrected average daily trip length of 65 miles to the Ports of Los Angeles and Long Beach will increase NOx emissions by 40%, PM10 emissions by 35%, and GHG emissions bv 19%, demonstrating an increase in the impacts on the community and the air basin The County offers no explanation as to why model year 2010 is the baseline value for heavy-duty vehicles on-site. If the County can limit the age of the heavy-duty vehicles entering and exiting the site then choosing new model vehicles will limit the impacts of the Project on the surrounding community.

O1.54 Cont.

Using the California Air Resources Board's (CARB) EMission FACtor (EMFAC) model, it is possible to estimate the emissions from onroad mobile sources in California, including but not limited to heavy duty trucks. The model calculates emissions factors and emissions inventories for:

- Carbon monoxide (CO)
- Nitrogen oxides (NOx)
- Hydrocarbons (HC): HC can be expressed as TOG (total organic gases), ROG (reactive organic gases), THC (total hydrocarbon), or CH_4 (methane). The TOG class includes all organic gases emitted into the atmosphere. The ROG class is same as EPA's VOC (volatile organic compounds) definition and does not contain compounds exempt from regulation.
- Particulate matter (PM): PM estimates are provided for total suspended particulates for particulate matters 10 microns or less in diameter (PM_{10}), and particulate matters 2.5 microns or less in diameter (PM2.5).
- Sulfur oxides (SOx): Emissions of oxides of sulfur are a function of the sulfur content of fuel. The model calculates these emissions by multiplying the fuel consumption by the weight fraction of sulfur in a gallon of fuel.
- Greenhouse Gases (GHG): GHG emissions are consisted of complete combustion CO_2, Nitrous Oxide (N_2O) and Methane (CH_4). These are the greenhouse gases that are now included in the EMFAC2017 but not in EMFAC2014 or prior versions

O1.55

In my analysis the emissions for NOx and $PM_{2.5}$ as exhaust for vehicles with model years 2010, 2018, and 2022 are presented in the table below.

O1.55 cont.

Table 1: EMFAC Emission Estimates For Heavy Duty Vehicles For Model Years 2010 Through 2022

Region	Calendar Year	Vehicle Category	Model Year	Speed	Fuel	NOx RUNEX	NOx IDLEX	NOx STREX	PM2.5 RUNEX	PM2.5 IDLEX	ROG RUNEX	ROG IDLEX
San Bernardino	2022	HHDT	2010	Aggregate	Diesel	8.416170639	66.63462309	0.303995324	0.061143063	0.015346498	0.389515889	3.711221415
San Bernardino	2022	HHDT	2011	Aggregate	Diesel	5.108084686	49.94368209	1.74914169	0.050351752	0.015193042	0.140670794	3.718894563
San Bernardino	2022	HHDT	2012	Aggregate	Diesel	3.888175928	35.75497962	2.807614527	0.028043419	0.012319964	0.023658391	3.025740095
San Bernardino	2022	HHDT	2013	Aggregate	Diesel	3.720064369	47.94325388	2.364825726	0.027326372	0.016519633	0.023244212	4.057164263
San Bernardino	2022	HHDT	2014	Aggregate	Diesel	2.501894439	51.37072174	2.577134663	0.020471148	0.017700623	0.019249143	4.347211329
San Bernardino	2022	HHDT	2015	Aggregate	Diesel	2.132749332	55.56413921	2.63263191	0.018341075	0.019145534	0.017675502	4.702076343
San Bernardino	2022	HHDT	2016	Aggregate	Diesel	2.046121765	75.3500383	2.459825115	0.018600961	0.025963089	0.017207775	6.376444189
San Bernardino	2022	HHDT	2017	Aggregate	Diesel	1.907108583	65.60669357	2.431979452	0.016899225	0.02260586	0.016417079	5.551920469
San Bernardino	2022	HHDT	2018	Aggregate	Diesel	1.791508608	69.09782834	2.549827758	0.014935616	0.023808788	0.015741602	5.847355302
San Bernardino	2022	HHDT	2019	Aggregate	Diesel	1.653470388	70.54006992	2.561556547	0.013213531	0.024305736	0.014944854	5.969403986
San Bernardino	2022	HHDT	2020	Aggregate	Diesel	1.511480591	72.58206083	2.567147195	0.011417445	0.025009337	0.014125251	6.142206035
San Bernardino	2022	HHDT	2021	Aggregate	Diesel	1.363787794	74.45298552	2.562063473	0.009588605	0.025653995	0.013272115	6.300531726
San Bernardino	2022	HHDT	2022	Aggregate	Diesel	1.213963064	69.46686997	2.600171616	0.007624458	0.023935947	0.012398767	5.878585192

Note: Units: g/mile for RUNEX, g/vehicle/day for IDLEX

Based on the averaged emissions from the table above (limiting the fleet to vehicles built before the year 2022) it is clear that changing the minimum allowable model year from 2010 to 2018 or 2022 would result in:

- An 80% reduction in running NO_X emissions (NO_X RUNEX) from trucks operating on site if the vehicles were restricted to model year 2018 or later.
- An 87% reduction in running NO_X emissions (NO_X RUNEX) from trucks operating on site if the vehicles were restricted to model year 2022 or later.
- A 66% reduction in diesel particulate matter (DPM) emissions from trucks measured as particulate matter less than 2.5 microns ($PM_{2.5}$) operating on site ($PM_{2.5}$ RUNEX) if the vehicles were restricted to model year 2018 or later.
- An 83% reduction in diesel particulate matter (DPM) emissions from trucks measured as particulate matter less than 2.5 microns ($PM_{2.5}$) operating on site ($PM_{2.5}$ RUNEX) if the vehicles were restricted to model year 2022 or later.

O1.55 Cont.

The County must reassess the impact that restricting the model year of vehicles operating during the construction and operation phase of the Project in PDF-AQ3 and PDF-AQ-9 to newer models than 2010 in a revised DEIR.

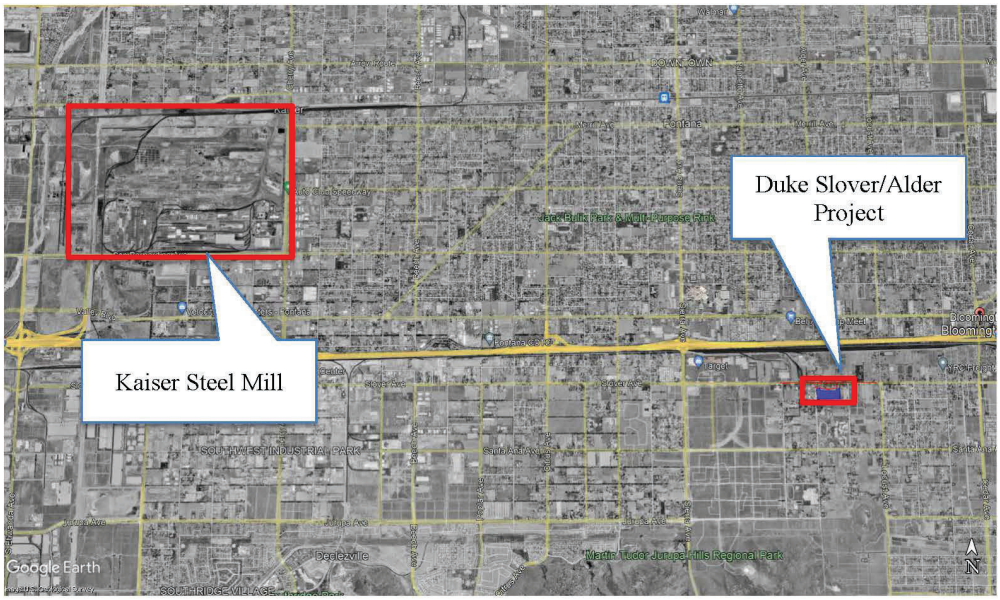
7. **PDF-AQ16 Specifies Non-Diesel Back-Up Generators On Site (BUGs), but the BUG Was Not Included In the Air Quality Analysis.**

PDF AQ-16 as listed in the DEIR requires the Project Applicant/Developer/Owner to power all stand-by emergency generators with a non-diesel fuel. However, in the air quality analysis of the Project, the County failed to assess the emissions from the alternatively fueled BUGs. This omission resulted in underestimated operational emissions. The County must recalculate operational emissions from all emissions sources in a revised DEIR.

8. **The DEIR Does Not Consider The Impact From Historic Emissions Associated With The Kaiser Steel Mill On The Soils At The Project Site.**

O1.56

The Project site is within the fall-out zone for the former Kaiser Steel Mill site because the Project site resides less than 4.5 miles from the edge of the former Kaiser Steel Mill site.



O1.56 Cont.

Figure 6: Location of Project Site To Former Kaiser Steel Mill

The original Kaiser Steel Mill, located on approximately 1,200 acres in Fontana is located approximately 4.5 miles to the northwest of the Project site. The Kaiser Steel Mill facility was an integrated steel production plant that the Kaiser Steel Corporation owned and operated from approximately 1942 to 1983. Studies of the steel mill found that it emitted large quantities of carcinogenic compounds that persist in the environment[12] and that the emission controls on the plant

[12] KVB. 1970. An Inventory Of Carcinogenic Substances Released Into The Ambient Air Of California. Final Report – Task II & IV. Prepared for Science Applications, Inc by R.M. Roberts, KVB, Inc. Energy and Environmental Systems. March, 1980.

were deficient. [13] In 1970, a report by KVB[14] sought to identity areas where the highest concentrations of emissions might be expected to occur resulting from the Mill's use or manufacture of 11 listed carcinogenic substances. The report focused on recognized "hot spots" in which carcinogenic compounds were released and had the potential for dispersion after release. At the time of the initial evaluation of the plant in 1980, there was a concern about the emissions from the Kaiser Steel Mill being one of the largest sources of polycyclic organic matter (POMs are also known as polycyclic aromatic hydrocarbons), arsenic, cadmium, and benzene in California.[15] Arsenic, cadmium, and POMs are not subject to degradation in the environment and will represent a COPC for the area. According to the U.S. EPA's 1976 assessment of visible emissions from the Steel Mill,[16] the basic coke, iron and steel processes result in the emission to the atmosphere of excessive levels of particulate air pollutants, despite the installation of various air pollution control devices. The aerial extent of the contamination was not defined in the study. A review of aerial photographs from the 1950s shows clear evidence that emissions from the Kaiser Steel Mill extend well beyond the boundaries of the facility and would have reached Bloomington.

O1.56 Cont.

[13] U.S. EPA. 1976. Visible Emission Observation, Kaiser Steel Corporation, Fontana, California, September, 1975. EPA-330/2-76-028.

[14] KVB. 1970. An Inventory Of Carcinogenic Substances Released Into The Ambient Air Of California. Final Report – Task II & IV. Prepared for Science Applications, Inc by R.M. Roberts, KVB, Inc. Energy and Environmental Systems. March, 1980.

[15] KVB. 1970. An Inventory Of Carcinogenic Substances Released Into The Ambient Air Of California. Final Report – Task II & IV. Prepared for Science Applications, Inc by R.M. Roberts, KVB, Inc. Energy and Environmental Systems. March, 1980.

[16] U.S. EPA. 1976. Visible Emission Observation, Kaiser Steel Corporation, Fontana, California, September, 1975. EPA-330/2-76-028.

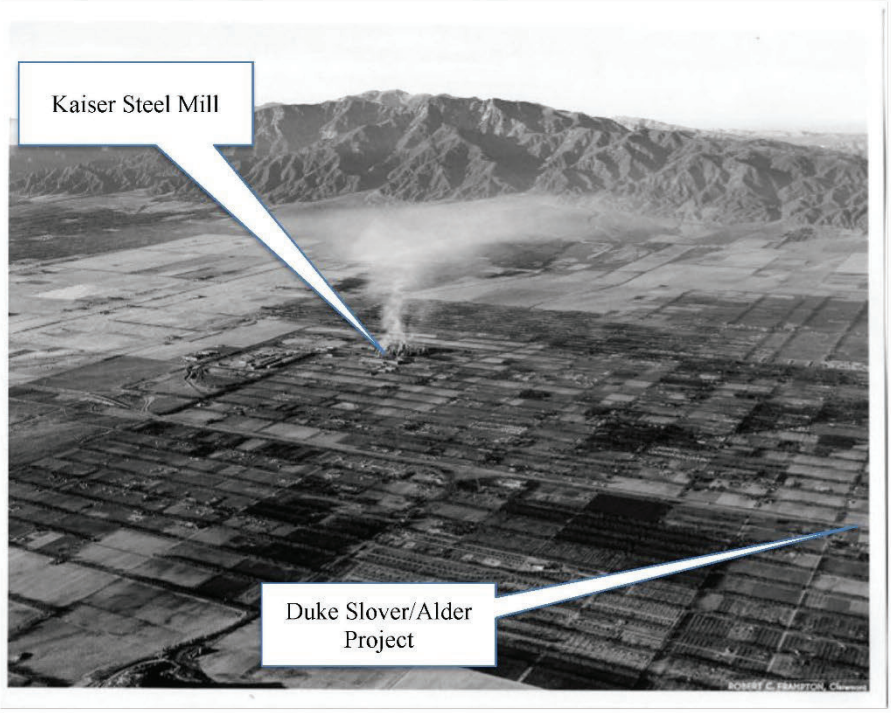


Figure 7: Kaiser Steel Mill Emissions Circa 1951

O1.57

Emissions from the plant would have covered the area of the Project Site for many decades and present a recognized environmental concern (REC) for the site which was not identified previously in the DEIR.

The Project's construction phase will disturb large quantities of soils in areas that could have been impacted by the steel mills emissions. Mechanically disturbing the soils will release impacted soils that will migrate offsite to the residences nearby. The County must assess the concentrations of contaminants (primarily polycyclic aromatic hydrocarbons and metals) that may be present in the soils of the Project site and calculate their associated health risks. The County must correct this error in the hazardous materials section and health risk analysis of the DEIR by preparing a quantified Phase II subsurface investigation and present the results in a revised environmental impact report (REIR).

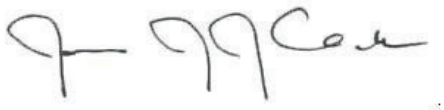
9. The Project Site Was Formerly Used As An Agricultural Site. A Phase II Investigation For The Pesticides Must Be Performed.

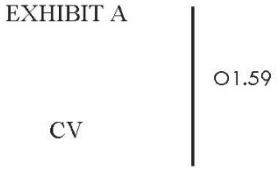
According to the project background information in the DEIR, the parcels that comprise the Project site have been used for many purposes ranging from agricultural production and residential use to commercial/industrial use, construction storage, and trailer parking in recent decades. The investigations to date have failed to assess the soils at the Project site to determine whether releases of pesticides or hazardous materials have occurred on-site. The County must correct this error in the hazardous materials section of the DEIR and present the results in a revised environmental impact report (REIR). O1.58

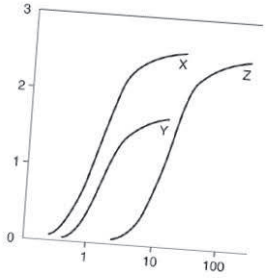
Conclusion

The facts identified and referenced in this comment letter lead me to reasonably conclude that the Project could result in significant unmitigated impacts if the DEIR is approved. The County must re-evaluate the significant impacts identified in this letter by requiring the preparation of a revised draft environmental impact report.

Sincerely,




EXHIBIT A
O1.59
CV



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Toxicology/Exposure Assessment Modeling

Risk Assessment/Analysis/Dispersion Modeling

Education:

Ph.D., Environmental Health Science, University of California, 1995

M.S., Environmental Health Science, University of California, 1993

B.S., Biophysical and Biochemical Sciences, University of Houston, 1987

Professional Experience:

Dr. Clark is a well-recognized toxicologist, air modeler, and health scientist. He has 30 years of experience in researching the effects of environmental contaminants on human health including environmental fate and transport modeling (SCREEN3, AEROMOD, ISCST3, Johnson-Ettinger Vapor Intrusion Modeling, RESRAD, GENII); exposure assessment modeling (partitioning of contaminants in the environment as well as PBPK modeling); conducting and managing human health risk assessments for regulatory compliance and risk-based clean-up levels; and toxicological and medical literature research.

SELECTED AIR MODELING RESEARCH/PROJECTS

Client(s) - Confidential

Dr. Clark performed a historical dose reconstruction for community members from an active 700 acre petroleum refinery in Los Angeles. The analysis included a multi-year dispersion model was performed in general accordance with the methods outlined by the U.S. EPA and the SCAQMD for assessing the health impacts in Torrance, California. The results of the analysis are being used as the basis for injunctive relief for the communities surrounding the refinery.

Client(s) – Multiple

Indoor Air Evaluations, California: Performed multiple indoor air screening evaluations and risk characterizations consistent with California Environmental Protection Agency's (Cal/EPA) Department of Toxic Substances Control (DTSC) and Regional Water Quality Control Board (RWQCB) methodologies. Characterizations included the use of DTSC's

modified Johnson & Ettinger Model and USEPA models, as well as the attenuation factor model currently advocated by Cal/EPA's Office of Environmental Health and Hazard Assessment (OEHHA).

Client – Adams, Broadwell, Joseph Cardozo, P.C.

Dr. Clark has performed numerous air quality analyses and risk assessments of criteria pollutants, air toxins, and particulate matter emissions for sites undergoing evaluation via the California Environmental Quality Act (CEQA) process. The analyses include the evaluation of Initial Study (IS) and Environmental Impacts Reports (EIR) for each project to determine the significance of air quality, green house gas (GHG), and hazardous waste components of the projects. The analyses were compiled as comment letters for submittal to oversight agencies.

Client – Confidential

Dr. Clark performed a comprehensive evaluation of criteria pollutants, air toxins, and particulate matter emissions from a carbon black production facility to determine the impacts on the surrounding communities. The results of the dispersion model were used to estimate acute and chronic exposure concentrations to multiple contaminants and were be incorporated into a comprehensive risk evaluation.

Client – Confidential

Dr. Clark performed a comprehensive evaluation of air toxins and particulate matter emissions from a railroad tie manufacturing facility to determine the impacts on the surrounding communities. The results of the dispersion model have been used to estimate acute and chronic exposure concentrations to multiple contaminants and have been incorporated into a comprehensive risk evaluation.

PUBLIC HEALTH/TOXICOLOGY

Client: Confidential

Dr. Clark performed a historical dose reconstruction for community members from radiologically impacted material (RIM) releases from an adjacent landfill. The analysis was performed in general accordance with the methods outlined by the Agency for Toxic Substances Control (ATSDR) for assessing radiation doses from historical source areas in North St. Louis County, Missouri.

Client: City of Santa Clarita, Santa Clarita, California

Dr. Clark managed the oversight of the characterization, remediation and development activities of a former 1,000 acre munitions manufacturing facility for the City of Santa

Clarita. The site is impacted with a number of contaminants including perchlorate, unexploded ordinance, and volatile organic compounds (VOCs). The site is currently under a number of regulatory consent orders, including an Immanent and Substantial Endangerment Order. Dr. Clark assisted the impacted municipality with the development of remediation strategies, interaction with the responsible parties and stakeholders, as well as interfacing with the regulatory agency responsible for oversight of the site cleanup.

Client: Confidential

Dr. Clark performed a historical dose reconstruction for community members exposed to radioactive waste released into the environment from legacy storage facilities. The releases resulted in impacts to soils, sediments, surface waters, and groundwater in the vicinity of the sites. The analysis was performed in general accordance with the methods outlined by the Agency for Toxic Substances Control (ATSDR) for assessing radiation doses from historical source areas in the community.

Client: Confidential

Dr. Clark performed a dose assessment of an individual occupationally exposed to metals and silica from fly ash who later developed cancer. A review of the individual's medical and occupational history was performed to prepare opinions regarding his exposure and later development of cancer.

Client: Brayton Purcell, Novato, California

Dr. Clark performed a toxicological assessment of residents exposed to methyl-tertiary butyl ether (MTBE) from leaking underground storage tanks (LUSTs) adjacent to the subject property. The symptomology of residents and guests of the subject property were evaluated against the known outcomes in published literature to exposure to MTBE. The study found that residents had been exposed to MTBE in their drinking water; that concentrations of MTBE detected at the site were above regulatory guidelines; and, that the symptoms and outcomes expressed by residents and guests were consistent with symptoms and outcomes documented in published literature.

Client: Confidential

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to hexavalent chromium who later developed cancer. A review of the individual's medical and occupational history was performed to prepare opinions regarding her exposure and later development of cancer.

Client: Covanta Energy, Westwood, California

Evaluated health risk from metals in biosolids applied as soil amendment on agricultural lands. The biosolids were created at a forest waste cogeneration facility using 96% whole tree wood chips and 4 percent green waste. Mass loading calculations were used to estimate Cr(VI) concentrations in agricultural soils based on a maximum loading rate of 40 tons of biomass per acre of agricultural soil. The results of the study were used by the Regulatory agency to determine that the application of biosolids did not constitute a health risk to workers applying the biosolids or to residences near the agricultural lands.

Client: Kaiser Venture Incorporated, Fontana, California

Prepared PBPK assessment of lead risk of receptors at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

RISK ASSESSMENTS/REMEDIAL INVESTIGATIONS

Kaiser Ventures Incorporated, Fontana, California

Prepared health risk assessment of semi-volatile organic chemicals and metals for a fifty-year old wastewater treatment facility used at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

ANR Freight - Los Angeles, California

Prepared a comprehensive Preliminary Endangerment Assessment (PEA) of petroleum hydrocarbon and metal contamination of a former freight depot. This evaluation was as the basis for reaching closure of the site with lead regulatory agency.

Kaiser Ventures Incorporated, Fontana, California

Prepared comprehensive health risk assessment of semi-volatile organic chemicals and metals for 23-acre parcel of a 1,100-acre former steel mill. The health risk assessment was used to determine clean up goals and as the basis for granting closure of the site by lead regulatory agency. Air dispersion modeling using ISCST3 was performed to determine downwind exposure point concentrations at sensitive receptors within a 1 kilometer radius of the site. The results of the health risk assessment were presented at a public meeting sponsored by the Department of Toxic Substances Control (DTSC) in the community potentially affected by the site.

Unocal Corporation - Los Angeles, California

Prepared comprehensive assessment of petroleum hydrocarbons and metals for a former petroleum service station located next to sensitive population center (elementary school). The assessment used a probabilistic approach to estimate risks to the community and was used as the basis for granting closure of the site by lead regulatory agency.

Client: Confidential, Los Angeles, California

Managed oversight of remedial investigation most contaminated heavy metal site in California. Lead concentrations in soil excess of 68,000,000 parts per billion (ppb) have been measured at the site. This State Superfund Site was a former hard chrome plating operation that operated for approximately 40-years.

Client: Confidential, San Francisco, California

Coordinator of regional monitoring program to determine background concentrations of metals in air. Acted as liaison with SCAQMD and CARB to perform co-location sampling and comparison of accepted regulatory method with ASTM methodology.

Client: Confidential, San Francisco, California

Analyzed historical air monitoring data for South Coast Air Basin in Southern California and potential health risks related to ambient concentrations of carcinogenic metals and volatile organic compounds. Identified and reviewed the available literature and calculated risks from toxins in South Coast Air Basin.

IT Corporation, North Carolina

Prepared comprehensive evaluation of potential exposure of workers to air-borne VOCs at hazardous waste storage facility under SUPERFUND cleanup decree. Assessment used in developing health based clean-up levels.

Professional Associations

American Public Health Association (APHA)
Association for Environmental Health and Sciences (AEHS)
American Chemical Society (ACS)
International Society of Environmental Forensics (ISEF)
Society of Environmental Toxicology and Chemistry (SETAC)

Publications and Presentations:

Books and Book Chapters

Sullivan, P., **J.J. J. Clark,** F.J. Agardy, and P.E. Rosenfeld. (2007). *Synthetic Toxins In The Food, Water and Air of American Cities*. Elsevier, Inc. Burlington, MA.

Sullivan, P. and **J.J. J. Clark**. 2006. *Choosing Safer Foods, A Guide To Minimizing Synthetic Chemicals In Your Diet*. Elsevier, Inc. Burlington, MA.

Sullivan, P., Agardy, F.J., and **J.J.J. Clark**. 2005. *The Environmental Science of Drinking Water*. Elsevier, Inc. Burlington, MA.

Sullivan, P.J., Agardy, F.J., **Clark, J.J.J.** 2002. *America's Threatened Drinking Water: Hazards and Solutions*. Trafford Publishing, Victoria B.C.

Clark, J.J.J. 2001. "TBA: Chemical Properties, Production & Use, Fate and Transport, Toxicology, Detection in Groundwater, and Regulatory Standards" in *Oxygenates in the Environment*. Art Diaz, Ed.. Oxford University Press: New York.

Clark, J.J.J. 2000. "Toxicology of Perchlorate" in *Perchlorate in the Environment*. Edward Urbansky, Ed. Kluwer/Plenum: New York.

Clark, J.J.J. 1995. Probabilistic Forecasting of Volatile Organic Compound Concentrations At The Soil Surface From Contaminated Groundwater. UMI.

Baker, J.; **Clark, J.J.J.**; Stanford, J.T. 1994. Ex Situ Remediation of Diesel Contaminated Railroad Sand by Soil Washing. Principles and Practices for Diesel Contaminated Soils, Volume III. P.T. Kostecki, E.J. Calabrese, and C.P.L. Barkan, eds. Amherst Scientific Publishers, Amherst, MA. pp 89-96.

Journal and Proceeding Articles

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 Equialency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. Organohalogen Compounds, Volume 70 (2008) page 002254.

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, Volume 70 (2008) page 000527

Hensley A.R., Scott, A., Rosenfeld P.E., **Clark, J.J.J.** (2007). "Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility." *Environmental Research*. 105:194-199.

Rosenfeld, P.E., **Clark, J. J.,** Hensley, A.R., and Suffet, I.H. 2007. "The Use Of An Odor Wheel Classification For The Evaluation of Human Health Risk Criteria For Compost Facilities" Water Science & Technology. 55(5): 345-357.

Hensley A.R., Scott, A., Rosenfeld P.E., **Clark, J.J.J.** 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, August 21 – 25, 2006. Radisson SAS Scandinavia Hotel in Oslo Norway.

Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2005. "The Value Of An Odor Quality Classification Scheme For Compost Facility Evaluations" The U.S. Composting Council's 13th Annual Conference January 23 - 26, 2005, Crowne Plaza Riverwalk, San Antonio, TX.

Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2004. "The Value Of An Odor Quality Classification Scheme For Urban Odor" WEFTEC 2004. 77th Annual Technical Exhibition & Conference October 2 - 6, 2004, Ernest N. Morial Convention Center, New Orleans, Louisiana.

Clark, J.J.J. 2003. "Manufacturing, Use, Regulation, and Occurrence of a Known Endocrine Disrupting Chemical (EDC), 2,4-Dichlorophnoxyacetic Acid (2,4-D) in California Drinking Water Supplies." National Groundwater Association Southwest Focus Conference: Water Supply and Emerging Contaminants. Minneapolis, MN. March 20, 2003.

Rosenfeld, P. and **J.J.J. Clark**. 2003. "Understanding Historical Use, Chemical Properties, Toxicity, and Regulatory Guidance" National Groundwater Association Southwest Focus Conference: Water Supply and Emerging Contaminants. Phoenix, AZ. February 21, 2003.

Clark, J.J.J., Brown A. 1999. Perchlorate Contamination: Fate in the Environment and Treatment Options. In Situ and On-Site Bioremediation, Fifth International Symposium. San Diego, CA, April, 1999.

Clark, J.J.J. 1998. Health Effects of Perchlorate and the New Reference Dose (RfD). Proceedings From the Groundwater Resource Association Seventh Annual Meeting, Walnut Creek, CA, October 23, 1998.

Browne, T., **Clark, J.J.J.** 1998. Treatment Options For Perchlorate In Drinking Water. Proceedings From the Groundwater Resource Association Seventh Annual Meeting, Walnut Creek, CA, October 23, 1998.

Clark, J.J.J., Brown, A., Rodriguez, R. 1998. The Public Health Implications of MtBE and Perchlorate in Water: Risk Management Decisions for Water Purveyors. Proceedings of the National Ground Water Association, Anaheim, CA, June 3-4, 1998.

Clark J.J.J., Brown, A., Ulrey, A. 1997. Impacts of Perchlorate On Drinking Water In The Western United States. U.S. EPA Symposium on Biological and Chemical Reduction of Chlorate and Perchlorate, Cincinnati, OH, December 5, 1997.

Clark, J.J.J.; Corbett, G.E.; Kerger, B.D.; Finley, B.L.; Paustenbach, D.J. 1996. Dermal Uptake of Hexavalent Chromium In Human Volunteers: Measures of Systemic Uptake From Immersion in Water At 22 PPM. Toxicologist. 30(1):14.

Dodge, D.G.; **Clark, J.J.J.**; Kerger, B.D.; Richter, R.O.; Finley, B.L.; Paustenbach, D.J. 1996. Assessment of Airborne Hexavalent Chromium In The Home Following Use of Contaminated Tapwater. Toxicologist. 30(1):117-118.

Paulo, M.T.; Gong, H., Jr.; **Clark, J.J.J.** (1992). Effects of Pretreatment with Ipratroprium Bromide in COPD Patients Exposed to Ozone. American Review of Respiratory Disease. 145(4):A96.

Harber, P.H.; Gong, H., Jr.; Lachenbruch, A.; **Clark, J.**; Hsu, P. (1992). Respiratory Pattern Effect of Acute Sulfur Dioxide Exposure in Asthmatics. American Review of Respiratory Disease. 145(4):A88.

McManus, M.S.; Gong, H., Jr.; Clements, P.; **Clark, J.J.J.** (1991). Respiratory Response of Patients With Interstitial Lung Disease To Inhaled Ozone. American Review of Respiratory Disease. 143(4):A91.

Gong, H., Jr.; Simmons, M.S.; McManus, M.S.; Tashkin, D.P.; Clark, V.A.; Detels, R.; **Clark, J.J.** (1990). Relationship Between Responses to Chronic Oxidant and Acute Ozone Exposures in Residents of Los Angeles County. American Review of Respiratory Disease. 141(4):A70.

Tierney, D.F. and **J.J.J. Clark.** (1990). Lung Polyamine Content Can Be Increased By Spermidine Infusions Into Hyperoxic Rats. American Review of Respiratory Disease. 139(4):A41.

EXHIBIT B

UPDATED CALEEMOD ANALYSIS

O1.60

Slover-Alder Avenue Industrial - San Bernardino-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Slover-Alder Avenue Industrial

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	259.48	1000sqft	7.94	259,481.00	0
Parking Lot	5.29	Acre	5.29	230,432.40	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	32
Climate Zone	10			**Operational Year**	2023
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Total Project Site = 13.23 acres

Construction Phase - Construction schedule provided by applicant

Off-road Equipment - Grading - 2 Excavators, 1 Grader, 1 Rubber Tired Dozer, 2 Scrapers, 2 Crawler Tractors

Off-road Equipment - Site Preparation - 3 Rubber Tired Dozers and 4 Crawler Tractors

Trips and VMT - 6 vendor trucks added to Demolition, Site Prep, and Grading Phases to account for water truck emissions

Demolition - 16,800 sq ft of building space = 773 tons + 117,000 sq ft of pavement = 2,828 tons

Grading -

Architectural Coating -

Vehicle Trips - Truck Trips analyzed under Parking Lot Land use and the Auto Trips analyzed under the Unrefrigerated Warehouse Land Use Change Trip Length to 65 miles from 40 miles to incorporate trips to and from Ports LA and Long Beach

Slover-Alder Avenue Industrial - San Bernardino-South Coast County, Annual

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Water And Wastewater -

Solid Waste -

Construction Off-road Equipment Mitigation - Water Exposed Area 3x per day selected to account for SCAQMD Rule 403 minimum requirements

Mobile Land Use Mitigation - Improve Pedestrian Network on Project Site and Connecting Offsite and 0.06 mile to nearest Transit Station

Energy Mitigation -

Water Mitigation - Install Low-Flow fixtures and use water-efficient Irrigation Systems selected to account for Title 24 Part 11 requirements

Waste Mitigation - 50% reduction in solid waste selected to account for AB 341

Operational Off-Road Equipment - 4 Forklifts 7 hours per day. Per PDF 1, analyzed as CNG fuel

Fleet Mix - Vehicle Mix set to match Trip Generation Memo

Area Coating - per proponent

Table Name	Column Name	Default Value	New Value
tblAreaCoating	Area_Nonresidential_Exterior	129741	129688
tblAreaCoating	Area_Nonresidential_Interior	389222	389064
tblConstructionPhase	NumDays	20.00	130.00
tblConstructionPhase	NumDays	20.00	130.00
tblFleetMix	HHD	0.02	0.60
tblFleetMix	HHD	0.02	0.00
tblFleetMix	LDA	0.54	0.00
tblFleetMix	LDA	0.54	0.58
tblFleetMix	LDT1	0.06	0.00
tblFleetMix	LDT1	0.06	0.06
tblFleetMix	LDT2	0.17	0.00
tblFleetMix	LDT2	0.17	0.19
tblFleetMix	LHD1	0.03	0.00
tblFleetMix	LHD1	0.03	0.00
tblFleetMix	LHD2	7.1960e-003	0.22
tblFleetMix	LHD2	7.1960e-003	0.00
tblFleetMix	MCY	0.03	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblFleetMix	MCY	0.03	0.03
tblFleetMix	MDV	0.14	0.00
tblFleetMix	MDV	0.14	0.15
tblFleetMix	MH	5.0710e-003	0.00
tblFleetMix	MH	5.0710e-003	0.00
tblFleetMix	MHD	0.01	0.18
tblFleetMix	MHD	0.01	0.00
tblFleetMix	OBUS	5.5900e-004	0.00
tblFleetMix	OBUS	5.5900e-004	0.00
tblFleetMix	SBUS	9.5400e-004	0.00
tblFleetMix	SBUS	9.5400e-004	0.00
tblFleetMix	UBUS	2.5400e-004	0.00
tblFleetMix	UBUS	2.5400e-004	0.00
tblLandUse	LandUseSquareFeet	259,480.00	259,481.00
tblLandUse	LotAcreage	5.96	7.94
tblOperationalOffRoadEquipment	OperFuelType	Diesel	CNG
tblOperationalOffRoadEquipment	OperHoursPerDay	8.00	7.00
tblOperationalOffRoadEquipment	OperOffRoadEquipmentNumber	0.00	4.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblVehicleTrips	CC_TL	8.40	65.00
tblVehicleTrips	CC_TTP	0.00	100.00
tblVehicleTrips	PR_TP	0.00	100.00
tblVehicleTrips	ST_TR	0.00	21.36
tblVehicleTrips	ST_TR	1.74	0.97
tblVehicleTrips	SU_TR	0.00	21.36
tblVehicleTrips	SU_TR	1.74	0.97
tblVehicleTrips	WD_TR	0.00	21.36

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblVehicleTrips	WD_TR	1.74	0.97

2.0 Emissions Summary

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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					
2022	0.3242	2.8403	2.7583	6.8300e-003	0.5312	0.1208	0.6520	0.1760	0.1128	0.2888	0.0000	615.3898	615.3898	0.1001	0.0235	624.8971
2023	1.5018	2.0166	2.8861	6.2600e-003	0.2347	0.0896	0.3243	0.0632	0.0839	0.1470	0.0000	564.0292	564.0292	0.0886	0.0188	571.8309
Maximum	**1.5018**	**2.8403**	**2.8861**	**6.8300e-003**	**0.5312**	**0.1208**	**0.6520**	**0.1760**	**0.1128**	**0.2888**	**0.0000**	**615.3898**	**615.3898**	**0.1001**	**0.0235**	**624.8971**

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					
2022	0.3242	2.8403	2.7583	6.8300e-003	0.3473	0.1208	0.4682	0.1065	0.1128	0.2192	0.0000	615.3894	615.3894	0.1001	0.0235	624.8967
2023	1.5018	2.0166	2.8861	6.2600e-003	0.2347	0.0896	0.3243	0.0632	0.0839	0.1470	0.0000	564.0288	564.0288	0.0886	0.0188	571.8305
Maximum	**1.5018**	**2.8403**	**2.8861**	**6.8300e-003**	**0.3473**	**0.1208**	**0.4682**	**0.1065**	**0.1128**	**0.2192**	**0.0000**	**615.3894**	**615.3894**	**0.1001**	**0.0235**	**624.8967**

Slover-Alder Avenue Industrial - San Bernardino-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	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	24.00	0.00	18.83	29.07	0.00	15.96	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	3-1-2022	5-31-2022	1.4370	1.4370
2	6-1-2022	8-31-2022	0.7357	0.7357
3	9-1-2022	11-30-2022	0.7312	0.7312
4	12-1-2022	2-28-2023	1.1714	1.1714
5	3-1-2023	5-31-2023	1.7207	1.7207
6	6-1-2023	8-31-2023	0.8783	0.8783
		Highest	1.7207	1.7207

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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	1.0763	3.0000e-005	3.3800e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	6.5700e-003	6.5700e-003	2.0000e-005	0.0000	7.0000e-003
Energy	2.8100e-003	0.0256	0.0215	1.5000e-004		1.9400e-003	1.9400e-003		1.9400e-003	1.9400e-003	0.0000	148.8967	148.8967	0.0108	1.7500e-003	149.6867
Mobile	0.2628	5.7053	3.0583	0.0339	1.5764	0.0610	1.6374	0.4381	0.0583	0.4964	0.0000	3,298.2074	3,298.2074	0.1146	0.4459	3,433.9577
Offroad	6.6200e-003	0.3228	4.2173	7.0000e-004		5.2100e-003	5.2100e-003		5.2100e-003	5.2100e-003	0.0000	79.8153	79.8153	0.0258	0.0000	80.4607
Waste						0.0000	0.0000		0.0000	0.0000	49.5115	0.0000	49.5115	2.9261	0.0000	122.6627
Water						0.0000	0.0000		0.0000	0.0000	19.0367	138.5640	157.6007	1.9670	0.0476	220.9549
Total	**1.3485**	**6.0537**	**7.3004**	**0.0348**	**1.5764**	**0.0681**	**1.6446**	**0.4381**	**0.0654**	**0.5036**	**68.5483**	**3,665.4899**	**3,734.0382**	**5.0442**	**0.4953**	**4,007.7296**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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	1.0763	3.0000e-005	3.3800e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	6.5700e-003	6.5700e-003	2.0000e-005	0.0000	7.0000e-003
Energy	2.8100e-003	0.0256	0.0215	1.5000e-004		1.9400e-003	1.9400e-003		1.9400e-003	1.9400e-003	0.0000	148.8967	148.8967	0.0108	1.7500e-003	149.6867
Mobile	0.2213	4.4014	2.4439	0.0259	1.1961	0.0463	1.2424	0.3324	0.0443	0.3767	0.0000	2,512.4720	2,512.4720	0.0886	0.3404	2,616.1108
Offroad	6.6200e-003	0.3228	4.2173	7.0000e-004		5.2100e-003	5.2100e-003		5.2100e-003	5.2100e-003	0.0000	79.8153	79.8153	0.0258	0.0000	80.4607
Waste						0.0000	0.0000		0.0000	0.0000	24.7558	0.0000	24.7558	1.4630	0.0000	61.3314
Water						0.0000	0.0000		0.0000	0.0000	16.0670	116.9480	133.0150	1.6601	0.0402	186.4860
Total	**1.3070**	**4.7497**	**6.6861**	**0.0267**	**1.1961**	**0.0535**	**1.2496**	**0.3324**	**0.0514**	**0.3839**	**40.8228**	**2,858.1386**	**2,898.9613**	**3.2483**	**0.3823**	**3,094.0824**

	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	**3.08**	**21.54**	**8.42**	**23.23**	**24.13**	**21.49**	**24.02**	**24.13**	**21.39**	**23.77**	**40.45**	**22.03**	**22.36**	**35.60**	**22.82**	**22.80**

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	3/1/2022	3/28/2022	5	20	
2	Site Preparation	Site Preparation	3/29/2022	4/11/2022	5	10	

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3	Grading	Grading	4/12/2022	5/23/2022	5	30	
4	Building Construction	Building Construction	5/24/2022	7/17/2023	5	300	
5	Paving	Paving	1/17/2023	7/17/2023	5	130	
6	Architectural Coating	Architectural Coating	1/17/2023	7/17/2023	5	130	

Acres of Grading (Site Preparation Phase): 35

Acres of Grading (Grading Phase): 120

Acres of Paving: 5.29

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 389,222; Non-Residential Outdoor: 129,741; Striped Parking Area: 13,826 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Crawler Tractors	4	8.00	212	0.43
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Grading	Crawler Tractors	2	8.00	212	0.43
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

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	6	15.00	6.00	356.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	6.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	6.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	206.00	80.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	41.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Demolition - 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					0.0385	0.0000	0.0385	5.8300e-003	0.0000	5.8300e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0264	0.2572	0.2059	3.9000e-004		0.0124	0.0124		0.0116	0.0116	0.0000	33.9902	33.9902	9.5500e-003	0.0000	34.2289
Total	**0.0264**	**0.2572**	**0.2059**	**3.9000e-004**	**0.0385**	**0.0124**	**0.0510**	**5.8300e-003**	**0.0116**	**0.0174**	**0.0000**	**33.9902**	**33.9902**	**9.5500e-003**	**0.0000**	**34.2289**

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	6.6000e-004	0.0256	6.3900e-003	1.0000e-004	3.0700e-003	2.5000e-004	3.3200e-003	8.4000e-004	2.4000e-004	1.0900e-003	0.0000	10.3454	10.3454	4.4000e-004	1.6400e-003	10.8450
Vendor	1.0000e-004	2.7600e-003	9.8000e-004	1.0000e-005	3.8000e-004	3.0000e-005	4.1000e-004	1.1000e-004	3.0000e-005	1.4000e-004	0.0000	1.0895	1.0895	3.0000e-005	1.6000e-004	1.1383
Worker	5.7000e-004	4.4000e-004	5.3200e-003	1.0000e-005	1.6400e-003	1.0000e-005	1.6500e-003	4.4000e-004	1.0000e-005	4.4000e-004	0.0000	1.3193	1.3193	4.0000e-005	4.0000e-005	1.3315
Total	**1.3300e-003**	**0.0288**	**0.0127**	**1.2000e-004**	**5.0900e-003**	**2.9000e-004**	**5.3800e-003**	**1.3900e-003**	**2.8000e-004**	**1.6700e-003**	**0.0000**	**12.7542**	**12.7542**	**5.1000e-004**	**1.8400e-003**	**13.3149**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Demolition - 2022

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					0.0150	0.0000	0.0150	2.2700e-003	0.0000	2.2700e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0264	0.2572	0.2059	3.9000e-004		0.0124	0.0124		0.0116	0.0116	0.0000	33.9902	33.9902	9.5500e-003	0.0000	34.2289
Total	**0.0264**	**0.2572**	**0.2059**	**3.9000e-004**	**0.0150**	**0.0124**	**0.0275**	**2.2700e-003**	**0.0116**	**0.0138**	**0.0000**	**33.9902**	**33.9902**	**9.5500e-003**	**0.0000**	**34.2289**

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	6.6000e-004	0.0256	6.3900e-003	1.0000e-004	3.0700e-003	2.5000e-004	3.3200e-003	8.4000e-004	2.4000e-004	1.0900e-003	0.0000	10.3454	10.3454	4.4000e-004	1.6400e-003	10.8450
Vendor	1.0000e-004	2.7600e-003	9.8000e-004	1.0000e-005	3.8000e-004	3.0000e-005	4.1000e-004	1.1000e-004	3.0000e-005	1.4000e-004	0.0000	1.0895	1.0895	3.0000e-005	1.6000e-004	1.1383
Worker	5.7000e-004	4.4000e-004	5.3200e-003	1.0000e-005	1.6400e-003	1.0000e-005	1.6500e-003	4.4000e-004	1.0000e-005	4.4000e-004	0.0000	1.3193	1.3193	4.0000e-005	4.0000e-005	1.3315
Total	**1.3300e-003**	**0.0288**	**0.0127**	**1.2000e-004**	**5.0900e-003**	**2.9000e-004**	**5.3800e-003**	**1.3900e-003**	**2.8000e-004**	**1.6700e-003**	**0.0000**	**12.7542**	**12.7542**	**5.1000e-004**	**1.8400e-003**	**13.3149**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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					0.1089	0.0000	0.1089	0.0517	0.0000	0.0517	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0224	0.2521	0.1000	2.8000e-004		0.0108	0.0108		9.9300e-003	9.9300e-003	0.0000	25.0258	25.0258	8.0900e-003	0.0000	25.2281
Total	**0.0224**	**0.2521**	**0.1000**	**2.8000e-004**	**0.1089**	**0.0108**	**0.1197**	**0.0517**	**9.9300e-003**	**0.0616**	**0.0000**	**25.0258**	**25.0258**	**8.0900e-003**	**0.0000**	**25.2281**

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	5.0000e-005	1.3800e-003	4.9000e-004	1.0000e-005	1.9000e-004	2.0000e-005	2.0000e-004	5.0000e-005	1.0000e-005	7.0000e-005	0.0000	0.5448	0.5448	1.0000e-005	8.0000e-005	0.5692
Worker	3.4000e-004	2.7000e-004	3.1900e-003	1.0000e-005	9.9000e-004	1.0000e-005	9.9000e-004	2.6000e-004	0.0000	2.7000e-004	0.0000	0.7916	0.7916	2.0000e-005	2.0000e-005	0.7989
Total	**3.9000e-004**	**1.6500e-003**	**3.6800e-003**	**2.0000e-005**	**1.1800e-003**	**3.0000e-005**	**1.1900e-003**	**3.1000e-004**	**1.0000e-005**	**3.4000e-004**	**0.0000**	**1.3363**	**1.3363**	**3.0000e-005**	**1.0000e-004**	**1.3681**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Site Preparation - 2022

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					0.0425	0.0000	0.0425	0.0202	0.0000	0.0202	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0224	0.2521	0.1000	2.8000e-004		0.0108	0.0108		9.9300e-003	9.9300e-003	0.0000	25.0257	25.0257	8.0900e-003	0.0000	25.2281
Total	**0.0224**	**0.2521**	**0.1000**	**2.8000e-004**	**0.0425**	**0.0108**	**0.0533**	**0.0202**	**9.9300e-003**	**0.0301**	**0.0000**	**25.0257**	**25.0257**	**8.0900e-003**	**0.0000**	**25.2281**

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	5.0000e-005	1.3800e-003	4.9000e-004	1.0000e-005	1.9000e-004	2.0000e-005	2.0000e-004	5.0000e-005	1.0000e-005	7.0000e-005	0.0000	0.5448	0.5448	1.0000e-005	8.0000e-005	0.5692
Worker	3.4000e-004	2.7000e-004	3.1900e-003	1.0000e-005	9.9000e-004	1.0000e-005	9.9000e-004	2.6000e-004	0.0000	2.7000e-004	0.0000	0.7916	0.7916	2.0000e-005	2.0000e-005	0.7989
Total	**3.9000e-004**	**1.6500e-003**	**3.6800e-003**	**2.0000e-005**	**1.1800e-003**	**3.0000e-005**	**1.1900e-003**	**3.1000e-004**	**1.0000e-005**	**3.4000e-004**	**0.0000**	**1.3363**	**1.3363**	**3.0000e-005**	**1.0000e-004**	**1.3681**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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					0.1540	0.0000	0.1540	0.0565	0.0000	0.0565	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0642	0.7126	0.4379	1.0700e-003		0.0286	0.0286		0.0263	0.0263	0.0000	94.2610	94.2610	0.0305	0.0000	95.0231
Total	**0.0642**	**0.7126**	**0.4379**	**1.0700e-003**	**0.1540**	**0.0286**	**0.1826**	**0.0565**	**0.0263**	**0.0829**	**0.0000**	**94.2610**	**94.2610**	**0.0305**	**0.0000**	**95.0231**

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	1.5000e-004	4.1500e-003	1.4700e-003	2.0000e-005	5.7000e-004	5.0000e-005	6.1000e-004	1.6000e-004	4.0000e-005	2.1000e-004	0.0000	1.6343	1.6343	4.0000e-005	2.4000e-004	1.7075
Worker	1.1300e-003	8.9000e-004	0.0107	3.0000e-005	3.2900e-003	2.0000e-005	3.3100e-003	8.7000e-004	2.0000e-005	8.9000e-004	0.0000	2.6386	2.6386	8.0000e-005	8.0000e-005	2.6631
Total	**1.2800e-003**	**5.0400e-003**	**0.0121**	**5.0000e-005**	**3.8600e-003**	**7.0000e-005**	**3.9200e-003**	**1.0300e-003**	**6.0000e-005**	**1.1000e-003**	**0.0000**	**4.2728**	**4.2728**	**1.2000e-004**	**3.2000e-004**	**4.3705**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Grading - 2022

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					0.0600	0.0000	0.0600	0.0220	0.0000	0.0220	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0642	0.7126	0.4379	1.0700e-003		0.0286	0.0286		0.0263	0.0263	0.0000	94.2609	94.2609	0.0305	0.0000	95.0230
Total	**0.0642**	**0.7126**	**0.4379**	**1.0700e-003**	**0.0600**	**0.0286**	**0.0887**	**0.0220**	**0.0263**	**0.0484**	**0.0000**	**94.2609**	**94.2609**	**0.0305**	**0.0000**	**95.0230**

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	1.5000e-004	4.1500e-003	1.4700e-003	2.0000e-005	5.7000e-004	5.0000e-005	6.1000e-004	1.6000e-004	4.0000e-005	2.1000e-004	0.0000	1.6343	1.6343	4.0000e-005	2.4000e-004	1.7075
Worker	1.1300e-003	8.9000e-004	0.0107	3.0000e-005	3.2900e-003	2.0000e-005	3.3100e-003	8.7000e-004	2.0000e-005	8.9000e-004	0.0000	2.6386	2.6386	8.0000e-005	8.0000e-005	2.6631
Total	**1.2800e-003**	**5.0400e-003**	**0.0121**	**5.0000e-005**	**3.8600e-003**	**7.0000e-005**	**3.9200e-003**	**1.0300e-003**	**6.0000e-005**	**1.1000e-003**	**0.0000**	**4.2728**	**4.2728**	**1.2000e-004**	**3.2000e-004**	**4.3705**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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	0.1357	1.2414	1.3009	2.1400e-003		0.0643	0.0643		0.0605	0.0605	0.0000	184.2216	184.2216	0.0441	0.0000	185.3249
Total	**0.1357**	**1.2414**	**1.3009**	**2.1400e-003**		**0.0643**	**0.0643**		**0.0605**	**0.0605**	**0.0000**	**184.2216**	**184.2216**	**0.0441**	**0.0000**	**185.3249**

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	0.0108	0.2930	0.1039	1.1900e-003	0.0401	3.3200e-003	0.0434	0.0116	3.1700e-003	0.0148	0.0000	115.4873	115.4873	3.1100e-003	0.0171	120.6619
Worker	0.0617	0.0485	0.5811	1.5600e-003	0.1796	9.6000e-004	0.1805	0.0477	8.8000e-004	0.0486	0.0000	144.0405	144.0405	4.1000e-003	4.1400e-003	145.3766
Total	**0.0726**	**0.3414**	**0.6850**	**2.7500e-003**	**0.2197**	**4.2800e-003**	**0.2240**	**0.0593**	**4.0500e-003**	**0.0633**	**0.0000**	**259.5279**	**259.5279**	**7.2100e-003**	**0.0212**	**266.0385**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2022

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	0.1357	1.2414	1.3009	2.1400e-003		0.0643	0.0643		0.0605	0.0605	0.0000	184.2214	184.2214	0.0441	0.0000	185.3247
Total	**0.1357**	**1.2414**	**1.3009**	**2.1400e-003**		**0.0643**	**0.0643**		**0.0605**	**0.0605**	**0.0000**	**184.2214**	**184.2214**	**0.0441**	**0.0000**	**185.3247**

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	0.0108	0.2930	0.1039	1.1900e-003	0.0401	3.3200e-003	0.0434	0.0116	3.1700e-003	0.0148	0.0000	115.4873	115.4873	3.1100e-003	0.0171	120.6619
Worker	0.0617	0.0485	0.5811	1.5600e-003	0.1796	9.6000e-004	0.1805	0.0477	8.8000e-004	0.0486	0.0000	144.0405	144.0405	4.1000e-003	4.1400e-003	145.3766
Total	**0.0726**	**0.3414**	**0.6850**	**2.7500e-003**	**0.2197**	**4.2800e-003**	**0.2240**	**0.0593**	**4.0500e-003**	**0.0633**	**0.0000**	**259.5279**	**259.5279**	**7.2100e-003**	**0.0212**	**266.0385**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2023

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	0.1109	1.0141	1.1452	1.9000e-003		0.0493	0.0493		0.0464	0.0464	0.0000	163.4224	163.4224	0.0389	0.0000	164.3942
Total	**0.1109**	**1.0141**	**1.1452**	**1.9000e-003**		**0.0493**	**0.0493**		**0.0464**	**0.0464**	**0.0000**	**163.4224**	**163.4224**	**0.0389**	**0.0000**	**164.3942**

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	6.3600e-003	0.2081	0.0842	1.0100e-003	0.0356	1.4900e-003	0.0371	0.0103	1.4200e-003	0.0117	0.0000	98.2956	98.2956	2.5600e-003	0.0145	102.6884
Worker	0.0506	0.0378	0.4726	1.3400e-003	0.1592	8.0000e-004	0.1600	0.0423	7.4000e-004	0.0430	0.0000	124.3690	124.3690	3.2600e-003	3.3700e-003	125.4562
Total	**0.0570**	**0.2459**	**0.5568**	**2.3500e-003**	**0.1948**	**2.2900e-003**	**0.1971**	**0.0526**	**2.1600e-003**	**0.0547**	**0.0000**	**222.6646**	**222.6646**	**5.8200e-003**	**0.0179**	**228.1446**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2023

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	0.1109	1.0141	1.1452	1.9000e-003		0.0493	0.0493		0.0464	0.0464	0.0000	163.4222	163.4222	0.0389	0.0000	164.3940
Total	**0.1109**	**1.0141**	**1.1452**	**1.9000e-003**		**0.0493**	**0.0493**		**0.0464**	**0.0464**	**0.0000**	**163.4222**	**163.4222**	**0.0389**	**0.0000**	**164.3940**

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	6.3600e-003	0.2081	0.0842	1.0100e-003	0.0356	1.4900e-003	0.0371	0.0103	1.4200e-003	0.0117	0.0000	98.2956	98.2956	2.5600e-003	0.0145	102.6884
Worker	0.0506	0.0378	0.4726	1.3400e-003	0.1592	8.0000e-004	0.1600	0.0423	7.4000e-004	0.0430	0.0000	124.3690	124.3690	3.2600e-003	3.3700e-003	125.4562
Total	**0.0570**	**0.2459**	**0.5568**	**2.3500e-003**	**0.1948**	**2.2900e-003**	**0.1971**	**0.0526**	**2.1600e-003**	**0.0547**	**0.0000**	**222.6646**	**222.6646**	**5.8200e-003**	**0.0179**	**228.1446**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.6 Paving - 2023

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	0.0671	0.6625	0.9480	1.4800e-003		0.0332	0.0332		0.0305	0.0305	0.0000	130.1746	130.1746	0.0421	0.0000	131.2272
Paving	6.9300e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0741**	**0.6625**	**0.9480**	**1.4800e-003**		**0.0332**	**0.0332**		**0.0305**	**0.0305**	**0.0000**	**130.1746**	**130.1746**	**0.0421**	**0.0000**	**131.2272**

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	3.4000e-003	2.5400e-003	0.0317	9.0000e-005	0.0107	5.0000e-005	0.0107	2.8400e-003	5.0000e-005	2.8900e-003	0.0000	8.3495	8.3495	2.2000e-004	2.3000e-004	8.4225
Total	**3.4000e-003**	**2.5400e-003**	**0.0317**	**9.0000e-005**	**0.0107**	**5.0000e-005**	**0.0107**	**2.8400e-003**	**5.0000e-005**	**2.8900e-003**	**0.0000**	**8.3495**	**8.3495**	**2.2000e-004**	**2.3000e-004**	**8.4225**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.6 Paving - 2023

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	0.0671	0.6625	0.9480	1.4800e-003		0.0332	0.0332		0.0305	0.0305	0.0000	130.1745	130.1745	0.0421	0.0000	131.2270
Paving	6.9300e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0741**	**0.6625**	**0.9480**	**1.4800e-003**		**0.0332**	**0.0332**		**0.0305**	**0.0305**	**0.0000**	**130.1745**	**130.1745**	**0.0421**	**0.0000**	**131.2270**

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	3.4000e-003	2.5400e-003	0.0317	9.0000e-005	0.0107	5.0000e-005	0.0107	2.8400e-003	5.0000e-005	2.8900e-003	0.0000	8.3495	8.3495	2.2000e-004	2.3000e-004	8.4225
Total	**3.4000e-003**	**2.5400e-003**	**0.0317**	**9.0000e-005**	**0.0107**	**5.0000e-005**	**0.0107**	**2.8400e-003**	**5.0000e-005**	**2.8900e-003**	**0.0000**	**8.3495**	**8.3495**	**2.2000e-004**	**2.3000e-004**	**8.4225**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2023

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	1.2347					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0125	0.0847	0.1177	1.9000e-004		4.6000e-003	4.6000e-003		4.6000e-003	4.6000e-003	0.0000	16.5962	16.5962	9.9000e-004	0.0000	16.6210
Total	**1.2472**	**0.0847**	**0.1177**	**1.9000e-004**		**4.6000e-003**	**4.6000e-003**		**4.6000e-003**	**4.6000e-003**	**0.0000**	**16.5962**	**16.5962**	**9.9000e-004**	**0.0000**	**16.6210**

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	9.2900e-003	6.9300e-003	0.0867	2.5000e-004	0.0292	1.5000e-004	0.0294	7.7600e-003	1.4000e-004	7.9000e-003	0.0000	22.8220	22.8220	6.0000e-004	6.2000e-004	23.0215
Total	**9.2900e-003**	**6.9300e-003**	**0.0867**	**2.5000e-004**	**0.0292**	**1.5000e-004**	**0.0294**	**7.7600e-003**	**1.4000e-004**	**7.9000e-003**	**0.0000**	**22.8220**	**22.8220**	**6.0000e-004**	**6.2000e-004**	**23.0215**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2023

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	1.2347					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0125	0.0847	0.1177	1.9000e-004		4.6000e-003	4.6000e-003		4.6000e-003	4.6000e-003	0.0000	16.5961	16.5961	9.9000e-004	0.0000	16.6210
Total	**1.2472**	**0.0847**	**0.1177**	**1.9000e-004**		**4.6000e-003**	**4.6000e-003**		**4.6000e-003**	**4.6000e-003**	**0.0000**	**16.5961**	**16.5961**	**9.9000e-004**	**0.0000**	**16.6210**

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	9.2900e-003	6.9300e-003	0.0867	2.5000e-004	0.0292	1.5000e-004	0.0294	7.7600e-003	1.4000e-004	7.9000e-003	0.0000	22.8220	22.8220	6.0000e-004	6.2000e-004	23.0215
Total	**9.2900e-003**	**6.9300e-003**	**0.0867**	**2.5000e-004**	**0.0292**	**1.5000e-004**	**0.0294**	**7.7600e-003**	**1.4000e-004**	**7.9000e-003**	**0.0000**	**22.8220**	**22.8220**	**6.0000e-004**	**6.2000e-004**	**23.0215**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Increase Transit Accessibility

Improve Pedestrian Network

	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	0.2213	4.4014	2.4439	0.0259	1.1961	0.0463	1.2424	0.3324	0.0443	0.3767	0.0000	2,512.4720	2,512.4720	0.0886	0.3404	2,616.1108
Unmitigated	0.2628	5.7053	3.0583	0.0339	1.5764	0.0610	1.6374	0.4381	0.0583	0.4964	0.0000	3,298.2074	3,298.2074	0.1146	0.4459	3,433.9577

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Parking Lot	112.99	112.99	112.99	2,673,448	2,028,414
Unrefrigerated Warehouse-No Rail	251.70	251.70	251.70	1,078,696	818,435
Total	364.69	364.69	364.69	3,752,144	2,846,848

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
Parking Lot	16.60	65.00	6.90	0.00	100.00	0.00	100	0	0
Unrefrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Parking Lot	0.000000	0.000000	0.000000	0.000000	0.000000	0.221000	0.177000	0.602000	0.000000	0.000000	0.000000	0.000000	0.000000
Unrefrigerated Warehouse-No Rail	0.579000	0.059000	0.185000	0.150000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.027000	0.000000	0.000000

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	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	121.0645	121.0645	0.0102	1.2400e-003	121.6890
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	121.0645	121.0645	0.0102	1.2400e-003	121.6890
NaturalGas Mitigated	2.8100e-003	0.0256	0.0215	1.5000e-004		1.9400e-003	1.9400e-003		1.9400e-003	1.9400e-003	0.0000	27.8323	27.8323	5.3000e-004	5.1000e-004	27.9977
NaturalGas Unmitigated	2.8100e-003	0.0256	0.0215	1.5000e-004		1.9400e-003	1.9400e-003		1.9400e-003	1.9400e-003	0.0000	27.8323	27.8323	5.3000e-004	5.1000e-004	27.9977

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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					
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	521557	2.8100e-003	0.0256	0.0215	1.5000e-004		1.9400e-003	1.9400e-003		1.9400e-003	1.9400e-003	0.0000	27.8323	27.8323	5.3000e-004	5.1000e-004	27.9977
Total		**2.8100e-003**	**0.0256**	**0.0215**	**1.5000e-004**		**1.9400e-003**	**1.9400e-003**		**1.9400e-003**	**1.9400e-003**	**0.0000**	**27.8323**	**27.8323**	**5.3000e-004**	**5.1000e-004**	**27.9977**

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					
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	521557	2.8100e-003	0.0256	0.0215	1.5000e-004		1.9400e-003	1.9400e-003		1.9400e-003	1.9400e-003	0.0000	27.8323	27.8323	5.3000e-004	5.1000e-004	27.9977
Total		**2.8100e-003**	**0.0256**	**0.0215**	**1.5000e-004**		**1.9400e-003**	**1.9400e-003**		**1.9400e-003**	**1.9400e-003**	**0.0000**	**27.8323**	**27.8323**	**5.3000e-004**	**5.1000e-004**	**27.9977**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Parking Lot	80651.3	14.3032	1.2100e-003	1.5000e-004	14.3769
Unrefrigerated Warehouse-No Rail	601996	106.7613	9.0100e-003	1.0900e-003	107.3121
Total		**121.0645**	**0.0102**	**1.2400e-003**	**121.6890**

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Parking Lot	80651.3	14.3032	1.2100e-003	1.5000e-004	14.3769
Unrefrigerated Warehouse-No Rail	601996	106.7613	9.0100e-003	1.0900e-003	107.3121
Total		**121.0645**	**0.0102**	**1.2400e-003**	**121.6890**

6.0 Area Detail

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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	1.0763	3.0000e-005	3.3800e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	6.5700e-003	6.5700e-003	2.0000e-005	0.0000	7.0000e-003
Unmitigated	1.0763	3.0000e-005	3.3800e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	6.5700e-003	6.5700e-003	2.0000e-005	0.0000	7.0000e-003

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	0.1234					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.9525					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	3.1000e-004	3.0000e-005	3.3800e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	6.5700e-003	6.5700e-003	2.0000e-005	0.0000	7.0000e-003
Total	**1.0763**	**3.0000e-005**	**3.3800e-003**	**0.0000**		**1.0000e-005**	**1.0000e-005**		**1.0000e-005**	**1.0000e-005**	**0.0000**	**6.5700e-003**	**6.5700e-003**	**2.0000e-005**	**0.0000**	**7.0000e-003**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

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	0.1234					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.9525					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	3.1000e-004	3.0000e-005	3.3800e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	6.5700e-003	6.5700e-003	2.0000e-005	0.0000	7.0000e-003
Total	**1.0763**	**3.0000e-005**	**3.3800e-003**	**0.0000**		**1.0000e-005**	**1.0000e-005**		**1.0000e-005**	**1.0000e-005**	**0.0000**	**6.5700e-003**	**6.5700e-003**	**2.0000e-005**	**0.0000**	**7.0000e-003**

7.0 Water Detail

7.1 Mitigation Measures Water

Install Low Flow Bathroom Faucet

Install Low Flow Kitchen Faucet

Install Low Flow Toilet

Use Water Efficient Irrigation System

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	133.0150	1.6601	0.0402	186.4860
Unmitigated	157.6007	1.9670	0.0476	220.9549

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	60.0048 / 0	157.6007	1.9670	0.0476	220.9549
Total		**157.6007**	**1.9670**	**0.0476**	**220.9549**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	50.644 / 0	133.0150	1.6601	0.0402	186.4860
Total		**133.0150**	**1.6601**	**0.0402**	**186.4860**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Institute Recycling and Composting Services

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	24.7558	1.4630	0.0000	61.3314
Unmitigated	49.5115	2.9261	0.0000	122.6627

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	243.91	49.5115	2.9261	0.0000	122.6627
Total		**49.5115**	**2.9261**	**0.0000**	**122.6627**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	121.955	24.7558	1.4630	0.0000	61.3314
Total		**24.7558**	**1.4630**	**0.0000**	**61.3314**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
Forklifts	4	7.00	260	89	0.20	CNG

Slover-Alder Avenue Industrial - San Bernardino-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

UnMitigated/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
Equipment Type	tons/yr										MT/yr					
Forklifts	6.6200e-003	0.3228	4.2173	7.0000e-004		5.2100e-003	5.2100e-003		5.2100e-003	5.2100e-003	0.0000	79.8153	79.8153	0.0258	0.0000	80.4607
Total	**6.6200e-003**	**0.3228**	**4.2173**	**7.0000e-004**		**5.2100e-003**	**5.2100e-003**		**5.2100e-003**	**5.2100e-003**	**0.0000**	**79.8153**	**79.8153**	**0.0258**	**0.0000**	**80.4607**

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

Slover-Alder Avenue Industrial - San Bernardino-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Slover-Alder Avenue Industrial

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	259.48	1000sqft	7.94	259,481.00	0
Parking Lot	5.29	Acre	5.29	230,432.40	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	32
Climate Zone	10			**Operational Year**	2023
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Total Project Site = 13.23 acres

Construction Phase - Construction schedule provided by applicant

Off-road Equipment - Grading - 2 Excavators, 1 Grader, 1 Rubber Tired Dozer, 2 Scrapers, 2 Crawler Tractors

Off-road Equipment - Site Preparation - 3 Rubber Tired Dozers and 4 Crawler Tractors

Trips and VMT - 6 vendor trucks added to Demolition, Site Prep, and Grading Phases to account for water truck emissions

Demolition - 16,800 sq ft of building space = 773 tons + 117,000 sq ft of pavement = 2,828 tons

Grading -

Architectural Coating -

Vehicle Trips - Truck Trips analyzed under Parking Lot Land use and the Auto Trips analyzed under the Unrefrigerated Warehouse Land Use Change Trip Length to 65 miles from 40 miles to incorporate trips to and from Ports LA and Long Beach

Slover-Alder Avenue Industrial - San Bernardino-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Water And Wastewater -

Solid Waste -

Construction Off-road Equipment Mitigation - Water Exposed Area 3x per day selected to account for SCAQMD Rule 403 minimum requirements

Mobile Land Use Mitigation - Improve Pedestrian Network on Project Site and Connecting Offsite and 0.06 mile to nearest Transit Station

Energy Mitigation -

Water Mitigation - Install Low-Flow fixtures and use water-efficient Irrigation Systems selected to account for Title 24 Part 11 requirements

Waste Mitigation - 50% reduction in solid waste selected to account for AB 341

Operational Off-Road Equipment - 4 Forklifts 7 hours per day. Per PDF 1, analyzed as CNG fuel

Fleet Mix - Vehicle Mix set to match Trip Generation Memo

Area Coating - per proponent

Table Name	Column Name	Default Value	New Value
tblAreaCoating	Area_Nonresidential_Exterior	129741	129688
tblAreaCoating	Area_Nonresidential_Interior	389222	389064
tblConstructionPhase	NumDays	20.00	130.00
tblConstructionPhase	NumDays	20.00	130.00
tblFleetMix	HHD	0.02	0.60
tblFleetMix	HHD	0.02	0.00
tblFleetMix	LDA	0.54	0.00
tblFleetMix	LDA	0.54	0.58
tblFleetMix	LDT1	0.06	0.00
tblFleetMix	LDT1	0.06	0.06
tblFleetMix	LDT2	0.17	0.00
tblFleetMix	LDT2	0.17	0.19
tblFleetMix	LHD1	0.03	0.00
tblFleetMix	LHD1	0.03	0.00
tblFleetMix	LHD2	7.1960e-003	0.22
tblFleetMix	LHD2	7.1960e-003	0.00
tblFleetMix	MCY	0.03	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblFleetMix	MCY	0.03	0.03
tblFleetMix	MDV	0.14	0.00
tblFleetMix	MDV	0.14	0.15
tblFleetMix	MH	5.0710e-003	0.00
tblFleetMix	MH	5.0710e-003	0.00
tblFleetMix	MHD	0.01	0.18
tblFleetMix	MHD	0.01	0.00
tblFleetMix	OBUS	5.5900e-004	0.00
tblFleetMix	OBUS	5.5900e-004	0.00
tblFleetMix	SBUS	9.5400e-004	0.00
tblFleetMix	SBUS	9.5400e-004	0.00
tblFleetMix	UBUS	2.5400e-004	0.00
tblFleetMix	UBUS	2.5400e-004	0.00
tblLandUse	LandUseSquareFeet	259,480.00	259,481.00
tblLandUse	LotAcreage	5.96	7.94
tblOperationalOffRoadEquipment	OperFuelType	Diesel	CNG
tblOperationalOffRoadEquipment	OperHoursPerDay	8.00	7.00
tblOperationalOffRoadEquipment	OperOffRoadEquipmentNumber	0.00	4.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblVehicleTrips	CC_TL	8.40	65.00
tblVehicleTrips	CC_TTP	0.00	100.00
tblVehicleTrips	PR_TP	0.00	100.00
tblVehicleTrips	ST_TR	0.00	21.36
tblVehicleTrips	ST_TR	1.74	0.97
tblVehicleTrips	SU_TR	0.00	21.36
tblVehicleTrips	SU_TR	1.74	0.97
tblVehicleTrips	WD_TR	0.00	21.36

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblVehicleTrips	WD_TR	1.74	0.97

2.0 Emissions Summary

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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					
2022	4.5657	50.7234	30.1156	0.0747	22.0177	2.1631	24.1808	10.3959	1.9902	12.3861	0.0000	7,256.9522	7,256.9522	2.2490	0.2907	7,320.0285
2023	23.0179	29.3038	43.6971	0.0932	3.4411	1.3163	4.7574	0.9243	1.2321	2.1564	0.0000	9,256.3591	9,256.3591	1.4427	0.2897	9,378.7497
Maximum	**23.0179**	**50.7234**	**43.6971**	**0.0932**	**22.0177**	**2.1631**	**24.1808**	**10.3959**	**1.9902**	**12.3861**	**0.0000**	**9,256.3591**	**9,256.3591**	**2.2490**	**0.2907**	**9,378.7497**

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					
2022	4.5657	50.7234	30.1156	0.0747	8.7331	2.1631	10.8962	4.0937	1.9902	6.0839	0.0000	7,256.9522	7,256.9522	2.2490	0.2907	7,320.0285
2023	23.0179	29.3038	43.6971	0.0932	3.4411	1.3163	4.7574	0.9243	1.2321	2.1564	0.0000	9,256.3591	9,256.3591	1.4427	0.2897	9,378.7497
Maximum	**23.0179**	**50.7234**	**43.6971**	**0.0932**	**8.7331**	**2.1631**	**10.8962**	**4.0937**	**1.9902**	**6.0839**	**0.0000**	**9,256.3591**	**9,256.3591**	**2.2490**	**0.2907**	**9,378.7497**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	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	52.18	0.00	45.91	55.67	0.00	43.34	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	5.8982	2.5000e-004	0.0270	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004		0.0580	0.0580	1.5000e-004		0.0618
Energy	0.0154	0.1401	0.1177	8.4000e-004		0.0107	0.0107		0.0107	0.0107		168.1086	168.1086	3.2200e-003	3.0800e-003	169.1076
Mobile	1.5696	29.5381	17.7018	0.1881	8.8110	0.3353	9.1463	2.4440	0.3204	2.7644		20,148.7993	20,148.7993	0.6920	2.6971	20,969.8214
Offroad	0.0510	2.4827	32.4407	5.3500e-003		0.0400	0.0400		0.0400	0.0400	0.0000	676.7805	676.7805	0.2189		682.2526
Total	**7.5341**	**32.1611**	**50.2872**	**0.1943**	**8.8110**	**0.3861**	**9.1971**	**2.4440**	**0.3712**	**2.8152**	**0.0000**	**20,993.7463**	**20,993.7463**	**0.9142**	**2.7001**	**21,821.2432**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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	lb/day										lb/day					
Area	5.8982	2.5000e-004	0.0270	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004		0.0580	0.0580	1.5000e-004		0.0618
Energy	0.0154	0.1401	0.1177	8.4000e-004		0.0107	0.0107		0.0107	0.0107		168.1086	168.1086	3.2200e-003	3.0800e-003	169.1076
Mobile	1.3414	22.7959	14.0485	0.1433	6.6852	0.2548	6.9399	1.8544	0.2434	2.0978		15,347.5246	15,347.5246	0.5338	2.0583	15,974.2351
Offroad	0.0510	2.4827	32.4407	5.3500e-003		0.0400	0.0400		0.0400	0.0400	0.0000	676.7805	676.7805	0.2189		682.2526
Total	**7.3059**	**25.4189**	**46.6339**	**0.1495**	**6.6852**	**0.3056**	**6.9907**	**1.8544**	**0.2942**	**2.1486**	**0.0000**	**16,192.4715**	**16,192.4715**	**0.7561**	**2.0614**	**16,825.6570**

	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	**3.03**	**20.96**	**7.26**	**23.07**	**24.13**	**20.86**	**23.99**	**24.13**	**20.73**	**23.68**	**0.00**	**22.87**	**22.87**	**17.30**	**23.66**	**22.89**

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	3/1/2022	3/28/2022	5	20	
2	Site Preparation	Site Preparation	3/29/2022	4/11/2022	5	10	
3	Grading	Grading	4/12/2022	5/23/2022	5	30	
4	Building Construction	Building Construction	5/24/2022	7/17/2023	5	300	

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5	Paving	Paving	1/17/2023	7/17/2023	5	130	
6	Architectural Coating	Architectural Coating	1/17/2023	7/17/2023	5	130	

Acres of Grading (Site Preparation Phase): 35

Acres of Grading (Grading Phase): 120

Acres of Paving: 5.29

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 389,222; Non-Residential Outdoor: 129,741; Striped Parking Area: 13,826 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Crawler Tractors	4	8.00	212	0.43
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Grading	Crawler Tractors	2	8.00	212	0.43
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

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	6	15.00	6.00	356.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	6.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	6.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	206.00	80.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	41.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

3.2 Demolition - 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					3.8518	0.0000	3.8518	0.5832	0.0000	0.5832			0.0000			0.0000
Off-Road	2.6392	25.7194	20.5941	0.0388		1.2427	1.2427		1.1553	1.1553		3,746.7812	3,746.7812	1.0524		3,773.0920
Total	**2.6392**	**25.7194**	**20.5941**	**0.0388**	**3.8518**	**1.2427**	**5.0945**	**0.5832**	**1.1553**	**1.7385**		**3,746.7812**	**3,746.7812**	**1.0524**		**3,773.0920**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Demolition - 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	0.0673	2.4260	0.6330	0.0105	0.3117	0.0255	0.3372	0.0855	0.0244	0.1099		1,140.0279	1,140.0279	0.0488	0.1807	1,195.0842
Vendor	0.0105	0.2627	0.0964	1.1200e-003	0.0384	3.1300e-003	0.0416	0.0111	2.9900e-003	0.0141		120.0413	120.0413	3.2400e-003	0.0178	125.4161
Worker	0.0635	0.0402	0.6179	1.5500e-003	0.1677	8.8000e-004	0.1685	0.0445	8.1000e-004	0.0453		157.4352	157.4352	4.0900e-003	3.9200e-003	158.7050
Total	**0.1413**	**2.7290**	**1.3473**	**0.0131**	**0.5178**	**0.0295**	**0.5473**	**0.1410**	**0.0282**	**0.1692**		**1,417.5043**	**1,417.5043**	**0.0562**	**0.2023**	**1,479.2054**

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					1.5022	0.0000	1.5022	0.2275	0.0000	0.2275			0.0000			0.0000
Off-Road	2.6392	25.7194	20.5941	0.0388		1.2427	1.2427		1.1553	1.1553	0.0000	3,746.7812	3,746.7812	1.0524		3,773.0920
Total	**2.6392**	**25.7194**	**20.5941**	**0.0388**	**1.5022**	**1.2427**	**2.7449**	**0.2275**	**1.1553**	**1.3827**	**0.0000**	**3,746.7812**	**3,746.7812**	**1.0524**		**3,773.0920**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Demolition - 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	0.0673	2.4260	0.6330	0.0105	0.3117	0.0255	0.3372	0.0855	0.0244	0.1099		1,140.0279	1,140.0279	0.0488	0.1807	1,195.0842
Vendor	0.0105	0.2627	0.0964	1.1200e-003	0.0384	3.1300e-003	0.0416	0.0111	2.9900e-003	0.0141		120.0413	120.0413	3.2400e-003	0.0178	125.4161
Worker	0.0635	0.0402	0.6179	1.5500e-003	0.1677	8.8000e-004	0.1685	0.0445	8.1000e-004	0.0453		157.4352	157.4352	4.0900e-003	3.9200e-003	158.7050
Total	**0.1413**	**2.7290**	**1.3473**	**0.0131**	**0.5178**	**0.0295**	**0.5473**	**0.1410**	**0.0282**	**0.1692**		**1,417.5043**	**1,417.5043**	**0.0562**	**0.2023**	**1,479.2054**

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					21.7780	0.0000	21.7780	10.3315	0.0000	10.3315			0.0000			0.0000
Off-Road	4.4790	50.4124	20.0053	0.0570		2.1590	2.1590		1.9862	1.9862		5,517.2355	5,517.2355	1.7844		5,561.8451
Total	**4.4790**	**50.4124**	**20.0053**	**0.0570**	**21.7780**	**2.1590**	**23.9370**	**10.3315**	**1.9862**	**12.3177**		**5,517.2355**	**5,517.2355**	**1.7844**		**5,561.8451**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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	0.0000
Vendor	0.0105	0.2627	0.0964	1.1200e-003	0.0384	3.1300e-003	0.0416	0.0111	2.9900e-003	0.0141		120.0413	120.0413	3.2400e-003	0.0178	125.4161
Worker	0.0762	0.0483	0.7415	1.8600e-003	0.2012	1.0600e-003	0.2023	0.0534	9.7000e-004	0.0543		188.9222	188.9222	4.9100e-003	4.7000e-003	190.4461
Total	**0.0867**	**0.3110**	**0.8380**	**2.9800e-003**	**0.2396**	**4.1900e-003**	**0.2438**	**0.0644**	**3.9600e-003**	**0.0684**		**308.9635**	**308.9635**	**8.1500e-003**	**0.0225**	**315.8622**

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					8.4934	0.0000	8.4934	4.0293	0.0000	4.0293			0.0000			0.0000
Off-Road	4.4790	50.4124	20.0053	0.0570		2.1590	2.1590		1.9862	1.9862	0.0000	5,517.2355	5,517.2355	1.7844		5,561.8451
Total	**4.4790**	**50.4124**	**20.0053**	**0.0570**	**8.4934**	**2.1590**	**10.6524**	**4.0293**	**1.9862**	**6.0155**	**0.0000**	**5,517.2355**	**5,517.2355**	**1.7844**		**5,561.8451**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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	0.0000
Vendor	0.0105	0.2627	0.0964	1.1200e-003	0.0384	3.1300e-003	0.0416	0.0111	2.9900e-003	0.0141		120.0413	120.0413	3.2400e-003	0.0178	125.4161
Worker	0.0762	0.0483	0.7415	1.8600e-003	0.2012	1.0600e-003	0.2023	0.0534	9.7000e-004	0.0543		188.9222	188.9222	4.9100e-003	4.7000e-003	190.4461
Total	**0.0867**	**0.3110**	**0.8380**	**2.9800e-003**	**0.2396**	**4.1900e-003**	**0.2438**	**0.0644**	**3.9600e-003**	**0.0684**		**308.9635**	**308.9635**	**8.1500e-003**	**0.0225**	**315.8622**

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					10.2641	0.0000	10.2641	3.7683	0.0000	3.7683			0.0000			0.0000
Off-Road	4.2792	47.5079	29.1953	0.0715		1.9081	1.9081		1.7554	1.7554		6,926.9974	6,926.9974	2.2403		6,983.0056
Total	**4.2792**	**47.5079**	**29.1953**	**0.0715**	**10.2641**	**1.9081**	**12.1722**	**3.7683**	**1.7554**	**5.5237**		**6,926.9974**	**6,926.9974**	**2.2403**		**6,983.0056**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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	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	0.0105	0.2627	0.0964	1.1200e-003	0.0384	3.1300e-003	0.0416	0.0111	2.9900e-003	0.0141		120.0413	120.0413	3.2400e-003	0.0178	125.4161
Worker	0.0847	0.0537	0.8239	2.0600e-003	0.2236	1.1700e-003	0.2247	0.0593	1.0800e-003	0.0604		209.9136	209.9136	5.4600e-003	5.2200e-003	211.6067
Total	**0.0952**	**0.3164**	**0.9203**	**3.1800e-003**	**0.2620**	**4.3000e-003**	**0.2663**	**0.0704**	**4.0700e-003**	**0.0744**		**329.9549**	**329.9549**	**8.7000e-003**	**0.0230**	**337.0228**

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					4.0030	0.0000	4.0030	1.4696	0.0000	1.4696			0.0000			0.0000
Off-Road	4.2792	47.5079	29.1953	0.0715		1.9081	1.9081		1.7554	1.7554	0.0000	6,926.9974	6,926.9974	2.2403		6,983.0056
Total	**4.2792**	**47.5079**	**29.1953**	**0.0715**	**4.0030**	**1.9081**	**5.9111**	**1.4696**	**1.7554**	**3.2251**	**0.0000**	**6,926.9974**	**6,926.9974**	**2.2403**		**6,983.0056**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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	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	0.0105	0.2627	0.0964	1.1200e-003	0.0384	3.1300e-003	0.0416	0.0111	2.9900e-003	0.0141		120.0413	120.0413	3.2400e-003	0.0178	125.4161
Worker	0.0847	0.0537	0.8239	2.0600e-003	0.2236	1.1700e-003	0.2247	0.0593	1.0800e-003	0.0604		209.9136	209.9136	5.4600e-003	5.2200e-003	211.6067
Total	**0.0952**	**0.3164**	**0.9203**	**3.1800e-003**	**0.2620**	**4.3000e-003**	**0.2663**	**0.0704**	**4.0700e-003**	**0.0744**		**329.9549**	**329.9549**	**8.7000e-003**	**0.0230**	**337.0228**

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	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612		2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**		**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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	0.0000
Vendor	0.1394	3.5032	1.2857	0.0149	0.5126	0.0417	0.5542	0.1476	0.0399	0.1875		1,600.5507	1,600.5507	0.0433	0.2369	1,672.2148
Worker	0.8725	0.5526	8.4864	0.0213	2.3026	0.0121	2.3147	0.6107	0.0111	0.6218		2,162.1100	2,162.1100	0.0562	0.0538	2,179.5493
Total	**1.0119**	**4.0558**	**9.7720**	**0.0362**	**2.8151**	**0.0538**	**2.8689**	**0.7583**	**0.0510**	**0.8093**		**3,762.6606**	**3,762.6606**	**0.0995**	**0.2907**	**3,851.7641**

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	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**	**0.0000**	**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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	0.0000
Vendor	0.1394	3.5032	1.2857	0.0149	0.5126	0.0417	0.5542	0.1476	0.0399	0.1875		1,600.5507	1,600.5507	0.0433	0.2369	1,672.2148
Worker	0.8725	0.5526	8.4864	0.0213	2.3026	0.0121	2.3147	0.6107	0.0111	0.6218		2,162.1100	2,162.1100	0.0562	0.0538	2,179.5493
Total	**1.0119**	**4.0558**	**9.7720**	**0.0362**	**2.8151**	**0.0538**	**2.8689**	**0.7583**	**0.0510**	**0.8093**		**3,762.6606**	**3,762.6606**	**0.0995**	**0.2907**	**3,851.7641**

3.5 Building Construction - 2023

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	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**		**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

Slover-Alder Avenue Industrial - San Bernardino-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2023

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	0.0000
Vendor	0.0936	2.8061	1.1775	0.0143	0.5125	0.0211	0.5336	0.1476	0.0202	0.1678		1,535.3454	1,535.3454	0.0401	0.2267	1,603.9137
Worker	0.8055	0.4860	7.7685	0.0206	2.3026	0.0114	2.3140	0.6107	0.0105	0.6211		2,104.6372	2,104.6372	0.0503	0.0495	2,120.6421
Total	**0.8991**	**3.2921**	**8.9459**	**0.0349**	**2.8151**	**0.0325**	**2.8476**	**0.7583**	**0.0306**	**0.7889**		**3,639.9826**	**3,639.9826**	**0.0904**	**0.2762**	**3,724.5558**

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	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**	**0.0000**	**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2023

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	0.0000
Vendor	0.0936	2.8061	1.1775	0.0143	0.5125	0.0211	0.5336	0.1476	0.0202	0.1678		1,535.3454	1,535.3454	0.0401	0.2267	1,603.9137
Worker	0.8055	0.4860	7.7685	0.0206	2.3026	0.0114	2.3140	0.6107	0.0105	0.6211		2,104.6372	2,104.6372	0.0503	0.0495	2,120.6421
Total	**0.8991**	**3.2921**	**8.9459**	**0.0349**	**2.8151**	**0.0325**	**2.8476**	**0.7583**	**0.0306**	**0.7889**		**3,639.9826**	**3,639.9826**	**0.0904**	**0.2762**	**3,724.5558**

3.6 Paving - 2023

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	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694		2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.1066					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.1394**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**		**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.6 Paving - 2023

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	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
Worker	0.0587	0.0354	0.5657	1.5000e-003	0.1677	8.3000e-004	0.1685	0.0445	7.6000e-004	0.0452		153.2503	153.2503	3.6600e-003	3.6000e-003	154.4157
Total	**0.0587**	**0.0354**	**0.5657**	**1.5000e-003**	**0.1677**	**8.3000e-004**	**0.1685**	**0.0445**	**7.6000e-004**	**0.0452**		**153.2503**	**153.2503**	**3.6600e-003**	**3.6000e-003**	**154.4157**

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	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	0.0000	2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.1066					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.1394**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**	**0.0000**	**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.6 Paving - 2023

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	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
Worker	0.0587	0.0354	0.5657	1.5000e-003	0.1677	8.3000e-004	0.1685	0.0445	7.6000e-004	0.0452		153.2503	153.2503	3.6600e-003	3.6000e-003	154.4157
Total	**0.0587**	**0.0354**	**0.5657**	**1.5000e-003**	**0.1677**	**8.3000e-004**	**0.1685**	**0.0445**	**7.6000e-004**	**0.0452**		**153.2503**	**153.2503**	**3.6600e-003**	**3.6000e-003**	**154.4157**

3.7 Architectural Coating - 2023

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	18.9960					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1917	1.3030	1.8111	2.9700e-003		0.0708	0.0708		0.0708	0.0708		281.4481	281.4481	0.0168		281.8690
Total	**19.1876**	**1.3030**	**1.8111**	**2.9700e-003**		**0.0708**	**0.0708**		**0.0708**	**0.0708**		**281.4481**	**281.4481**	**0.0168**		**281.8690**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2023

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	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
Worker	0.1603	0.0967	1.5462	4.0900e-003	0.4583	2.2600e-003	0.4606	0.1215	2.0800e-003	0.1236		418.8841	418.8841	0.0100	9.8500e-003	422.0696
Total	**0.1603**	**0.0967**	**1.5462**	**4.0900e-003**	**0.4583**	**2.2600e-003**	**0.4606**	**0.1215**	**2.0800e-003**	**0.1236**		**418.8841**	**418.8841**	**0.0100**	**9.8500e-003**	**422.0696**

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	18.9960					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1917	1.3030	1.8111	2.9700e-003		0.0708	0.0708		0.0708	0.0708	0.0000	281.4481	281.4481	0.0168		281.8690
Total	**19.1876**	**1.3030**	**1.8111**	**2.9700e-003**		**0.0708**	**0.0708**		**0.0708**	**0.0708**	**0.0000**	**281.4481**	**281.4481**	**0.0168**		**281.8690**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2023

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	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
Worker	0.1603	0.0967	1.5462	4.0900e-003	0.4583	2.2600e-003	0.4606	0.1215	2.0800e-003	0.1236		418.8841	418.8841	0.0100	9.8500e-003	422.0696
Total	**0.1603**	**0.0967**	**1.5462**	**4.0900e-003**	**0.4583**	**2.2600e-003**	**0.4606**	**0.1215**	**2.0800e-003**	**0.1236**		**418.8841**	**418.8841**	**0.0100**	**9.8500e-003**	**422.0696**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Increase Transit Accessibility

Improve Pedestrian Network

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	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	1.3414	22.7959	14.0485	0.1433	6.6852	0.2548	6.9399	1.8544	0.2434	2.0978		15,347.5246	15,347.5246	0.5338	2.0583	15,974.2351
Unmitigated	1.5696	29.5381	17.7018	0.1881	8.8110	0.3353	9.1463	2.4440	0.3204	2.7644		20,148.7993	20,148.7993	0.6920	2.6971	20,969.8214

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Parking Lot	112.99	112.99	112.99	2,673,448	2,028,414
Unrefrigerated Warehouse-No Rail	251.70	251.70	251.70	1,078,696	818,435
Total	364.69	364.69	364.69	3,752,144	2,846,848

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
Parking Lot	16.60	65.00	6.90	0.00	100.00	0.00	100	0	0
Unrefrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Parking Lot	0.000000	0.000000	0.000000	0.000000	0.000000	0.221000	0.177000	0.602000	0.000000	0.000000	0.000000	0.000000	0.000000
Unrefrigerated Warehouse-No Rail	0.579000	0.059000	0.185000	0.150000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.027000	0.000000	0.000000

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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	0.0154	0.1401	0.1177	8.4000e-004		0.0107	0.0107		0.0107	0.0107		168.1086	168.1086	3.2200e-003	3.0800e-003	169.1076
NaturalGas Unmitigated	0.0154	0.1401	0.1177	8.4000e-004		0.0107	0.0107		0.0107	0.0107		168.1086	168.1086	3.2200e-003	3.0800e-003	169.1076

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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					
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	1428.92	0.0154	0.1401	0.1177	8.4000e-004		0.0107	0.0107		0.0107	0.0107		168.1086	168.1086	3.2200e-003	3.0800e-003	169.1076
Total		**0.0154**	**0.1401**	**0.1177**	**8.4000e-004**		**0.0107**	**0.0107**		**0.0107**	**0.0107**		**168.1086**	**168.1086**	**3.2200e-003**	**3.0800e-003**	**169.1076**

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					
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	1.42892	0.0154	0.1401	0.1177	8.4000e-004		0.0107	0.0107		0.0107	0.0107		168.1086	168.1086	3.2200e-003	3.0800e-003	169.1076
Total		**0.0154**	**0.1401**	**0.1177**	**8.4000e-004**		**0.0107**	**0.0107**		**0.0107**	**0.0107**		**168.1086**	**168.1086**	**3.2200e-003**	**3.0800e-003**	**169.1076**

6.0 Area Detail

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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	5.8982	2.5000e-004	0.0270	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004		0.0580	0.0580	1.5000e-004		0.0618
Unmitigated	5.8982	2.5000e-004	0.0270	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004		0.0580	0.0580	1.5000e-004		0.0618

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	0.6763					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	5.2193					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	2.5000e-003	2.5000e-004	0.0270	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004		0.0580	0.0580	1.5000e-004		0.0618
Total	**5.8981**	**2.5000e-004**	**0.0270**	**0.0000**		**1.0000e-004**	**1.0000e-004**		**1.0000e-004**	**1.0000e-004**		**0.0580**	**0.0580**	**1.5000e-004**		**0.0618**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

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	0.6763					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	5.2193					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	2.5000e-003	2.5000e-004	0.0270	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004		0.0580	0.0580	1.5000e-004		0.0618
Total	**5.8981**	**2.5000e-004**	**0.0270**	**0.0000**		**1.0000e-004**	**1.0000e-004**		**1.0000e-004**	**1.0000e-004**		**0.0580**	**0.0580**	**1.5000e-004**		**0.0618**

7.0 Water Detail

7.1 Mitigation Measures Water

Install Low Flow Bathroom Faucet

Install Low Flow Kitchen Faucet

Install Low Flow Toilet

Use Water Efficient Irrigation System

8.0 Waste Detail

8.1 Mitigation Measures Waste

Institute Recycling and Composting Services

9.0 Operational Offroad

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
Forklifts	4	7.00	260	89	0.20	CNG

UnMitigated/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
Equipment Type	lb/day										lb/day					
Forklifts	0.0510	2.4827	32.4407	5.3500e-003		0.0400	0.0400		0.0400	0.0400	0.0000	676.7805	676.7805	0.2189		682.2526
Total	**0.0510**	**2.4827**	**32.4407**	**5.3500e-003**		**0.0400**	**0.0400**		**0.0400**	**0.0400**	**0.0000**	**676.7805**	**676.7805**	**0.2189**		**682.2526**

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

Slover-Alder Avenue Industrial - San Bernardino-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Slover-Alder Avenue Industrial

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	259.48	1000sqft	7.94	259,481.00	0
Parking Lot	5.29	Acre	5.29	230,432.40	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	32
Climate Zone	10			**Operational Year**	2023
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Total Project Site = 13.23 acres

Construction Phase - Construction schedule provided by applicant

Off-road Equipment - Grading - 2 Excavators, 1 Grader, 1 Rubber Tired Dozer, 2 Scrapers, 2 Crawler Tractors

Off-road Equipment - Site Preparation - 3 Rubber Tired Dozers and 4 Crawler Tractors

Trips and VMT - 6 vendor trucks added to Demolition, Site Prep, and Grading Phases to account for water truck emissions

Demolition - 16,800 sq ft of building space = 773 tons + 117,000 sq ft of pavement = 2,828 tons

Grading -

Architectural Coating -

Vehicle Trips - Truck Trips analyzed under Parking Lot Land use and the Auto Trips analyzed under the Unrefrigerated Warehouse Land Use Change Trip Length to 65 miles from 40 miles to incorporate trips to and from Ports LA and Long Beach

Slover-Alder Avenue Industrial - San Bernardino-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Water And Wastewater -

Solid Waste -

Construction Off-road Equipment Mitigation - Water Exposed Area 3x per day selected to account for SCAQMD Rule 403 minimum requirements

Mobile Land Use Mitigation - Improve Pedestrian Network on Project Site and Connecting Offsite and 0.06 mile to nearest Transit Station

Energy Mitigation -

Water Mitigation - Install Low-Flow fixtures and use water-efficient Irrigation Systems selected to account for Title 24 Part 11 requirements

Waste Mitigation - 50% reduction in solid waste selected to account for AB 341

Operational Off-Road Equipment - 4 Forklifts 7 hours per day. Per PDF 1, analyzed as CNG fuel

Fleet Mix - Vehicle Mix set to match Trip Generation Memo

Area Coating - per proponent

Table Name	Column Name	Default Value	New Value
tblAreaCoating	Area_Nonresidential_Exterior	129741	129688
tblAreaCoating	Area_Nonresidential_Interior	389222	389064
tblConstructionPhase	NumDays	20.00	130.00
tblConstructionPhase	NumDays	20.00	130.00
tblFleetMix	HHD	0.02	0.60
tblFleetMix	HHD	0.02	0.00
tblFleetMix	LDA	0.54	0.00
tblFleetMix	LDA	0.54	0.58
tblFleetMix	LDT1	0.06	0.00
tblFleetMix	LDT1	0.06	0.06
tblFleetMix	LDT2	0.17	0.00
tblFleetMix	LDT2	0.17	0.19
tblFleetMix	LHD1	0.03	0.00
tblFleetMix	LHD1	0.03	0.00
tblFleetMix	LHD2	7.1960e-003	0.22
tblFleetMix	LHD2	7.1960e-003	0.00
tblFleetMix	MCY	0.03	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblFleetMix	MCY	0.03	0.03
tblFleetMix	MDV	0.14	0.00
tblFleetMix	MDV	0.14	0.15
tblFleetMix	MH	5.0710e-003	0.00
tblFleetMix	MH	5.0710e-003	0.00
tblFleetMix	MHD	0.01	0.18
tblFleetMix	MHD	0.01	0.00
tblFleetMix	OBUS	5.5900e-004	0.00
tblFleetMix	OBUS	5.5900e-004	0.00
tblFleetMix	SBUS	9.5400e-004	0.00
tblFleetMix	SBUS	9.5400e-004	0.00
tblFleetMix	UBUS	2.5400e-004	0.00
tblFleetMix	UBUS	2.5400e-004	0.00
tblLandUse	LandUseSquareFeet	259,480.00	259,481.00
tblLandUse	LotAcreage	5.96	7.94
tblOperationalOffRoadEquipment	OperFuelType	Diesel	CNG
tblOperationalOffRoadEquipment	OperHoursPerDay	8.00	7.00
tblOperationalOffRoadEquipment	OperOffRoadEquipmentNumber	0.00	4.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblVehicleTrips	CC_TL	8.40	65.00
tblVehicleTrips	CC_TTP	0.00	100.00
tblVehicleTrips	PR_TP	0.00	100.00
tblVehicleTrips	ST_TR	0.00	21.36
tblVehicleTrips	ST_TR	1.74	0.97
tblVehicleTrips	SU_TR	0.00	21.36
tblVehicleTrips	SU_TR	1.74	0.97
tblVehicleTrips	WD_TR	0.00	21.36

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblVehicleTrips	WD_TR	1.74	0.97

2.0 Emissions Summary

Slover-Alder Avenue Industrial - San Bernardino-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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					
2022	4.5623	50.7390	29.9719	0.0745	22.0177	2.1631	24.1808	10.3959	1.9902	12.3861	0.0000	7,237.2889	7,237.2889	2.2490	0.2928	7,300.4240
2023	22.9737	29.4934	41.9851	0.0908	3.4411	1.3164	4.7575	0.9243	1.2322	2.1564	0.0000	9,008.3980	9,008.3980	1.4425	0.2924	9,131.5954
Maximum	**22.9737**	**50.7390**	**41.9851**	**0.0908**	**22.0177**	**2.1631**	**24.1808**	**10.3959**	**1.9902**	**12.3861**	**0.0000**	**9,008.3980**	**9,008.3980**	**2.2490**	**0.2928**	**9,131.5954**

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					
2022	4.5623	50.7390	29.9719	0.0745	8.7331	2.1631	10.8962	4.0937	1.9902	6.0839	0.0000	7,237.2889	7,237.2889	2.2490	0.2928	7,300.4240
2023	22.9737	29.4934	41.9851	0.0908	3.4411	1.3164	4.7575	0.9243	1.2322	2.1564	0.0000	9,008.3980	9,008.3980	1.4425	0.2924	9,131.5954
Maximum	**22.9737**	**50.7390**	**41.9851**	**0.0908**	**8.7331**	**2.1631**	**10.8962**	**4.0937**	**1.9902**	**6.0839**	**0.0000**	**9,008.3980**	**9,008.3980**	**2.2490**	**0.2928**	**9,131.5954**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	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	52.18	0.00	45.91	55.67	0.00	43.34	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	5.8982	2.5000e-004	0.0270	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004		0.0580	0.0580	1.5000e-004		0.0618
Energy	0.0154	0.1401	0.1177	8.4000e-004		0.0107	0.0107		0.0107	0.0107		168.1086	168.1086	3.2200e-003	3.0800e-003	169.1076
Mobile	1.4407	30.9876	16.4108	0.1863	8.8110	0.3354	9.1465	2.4440	0.3205	2.7645		19,967.4434	19,967.4434	0.6932	2.7022	20,790.0338
Offroad	0.0510	2.4827	32.4407	5.3500e-003		0.0400	0.0400		0.0400	0.0400	0.0000	676.7805	676.7805	0.2189		682.2526
Total	**7.4052**	**33.6106**	**48.9963**	**0.1925**	**8.8110**	**0.3862**	**9.1973**	**2.4440**	**0.3713**	**2.8153**	**0.0000**	**20,812.3904**	**20,812.3904**	**0.9154**	**2.7053**	**21,641.4557**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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	lb/day										lb/day					
Area	5.8982	2.5000e-004	0.0270	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004		0.0580	0.0580	1.5000e-004		0.0618
Energy	0.0154	0.1401	0.1177	8.4000e-004		0.0107	0.0107		0.0107	0.0107		168.1086	168.1086	3.2200e-003	3.0800e-003	169.1076
Mobile	1.2150	23.9267	13.1309	0.1420	6.6852	0.2549	6.9401	1.8544	0.2436	2.0979		15,211.5463	15,211.5463	0.5357	2.0626	15,839.5915
Offroad	0.0510	2.4827	32.4407	5.3500e-003		0.0400	0.0400		0.0400	0.0400	0.0000	676.7805	676.7805	0.2189		682.2526
Total	**7.1795**	**26.5498**	**45.7163**	**0.1481**	**6.6852**	**0.3057**	**6.9909**	**1.8544**	**0.2943**	**2.1487**	**0.0000**	**16,056.4932**	**16,056.4932**	**0.7580**	**2.0657**	**16,691.0134**

	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	**3.05**	**21.01**	**6.69**	**23.05**	**24.13**	**20.85**	**23.99**	**24.13**	**20.72**	**23.68**	**0.00**	**22.85**	**22.85**	**17.20**	**23.64**	**22.87**

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	3/1/2022	3/28/2022	5	20	
2	Site Preparation	Site Preparation	3/29/2022	4/11/2022	5	10	
3	Grading	Grading	4/12/2022	5/23/2022	5	30	
4	Building Construction	Building Construction	5/24/2022	7/17/2023	5	300	

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5	Paving	Paving	1/17/2023	7/17/2023	5	130	
6	Architectural Coating	Architectural Coating	1/17/2023	7/17/2023	5	130	

Acres of Grading (Site Preparation Phase): 35

Acres of Grading (Grading Phase): 120

Acres of Paving: 5.29

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 389,222; Non-Residential Outdoor: 129,741; Striped Parking Area: 13,826 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Crawler Tractors	4	8.00	212	0.43
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Grading	Crawler Tractors	2	8.00	212	0.43
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

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	6	15.00	6.00	356.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	6.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	6.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	206.00	80.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	41.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

3.2 Demolition - 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					3.8518	0.0000	3.8518	0.5832	0.0000	0.5832			0.0000			0.0000
Off-Road	2.6392	25.7194	20.5941	0.0388		1.2427	1.2427		1.1553	1.1553		3,746.7812	3,746.7812	1.0524		3,773.0920
Total	**2.6392**	**25.7194**	**20.5941**	**0.0388**	**3.8518**	**1.2427**	**5.0945**	**0.5832**	**1.1553**	**1.7385**		**3,746.7812**	**3,746.7812**	**1.0524**		**3,773.0920**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Demolition - 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	0.0645	2.5472	0.6473	0.0105	0.3117	0.0255	0.3372	0.0855	0.0244	0.1099		1,140.8790	1,140.8790	0.0487	0.1808	1,195.9723
Vendor	0.0101	0.2758	0.0998	1.1200e-003	0.0384	3.1400e-003	0.0416	0.0111	3.0000e-003	0.0141		120.1737	120.1737	3.2200e-003	0.0178	125.5572
Worker	0.0610	0.0423	0.5076	1.4000e-003	0.1677	8.8000e-004	0.1685	0.0445	8.1000e-004	0.0453		142.5884	142.5884	4.0800e-003	4.0400e-003	143.8959
Total	**0.1356**	**2.8653**	**1.2547**	**0.0130**	**0.5178**	**0.0295**	**0.5474**	**0.1410**	**0.0282**	**0.1693**		**1,403.6411**	**1,403.6411**	**0.0560**	**0.2026**	**1,465.4253**

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					1.5022	0.0000	1.5022	0.2275	0.0000	0.2275			0.0000			0.0000
Off-Road	2.6392	25.7194	20.5941	0.0388		1.2427	1.2427		1.1553	1.1553	0.0000	3,746.7812	3,746.7812	1.0524		3,773.0920
Total	**2.6392**	**25.7194**	**20.5941**	**0.0388**	**1.5022**	**1.2427**	**2.7449**	**0.2275**	**1.1553**	**1.3827**	**0.0000**	**3,746.7812**	**3,746.7812**	**1.0524**		**3,773.0920**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Demolition - 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	0.0645	2.5472	0.6473	0.0105	0.3117	0.0255	0.3372	0.0855	0.0244	0.1099		1,140.8790	1,140.8790	0.0487	0.1808	1,195.9723
Vendor	0.0101	0.2758	0.0998	1.1200e-003	0.0384	3.1400e-003	0.0416	0.0111	3.0000e-003	0.0141		120.1737	120.1737	3.2200e-003	0.0178	125.5572
Worker	0.0610	0.0423	0.5076	1.4000e-003	0.1677	8.8000e-004	0.1685	0.0445	8.1000e-004	0.0453		142.5884	142.5884	4.0800e-003	4.0400e-003	143.8959
Total	**0.1356**	**2.8653**	**1.2547**	**0.0130**	**0.5178**	**0.0295**	**0.5474**	**0.1410**	**0.0282**	**0.1693**		**1,403.6411**	**1,403.6411**	**0.0560**	**0.2026**	**1,465.4253**

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					21.7780	0.0000	21.7780	10.3315	0.0000	10.3315			0.0000			0.0000
Off-Road	4.4790	50.4124	20.0053	0.0570		2.1590	2.1590		1.9862	1.9862		5,517.2355	5,517.2355	1.7844		5,561.8451
Total	**4.4790**	**50.4124**	**20.0053**	**0.0570**	**21.7780**	**2.1590**	**23.9370**	**10.3315**	**1.9862**	**12.3177**		**5,517.2355**	**5,517.2355**	**1.7844**		**5,561.8451**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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	0.0000
Vendor	0.0101	0.2758	0.0998	1.1200e-003	0.0384	3.1400e-003	0.0416	0.0111	3.0000e-003	0.0141		120.1737	120.1737	3.2200e-003	0.0178	125.5572
Worker	0.0732	0.0508	0.6091	1.6800e-003	0.2012	1.0600e-003	0.2023	0.0534	9.7000e-004	0.0543		171.1060	171.1060	4.9000e-003	4.8500e-003	172.6750
Total	**0.0833**	**0.3266**	**0.7089**	**2.8000e-003**	**0.2396**	**4.2000e-003**	**0.2438**	**0.0644**	**3.9700e-003**	**0.0684**		**291.2797**	**291.2797**	**8.1200e-003**	**0.0226**	**298.2322**

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					8.4934	0.0000	8.4934	4.0293	0.0000	4.0293			0.0000			0.0000
Off-Road	4.4790	50.4124	20.0053	0.0570		2.1590	2.1590		1.9862	1.9862	0.0000	5,517.2355	5,517.2355	1.7844		5,561.8451
Total	**4.4790**	**50.4124**	**20.0053**	**0.0570**	**8.4934**	**2.1590**	**10.6524**	**4.0293**	**1.9862**	**6.0155**	**0.0000**	**5,517.2355**	**5,517.2355**	**1.7844**		**5,561.8451**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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	0.0000
Vendor	0.0101	0.2758	0.0998	1.1200e-003	0.0384	3.1400e-003	0.0416	0.0111	3.0000e-003	0.0141		120.1737	120.1737	3.2200e-003	0.0178	125.5572
Worker	0.0732	0.0508	0.6091	1.6800e-003	0.2012	1.0600e-003	0.2023	0.0534	9.7000e-004	0.0543		171.1060	171.1060	4.9000e-003	4.8500e-003	172.6750
Total	**0.0833**	**0.3266**	**0.7089**	**2.8000e-003**	**0.2396**	**4.2000e-003**	**0.2438**	**0.0644**	**3.9700e-003**	**0.0684**		**291.2797**	**291.2797**	**8.1200e-003**	**0.0226**	**298.2322**

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					10.2641	0.0000	10.2641	3.7683	0.0000	3.7683			0.0000			0.0000
Off-Road	4.2792	47.5079	29.1953	0.0715		1.9081	1.9081		1.7554	1.7554		6,926.9974	6,926.9974	2.2403		6,983.0056
Total	**4.2792**	**47.5079**	**29.1953**	**0.0715**	**10.2641**	**1.9081**	**12.1722**	**3.7683**	**1.7554**	**5.5237**		**6,926.9974**	**6,926.9974**	**2.2403**		**6,983.0056**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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	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	0.0101	0.2758	0.0998	1.1200e-003	0.0384	3.1400e-003	0.0416	0.0111	3.0000e-003	0.0141		120.1737	120.1737	3.2200e-003	0.0178	125.5572
Worker	0.0814	0.0564	0.6768	1.8700e-003	0.2236	1.1700e-003	0.2247	0.0593	1.0800e-003	0.0604		190.1178	190.1178	5.4400e-003	5.3900e-003	191.8611
Total	**0.0914**	**0.3323**	**0.7766**	**2.9900e-003**	**0.2620**	**4.3100e-003**	**0.2663**	**0.0704**	**4.0800e-003**	**0.0744**		**310.2915**	**310.2915**	**8.6600e-003**	**0.0232**	**317.4183**

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					4.0030	0.0000	4.0030	1.4696	0.0000	1.4696			0.0000			0.0000
Off-Road	4.2792	47.5079	29.1953	0.0715		1.9081	1.9081		1.7554	1.7554	0.0000	6,926.9974	6,926.9974	2.2403		6,983.0056
Total	**4.2792**	**47.5079**	**29.1953**	**0.0715**	**4.0030**	**1.9081**	**5.9111**	**1.4696**	**1.7554**	**3.2251**	**0.0000**	**6,926.9974**	**6,926.9974**	**2.2403**		**6,983.0056**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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	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	0.0101	0.2758	0.0998	1.1200e-003	0.0384	3.1400e-003	0.0416	0.0111	3.0000e-003	0.0141		120.1737	120.1737	3.2200e-003	0.0178	125.5572
Worker	0.0814	0.0564	0.6768	1.8700e-003	0.2236	1.1700e-003	0.2247	0.0593	1.0800e-003	0.0604		190.1178	190.1178	5.4400e-003	5.3900e-003	191.8611
Total	**0.0914**	**0.3323**	**0.7766**	**2.9900e-003**	**0.2620**	**4.3100e-003**	**0.2663**	**0.0704**	**4.0800e-003**	**0.0744**		**310.2915**	**310.2915**	**8.6600e-003**	**0.0232**	**317.4183**

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	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612		2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**		**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

Slover-Alder Avenue Industrial - San Bernardino-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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	0.0000
Vendor	0.1340	3.6776	1.3309	0.0150	0.5126	0.0418	0.5544	0.1476	0.0400	0.1876		1,602.3161	1,602.3161	0.0430	0.2373	1,674.0960
Worker	0.8381	0.5812	6.9710	0.0193	2.3026	0.0121	2.3147	0.6107	0.0111	0.6218		1,958.2134	1,958.2134	0.0561	0.0556	1,976.1696
Total	**0.9721**	**4.2588**	**8.3019**	**0.0342**	**2.8151**	**0.0539**	**2.8690**	**0.7583**	**0.0511**	**0.8094**		**3,560.5295**	**3,560.5295**	**0.0991**	**0.2928**	**3,650.2657**

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	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**	**0.0000**	**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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	0.0000
Vendor	0.1340	3.6776	1.3309	0.0150	0.5126	0.0418	0.5544	0.1476	0.0400	0.1876		1,602.3161	1,602.3161	0.0430	0.2373	1,674.0960
Worker	0.8381	0.5812	6.9710	0.0193	2.3026	0.0121	2.3147	0.6107	0.0111	0.6218		1,958.2134	1,958.2134	0.0561	0.0556	1,976.1696
Total	**0.9721**	**4.2588**	**8.3019**	**0.0342**	**2.8151**	**0.0539**	**2.8690**	**0.7583**	**0.0511**	**0.8094**		**3,560.5295**	**3,560.5295**	**0.0991**	**0.2928**	**3,650.2657**

3.5 Building Construction - 2023

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	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**		**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2023

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	0.0000
Vendor	0.0871	2.9639	1.2138	0.0144	0.5125	0.0212	0.5337	0.1476	0.0203	0.1678		1,539.0688	1,539.0688	0.0398	0.2274	1,607.8390
Worker	0.7759	0.5111	6.3939	0.0186	2.3026	0.0114	2.3140	0.6107	0.0105	0.6211		1,906.7478	1,906.7478	0.0503	0.0511	1,923.2284
Total	**0.8630**	**3.4750**	**7.6076**	**0.0330**	**2.8151**	**0.0326**	**2.8477**	**0.7583**	**0.0307**	**0.7890**		**3,445.8166**	**3,445.8166**	**0.0901**	**0.2785**	**3,531.0674**

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	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**	**0.0000**	**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2023

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	0.0000
Vendor	0.0871	2.9639	1.2138	0.0144	0.5125	0.0212	0.5337	0.1476	0.0203	0.1678		1,539.0688	1,539.0688	0.0398	0.2274	1,607.8390
Worker	0.7759	0.5111	6.3939	0.0186	2.3026	0.0114	2.3140	0.6107	0.0105	0.6211		1,906.7478	1,906.7478	0.0503	0.0511	1,923.2284
Total	**0.8630**	**3.4750**	**7.6076**	**0.0330**	**2.8151**	**0.0326**	**2.8477**	**0.7583**	**0.0307**	**0.7890**		**3,445.8166**	**3,445.8166**	**0.0901**	**0.2785**	**3,531.0674**

3.6 Paving - 2023

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	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694		2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.1066					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.1394**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**		**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.6 Paving - 2023

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	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
Worker	0.0565	0.0372	0.4656	1.3600e-003	0.1677	8.3000e-004	0.1685	0.0445	7.6000e-004	0.0452		138.8409	138.8409	3.6600e-003	3.7200e-003	140.0409
Total	**0.0565**	**0.0372**	**0.4656**	**1.3600e-003**	**0.1677**	**8.3000e-004**	**0.1685**	**0.0445**	**7.6000e-004**	**0.0452**		**138.8409**	**138.8409**	**3.6600e-003**	**3.7200e-003**	**140.0409**

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	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	0.0000	2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.1066					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.1394**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**	**0.0000**	**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.6 Paving - 2023

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	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
Worker	0.0565	0.0372	0.4656	1.3600e-003	0.1677	8.3000e-004	0.1685	0.0445	7.6000e-004	0.0452		138.8409	138.8409	3.6600e-003	3.7200e-003	140.0409
Total	**0.0565**	**0.0372**	**0.4656**	**1.3600e-003**	**0.1677**	**8.3000e-004**	**0.1685**	**0.0445**	**7.6000e-004**	**0.0452**		**138.8409**	**138.8409**	**3.6600e-003**	**3.7200e-003**	**140.0409**

3.7 Architectural Coating - 2023

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	18.9960					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1917	1.3030	1.8111	2.9700e-003		0.0708	0.0708		0.0708	0.0708		281.4481	281.4481	0.0168		281.8690
Total	**19.1876**	**1.3030**	**1.8111**	**2.9700e-003**		**0.0708**	**0.0708**		**0.0708**	**0.0708**		**281.4481**	**281.4481**	**0.0168**		**281.8690**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2023

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	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
Worker	0.1544	0.1017	1.2726	3.7100e-003	0.4583	2.2600e-003	0.4606	0.1215	2.0800e-003	0.1236		379.4984	379.4984	0.0100	0.0102	382.7785
Total	**0.1544**	**0.1017**	**1.2726**	**3.7100e-003**	**0.4583**	**2.2600e-003**	**0.4606**	**0.1215**	**2.0800e-003**	**0.1236**		**379.4984**	**379.4984**	**0.0100**	**0.0102**	**382.7785**

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	18.9960					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1917	1.3030	1.8111	2.9700e-003		0.0708	0.0708		0.0708	0.0708	0.0000	281.4481	281.4481	0.0168		281.8690
Total	**19.1876**	**1.3030**	**1.8111**	**2.9700e-003**		**0.0708**	**0.0708**		**0.0708**	**0.0708**	**0.0000**	**281.4481**	**281.4481**	**0.0168**		**281.8690**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.7 Architectural Coating - 2023

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	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
Worker	0.1544	0.1017	1.2726	3.7100e-003	0.4583	2.2600e-003	0.4606	0.1215	2.0800e-003	0.1236		379.4984	379.4984	0.0100	0.0102	382.7785
Total	**0.1544**	**0.1017**	**1.2726**	**3.7100e-003**	**0.4583**	**2.2600e-003**	**0.4606**	**0.1215**	**2.0800e-003**	**0.1236**		**379.4984**	**379.4984**	**0.0100**	**0.0102**	**382.7785**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Increase Transit Accessibility

Improve Pedestrian Network

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	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	1.2150	23.9267	13.1309	0.1420	6.6852	0.2549	6.9401	1.8544	0.2436	2.0979		15,211.5463	15,211.5463	0.5357	2.0626	15,839.5915
Unmitigated	1.4407	30.9876	16.4108	0.1863	8.8110	0.3354	9.1465	2.4440	0.3205	2.7645		19,967.4434	19,967.4434	0.6932	2.7022	20,790.0338

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Parking Lot	112.99	112.99	112.99	2,673,448	2,028,414
Unrefrigerated Warehouse-No Rail	251.70	251.70	251.70	1,078,696	818,435
Total	364.69	364.69	364.69	3,752,144	2,846,848

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
Parking Lot	16.60	65.00	6.90	0.00	100.00	0.00	100	0	0
Unrefrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Parking Lot	0.000000	0.000000	0.000000	0.000000	0.000000	0.221000	0.177000	0.602000	0.000000	0.000000	0.000000	0.000000	0.000000
Unrefrigerated Warehouse-No Rail	0.579000	0.059000	0.185000	0.150000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.027000	0.000000	0.000000

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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	0.0154	0.1401	0.1177	8.4000e-004		0.0107	0.0107		0.0107	0.0107		168.1086	168.1086	3.2200e-003	3.0800e-003	169.1076
NaturalGas Unmitigated	0.0154	0.1401	0.1177	8.4000e-004		0.0107	0.0107		0.0107	0.0107		168.1086	168.1086	3.2200e-003	3.0800e-003	169.1076

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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					
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	1428.92	0.0154	0.1401	0.1177	8.4000e-004		0.0107	0.0107		0.0107	0.0107		168.1086	168.1086	3.2200e-003	3.0800e-003	169.1076
Total		**0.0154**	**0.1401**	**0.1177**	**8.4000e-004**		**0.0107**	**0.0107**		**0.0107**	**0.0107**		**168.1086**	**168.1086**	**3.2200e-003**	**3.0800e-003**	**169.1076**

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					
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	1.42892	0.0154	0.1401	0.1177	8.4000e-004		0.0107	0.0107		0.0107	0.0107		168.1086	168.1086	3.2200e-003	3.0800e-003	169.1076
Total		**0.0154**	**0.1401**	**0.1177**	**8.4000e-004**		**0.0107**	**0.0107**		**0.0107**	**0.0107**		**168.1086**	**168.1086**	**3.2200e-003**	**3.0800e-003**	**169.1076**

6.0 Area Detail

Slover-Alder Avenue Industrial - San Bernardino-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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	5.8982	2.5000e-004	0.0270	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004		0.0580	0.0580	1.5000e-004		0.0618
Unmitigated	5.8982	2.5000e-004	0.0270	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004		0.0580	0.0580	1.5000e-004		0.0618

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	0.6763					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	5.2193					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	2.5000e-003	2.5000e-004	0.0270	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004		0.0580	0.0580	1.5000e-004		0.0618
Total	**5.8981**	**2.5000e-004**	**0.0270**	**0.0000**		**1.0000e-004**	**1.0000e-004**		**1.0000e-004**	**1.0000e-004**		**0.0580**	**0.0580**	**1.5000e-004**		**0.0618**

Slover-Alder Avenue Industrial - San Bernardino-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

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	0.6763					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	5.2193					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	2.5000e-003	2.5000e-004	0.0270	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004		0.0580	0.0580	1.5000e-004		0.0618
Total	**5.8981**	**2.5000e-004**	**0.0270**	**0.0000**		**1.0000e-004**	**1.0000e-004**		**1.0000e-004**	**1.0000e-004**		**0.0580**	**0.0580**	**1.5000e-004**		**0.0618**

7.0 Water Detail

7.1 Mitigation Measures Water

Install Low Flow Bathroom Faucet

Install Low Flow Kitchen Faucet

Install Low Flow Toilet

Use Water Efficient Irrigation System

8.0 Waste Detail

8.1 Mitigation Measures Waste

Institute Recycling and Composting Services

9.0 Operational Offroad

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
Forklifts	4	7.00	260	89	0.20	CNG

UnMitigated/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
Equipment Type	lb/day										lb/day					
Forklifts	0.0510	2.4827	32.4407	5.3500e-003		0.0400	0.0400		0.0400	0.0400	0.0000	676.7805	676.7805	0.2189		682.2526
Total	**0.0510**	**2.4827**	**32.4407**	**5.3500e-003**		**0.0400**	**0.0400**		**0.0400**	**0.0400**	**0.0000**	**676.7805**	**676.7805**	**0.2189**		**682.2526**

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

EXHIBIT B

794 Sawnee Bean Road
Thetford Center VT 05075

Norman Marshall, President
(802) 356-2969
nmarshall@smartmobility.com

August 19, 2022

Kevin T. Carmichael
Adams Broadwell Joseph & Cardozo
520 Capitol Mall, Suite 350
Sacramento, CA 95814

Subject: Duke Warehouse at Slover and Alder

Dear Mr. Carmichael,

I have reviewed trip generation, vehicle miles traveled (VMT) impacts and greenhouse gas (GHG) impacts of the proposed Duke Warehouse at Slover and Alder Draft Environmental Impact Report ("DEIR"). I make the following findings:

1) Given that the tenants have not been identified, trip generation is highly uncertain. The DEIR applies the lowest rate of five different rates for high-cube warehouses in *Trip Generation*. Depending on the tenant and type of operation, the actual trip generation rate could be three times the rate used in the DEIR or even higher.
2) The DEIR claim that the proposed project passes a VMT screen is based solely on the application of a more lenient VMT threshold in unincorporated Bloomington than in nearly incorporated Fontana and Rialto.
3) It is becoming increasingly difficult to recruit warehouse workers in the project vicinity and Census data show that average commute distance to jobs in Bloomington is much higher than the screening model indicates.
4) Given more realistic assumptions about employee commute length, the DEIR should include mitigation strategies to reduce project VMT.
5) Average truck trip length also is underestimated in the DEIR. The combination of underestimating trip length and underestimating trip generation causes the DEIR to underestimate GHG.

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1

Project Trip Generation Could Be Much Higher Than Assumed

The project is comprised of 259,481 square feet of warehouse/distribution use. (DEIR, p. 1-1) The tenants have not been identified, and the nature of the operations are unknown at this time.

The DEIR estimated trip generation using the *Trip Generation Manual* category: "High-Cube Transload and Short-Term Storage Warehouse." (DEIR, p. 5.12-6) The *Trip Generation Manual* (11th Edition)[1] states:

> A high-cube warehouse (HCW) is a building that typically has at least 200,000 gross square feet of floor area, has a ceiling height of 24 feet or more, and is used primarily for the storage and/or consolidation of manufactured goods (and to a lesser extent, raw materials) prior to their distribution to retail locations or other warehouses. A typical HCW has a high level of on-site automation and logistics management. The automation and logistics enable highly efficient processing of goods through the HCS.

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The *Trip Generation Manual* presents trip generation rates for five types of high-cube warehouses:

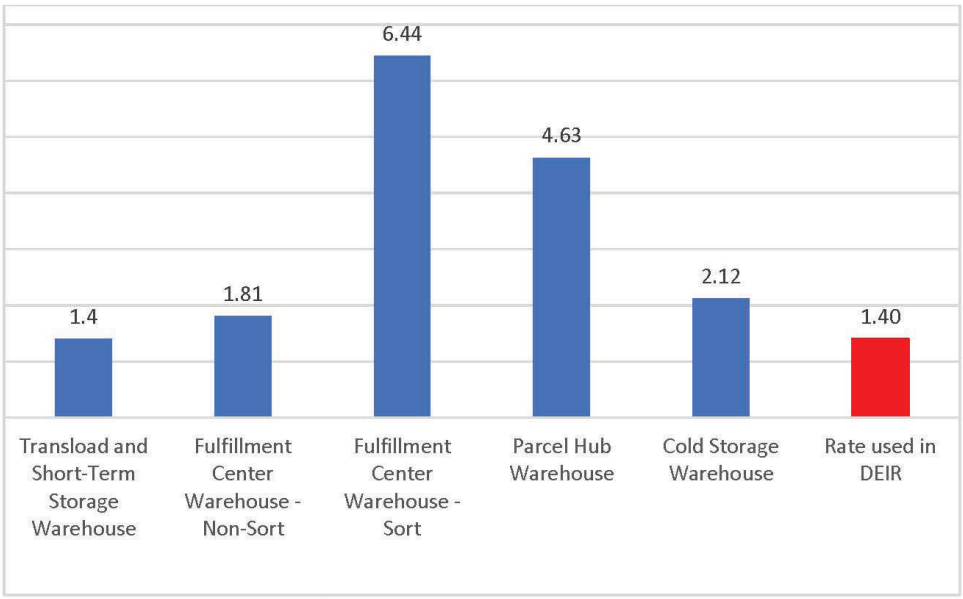
- High-Cube Transload and Short-Term Storage Warehouse (154) – Transload facilities have a primary function of consolidation and distribution of pallet loads (or larger) for manufacturer, wholesalers, or retailer. Short-term HCWs are high-efficiency distribution facilities often with custom/special features built into structure for movement of large volumes of freight with only short-term storage of projects.
- High-Cube Fulfillment Center Warehouse (155) – characterized by a significant storage function and direct distribution of ecommerce product to end users
  - A) Non-sort
  - B) Sort
- High-Cube Parcel Hub Warehouse (156) – typically serve as regional and local freight-forwarder facilities for time sensitive shipments via airfreight and ground carriers
- High-Cube Cold Storage Warehouse (157) – facilities typified by temperature-controlled environments for frozen food or other perishable products.

As shown in Figure 1, the trip generation rate per 1,000 square feet of high-cube warehouse varies significantly across these types. The DEIR used the category with the lowest trip rate.

[1] Institute of Transportation Engineers (2020).

2

Figure 1: Weekday Daily Trips per 1000 Square Feet for Different Types of High-Cube Warehouses



Source: *Trip Generation Manual 10th edition*

No justification is given for the choice to use the lowest trip generation category. In fact, it appears that the category is unknown now. The DEIR uses only the term "high-cube warehouse" which could be in any of the categories although the DEIR states that the "buildings are not designed to accommodate any warehouse cold storage or refrigerated uses" (p. 3-17) so the Cold Storage Warehouse category may be unlikely.

Additionally, a 2019 study of warehouse trip generation was done by WSP for the Western Riverside Council of Governments ("COG").[2] This study was based on counts at 16 warehouses, segmented between 11 fulfillment centers and 5 parcel hubs. The average rate across the 11 fulfillment centers was 2.13 per 1000 square feet, i.e., 50% higher than the rate used in the DEIR.

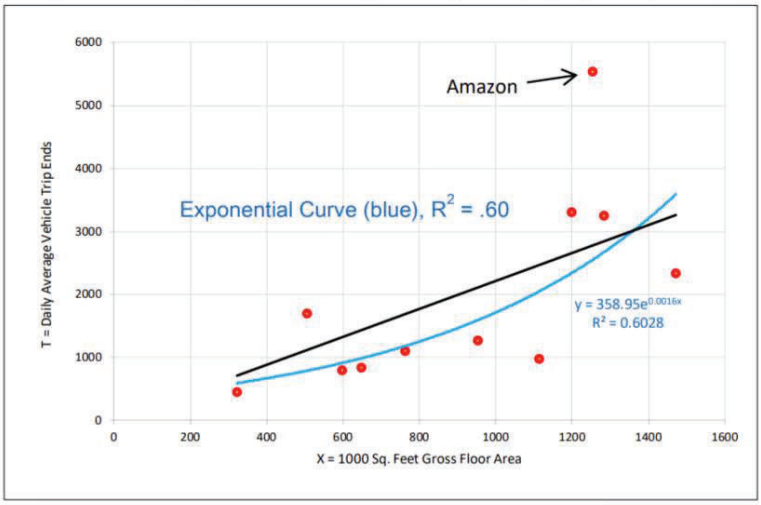
The data in the Western Riverside COG study are much more variable than the average rates suggest. As shown in the figure below, the different fulfillment center sites have wildly different trip generation rates, with an Amazon facility having an especially high rate.

O1.63

[2] https://wrcog.us/AgendaCenter/ViewFile/Agenda/_02212019-292

Figure 2: Western Riverside COG Warehouse Trip Generation Study Exhibit 1

Exhibit 1: Data Plot for Daily Total Vehicle Trip Ends against Building Size (Fulfillment Center)



Other businesses are copying many of Amazon's logistics methods, so the higher rate could be applicable to many new operations. For example, the trip generation at the Walmart site in the study also is higher than the average used in the DEIR. If the Amazon rate were applied to this project, trip generation would be three times as high as estimated in the DEIR.

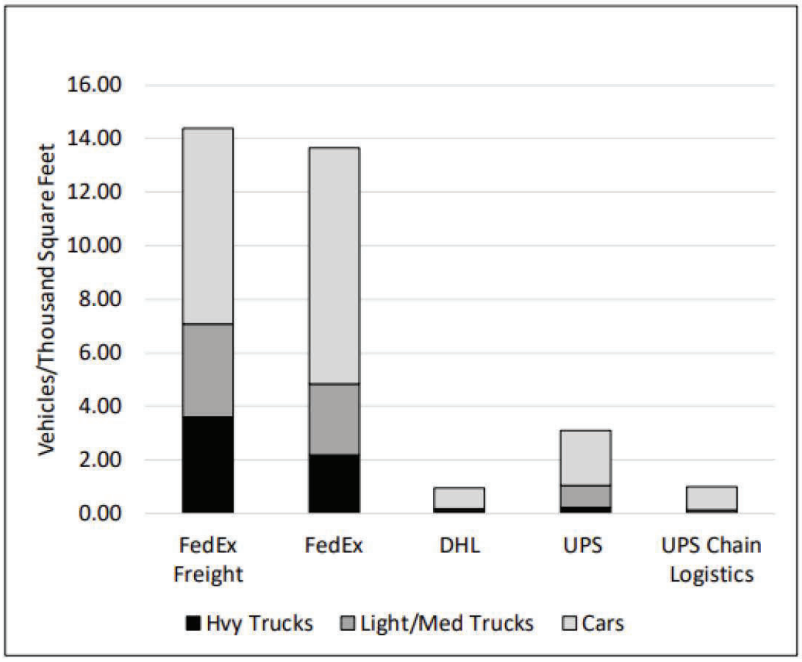
As shown in Figure 3 below, the observed trip generation rates at two of parcel hub sites in the study are even higher, i.e., about ten times the rate used in the DEIR. At the rate of 14 trips per 1000 square feet counted at these parcel hubs, the proposed project would generate 3633 vehicle trip per day.

O1.63 cont.

4

Figure 3: Western Riverside COG Warehouse Trip Generation Study Exhibit 11

Exhibit 11: Daily Trip Generation Rates at Parcel Hubs



O1.63 Cont.

To be conservative, the DEIR should apply the Amazon trip generation rate, or possibly the even higher parcel hub rate if parcel hub tenants are possible in this project.

Project Area Meets SBCTA VMT Screen Only Due to Unincorporated Loophole

The DEIR states:

> To determine if the project is located in a low VMT generating area, the SBCTA VMT Screening Tool was utilized. The County's guidelines specify that a low-VMT generating area is an area where the VMT/employee is not greater than 4% below the existing VMT per employee for the unincorporated County. Using the VMT Screening Tool, the VMT/employee in the project zone is 16.3 which is 13.64% less than the unincorporated County VMT/employee of 18.9. The results from the screening tool are shown in Figure 2.
>
> Because the project is located in a low VMT generating area, the project is presumed to have a less than significant impact on VMT and would not require further VMT analysis. (DEIS, Appendix J, p. 2)

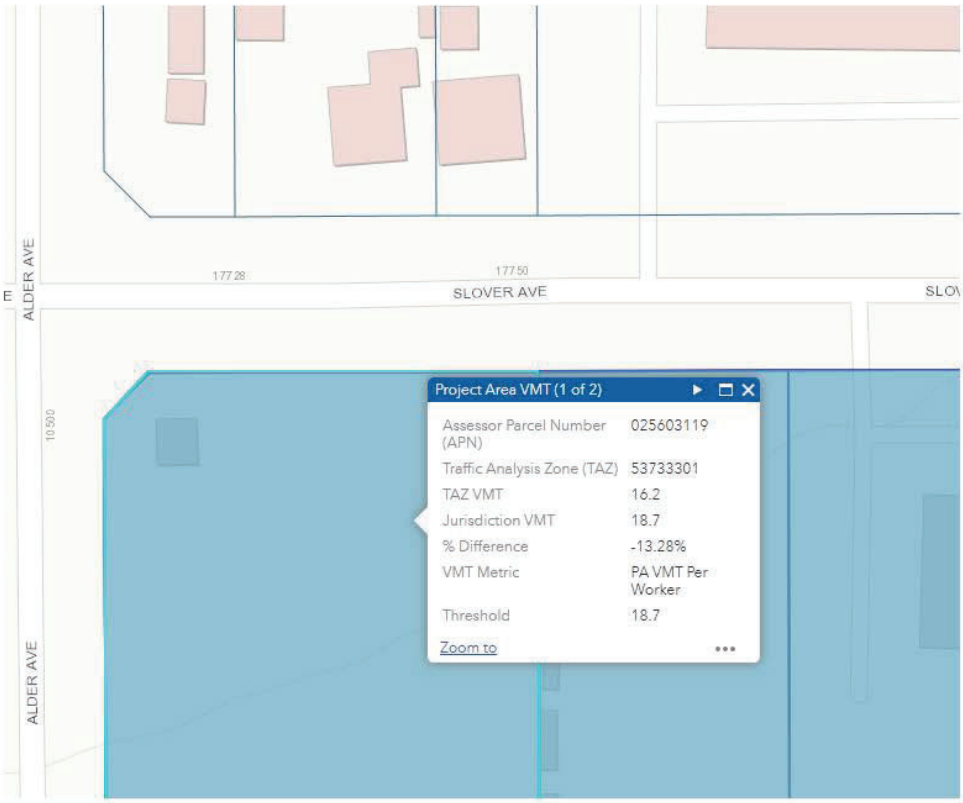
O1.64

The word "unincorporated" is critical here as is demonstrated below.

5

I applied the SBCTA VMT Screening Tool to the proposed project's seven parcels. The results are shown in Figure 4. For 2022, the Tool gives a VMT Per Worker of 16.2. DEIR Appendix J gives a slightly different number – 16.3, presumably because a different year was entered into the Tool. The threshold value shown in Figure 4 is 18.7 and the value in DEIR Appendix J is 18.9. In both cases, the project site passes the screen.

Figure 4: SBCTA VMT Screening Tool – Project Parcels Meet Screen



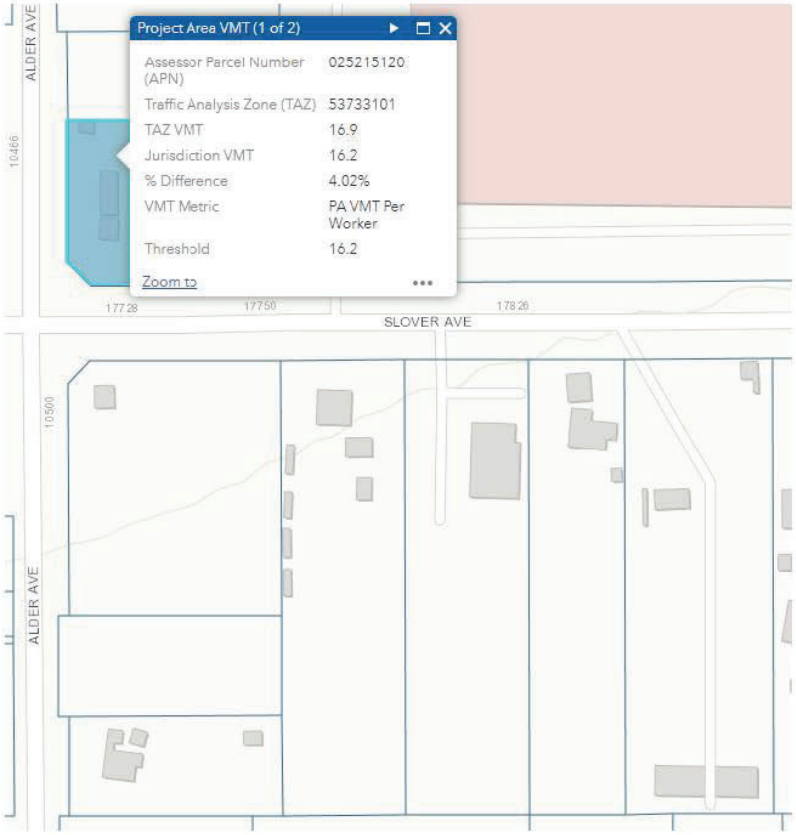
O1.64 cont.

6

However, if the SBCTA VMT Screening Tool is applied to parcels immediately across Slover Avenue, the screening test fails as shown in Figure 5. The model-estimated VMT Per Worker is somewhat higher than to the south of Slover Avenue – 16.9 vs. 16.2. However, the larger difference is in the threshold – 16.2 north of Slover Avenue and 18.7 south of Slover Avenue.

O1.64 cont.

Figure 5: SBCTA VMT Screening Tool – Parcel Across Slover Avenue Fails Screen



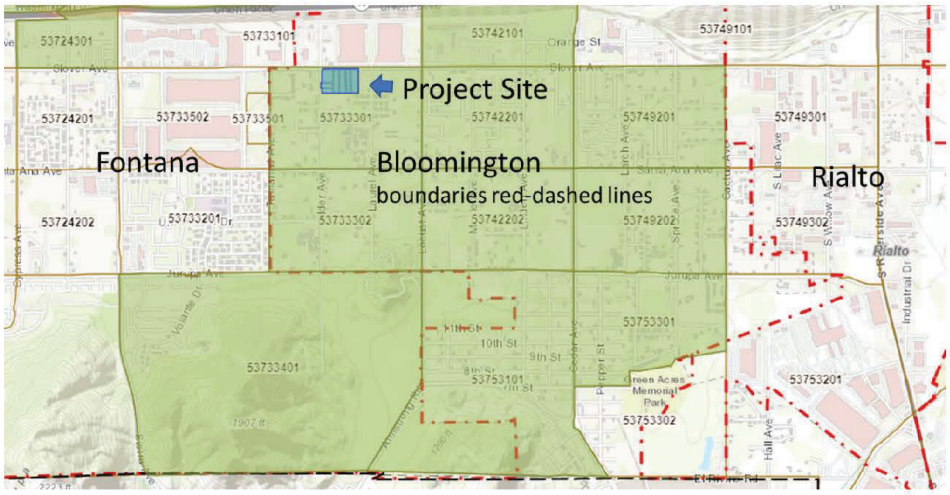
7

The large difference in the thresholds is because to the north of Slover Avenue, the City of Fontana threshold is applied and to the south of Slover Avenue, unincorporated Bloomington is lumped in with much more rural unincorporated San Bernadino County and a higher threshold associated with these rural areas is applied. This is arbitrary and fails to satisfy a proper planning purpose given that Bloomington is just as urbanized as adjacent incorporated cities.

O1.64 Cont.

In Figure 6 the shaded areas represent the low-VMT areas in the SBCTA VMT Screening Tool. As shown, most of unincorporated Bloomington is shown as low VMT, while most of incorporated Fontana south of I-10 is not low VMT, and most of incorporated Rialto south of I-10 is not low VMT. There is no reason why projects in unincorporated Bloomington should get a free pass relative to similar projects in Fontana and Rialto.

Figure 6: SBCTA VMT Screening Tool – Low VMT Areas Shown as Shaded



8

Area Does Not Have Short Average Commute Distances as Asserted in DEIR

Regional travel demand models are commonly used to estimate VMT metrics. However, the models are not necessarily accurate.

Modeling Inland Empire warehouse commuting patterns has unique challenges because the industry has been growing so rapidly and has become such a large share of the local economy. The *Press-Enterprise* recently reported:

> Clearly the I.E. logistics industry is leading the way. Employment at businesses in the transportation/warehouse industry was at 137% of pre-coronavirus jobs with 209,000 workers in June. That's up 56,100 from February 2020 . . .[3]

Warehouse jobs generally are physically demanding. Many in the workforce are not capable of doing these these jobs and many who are capable are not interested in them or will do them only for a short time. *Fortune* has reported that am internal Amazon memo stated that ". . . the availability of staff at its warehouses 60 miles east of Los Angeles will dry up by the end of 2022."[4] This is exactly the area where this project is proposed. The DEIR also describes the project site the same way as being ". . . 60 miles east of downtown Los Angeles" (p. 2-11) so it is subject to the same hiring constraints that concern Amazon. O1.65

This rapid growth in Inland Empire warehouse employment likely has been accompanied by growing average commute distance to these jobs.

The SBCTA travel demand model is incapable of forecasting longer average commute distances caused by warehouse worker scarcity. It continues to see the Inland Empire as having an excess of workers relative to the number of jobs. Any worker in the model will fill any sort of job in the model which segments commutes only within 3 broad income categories.[5] Therefore, the model fails to recognize labor scarcity in particular sectors and calculates short average trip lengths for all jobs in this area.

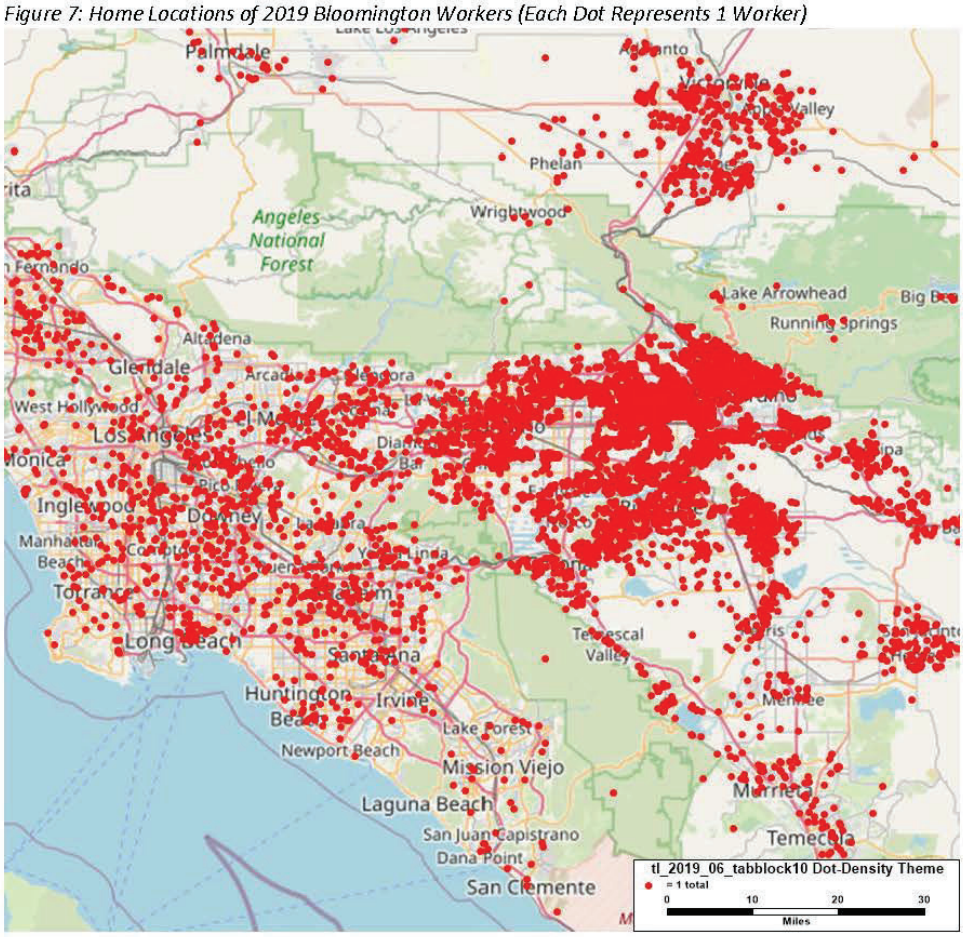
Given the inherent limitations of regional travel demand models, it is much more accurate to look at existing commuting data. The U.S. Census Bureau publishes Longitudinal Employer-Household Dynamics (LEHD) Origin-Destination Employment Statistics (LODES) data that provide detailed geographic data about workers, jobs, and commutes at the Census Block level.

As shown with LODES data mapped in Figure 7, there are many long commutes today into Bloomington.

[3] https://www.pe.com/2022/08/06/riverside-san-bernardino-hiring-pace-halved-but-regions-65100-jobs-above-pre-pandemic-level/ August 6, 2022.
[4] https://fortune.com/2022/06/20/amazon-warehouse-problems-running-out-of-workers-to-hire-too-much-space/
[5] https://www.gosbcta.com/wp-content/uploads/2019/10/SBTAM-Documentation-and-User%E2%80%99s-Guide.pdf, p. 5-1.

9

Figure 7: Home Locations of 2019 Bloomington Workers (Each Dot Represents 1 Worker)



O1.65 Cont.

Average (mean) commute distances to Bloomington jobs were estimated from these LODES data by:

- calculating the direct ("crow flies") distance between the centers of each Census block,
- eliminating commutes of over 100 miles where the data may be spurious, and
- multiplying by 110% to account for actual routing along roads

The resulting mean one-way commute distance is 22.3 miles.

To compare to average daily VMT, this one-way commute distance needs to be factored further:

- x 2.0 to account for round trips,
- x 5/7 to account for 5-day work week, and
- x 95% to account for non-single-occupant auto commutes.

10

The resulting mean commute VMT per employee per day is 30.2, i.e., much higher than either the 16.3 estimate given in the DEIR or the 18.9 threshold cited in the DEIR.

LODES data do not segment origin-destination data by industry. Given the specific nature of warehouse employment as discussed above, it is likely that average commute lengths are even higher in this industry than the averages for Bloomington.

Therefore, the project does not satisfy a low-VMT screen and would result in a significant impact that must be addressed via additional VMT analysis.

O1.65 Cont.

The Project Should Mitigate Employee Commuting VMT

Transportation Demand Management ("TDM)" is challenging in the project area because as the DEIR states:

- The project area has very limited bus service with 60-minute headways and no Sunday service (DEIR, p. 4-11)
- "The Project site and surrounding area do not currently support bicycle infrastructure." (DEIR, p. 4-11)
- "Additionally, the Project site does not contain sidewalks." (DEIR, p. 4-11)

Nevertheless, the project should include VMT mitigation. Employer-sponsored vanpools can be very effective in situations like this one where many employees working set shifts are concentrated at one location or multiple locations in the same area, but where the workforce is dispersed over a wide area.

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DEIR Underestimates of Trip Generation and Trip Length Cause Underestimated GHG

The DEIR states:

> . . . the proposed Project would generate 818,435 vehicle miles traveled per year from autos and would generate 1,248,255 vehicle miles traveled per year from trucks. (DEIR, p. 5.5-6)
>
> . . . the CalEEMod defaults of 16.6 miles were utilized for trip length and the SCAQMD recommended truck trip length of 40 miles with an assumption of 100% primary trips was used for the proposed industrial land uses. (DEIR, p. 5.7-10)

These generic trip lengths are not appropriate for this project site. As documented above, the average commute distance to Bloomington jobs today is about 22.3 miles, i.e. 34% higher than what the DEIR assumes. The most accurate way to estimate average truck trip length is to calculate the distance to the ports. This was done in the DEIR for another Duke warehouse project in San Bernadino County. The Duke Alabama Palmetto DEIR states:

> An average truck trip length of approximately 77 miles was assumed, which is the distance to the Ports of Los Angeles/Long Beach.[6]

The Duke Warehouse at Slover and Alder project site is 65 miles from the Port of Long Beach and 66 miles from the Port of Los Angeles (calculated with Google Maps). Therefore, an average truck length of

O1.67

[6] https://files.ceqanet.opr.ca.gov/93435-2/attachment/VK0ZFLFmWno-mTmQUc1OLE3NoESo8LNoggSPQRh7_wTNRQdIlHmYJfGSuqC6ApCbG4IaL_oWZ2T6sZKs0, p. 4-3-16 (pdf p. 79)

65 miles should be used. GHG impacts should be recalculated with these higher average auto and truck trip lengths.

A higher trip generation rate, and especially a higher truck trip generation rate, also would translate into higher estimated GHG emissions. As discussed above, depending on the type of warehouse operation, the actual trip generation rate could be three times as larger as assumed in the DEIR or even larger than that. This further causes the DEIR to underestimate project GHG.

O1.67 Cont.

Sincerely,

Norman L. Marshall

Norman L. Marshall

12

Resume

NORMAN L. MARSHALL, PRESIDENT

nmarshall@smartmobility.com

EDUCATION:

Master of Science in Engineering Sciences, Dartmouth College, Hanover, NH, 1982
Bachelor of Science in Mathematics, Worcester Polytechnic Institute, Worcester, MA, 1977

PROFESSIONAL EXPERIENCE: (33 Years, 19 at Smart Mobility, Inc.)

Norm Marshall helped found Smart Mobility, Inc. in 2001. Prior to this, he was at RSG for 14 years where he developed a national practice in travel demand modeling. He specializes in analyzing the relationships between the built environment and travel behavior and doing planning that coordinates multi-modal transportation with land use and community needs.

Regional Land Use/Transportation Scenario Planning

Portland Area Comprehensive Transportation System (PACTS) – the Portland Maine Metropolitan Planning Organization. Updating regional travel demand model with new data (including AirSage), adding a truck model, and multiclass assignment including differentiation between cash toll and transponder payments.

Loudoun County Virginia Dynamic Traffic Assignment – Enhanced subarea travel demand model to include Dynamic Traffic Assignment (Cube). Model being used to better understand impacts of roadway expansion on induced travel.

O1.68

Vermont Agency of Transportation-Enhanced statewide travel demand model to evaluate travel impacts of closures and delays resulting from severe storm events. Model uses innovate Monte Carlo simulations process to account for combinations of failures.

California Air Resources Board – Led team including the University of California in $250k project that reviewed the ability of the new generation of regional activity-based models and land use models to accurately account for greenhouse gas emissions from alternative scenarios including more compact walkable land use and roadway pricing. This work included hands-on testing of the most complex travel demand models in use in the U.S. today.

Climate Plan (California statewide) – Assisted large coalition of groups in reviewing and participating in the target setting process required by Senate Bill 375 and administered by the California Air Resources Board to reduce future greenhouse gas emissions through land use measures and other regional initiatives.

Chittenden County (2060 Land use and Transportation Vision Burlington Vermont region) – led extensive public visioning project as part of MPO's long-range transportation plan update.

Flagstaff Metropolitan Planning Organization – Implemented walk, transit and bike models within regional travel demand model. The bike model includes skimming bike networks including on-road and off-road bicycle facilities with a bike level of service established for each segment.

Chicago Metropolis Plan and Chicago Metropolis Freight Plan (6-county region)— developed alternative transportation scenarios, made enhancements in the regional travel demand model, and used the enhanced

13

model to evaluate alternative scenarios including development of alternative regional transit concepts. Developed multi-class assignment model and used it to analyze freight alternatives including congestion pricing and other peak shifting strategies.

Municipal Planning

City of Grand Rapids – Michigan Street Corridor – developed peak period subarea model including non-motorized trips based on urban form. Model is being used to develop traffic volumes for several alternatives that are being additional analyzed using the City's Synchro model

City of Omaha - Modified regional travel demand model to properly account for non-motorized trips, transit trips and shorter auto trips that would result from more compact mixed-use development. Scenarios with different roadway, transit, and land use alternatives were modeled.

City of Dublin (Columbus region) – Modified regional travel demand model to properly account for non-motorized trips and shorter auto trips that would result from more compact mixed-use development. The model was applied in analyses for a new downtown to be constructed in the Bridge Street corridor on both sides of an historic village center.

City of Portland, Maine – Implemented model improvements that better account for non-motorized trips and interactions between land use and transportation and applied the enhanced model to two subarea studies.

City of Honolulu – Kaka'ako Transit Oriented Development (TOD) – applied regional travel demand model in estimating impacts of proposed TOD including estimating internal trip capture.

City of Burlington (Vermont) Transportation Plan – Led team that developing Transportation Plan focused on supporting increased population and employment without increases in traffic by focusing investments and policies on transit, walking, biking and Transportation Demand Management.

Transit Planning

Regional Transportation Authority (Chicago) and Chicago Metropolis 2020 – evaluated alternative 2020 and 2030 system-wide transit scenarios including deterioration and enhance/expand under alternative land use and energy pricing assumptions in support of initiatives for increased public funding.

Capital Metropolitan Transportation Authority (Austin, TX) Transit Vision – analyzed the regional effects of implementing the transit vision in concert with an aggressive transit-oriented development plan developed by Calthorpe Associates. Transit vision includes commuter rail and BRT.

Bus Rapid Transit for Northern Virginia HOT Lanes (Breakthrough Technologies, Inc and Environmental Defense.) – analyzed alternative Bus Rapid Transit (BRT) strategies for proposed privately-developing High Occupancy Toll lanes on I-95 and I-495 (Capital Beltway) including different service alternatives (point-to-point services, trunk lines intersecting connecting routes at in-line stations, and hybrid).

Roadway Corridor Planning

I-30 Little Rock Arkansas – Developed enhanced version of regional travel demand model that integrates TransCAD with open source Dynamic Traffic Assignment (DTA) software, and used to model I-30 alternatives. Freeway bottlenecks are modeled much more accurately than in the base TransCAD model.

14

South Evacuation Lifeline (SELL) – In work for the South Carolina Coastal Conservation League, used Dynamic Travel Assignment (DTA) to estimate evaluation times with different transportation alternatives in coastal South Caroline including a new proposed freeway.

Hudson River Crossing Study (Capital District Transportation Committee and NYSDOT) – Analyzing long term capacity needs for Hudson River bridges which a special focus on the I-90 Patroon Island Bridge where a microsimulation VISSIM model was developed and applied.

PUBLICATIONS AND PRESENTATIONS (partial list)

DTA Love: Co-leader of workshop on Dynamic Traffic Assignment at the June 2019 Transportation Research Board Planning Applications Conference.

Forecasting the Impossible: The Status Quo of Estimating Traffic Flows with Static Traffic Assignment and the Future of Dynamic Traffic Assignment. *Research in Transportation Business and Management* 2018.

Assessing Freeway Expansion Projects with Regional Dynamic Traffic Assignment. Presented at the August 2018 Transportation Research Board Tools of the Trade Conference on Transportation Planning for Small and Medium Sized Communities.

Vermont Statewide Resilience Modeling. With Joseph Segale, James Sullivan and Roy Schiff. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

Assessing Freeway Expansion Projects with Regional Dynamic Traffic Assignment. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

Pre-Destination Choice Walk Mode Choice Modeling. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

A Statistical Model of Regional Traffic Congestion in the United States, presented at the 2016 Annual Meeting of the Transportation Research Board.

MEMBERSHIPS/AFFILIATIONS

Associate Member, Transportation Research Board (TRB)

Member and Co-Leader Project for Transportation Modeling Reform, Congress for the New Urbanism (CNU)

15

Response to Comment Letter O1: Adams Broadwell Joseph & Cardozo, on behalf of Californians Allied for a Responsible Economy, dated August 22, 2022

Comment O1.1: This comment states that the commenter is writing on behalf of CARECA and summarizes the project description. The comment also states that they have reviewed the DEIR and conclude that the DEIR fails to comply with the requirements of CEQA.

Response O1.1: 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 O1.2: The comment states that the DEIR fails to provide an accurate project description and environmental baseline and fails to analyze reasonably foreseeable uses related to truck trips. The comment states that the DEIR does not accurately disclose and fails to mitigate potentially significant air quality, GHG, soil contamination, noise, transportation, and energy impacts. The comment concludes that the County must address and respond to the technical comments separately.

Response O1.2: The comment does not provide substantial evidence of any environmental impact. The comment is introductory in nature. Responses related to the project description, air quality, GHG, soil contamination, noise, transportation, and energy are discussed below in Responses O1.4 through O1.70. In addition, letters from technical commenters have been responded to below. No further response is required.

Comment O1.3: This comment provides a statement of interest from CARECA and states that the commenter has an interest in enforcing environmental laws that encourage sustainable development. The comment also states that environmental degradation can cause construction moratoriums and other restrictions on growth.

Response O1.3: 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 O1.4: The comment states that the two primary purposes of CEQA are to inform decisionmakers and the public about the potential significant environmental effects of a project and requires public agencies to avoid or reduce environmental damage when feasible. The comment also states that the ultimate inquiry as case law is whether the EIR includes enough detail to enable who did not participate in its preparation to understand and consider meaningfully the issues raised by the proposed Project.

Response O1.4: The comment is introductory 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 or provided.

Comment O1.5: The comment states that the DEIR fails to include an accurate, complete, and stable project description and states that the environmental analysis under CEQA is limited. The comment also states that this would minimize the Project's impacts and undermine a meaningful public review.

Response O1.5: The comment does not provide substantial evidence of any environmental impact. The County disagrees with the assertion that the Draft EIR does not include an accurate and complete Project description. The comment contains no specific examples in support of this assertion. Section 3.0, *Project Description*, of the Draft EIR provides a description of the Project sufficient to meet CEQA's informational requirements under CEQA Guidelines Section 15124. Since the comment does not identify the alleged grounds for its assertion that the Draft EIR's Project description fails under CEQA, no further response can be provided.

Comment O1.6: The comment states that the Draft EIR failed to consistently describe the size of the buildings to be constructed which skewed the results of the Draft EIR's analysis of air quality impacts and noise impacts. The comment also states that the Draft EIR did not include a discussion of any back up generators and, therefore, the Draft EIR does not account for all potential emissions sources.

Response O1.6: The comment does not provide substantial evidence of any environmental impact. The Commenter claims that the incorrect building height was used in the modeling. The AERMOD model was rerun (included as Appendix A to the Final EIR) with the proposed warehouse height set to 50 feet to match the height used in the Project Description. A grid receptor was also added to the AERMOD model run that covered the area from the south side of the project site to most of Bloomington High School. The revised pages from the Air Report are included as Appendix A to the Final EIR and show the changes in tracked changes and includes the revised AERMOD output files in the appendices. As shown in the revised AERMOD model runs, the changes to the AERMOD model did not result in a higher cancer risk at any analyzed receptor.

Furthermore, the County disagrees with the assertion that the Draft EIR does not disclose whether the Project will require backup generators and must analyze the use of generators. The Project proposes the development of industrial speculative warehouse buildings and the end users are not known at this time. As the end users of the Project have not been identified, it is not known if backup generators would be needed for the building. Backup generators would only be used in the event of a power failure and would not be part of the Project's normal daily operations. If backup generators are required, the end user would be required to obtain a permit from the South Coast Air Quality Management District (SCAQMD) prior to installation. Emergency backup generators must meet SCAQMD's Best Available Control Technology (BACT) requirements and comply with SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines), which would minimize emissions. As the end users and future tenants of the proposed Project are unknown, the need for emergency backup generators is speculative. Under CEQA Guidelines Section 15384, argument, speculation, unsubstantiated opinion or narrative, evidence that is not credible, and evidence of social and economic impacts does not constitute substantial evidence. Thus, no further response is warranted.

Comment O1.7: The comment states that CEQA defines the environmental setting as the physical environmental conditions in the vicinity of the project and an EIR must describe the existing environment.

Response O1.7: The comment does not provide substantial evidence of any environmental impact. Section 4.0, *Environmental Setting*, outlines the environmental setting of the Project and discusses the environmental setting by topic area. In addition, Table 4-1 has been included in Chapter 3, *Errata* of the Final EIR to include the existing surrounding land uses. Therefore, the EIR adequately addresses the environmental setting and no further response is warranted.

Comment O1.8: The comment states that the DEIR fails to disclose that the census tract is already disproportionately affected by environmental pollution levels and does not discuss consistency with environmental justice elements of the Countywide Plan. The comment requests that the Environmental Setting section includes the background environmental burdens faced.

Response O1.8: The comment does not provide substantial evidence of any environmental impact. As discussed in Master Response 2, the census tracts within the Environmental Justice Focus Area are included on page 5.2-22 of Section 5.2, Air Quality. Consistency with County environmental justice policies was included in Table 5.10-3 in Section 5.10, Land Use and Planning. In addition, discussion of the environmental justice focus areas has been included in Chapter 3, *Errata* of the Final EIR. Therefore, the Project has addressed the environmental justice element of the Countywide Plan and no further response is warranted.

Comment O1.9: The comment states that the DEIR states that the Project is considered adjacent to an EJFA and defines an EJFA as an area where the community is ranked by SCAQMD for being in the 75th percentile or higher based on the composite score of impacts. The comment also states that the DEIR fails to detail the severity of air quality impacts in the census tract surrounding the Project.

Response O1.9: The comment does not provide substantial evidence of any environmental impact. As discussed above and in Master Response 2, the census tracts within the Environmental Justice Focus Area are included on page 5.2-22 of Section 5.2, Air Quality. Consistency with County environmental justice policies was included in Table 5.10-3 in Section 5.10, Land Use and Planning. In addition, discussion of the environmental justice focus areas has been included in Chapter 3, *Errata* of the Final EIR. Therefore, the Project has addressed the environmental justice focus area of the Countywide Plan.

As detailed in the Impact AQ-2 discussion that begins on page 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required.

As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project 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 Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. The Operational Mobile Health Risk Assessment and Construction Health Risk Assessment were prepared pursuant to the guidelines set forth by SCAQMD and the Office of Environmental Health Hazard Assessment (OEHHA). In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

Comment O1.10: The comment states that the DEIR fails to explain the relevance of the existing conditions and fails to analyze the extent to which the Project's impacts will exacerbate these existing conditions. The comment also states that the DEIR fails to consider the cumulative impacts in the overburdened communities. The comment states that the DEIR fails to provide an accurate characterization of the Project's environmental setting.

Response O1.10: The comment does not provide substantial evidence of any environmental impact. As discussed in Response O1.8 and O1.9 above, a description of the Project in relation the Environmental Justice Focus Area is included on page 5.2-22 of Section 5.2, Air Quality. Consistency with County environmental justice policies was included in Table 5.10-3 in Section 5.10, Land Use and Planning. In addition, discussion of the environmental justice focus areas has been included in Chapter 3, *Errata* of the Final EIR. As discussed in Section 5.2, *Air Quality*, per SCAQMDs 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. Since the Project would not exceed the SCAQMD health risk or air quality thresholds, the Project would not result in a cumulative impact pursuant to SCAQMD guidance.

Comment O1.11: The comment states that the failure to proceed in a manner required by CEQA and an agency's failure to proceed in a manner by CEQA such as the failure to disclose environmental effects or alternatives are subject to a less deferential standard than challenges to an agency's factual conclusions.

The comment also states that a clearly inadequate or unsupported study is entitled to no judicial deference.

Response O1.11: The comment does not provide substantial evidence of any environmental impact. The commenter provides no evidence supporting their claims that the Draft EIR fails to adequately disclose and mitigate potentially significant impacts. Under CEQA Guidelines Section 15384, argument, speculation, unsubstantiated opinion or narrative, evidence that is not credible, and evidence of social and economic impacts does not constitute substantial evidence. As discussed throughout the Draft EIR and Chapter 3, *Errata*, of the Final EIR, all potentially significant impacts have been disclosed and feasible mitigation measures have been included to reduce potentially significant impacts. As discussed in Section 7.0, Alternatives, feasible alternatives were provided to be considered by the County. The technical studies provided are adequate and updates have been provided as necessary in the Final EIR. Thus, no further response is warranted.

Comment O1.12: The comment states that the transportation analysis does not consider the full range of possible uses for the site and underestimates truck and worker trip lengths. The comment also states that the DEIR fails to disclose and mitigate potentially significant transportation impacts.

Response O1.12: The comment does not provide substantial evidence of any environmental impact. The commenter provides no evidence supporting their claims that the Draft EIR fails to adequately disclose truck and worker trip lengths. Under CEQA Guidelines Section 15384, argument, speculation, unsubstantiated opinion or narrative, evidence that is not credible, and evidence of social and economic impacts does not constitute substantial evidence. The proposed Project would be used for warehouse uses and the trip generation is consistent with previously used methodology and was reviewed and approved by the County of San Bernardino Public Works Department. As discussed on Page 43 of the *AQ GHG Energy Analysis and HRA* included as Appendix A of the Final EIR, according to *Review of SCAQMD Staff Comments and Testimony on Warehouse Projects*, prepared by Southern California Leadership Council, March 14, 2014, SCAQMD requires that truck trip length should be set to 40 miles in CalEEMod. In order to account for the longer truck trip length in CalEEMod, the 75 daily truck trips were analyzed under the "Parking Lot" land use because the parking lot use generates no vehicle trips on its own so it was an available placeholder allowing analysis solely of the project's trucks without mixing the trucks with any other trip-generating use.

Therefore, the analysis is consistent with SCAQMD methodology for a project 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. In addition, as discussed in Section 5.12, Transportation, Impacts TR-1 through TR-4 are less than significant. Therefore, no further response is required or provided.

Comment O1.13: The comment states that the Draft EIR's transportation section relies on the assumption that the Project will operate as a high-cube warehouse and does not consider reasonably foreseeable uses for the Project that would result in significantly greater traffic intensive uses of the site. The comment also states that the DEIR fails to reflect a good faith effort at full disclosure as required by CEQA.

Response O1.13: The comment does not provide substantial evidence of any environmental impact and relies on speculation. Under CEQA Guidelines Section 15384, argument, speculation, unsubstantiated opinion or narrative, evidence that is not credible, and evidence of social and economic impacts does not constitute substantial evidence. The Trip Generation and Vehicle Miles Traveled (VMT) Screening Analysis, included as Appendix J to the Draft EIR, trip generation used the trip rates provided by Institute of Transportation Engineer's *Trip Generation, 11th Edition, 2021* for High-Cube Transload and Short-Term Storage Warehouse and truck splits provided in the *SCAQMD Warehouse Truck Trip Study, 2017*. 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 Solver and Alder trip generation. Thus, the traffic analysis and high-cube warehouse land use designation is consistent with previously used methodology. 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. Therefore, the high-cube trip generation for the Slover and Alder Project is a reasonable representation of the potential Project impacts and complies with CEQA. The Project analysis utilizes ITE which is recognized and used nationwide as a source and is consistent with other industrial projects in the Bloomington area and required by the adjacent jurisdiction. Thus, no further response is warranted.

Comment O1.14: The comment states that the DEIR evaluated the Project's transportation impacts based on the ITE's 11th Edition trip rates for high-cube transload and short term storage warehouse.

Response O1.14: The comment does not provide substantial evidence of any environmental impact. The commenter is referred to Response O1.13. Therefore, no further response is required or provided.

Comment O1.15: This comment states that the ITE outlines several other compatible uses of high cube warehouses which have significantly higher trip rates than the category used for the trip generation.

Response O1.15: The comment does not provide substantial evidence of any environmental impact. Refer to Response O1.13 regarding the high-cube warehouse trip rates utilized for the Project.

Comment O1.16: The comment states that the trip generation rate used in the Draft EIR is on the low end of potential uses for the Project and states that the WRCOG study analyzed actual trip generation rates from 16 warehouse in the Inland Empire and found that the ITE categories underestimate trip generation for fulfillment centers.

Response O1.16: The comment does not provide substantial evidence of any environmental impact. Refer to Response O1.13 regarding the trip generation used in the Draft EIR.

Comment O1.17: The comment states that the Draft EIR relies on the least intensive use category for a high-cube warehouse to determine that the Project would generate 363 trips per day. The comment also states that this is underestimating the Project's potentially significant vehicle miles traveled as well as impacts to Air Quality, GHG emissions, and Noise impacts.

Response O1.17: The comment does not provide substantial evidence of any environmental impact and relies on speculation of worst-case scenarios. Under CEQA Guidelines Section 15384, argument, speculation, unsubstantiated opinion or narrative, evidence that is not credible, and evidence of social and economic impacts does not constitute substantial evidence. Refer to Response O1.13 regarding the trip generation used in the Draft EIR. The traffic analysis and high-cube warehouse land use designation utilized by the Draft EIR is consistent with previously used methodology and accurately reflects the proposed Project's potential use. 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. Thus, the VMT, Air Quality, GHG, and Noise impacts were not underestimated and would not need to be updated. Therefore, no further response is warranted.

Comment O1.18: This comment states that the DEIR needs to be revised based on the reasonably foreseeable trip generation rates for the Project.

Response O1.18: The comment does not provide substantial evidence of any environmental impact. As discussed in Responses O1.13 through O1.17, the Draft EIR does not require recirculation. Thus, no further response is warranted.

Comment O1.19: The comment states that the VMT generated from trucks is based on an estimated 40 miles traveled per truck trip and does not account for the distance that trucks must travel to serve the Project. The comment states that the distance should be based on the distance of the Project to the Port of Los Angeles and the Port of Long Beach. The comment states that the estimated distance traveled by trucks need to be corrected.

Response O1.19: The comment does not provide substantial evidence of any environmental impact. As discussed on Page 43 of the *AQ GHG Energy Analysis and HRA* included as Appendix A of the Final EIR, according to *Review of SCAQMD Staff Comments and Testimony on Warehouse Projects*, prepared by Southern California Leadership Council, March 14, 2014, SCAQMD requires that truck trip length should be set to 40 miles in CalEEMod. In order to account for the longer truck trip length in CalEEMod, the 75 daily truck trips were analyzed under the "Parking Lot" land use because the parking lot use generates no vehicle trips on its own, so it was an available placeholder allowing analysis solely of the Project's trucks without mixing the trucks with any other trip-generating use. Thus, the trip length is consistent with the SCAQMD methodology and would not need to be revised. 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. Therefore, no further response is warranted.

Comment O1.20: The comment states that the Draft EIR relies on the San Bernardino County (SBCTA) VMT Screening tool. The comment states that the threshold is misleading and does not consider the land uses surrounding the Project site. The comment states that the Draft EIR should use the more appropriate City of Fontana 16.2 VMT per employee threshold to analyze the VMT impacts for the Project.

Response O1.20: The comment does not provide substantial evidence of any environmental impact. The Project applies the VMT thresholds that are applicable by the County's TIA guidelines. The SBCTA screening tool is based on the SBTAM transportation model for the County which takes into account all planned land uses per Countywide land use designations and assigns trip distribution based on County socio-economic data. As such, SBTAM models are based on land uses derived from the Countywide Plan, which include industrial uses in the Project vicinity. The County's guidelines apply to all unincorporated areas of the County including the Project site. The Project would not need to utilize the City of Fontana's VMT per employee threshold as it is not within the City of Fontana. Thus, additional VMT analysis would not be required and no further response is warranted.

Comment O1.21: The comment states that the commenter conducted an analysis of employee VMT based on data compiled by the U.S. Census Bureau which resulted in different results from the Draft EIR. The comment also states that the eventual tenant at the Project site will likely need to source labor from further away than what was estimated. The comment concludes by stating that the Draft EIR must be revised to account for higher employee VMT and propose mitigation measures that will reduce the impacts. The comment also states that the Project should require an employer-sponsored vanpool service.

Response O1.21: The comment does not provide substantial evidence of any environmental impact. As discussed in Response O1.20 above, the VMT thresholds that are applicable are based on the County Transportation Analysis Guidelines. The 16.30 vehicle miles traveled/employee is the average of all the trips assumed by the SBTAM model to/from the proposed Project site. These trips range from within the immediate vicinity of the Project to the longer distances in the County of San Bernardino. This trip distribution is mathematically based on socio-economic data in the County. The transportation analysis therefore adequately represents the VMT, and the VMT impacts are found to be less than significant. Thus,

the Project would not be required to account for higher employee VMT or propose mitigation measures as impacts would remain less than significant. As such, there is no nexus for requiring an employer-sponsored vanpool as impacts related to VMT are less than significant. Thus, no further response is warranted.

Comment O1.22: The comment states that the Draft EIR fails to disclose all potentially significant air quality impacts of the Project and does not implement all feasible mitigation to reduce those impacts to less than significant levels.

Response O1.22: The comment is introductory in nature and does not provide substantial evidence to support its claim. Thus, no further response is warranted.

Comment O1.23: The comment states that the Draft EIR underestimates truck trip lengths for the Project and doesn't account for trip lengths to the Port of LA. The comment includes revised daily emissions based on an increased trip length to 65 miles. The comment states that the Draft EIR must be revised to calculate truck emissions based on reasonably foreseeable and accurate truck trip lengths.

Response O1.23: The comment does not provide substantial evidence of any environmental impact. The commenter is referred to Response O1.12. Further, as demonstrated by the Commenter, changing trip lengths to 65 miles would continue to result in emissions below SCAQMD thresholds. Thus, no further response is warranted.

Comment O1.24: The comment states that the DEIR fails to analyze the potentially significant health risk impacts from exposure to all toxic air contaminants The comment states that the Draft EIR accounts for DPM but does not account for other vapor components of diesel exhaust.

Response O1.24: The comment does not provide substantial evidence of any environmental impact. The commenter falsely states that other vapor components are not accounted for. According to "The Report on Diesel Exhaust" (CARB, 1998) DPM consists of the gases and fine particles emitted by a diesel-fueled combustion engine. As such, DPM covers all of the vapor components that are part of diesel engines. As shown in Table A of the AQ, GHG, Energy Analysis and HRA (included as Appendix A to the Final EIR) all of the TAC pollutants are listed in diesel exhaust and then utilized the ratios of each pollutant to develop an acute REL for DPM which provides for a worst-case or conservative analysis.

Comment O1.25: The comment states that the lead agency cannot conclude that an impact is less than significant unless it produces concrete substantial evidence. This comment also states that the standards apply to an EIR's analysis of the air quality impacts of a Project.

Response O1.25: The comment does not provide substantial evidence of any environmental impact. The comment is introductory in nature and does not raise a specific issue with the adequacy of the air quality analysis in the Draft EIR or raise any other CEQA issue. As disclosed throughout the Draft EIR and this Response to Comments, the Draft EIR relies on substantial evidence in support of its analysis. Therefore, no further response is required or provided.

Comment O1.26: The comment discusses two court cases, *Sierra Club v. County of Fresno* and *Berkeley Jets*, and concludes that the County's EIR was inadequate for failing to disclose the nature and extent of public health impacts. The comment also states that the Court held that mitigation alone was insufficient.

Response O1.26: The comment does not provide substantial evidence of any environmental impact. The comment is informative in nature and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. As discussed in Section 5.2, *Air Quality*, of the Draft EIR, the Project would not result in any health risks to surrounding residences. Specifically on page 5.2-34 of the Draft EIR, the document includes a discussion of the *Friant Ranch* case and states that Project emissions are not sufficiently

high enough to use a regional modeling program to correlate health effects on a basin-wide level. Notwithstanding, the Draft EIR does evaluate the Project's localized impacts to air quality for emissions of CO, NOX, PM10, and PM2.5 by comparing the on-site emissions to the SCAQMD's applicable LST thresholds. In addition, a Mobile Source Health Risk Assessment was prepared (included as Appendix A to the Final EIR) and the proposed Project would not result in emissions that exceed the SCAQMD's health risk thresholds. Therefore, the proposed Project would not be expected to exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NOX, PM10, and PM2.5. Therefore, no further response is required or provided.

Comment O1.27: This comment states that Courts reviewing challenges to an agency's approval of an EIR based on a lack of substantial evidence will determine whether the agency has employed the correct procedures. The comment also states that by failing to include an analysis of the additional TAC components of the Project's diesel exhaust, the DEIR does not provide a full picture of the Project's potential health risk impacts and states that the HRA must be updated to include.

Response O1.27: The comment does not provide substantial evidence of any environmental impact. The commenter is referred to Response O1.24 for a discussion of TAC components. No further response is required.

Comment O1.28: The comment states that the Draft EIR does not include enforceable mitigation measures to protect construction workers or nearby sensitive receptors. The comment states that the use of PDFs dismisses the significance of the Project's unmitigated air quality impacts.

Response O1.28: The comment does not provide substantial evidence of any environmental impact. This comment does not provide any substantial evidence that the Project's proposed mitigation measures and PDFs are inadequate. 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 5.2-37, 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"[1]. 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, 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.

Comment O1.29: The comment states that CEQA requires that mitigation measures be fully enforceable through permit conditions and PDFs fail to provide the binding mechanism required by CEQA to compel the Applicant's compliance with mitigation following Project approval.

Response O1.29: The comment does not provide substantial evidence of any environmental impact. As discussed in Response O1.28, the PDFS are included in the MMRP to ensure implementation along with the

[1] https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf

Project. Thus, the PDFs are enforceable, are not considered mitigation, and additional mitigation measures would not be required.

Comment O1.30: The comment states that mitigation must be incorporated directly into a Project's MMRP. The comment also states that the PDFs must be incorporated into the MMRP as mitigation measures.

Response O1.30: The comment does not provide substantial evidence of any environmental impact. As discussed in Response O1.28 and O1.29, the PDFs are included in the MMRP to ensure implementation along with the Project. Thus, the PDFs are enforceable, are not considered mitigation, and additional mitigation measures would not be required.

Comment O1.31: The comment states that the Draft EIR dismisses the potential risks to construction employees and nearby sensitive receptors. The comment also states that the Draft EIR must be revised to require any and all mitigation measures in the MMRP.

Response O1.31: The comment does not provide substantial evidence of any environmental impact. As discussed in Response O1.28 and O1.29, the PDFs included as part of the Draft EIR do not constitute mitigation. In response to the Air Quality and Health Risk analyses conducted for the Project, one mitigation measure was applied, and the Project includes 25 PDFs to further reduce impacts related to air quality, health risk and greenhouse gas emissions. These PDFs are included in the Project's MMRP to ensure implementation by with the Project. As provided in the responses to the detailed comments above and below, potential impacts have been adequately addressed and additional mitigation is not required. Thus, the PDFs are enforceable, are not considered mitigation, and additional mitigation measures would not be required.

Comment O1.32: The comment states that the significance determination must be supported by accurate data and provides a summary of how courts interpret challenges to EIRs.

Response O1.32: The comment does not provide substantial evidence of any environmental impact. The comment is introductory in nature and does not raise a specific issue with the adequacy of the hazardous materials discussion in the Draft EIR or raise any other CEQA issue. As disclosed throughout the Draft EIR and this Response to Comments, the Draft EIR relies on substantial evidence in support of its analysis. Therefore, no further response is required or provided.

Comment O1.33: The comment states that the Draft EIR fails to analyze the impacts from disturbance of soils that could contain harmful pesticides and heavy metals. The comment states that the onsite soils could contain chemicals from the Kaiser Steel Mill facility. The comment states that the County must conduct a Phase II Environmental Site Assessment to analyze the existing contamination levels in the Project soils and include a cleanup plan before construction can begin.

Response O1.33: The comment does not provide substantial evidence of any environmental impact. As discussed in Section 5.8, *Hazards and Hazardous Materials*, of the Draft EIR, a Phase I Environmental Site Assessment was prepared for the Project site by Apex Companies (included as Appendix F to the Draft EIR). The Phase I Environmental Site Assessment identified no recognized environmental conditions (RECs) in connection with the site. While the site had been historically used for agricultural activities, the property is planned for industrial development, and the area of the subject property would largely either be paved over or covered by improvements that make direct contact with any potential remaining concentrations in the soil unlikely. In regard to the Kaiser Steel Mill facility, the facility is located approximately 5.16 miles northwest of the Project site. Therefore, the Project site is located a significant distance away from the former Steel Mill facility and there is no substantial evidence of any soil contamination in relation to the mill at the Project site. Further, Project construction would be required to comply with SCAQMD Rule 403, which would limit fugitive dust from site construction activities. As such, there is no evidence supporting the

need for preparation of a Phase II Environmental Site Assessment and the Draft EIR's analysis of hazardous materials is adequate.

Comment O1.34: This comment states that the Draft EIR fails to properly disclose, analyze, and mitigate the Project's potentially significant impacts on energy use. The comment states that the Project's VMT assumptions, truck trip length, and trip generation rates are underrepresented, which leads to the Draft EIR's on-road vehicle energy consumption being underrepresented. The comment states that the Draft EIR inaccurately analyzes the potential energy use due to issues with the warehouse size. The comment states that the Draft EIR also relies on vague thresholds related to energy use and not a quantitative threshold.

Response O1.34: The comment does not provide substantial evidence of any environmental impact. The Commenter claims that the auto and truck trip length and building height utilized in the CalEEMod modeling were incorrect and the threshold for fuel energy usage is not correct. The auto and truck trip lengths that were entered into the CalEEMod model are discussed on pages 43 and 44 of the Air Report (included as Appendix A to the Final EIR) which details that the truck trip length modeled in CalEEMod was modeled as 40 miles per trip that was based on a scientific report produced by SCAQMD of typical trip lengths in the Air Basin. Although the ports are greater than 40 miles away, the edge of the Air Basin, via Cajon Pass is only 15 miles away, and several truck trips, such as Fedex and UPS truck trips will be much shorter than the long-haul trips. The automobile truck trips were based on the default trip lengths in the CalEEMod model, which are based on studies that analyzed the average trip lengths in the Air Basin. For building height, it is not possible to enter building height into CalEEMod and doing so would not change the results, since CalEEMod only calculates total air emissions created from the Project based on square footage and not air emissions dispersion, where building height is a factor. The energy usage thresholds were based on the 2020 CEQA Guidelines that detail how a project should be compared to overall energy consumption. CEQA Guidelines Appendix F does not provide quantitative thresholds for evaluating energy use. Therefore, since the Draft EIR relies on Appendix F thresholds, as further described in Draft EIR Section *5.5.5*, the energy analysis included within the Draft EIR is consistent with the requirements of CEQA.

Comment O1.35: This comment states that CEQA requires agencies to conduct noise analyses for projects that consider both the absolute noise levels expected, and the degree noise levels are expected to increase.

Response O1.35: The comment does not provide substantial evidence of any environmental impact. The comment is introductory in nature and does not raise a specific issue with the adequacy of the hazardous materials discussion in the Draft EIR or raise any other CEQA issue. Therefore, no further response is required or provided.

Comment O1.36: This comment provides a summary of the *King & Gardiner Farms, LLC* v. *County of Kern* case decision and states that an EIR cannot rely on a compliance with noise regulations to conclude that there would be no significant noise impacts without considering the impacts of increases in noise.

Response O1.36: The comment does not provide substantial evidence of any environmental impact. The comment is informative in nature and does not raise a specific issue with the adequacy of the hazardous materials discussion in the Draft EIR or raise any other CEQA issue. Therefore, no further response is required or provided.

Comment O1.37: This comment provides a summary of the *Berkeley Jets* case decision and states that an EIR cannot rely on a compliance with the CNEL metric to conclude that there would be no significant noise impacts without considering the impacts of increases in noise.

Response O1.37: The comment does not provide substantial evidence of any environmental impact. The comment is informative in nature and does not raise a specific issue with the adequacy of the hazardous

materials discussion in the Draft EIR or raise any other CEQA issue. Therefore, no further response is required or provided.

Comment O1.38: This comment states that the Draft EIR relies on the County's construction noise exemption and standards. The comment states that the ordinance does not establish any limit on the hours of construction, but merely states that construction noise is exempt if it is generated within certain hours. The comment states that the Draft EIR fails to include a mitigation measure restricting construction to the hours of 7:00 AM to 7:00 PM and therefore cannot conclude that the Project would not result in a significant construction noise impact.

Response O1.38: The comment does not provide substantial evidence of any environmental impact. As described in Section 3.0*, Project Description*, of the Draft EIR, construction activities would adhere to San Bernardino County Development Code Section 3.11, which limits construction between the hours of 7:00 AM to 7:00 PM, Monday to Saturday, with no construction activity permitted on Sundays or national holidays. As discussed, construction would occur between 7:00 AM and 7:00 PM; therefore, the Project would comply with the County's construction noise standards. These standards are legally enforceable by the County and will be imposed as Standard Conditions, and therefore are not required to be included as mitigation. (*See Tracy First v. City of Tracy* (2009) 177 Cal. App. 4th 912, 933-934).

Comment O1.39: This comment states that the Draft EIR discusses that construction noise would be significant if noise at nearby sensitive receptors exceeds 80 dBA. The comment states that the Draft EIR contradicts itself by showing that some construction equipment would exceed the 80 dBA threshold at 50 feet, while the nearest sensitive receptor is 29 feet south of the Project site. The comment states that, therefore, this receptor will experience noise impacts that exceed the 80 dBA threshold as it is less than 50 feet away from the Project site.

Response O1.39: The comment does not provide substantial evidence of any environmental impact. The Commenter misinterprets the use of dBA Lmax and dBA Leq in Draft EIR Section 5.11, *Noise*, in Tables 5.11-5 and Tables 5.11-6. Table 5.11-5 within the Draft EIR lists construction reference noise levels from standard construction equipment using dBA Lmax, which represents a maximum noise level. Table 5.11-6 within the Draft EIR lists construction noise levels at nearby sensitive receiver locations using dBA Leq, which represents an equivalent sound level. As shown on Table 5.11-5 of the Draft EIR, noise levels during Project construction would range from 51 to 70 dBA Leq at nearby sensitive receivers, which would not exceed the 80 dba Leq daytime construction noise level threshold at receptor locations. Therefore, impacts related to construction noise would be less than significant.

Comment O1.40: This comment states that the Project would implement PDF NOI-1, but PDF NOI-1 should be included as a mitigation measure since it is not enforceable as a PDF. In addition, the comment states that there is no evidence that the PDF would reduce construction noise.

Response O1.40: This comment does not provide any substantial evidence that the Project's proposed mitigation measures and PDFs are inadequate. PDF NOI-1 is not a mitigation measure but would be included in the Project's MMRP to ensure implementation and is fully enforceable by the County. The Draft EIR's impact analysis does not take credit for noise level reductions as a result of implementation of this PDF. The PDF serves to reduce impacts over and above those disclosed in the Draft EIR. However, the EIR's not taking credit for reductions associated with the PDF does not prevent the public from identifying the Project's potential noise impacts. Rather, the Draft EIR merely provides a more conservative disclosure of potential impacts, which is encouraged under CEQA.

Comment O1.41: This comment states that the Project requires approval of a Conditional Use Permit (CUP), which requires the County to make findings regarding land use consistency and environmental

factors. The comment states that the Draft EIR fails to disclose the Project's potentially significant unmitigated impacts on air quality, public health, noise, and transportation and the County is unable to make the necessary findings for the CUP.

Response O1.41: The comment does not provide substantial evidence of any environmental impact. As substantiated by Responses O1.1 through O1.40, above, the Draft EIR provides substantial evidence and adequate analysis to support the conclusions that the Project would not result in any significant and unavoidable impacts, including those related to air quality, public health, noise, and transportation. No further response is required.

Comment O1.42: This comment states that in order for the Planning Commission to approve the CUP application, they must take into account the following findings:

1. The site for the proposed use is adequate in terms of shape and size to accommodate the proposed use and all landscaping, loading areas, open spaces, parking areas, setbacks, walls and fences, yards, and other required features pertaining to the application.
2. The site for the proposed use has adequate access, which means that the site design incorporates appropriate street and highway characteristics to serve the proposed use.
3. The proposed use will not have a substantial adverse effect on abutting property or the allowed use of the abutting property, which means that the use will not generate excessive noise, traffic, vibration, or other disturbance. In addition, the use will not substantially interfere with the present or future ability to use solar energy systems.
4. The proposed use and manner of development are consistent with the goals, maps, policies, and standards of the General Plan and any applicable community or specific plan.
5. There is supporting infrastructure, existing or available, consistent with the intensity of development, to accommodate the proposed development without significantly lowering service levels.
6. The lawful conditions stated in the approval are deemed reasonable and necessary to protect the public health, safety, and general welfare.
7. The design of the site has considered the potential for the use of solar energy systems and passive or natural heating and cooling opportunities.

The comment states that the County cannot make the finding that the Project would not have a substantial adverse effect on abutting property or the allowed use of the abutting property due to the Project's potentially significant, unmitigated impacts on air quality, public health, noise, and traffic. The comment states that the County cannot make the necessary findings that the Project is consistent with the Hazards and Environmental Goals of the General Plan due to significant health risk impacts.

Response O1.42: The comment does not provide substantial evidence of any environmental impact. As substantiated by Responses O1.1 through O1.40, above, the Draft EIR provides substantial evidence and adequate analysis to support the conclusions that the Project would not result in any significant and unavoidable impacts, including those related to air quality, public health, noise, and transportation. Further, as shown in Table 5.10-3 of the Draft EIR, the Project would be consistent with applicable Countywide Plan Policies from the Hazards Element related to Environmental Justice. Appropriate findings for approval of the CUP would be considered and adopted by the Planning Commission at a public hearing.

Comment O1.43: This comment states that based on the other comments, the Draft EIR is inadequate under CEQA and must be revised to provide a legally adequate analysis and mitigation for all of the Project's potentially significant impacts. The comment states that until the Draft EIR is revised and recirculated, the County may not lawfully approve the Project.

Response O1.43: 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 O1.44: This comment states that at the request of Adams Broadwell Joseph & Cardozo, Clark and Associates has reviewed the Draft EIR. The comment states that the review of materials in no way constitutes a validation of the conclusions or materials within the Draft EIR.

Response O1.44: 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 O1.45: This comment provides a summary of the Project description and provides figures of the Project site aerial and Conceptual Site Plan. The comment states that the Draft EIR states that potentially significant impacts will be mitigated to less than significant levels, which is not supported by facts of the Project. The comment states that there are significant impacts that are not addressed in the County's analysis that must be addressed in a revised EIR.

Response O1.45: 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.

Despite the differing opinion offered by commenter's air quality consultant, the existence of disagreement among experts concerning the conclusions of an EIR or the propriety of the analytical methods employed in an EIR are not indicative of any deficiency. The County, as CEQA lead agency, is entitled to choose among conflicting expert opinions. (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal. 3d 376, 409; *Greenbaum v. City of Los Angeles* (1984) 153 Cal.App.3d at 412, 413; (*Browning-Ferris v. City Council* (1986) 181 Cal.App.3d 852 at 863).

Comment O1.46: This comment states that the County's analysis of pollutants ignores substantial evidence that the census tract that the Project site resides in is in one of the worst areas in California for ozone, other pollutants, and toxic air contaminants. The comment states that CalEnviroscreen 4.0 reports that the census tract is in the top 5% in California for ozone impacts, the top 6% for $PM_{2.5}$ impacts, the top 22% for DPM, and the top 15% for toxic releases. The comment states that increasing the sources of unburned hydrocarbons, NOx, and DPM exhaust will exacerbate existing health conditions in the Bloomington census tract and the County must address these substantial impacts in a revised Draft EIR.

Response O1.46: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed in Master Response 1, with regard to CalEnviroScreen, this tool was developed by OEHHA and the California Environmental Protection Agency (CalEPA). While CalEnviroScreen can assist CalEPA in prioritizing resources and helping promote greater compliance with environmental laws, it does have several limitations. The tool's output provides a relative ranking of communities based on a selected group of available datasets, through the use of a summary score. Unlike the health risk assessments prepared for the proposed Project, a CalEnviroScreen score is not an expression of health risk and does not provide quantitative information on increases in cumulative impacts for specific sites or projects. Further, as a comparative screening tool, the results do not provide a basis for

determining when differences between scores are significant in relation to public health or the environment. Accordingly, CalEnviroScreen is not intended to be used as a health or ecological risk assessment for a specific area or site. Therefore, the fact that the Project is located in an area that CalEnviroScreen identifies as in a higher percentile for pollution burden is not indicative of a CEQA impact.

The commenter erroneously states that the Draft EIR does not include a discussion of existing air quality pollutants in the Project vicinity. As shown on Table 5.2-2 within the Draft EIR, monitoring data from SCAQMD shows that ozone exceeded the California pollutant standards 91 days in 2020, nitrogen dioxide exceeded standards 0 days in 2020, inhalable particulates exceeded standards 6 days in 2020, and ultrafine particulates exceeded standards 4 days in 2020. No areas of the Basin exceeded federal or state standards for NO2, SO2, CO, sulfates, or lead. As detailed in the Impact AQ-2 discussion that begins on page 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required.

As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, a Construction Health Risk Assessment (Appendix K to the Draft EIR) and Operational Health Risk Assessment (Appendix B to the Draft EIR) to the Draft EIR were prepared pursuant to the requirements and guidelines set forth by SCAQMD and OEHHA. As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project would result in exposure of sensitive receivers to DPM as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant. Thus, no further analysis is required.

Comment O1.47: This comment states that the Health Risk Assessment air dispersion model uses the wrong height for the new building. The comment states that the model used a building with a 44-foot height when the Project proposes a building of 48 feet to 50 feet. The comment states that this changes the downwash effect for the model and that this difference will create an additional air quality impact that is not accounted in the County's analysis. The comment states that other buildings will also result in downwash, which should be accounted for in the model.

Response O1.47: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact and relies on speculation that changes to the model will result in significant impacts. Under CEQA Guidelines Section 15384, argument, speculation, unsubstantiated opinion or narrative, evidence that is not credible, and evidence of social and economic impacts does not constitute substantial evidence. The AERMOD model was re-run with the building height changed from 44 feet to 50 feet, and is included in Appendix A to the Final EIR. In addition, a grid receptor was added that covered the entire area on the south side of the project site, from the nearest homes to the majority of the Bloomington High School area. The revised pages from the Air Report are included as Final EIR Appendix A and show the changes in tracked changes and includes the revised Appendices with the revised AERMOD output files. As shown in the revised AERMOD model run, the changes to the AERMOD model run did not result in a higher cancer risk at any analyzed receptor. Therefore, the analysis of potential health risks in the Draft EIR accurately discloses potential impacts.

Comment O1.48: This comment states that guidance from SCAQMD does not require a 40-mile truck trip and provides a discussion from SCAQMD's Final Environmental Assessment and Adoption of Proposed Rule

2305 – Warehouse Indirect Source Rule (WAIRE). The comment states that the County's assumption that the 40-mile truck trip should be used is unsupported and insufficient to allow vehicles to travel to ports in Los Angeles and Long Beach. The comment states that this truck trip length is also inconsistent with other trip lengths assumed in County CEQA documents for similar warehouse projects, such as the Alabama/Palmetto Warehouse, which uses a truck trip length of 77 miles.

Response O1.48: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As detailed above in Response O1.34 the truck trip length of 40 miles per trip was based on a scientific report prepared by the SCAQMD and provides for a reasonable estimate of truck trip lengths within the Air Basin.

Comment O1.49: The comment states that the Draft EIR underestimates truck trip lengths for the Project and doesn't account for trip lengths to the Port of LA. The comment includes revised daily emissions based on an increased trip length to 65 miles. The comment states that the Draft EIR must be revised to calculate truck emissions based on reasonably foreseeable and accurate truck trip lengths.

Response O1.49: The comment does not provide substantial evidence of any environmental impact. As detailed above in Response O1.34 the truck trip length of 40 miles per trip was based on a scientific report prepared by the SCAQMD and provides for a reasonable estimate of truck trip lengths within the Air Basin. Further, as demonstrated by the Commenter, changing trip lengths to 65 miles would continue to result in emissions below SCAQMD thresholds. Thus, no further response is warranted.

Comment O1.50: This comment states that the County uses trip rates from a 2016 study of High-Cube Warehouse Distribution Centers by SCAQMD that are lower than other ITE vehicle trip rates. The comment provides other ITE trip rates for fulfillment center warehouse- non-sort (1.81 trips per 1,000 sf), fulfillment center warehouse- sort (6.44 trips per 1,000 sf), parcel hub warehouse (4.63 trips per 1,000 sf), and cold storage warehouse (2.12 trips per 1,000 sf).

Response O1.50: The comment does not provide substantial evidence of any environmental impact and relies on speculation. Under CEQA Guidelines Section 15384, argument, speculation, unsubstantiated opinion or narrative, evidence that is not credible, and evidence of social and economic impacts does not constitute substantial evidence. The Trip Generation and Vehicle Miles Traveled (VMT) Screening Analysis, included as Appendix J to the Draft EIR, trip generation used the trip rates provided by Institute of Transportation Engineer's *Trip Generation, 11th Edition, 2021* for High-Cube Transload and Short-Term Storage Warehouse and truck splits provided in the *SCAQMD Warehouse Truck Trip Study, 2017*. 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 Solver and Alder trip generation. Thus, the traffic analysis and high-cube warehouse land use designation is consistent with previously used methodology. 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. Therefore, the high-cube trip generation for the Slover and Alder Project is a reasonable representation of the potential Project impacts and complies with CEQA. The Project analysis utilizes ITE trip rates and SCAQMD truck splits which is recognized and used nationwide as a source and is consistent with other industrial projects in the Bloomington area and required by the adjacent jurisdiction. Thus, no further response is warranted.

Comment O1.51: This comment states that using the High-Cube Transload and Short-Term Storage Warehouse results in 363 trips daily, while using Fulfillment Center Warehouse-Sort rates results in 1,671 trips daily. The comment states that in the 2016 SCAQMD study, a value of 1.432 daily trips per 1,000 SF is pulled from a large dataset of transload and short-term storage high-cube warehouses, but does not produce an acceptable level of correlation to develop a fitted curve equation. The comment provides data

from the WSP Study for WRCOG and states that the value for number of daily trips per day utilized by the County is not supportable. The comment states that the County should reevaluate the Project's operational emissions using the SCAQMD rate of 1.68 or WRCOG rate of 2.13.

Response O1.51: 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. Since the Project does not propose a sort fulfillment center, the TUMF rates would incorrectly yield higher rates when applied to a regular high-cube warehouse. The comment also references the 2016 AQMD study. The 2016 AQMD study formed the basis of the ITE 11th Edition trip rates for High-Cube Warehouse land use. The ITE high-cube transload and short-term storage warehouse, land use 154, is validated through 91 surveys and provides enough data points to average the daily rates for the land use with a straight line equation and does not need a fitted curve equation. The Project analysis utilizes ITE which is recognized and used nationwide as a source and is consistent with other industrial projects in the Bloomington area and required by the adjacent jurisdiction. Therefore, the trip generation used in the Draft EIR and supporting analyses is a reasonable representation of the potential Project impacts and complies with CEQA.

Comment O1.52: This comment states that the Operational Health Risk Assessment only quantifies the health risk from exposure to DPM and does not quantify exposure to other TACs released in diesel exhaust. The comment states that elsewhere in Appendix B, the County lists other components of diesel exhaust. The comment states that the County must assess the air quality impacts for all TACs during Project construction and operation.

Response O1.52: The comment does not provide substantial evidence of any environmental impact and relies on speculation regarding potential health risk impacts. Under CEQA Guidelines Section 15384, argument, speculation, unsubstantiated opinion or narrative, evidence that is not credible, and evidence of social and economic impacts does not constitute substantial evidence. As detailed above in Response to Comment O1.24, DPM includes both the gas and particle components created by diesel engines. The Air Report went above and beyond what is required by providing Table A that lists all of the TAC pollutants that make up diesel exhaust and by calculating an Acute Potency Factor from these TACs, since OEHHA has not assigned an Acute Potency Factor for DPM since it is a negligible amount. As such, the Commenter is not correct in the claim that all toxic air compounds from diesel exhaust were not analyzed.

Comment O1.53: This comment states that by omitting analysis of all potential TACs, the HRA underestimates the risk from diesel trucks. The comment states that without a complete analysis, the County cannot say with certainty that operational emissions would not exceed the 10 in one million risk threshold or cancer value of 0.5. The comment states that the County must address this underestimation in a revised Draft EIR.

Response O1.53: The comment does not provide substantial evidence of any environmental impact and relies on speculation regarding potential health risk impacts. Under CEQA Guidelines Section 15384, argument, speculation, unsubstantiated opinion or narrative, evidence that is not credible, and evidence of social and economic impacts does not constitute substantial evidence. The Commenter claims that the omission of analyzing all potential TACs that will be released by the Project that the HRA underestimates the risk from diesel trucks and fails to consider any of the gasoline emission TACs. As detailed above in Responses O1.24 and O1.52, the TAC emissions risks from diesel trucks were analyzed completely. According to the SCAQMD, the only potentially significant TAC risk from gasoline is associated with the transfer and dispensing of gasoline, which typically only occurs at gas stations. The Project does not include any gas dispensing facilities, as such the TAC risk from gasoline is negligible. Therefore, the Draft EIR and supporting HRA adequately and accurately analyzed potential health risk impacts from the use of diesel trucks and impacts would be less than significant.

Comment O1.54: This comment states that the Draft EIR contains PDFs intended to reduce emissions which are not enforceable and will not have a significant impact on NOx and DPM emissions onsite. The comment states that the PDFs assume that impacts are less than significant. The comment stats that the County offers no explanation as to why model year 2010 is the baseline value for heavy-duty vehicles onsite and the County should choose newer age models.

Response O1.54: The comment does not provide substantial evidence of any environmental impact. This comment does not provide any substantial evidence that the Project's proposed PDFs are inadequate. 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, and are fully enforceable by the County. As detailed on Draft EIR page 5.2-37, 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"[2]. 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, 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. Additionally, the use of 2010 model year heavy duty trucks as baseline is pulled directly from the Attorney General's best practices, which states that these engine standards are currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. 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)). Due to market infeasibility of limiting trucks to model years newer than 2010, the PDF will not be revised to limit access to the site beyond what is included in PDF AQ-9.

Comment O1.55: This comment provides a summary of CARB's EMFAC model in relation to modeling emissions from on-road heavy duty trucks. The comment provides EMFAC emissions estimates for heavy duty vehicles for model years 2010 through 2022 and states that the County must reassess the impact of restricting the model years of vehicles in PDF AQ-3 and AQ-9 to newer models than 2010 in a revised Draft EIR.

The comment states that PDF AQ-16 in the Draft EIR requires the Project to power all standby emergency generators with non-diesel fuel; however, the air quality analysis did not assess emissions from alternatively fueled backup generators. The comment states that this underestimates emissions.

Response O1.55: The comment does not provide substantial evidence of any environmental impact. This comment does not provide any substantial evidence that the Project's proposed PDFs are inadequate. The Commenter claims that PDF AQ-3 and AQ-9 should be revised to use newer than 2010 model trucks and provides calculations to show that if newer model trucks were used, the Project would create less emissions. It should be noted that the Draft EIR found less than significant air quality impacts for construction and operation and no mitigation was necessary to reduce the impacts to less than significant. The Project

[2] https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf

applicant has committed to PDF AQ-3 and AQ-9 to go above and beyond what is required. Furthermore, the Project would implement Mitigation Measure AQ-1, which requires the use of Tier 4 equipment during Project construction. There is no justification for the Commenter's request to change these two PDFs.

Furthermore, the County disagrees with the assertion that the Draft EIR does not disclose whether the Project will require backup generators and must analyze the use of generators. The Project proposes the development of industrial speculative warehouse buildings and the end users are not known at this time. As the end users of the Project have not been identified, it is not known if backup generators would be needed for the building. Backup generators would only be used in the event of a power failure and would not be part of the Project's normal daily operations. If backup generators are required, the end user would be required to obtain a permit from the South Coast Air Quality Management District (SCAQMD) prior to installation. Emergency backup generators must meet SCAQMD's Best Available Control Technology (BACT) requirements and comply with SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines), which would minimize emissions. As the end users and future tenants of the proposed Project are unknown, the need for emergency backup generators is speculative. Under CEQA Guidelines Section 15384, argument, speculation, unsubstantiated opinion or narrative, evidence that is not credible, and evidence of social and economic impacts does not constitute substantial evidence. Backup generators Thus, no further response is warranted.

Comment O1.56: This comment states that the Project is in the fallout zone for the former Kaiser Steel Mill site because the Project site resides less than 4.5 miles from the edge of the former Kaiser Mill site. The comment provides a summary of analysis done regarding carcinogenic emissions from the Kaiser Steel Mill.

Response O1.56: The comment does not provide substantial evidence of any environmental impact. The area containing the former Kaiser Steel Mill facility is located approximately 5.16 miles northwest of the Project site. Therefore, the Project site is located a significant distance away from the former Steel Mill facility and there is no substantial evidence of any soil contamination in relation to the mill at the Project site. Further, should any contaminated soils be encountered during Project construction, Project contractors would be required to follow standard construction best practices. Any removal of hazardous materials will be completed in accordance with applicable regulations by workers with the hazardous waste operations and emergency response (HAZWOPER) training, as outlined in 29 CFR 1910.120 and 8 CCR 5192. Nevertheless, the Commenter's assumption that onsite soils are contaminated by heavy metals associated with the Kaiser Mill site is speculative and does not rise to the level of substantial evidence. Under CEQA Guidelines Section 15384, argument, speculation, unsubstantiated opinion or narrative, evidence that is not credible, and evidence of social and economic impacts does not constitute substantial evidence.

Comment O1.57: This comment states that emissions from the plant would have covered the Project site for decades and present a REC to the site that was not identified in the Draft EIR. The comment states that mechanically disturbing soils will release impacted soils and impact offsite residences.

Response O1.57: The comment does not provide substantial evidence of any environmental impact. The commenter is referred to Response O1.56. In addition, Project construction would be required to comply with SCAQMD Rule 403, which would limit fugitive dust from site construction activities. As such, there is no evidence supporting the need for preparation of a Phase II Environmental Site Assessment and the Draft EIR's analysis of hazardous materials is adequate.

Comment O1.58: This comment states that the Project site has been used for agricultural production and multiple other hazardous materials. The comment states that the Draft EIR fails to address whether any hazardous materials releases have occurred onsite and the County should prepare a revised EIR.

This comment concludes the letter and states that the Project would result in significant impacts and a revised Draft EIR should be prepared.

Response O1.58: The comment does not provide substantial evidence of any environmental impact. With respect to the Site's agricultural history, the Site was historically used for agricultural purposes dating from at least 1938 to between 1948 and 1953. Organochlorine pesticides (OCPs) were used extensively from the 1940s through the 1960s in the agricultural industry, although any residual OCPs within Project site soils would be expected to have attenuated over time. Arsenic may also be found in old agricultural soils and also exists at high, naturally-occurring background concentrations throughout Southern California. OCPs and arsenic in soils are a Business Environmental Risk to the property. As disclosed in Appendix F to the Draft EIR, Apex identified no evidence of storage or mixing areas for the historical use of agricultural chemicals at the Site. Although the presence of residual pesticides and heavy metal-containing herbicides is common in relation to sites historically used for agricultural purposes, the contemplated redevelopment of the Project site, which would result in the majority of the subject property being covered by buildings, hardscapes or landscaping, thereby preventing long-term exposure to soil potentially affected by historical agricultural use, suggests that the historical agricultural use of the subject property is unlikely to represent an environmental concern. Furthermore, the Phase I ESA did not identify any evidence of other hazardous material releases from current or former site activities. As such, there is no evidence supporting the need for preparation of a Phase II Environmental Site Assessment and the Draft EIR's analysis of hazardous materials is adequate.

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 O1.59: This comment provides Dr. Clark's professional experience.

Response O1.59: 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 O1.60: This comment provides the CalEEMod analysis associated with the comment letter.

Response O1.60: The updated CalEEMod analysis included in this comment does not provide substantial evidence of any environmental impact. The Commenter provided a CalEEMod model run that are not based on the Project conditions. As such the CalEEMod model run is not relevant to the Project. The commenter is referred to O1.23.

Comment O1.61: This comment states that Smart Mobility has reviewed the trip generation, VMT analysis, and GHG analysis for the proposed Project and finds that the trip generation is uncertain and could be higher; the VMT analysis uses a more lenient threshold; warehouse commutes are longer than the screening model indicates; the Draft EIR should include mitigation for VMT; and average truck trip length is underrepresented.

Response O1.61: The comment is introductory in nature and does not include specific or substantial evidence of significant impacts or errors in the Draft EIR. Therefore, no further response is required.

Comment O1.62: This comment provides multiple different trip generation rates for high-cube warehouses and states that the trip generation of high-cube transload and short-term storage warehouse is the lowest trip rate.

Response O1.62: The comment does not provide substantial evidence of any environmental impact and relies on speculation. Under CEQA Guidelines Section 15384, argument, speculation, unsubstantiated opinion or narrative, evidence that is not credible, and evidence of social and economic impacts does not constitute substantial evidence. The Trip Generation and Vehicle Miles Traveled (VMT) Screening Analysis, included as Appendix J to the Draft EIR, trip generation used the trip rates provided by Institute of Transportation Engineer's *Trip Generation, 11th Edition, 2021* for High-Cube Transload and Short-Term Storage Warehouse and truck splits provided in the *SCAQMD Warehouse Truck Trip Study, 2017*. 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 Solver and Alder trip generation. Thus, the traffic analysis and high-cube warehouse land use designation is consistent with previously used methodology. 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. Therefore, the high-cube trip generation for the Slover and Alder Project is a reasonable representation of the potential Project impacts and complies with CEQA. The Project analysis utilizes ITE which is recognized and used nationwide as a source and is consistent with other industrial projects in the Bloomington area and required by the adjacent jurisdiction. Thus, no further response is warranted.

Comment O1.63: This comment states that there is no justification for the Draft EIR's trip rates and provides a description of the WRCOG WSP study. The comment provides a summary of the WSP trip rates states that Amazon facilities have an especially high trip rate. The comment states that other businesses are copying many of Amazon's logistics methods so the higher rate is applicable to other projects, including the proposed Project. The comment states that to be conservative, the Draft EIR should apply the Amazon trip generation rate or even higher if parcel hub tenants are possible in the Project.

Response O1.63: 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. Since the Project does not propose a sort fulfillment center, the TUMF rates would incorrectly yield higher rates when applied to a regular high-cube warehouse. Additionally, as the Project does not propose a parcel hub facility, utilization of the Amazon rates or another parcel hub rate would yield inaccurately high results that do not accurately reflect Project conditions. The comment also references the 2016 AQMD study. The 2016 AQMD study formed the basis of the ITE 11th Edition trip rates for High-Cube Warehouse land use. The ITE high-cube transload and short-term storage warehouse, land use 154, is validated through 91 surveys and provides enough data points to average the daily rates for the land use with a straight line equation and does not need a fitted curve equation. The Project analysis utilizes ITE which is recognized and used nationwide as a source and is consistent with other industrial projects in the Bloomington area and required by the adjacent jurisdiction. Therefore, the trip generation used in the Draft EIR and supporting analyses is a reasonable representation of the potential Project impacts and complies with CEQA.

Comment O1.64: This comment states that the Project is located in unincorporated San Bernardino County and only meets the SBCTA VMT Screening since it is in the unincorporated County. The comment provides a new screening of the Project site using the year 2022 and states that the Project site passes the screening. The comment states that if the SBCTA VMT Screening tool is applied to parcels immediately across, the parcels do not pass the threshold or VMT screening. The comment states that for the parcels to the north, the City of Fontana threshold is applied while the Project parcels rely on unincorporated thresholds. The comment states that these threshold and low VMT areas in the SBCTA model are arbitrary as Bloomington is just as urbanized as Fontana.

Response O1.64: The comment does not provide substantial evidence of any environmental impact. The Project applies the VMT thresholds that are applicable by the County's TIA guidelines. The SBCTA screening tool is based on SBTAM transportation model for the County which takes into account all planned land uses per Countywide land use designations and assigns trip distribution based on County socio-economic data. As such, SBTAM models are based on land uses derived from the Countywide Plan, which include industrial uses in the Project vicinity. The County's guidelines apply to all unincorporated areas of the County including the Project site. The Project would not need to utilize the City of Fontana's VMT per employee threshold as it is not within the City of Fontana. The threshold set by the County is based off the results of SBTAM and the TAZ in which the Project is located; therefore, it does not provide an apples-to-apples comparison to areas within Fontana or Rialto. Thus, additional VMT analysis would not be required and no further response is warranted.

Comment O1.65: This comment states regional travel demand models are commonly used to estimate VMT metrics, but these models are not necessarily accurate. The comment states that warehouse jobs are difficult and many people in the workforce are not capable of doing them. The comment states that the availability of warehouse workers is decreasing, and the SBCTA travel demand model is incapable of forecasting longer average commute distances caused by warehouse worker scarcity. The comment states that using LODES data, there are many long commutes today into Bloomington, and the resulting mean commute VMT per employee is 30.2, which is much higher than the 16.3 estimate given in the Draft EIR. The comment states that therefore, the Project does not satisfy the low VMT screening and would result in significant impacts that should be addressed by additional VMT analysis.

Response O1.65: The comment does not provide substantial evidence of any environmental impact. The commenter erroneously assumes that any worker in the SBCTA model will fill any sort of job in the model which segments commute only within three broad income categories. The statement footnotes the SBTAM model user guide. This statement lacks technical understanding and reflects the inexperience of the commenter with the SBTAM transportation model. The model socio-economic data includes model inputs based on different industries such as education, transportation, retail, medical etc. and also includes population data and household data which helps understand the number of people travel who to work outside their immediate neighborhood. The SBCTA VMT screening tool which uses SBTAM analyzes people travelling to any parcel from the neighboring counties, San Bernardino County, and also within the vicinity of the Project site. The VMT conducted for the Draft EIR follows the San Bernardino County Transportation Analysis guidelines. Based on the County Guidelines, projects within a low VMT area are presumed to have a less than significant impact on VMT and are therefore exempt from further VMT analysis. Because the Project is located within a low-VMT area, it is presumed to have less than significant impacts and therefore does not need any mitigation measure for VMT reduction.

Comment O1.66: The comment states that transportation demand management is challenging in the Project area. The comment states that the Project should include VMT mitigation, such as employer-sponsored vanpools.

Response O1.66: The comment does not provide substantial evidence of any environmental impact. As discussed in Response O1.20 above, the VMT thresholds that are applicable are based on the County Transportation Analysis Guidelines. The 16.30 vehicle miles traveled/employee is the average of all the trips assumed by the SBTAM model to/from the proposed Project site. These trips range from within the immediate vicinity of the Project to the longer distances in the County of San Bernardino. This trip distribution is mathematically based on socio-economic data in the County. The transportation analysis therefore adequately represents the VMT, and the VMT impacts are found to be less than significant. Thus, the Project would not be required to account for higher employee VMT or propose mitigation measures as impacts would remain less than significant. As such, there is no nexus for requiring an employer-sponsored vanpool as impacts related to VMT are less than significant. Thus, no further response is warranted.

Comment O1.67: This comment states that the Draft EIR underestimates trip lengths and that the average commute distance to Bloomington is about 22.3 miles, which is higher than what the Draft EIR assumes. The comment states that a truck trip length of 65 miles should be used. The comment states that a higher trip generation rate and increased trip lengths would translate into higher GHG emissions and the Draft EIR, therefore, underestimates Project-generated GHG emissions.

Response O1.67: The comment does not provide substantial evidence of any environmental impact. The commenter provides no evidence supporting their claims that the Draft EIR fails to adequately disclose truck and worker trip lengths. Under CEQA Guidelines Section 15384, argument, speculation, unsubstantiated opinion or narrative, evidence that is not credible, and evidence of social and economic impacts does not constitute substantial evidence. The proposed Project would be used for warehouse uses and the trip generation is consistent with previously used methodology and was reviewed and approved by the County of San Bernardino Public Works Department. As discussed on Page 43 of the *AQ GHG Energy Analysis and HRA* included as Appendix A of the Final EIR, according to *Review of SCAQMD Staff Comments and Testimony on Warehouse Projects*, prepared by Southern California Leadership Council, March 14, 2014, SCAQMD requires that truck trip length should be set to 40 miles in CalEEMod. In order to account for the longer truck trip length in CalEEMod, the 75 daily truck trips were analyzed under the "Parking Lot" land use because the parking lot use generates no vehicle trips on its own so it was an available placeholder allowing analysis solely of the project's trucks without mixing the trucks with any other trip-generating use.

Therefore, the analysis is consistent with SCAQMD methodology for a project 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. In regard to trip rates, the commenter is referred to Response O1.63. Therefore, the Draft EIR adequately and accurately analyzes potential impacts related to GHG emissions and impacts would be less than significant.

Comment O1.68: This comment provides Mr. Marshall's professional experience.

Response O1.68: 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.

LETTER O2: Center for Community Action and Environmental Justice (13 pages)

1

Aug 22, 2022

San Bernardino County Planning Commission

Aron Liang– San Bernardino County Senior Planner Aron.Liang@lus.sbcounty.gov

Re: Notice of Opposition to Draft Environmental Impact Report SCH: 2021120526.

Project: The Project proposes to demolish the existing single-family residences and commercial/industrial buildings and develop an approximately 259,481 square foot high-cube warehouse building, inclusive inclusive of 5,000 square feet of office space, a 2,975 square foot mezzanine, and 38 dock doors along the north side of the building, facing Slover Avenue on approximately 13.23 acres. The proposed building would be 48 feet in height to the roof and 50 feet in height to the parapet. O2.1

Location: Within Bloomington, the Project site is bounded by Slover Avenue to the north and by Alder Avenue to the west. The Project site consists of seven generally rectangularly-shaped parcels that together comprise 13.23 acres. The Assessor Parcel Numbers (APN) for the site include 0256-031-07 through 10, and 0256- 031- 17 through 19.

Sensitive Receptors: three homes directly adjacent to the south, one west, Bloomington High School (330 feet; 2,314 students), Ruth O. Harris Middle School (3,500 feet; 670 students), Sycamore Hills Elementary School (3,615 feet; 725 students), Sycamore Hills Park (4,065 feet), and Walter Zimmerman Elementary School (4,500 feet; 578 students) are within a mile radius of the project.

CalEnviroScreen 4.0 Tract: 6071002601 Population 9,594

Proposal: Industrial to facilitate development of a 259,481 square foot industrial warehouse building.

Honorable Planning Commission,

It is with great concern that the community of Bloomington, Rialto, Fontana, Colton, and surrounding communities draft this letter of opposition to SCH 2021120526. The environment is our most valuable resource and we have become increasingly concerned with the amount of pollution our children have faced due to the exponential growth of warehouses. ***The children of Bloomington struggle to breathe as diesel fuel byproducts rip through their bodies like shrapnel in war. In the morning the evidence of this war is in pools of blood from their noses. Approving warehouse after warehouse without considering the cumulative impacts means the children of Bloomington are being sold to developers like Duke, who refuse to mitigate the pollutants that they will bring to an Environmental Justice Focus Area.*** O2.2

The effects of pollution on our children's health is like shrapnel in their tiny lungs
A Draft Environmental Impact Report is presented before you with the EXPECTATION that San Bernardino County leadership will approve SCH 2021120526 despite the EIR's refusal to mitigate the impact on the community. The applicant Duke Realty strategically failed to report the true Health, Traffic, Air Quality, Energy, and Water Quality impacts this project will burden the community with and has strategically refused to mitigate the health impacts to our most sensitive receptors: our children and the elderly.

Industrial development, such as the proposed 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 Project will expose our communities to elevated levels of air pollution. Residences are located south and west of the Project with the closest O2.3

2

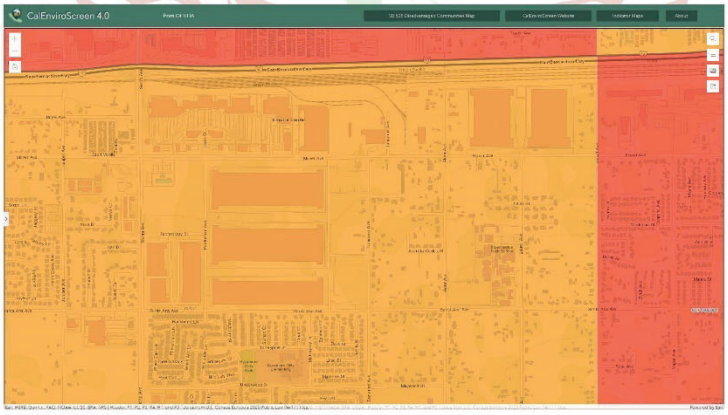
residences located directly adjacent the Project's southern boundary. In addition to the residences, Bloomington High School (330 feet), Ruth O. Harris Middle School (3,500 feet), Sycamore Hills Elementary School (3,615 feet), Sycamore Hills Park (4,065 feet), and Walter Zimmerman Elementary School (4,500 feet) are all located within a mile radius of the project with several other sites lying just over a mile away. According to the California Communities Environmental Health Screening Tool Version 4.0 (CalEnviroScreen). This Draft EIR is also in violation of the Countywide Plan, the County of San Bernardino's General Plan, and it is for this reason the applicant is asking for special considerations with the intent of bypassing the legal requirements of land use, zoning, elevations, landscaping, and quality of life.

O2.3 Cont.

The NOP received comments from the Colton Unified School District reminding of the schools in the area and that more considerations must be taken for sensitive receptors. Most offensive to Bloomington's children the applicant refused to mitigate the impact of idling trucks would have to the students of Bloomington High School (330 feet) by installing a mason wall, in contrast to scientific data, AQMD, and CARB recommendations that sensitive receptors should have a minimum of 1,000 ft buffering distance and mitigation should occur with the use of physical boundaries and trees that are efficient in $PM_{2.5}$ scrubbing, such as cypress trees, live oak trees, and pine trees (mediterranean pines). With the homes hundreds of feet from this project, the response from the analysis is that their project would have little impact on a community that is already defined as in the 91% of the worst air quality in the state. In essence, the developer is stating that the community of Bloomington is a community that is disposable and mitigations are just not worth the investment.

O2.4

Image 1. CalEnviroScreen 4.0 data for the APN: 0256-031-07 through 10, and 0256- 031-17 through 19 SCH 2021120526



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CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE

"Bringing People Together to Improve Our Social and Natural Environment"

Table 1. Date from the CalEnviroScreen 4.0 shows this tract with 91% pollution burden

Census Tract: 6071004001	
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	71
Pollution Burden Percentile	97
Population Characteristics Percentile	41
Exposures	
Ozone	95
Particulate Matter 2.5	94
Diesel Particulate Matter	78
Toxic Releases	85
Traffic	80
Pesticides	18
Drinking Water	96
Lead from Housing	42
Environmental Effects	
Cleanup Sites	83
Groundwater Threats	14
Hazardous Waste	94
Impaired Waters	0
Solid Waste	87
Sensitive Populations	
Asthma	44
Low Birth Weight	20
Cardiovascular Disease	55
Socioeconomic Factors	
Education	73
Linguistic Isolation	35
Poverty	51
Unemployment	51
Housing Burden	27

Bloomington parents are constantly changing pillowcases from bloody noses, missing work/school for asthma attacks, and facing overwhelming medical bills from the impacts of the poor air quality in Bloomington. There are several sources of air pollution which are concerning for our community: Ozone and Particulate Matter (PM). Within the PM category there are two sizes PM_{10}, which is the large dust that used to block our views of the mountains, which is made up of dust and particles that you can see. $PM_{2.5}$ is a microparticle that we cannot see but is able to pass directly into the bloodstream and pass the blood brain barrier having long term impacts such as: heart damage, respiratory illness, hepatic diseases, hematological diseases, neurological disorders, pulmonary diseases, mental health impacts, intellectual delays, and the list goes on. CalEPA has set the threshold for $PM_{2.5}$ at 12ppb, but as you can see in Image 5, Bloomington is often 200 times the healthy threshold.

O2.4 Cont.

We are concerned with the potential cumulative health impacts associated with the construction and operation of the Project. In reviewing the data provided in this DEIR, our community is concerned about the air pollution and health risk impacts that would result from the proposed project. Bloomington's air quality has become similar to China's Air Quality, where they do not have such stringent regulations.

O2.5

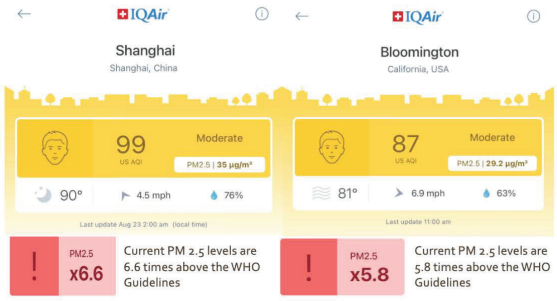
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3

4

Image 2. A comparison of Air Quality in Shanghai China, and Bloomington Ca on 8/22/2022. China does not have stringent regulations, and it appears that SAn Bernardino Fails to enforce them!



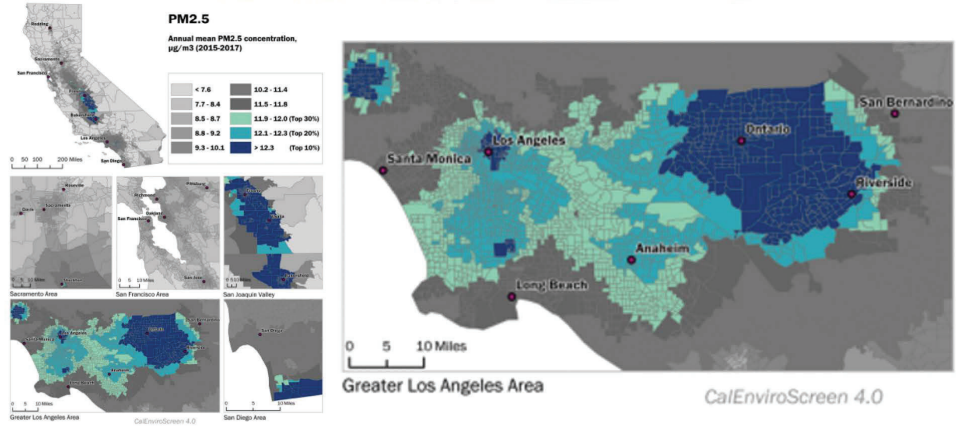
AQI Value Of Index	Levels of Health Concern	$PM_{2.5}$ Conc. (µg/m³)	PM_{10} Conc. (µg/m³)	Daily AQI Color	Air Pollution Level
0–50	Good	0–12	0–54	green	Level 1
51–100	Moderate	12.1–35.4	55–154	yellow	Level 2
101–150	Unhealthy for sensitive groups	35.5–55.4	155–254	orange	Level 3
151–200	unhealthy	55.5–150.4	255–354	Red	Level 4
201–300	Very unhealthy	150.5–250.4	355–424	Purple	Level 5
301 and Higher	Hazardous	250.5–Higher	425–Higher	Maroon	Level 6

O2.5 cont.

This Project is going to this community which is already in the 97th percentile of Pollution Burden including our Air, Water, and overall, Health impacts according to CalEnviroScreen 4.0, to a higher burden level. This project will decrease the life expectancy in our community and impact them financially as Bloomington parents take seven sick days per year to care for children negatively impacted by our pollution for things like migraines, asthma attacks, respiratory issues, diabetes, and neurological disorders. According to the World Health Organization, the American Heart Association, the American Lung Association, and the American Pediatric Association, all these ailments have links to diesel pollutants. This project would exponentially increase this risk of life long diseases that increase health costs, decrease life expectancies, and reduce the quality of life. How can you enjoy any life, if you cannot breathe?

O2.6

Image 3. Data from Cal EPA showing Bloomington more than the 12-ppb standard that is acceptable for sensitive receptors. Bloomington is often 40-120 percent above health guidelines.



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5

This project is near residences and schools that are burdened by multiple air pollution sources, the applicant must prepare a health risk assessment (HRA) for the Project. The HRA should account for all potential operational health risks from Project-related diesel PM emission sources, including, but not limited to, back-up generators, on-site diesel-powered equipment, and heavy-duty trucks. The HRA should also determine if the operation of the Project in conjunction with past, present, and reasonably near future projects or activities would result in a cumulative cancer risk impact on nearby residences. To reduce diesel PM exposure and associated cancer risks, the County and applicant should include all applicable air pollution reduction and provide onsite air quality monitoring equipment. It is the responsibility of the County to ensure that public health and safety is the priority. This DEIR fails to deliver for the people of Bloomington.

Image 4.Screen capture from DEIR, showing that the project understands the critical health impacts this would have on the environmental justice focus area (EFJA), but decide Bloomington does not deserve innovative mitigation steps to protect the people of color who live here.

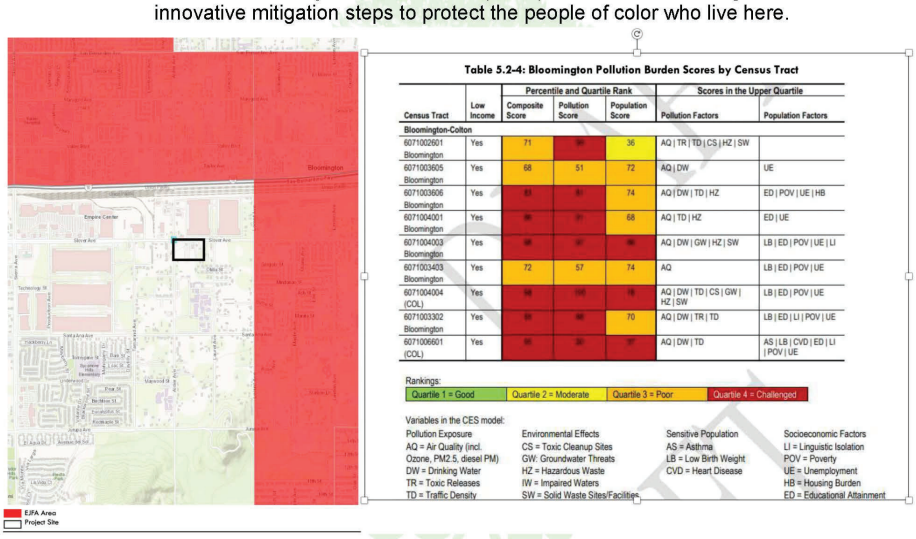


Table 5.2-4: Bloomington Pollution Burden Scores by Census Tract

Census Tract	Low Income	Percentile and Quartile Rank: Composite Score	Pollution Score	Population Score	Scores in the Upper Quartile: Pollution Factors	Population Factors
Bloomington-Colton						
6071002601 Bloomington	Yes	71	90	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	90	91	68	AQ | TD | HZ	ED | UE
6071004003 Bloomington	Yes	98	97	96	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	89	86	70	AQ | DW | TR | TD	LB | ED | LI | POV | UE
6071006601 (COL)	Yes	95	90	97	AQ | DW | TD	AS | LB | CVD | ED | LI | POV | UE

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

EJFA Area
Project Site

O2.7

Images 1,2, 3, 4, and 5 illustrate the $PM_{2.5}$ burden the community is facing. $PM_{2.5}$ exposure has a direct impact on our reproductive rights. Maternal exposure to fine and ultrafine Particulate Matter (PM) directly and indirectly yields numerous adverse birth outcomes and impacts on children's respiratory systems, immune status, brain development, and cardiometabolic health. The biological mechanisms underlying adverse effects include direct placental translocation of ultrafine particles, placental and systemic maternal oxidative stress and inflammation elicited by both fine and ultrafine PM, epigenetic changes, and potential endocrine effects that influence long-term health. Recent studies have also shown that elevated $PM_{2.5}$ levels have an adverse effect on sexual function in men. The function of penile erection is impaired by exposure to $PM_{2.5}$. The decrease in the expression of endothelial nitric oxide synthase NOS activity in penile cavernous tissue caused by systemic inflammatory and oxidative stress status induced by exposure to $PM_{2.5}$ may be one of the important risk factors of erectile

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dysfunction. In addition to erectile dysfunction science has found that $PM_{2.5}$ exposure is linked to hair loss and male pattern baldness as recent studies have concluded. O2.7 Cont.

The common phrase that we hear from developers and the data being generated in Environmental Impact Reports is that our air quality meets the nonattainment classification. "Nonattainment" is the technical term that simply means an area has too much of one of the nation's most widespread and dangerous air pollutants, such as ozone. It means that an area must clean up emissions to reach, or "attain," the official, health-based limits for that pollutant. However, what we have seen developers conclude is that the air quality is so poor that there is nothing that can be done to mitigate the air quality that they have the **RIGHT** to further increase the pollution levels. This was not the intent of the Clean Air Act which gives everyone the right to protection from air pollution above the legal limit. It is clear from Images 1-5 that this community has far exceeded the EPA's guidelines of 70 ppb Ozone and 12ppb $PM_{2.5}$ but yet we are not holding developers accountable to prevent the damage they are causing to unborn children still in their mother's womb, to the children directly impacted, and to sexual perfromance in males. The nonattainment reflects the inaction of Community Leaders to demand mitigation, it does not grant permission to developers to continue to pollute without ramifications. For this reason, the Planning Commission's must reject this project and demand mitigations. When you know better, you should do better! O2.8

The planning commision is an important role in our communities. Projects may look through the lense of their sole impact, but SB1000 demands that the planning commission hold the developers accountable to consider the cumulative impacts on the entire community. The role is to protect the community and develop methods to mitigate the entire region to improve air quality. Although, $PM_{2.5}$ levels are regulated, it is recognized that minority and low socioeconomic status groups experience disproportionate exposures. Consequently, preventive strategies that inform neighborhood/regional planning and clinical/nutritional recommendations are needed to mitigate maternal exposure and ultimately protect children's health.

The unborn and the born are under attack as the PM rips through their bodies like shrapnel in war. This plan fails to mitigate any of the impacts, as this is a speculative project and in fact we do not know for certain any of the truck traffic volumes as this DEIR grossly under represents the true cost of: road damage, time spent in traffic, pollution burdon, health impacts, days of worked missed, lower quality of life, and over all shortened life expectancy that such a project would have on this community at every economic level. In fact, because this project fails to deliver innovative or meaningful mitigation the impact becomes a form of forced sterilization, as erectile dysfunction and impacts on the female reproductive system occurs when the female fetus is still in utero. With the data presented in this letter, and the data in the DEIR created by the developer it is clear that this project has the potential to reduce the birth rate of people of color. Duke's refusal to offer meaningful mitigation to protect reproductive rights of men and women of the community harken to the California Eugenic Laws, which were repealed in 1979. Recently, Assemblymember Wendy Carrillo, with Governor Gaven Newsom support, introduced AB1007 so that victims could be compensated for such violation of a basic human right. Is it time to hold developers who knowingly fail to mitigate O2.9

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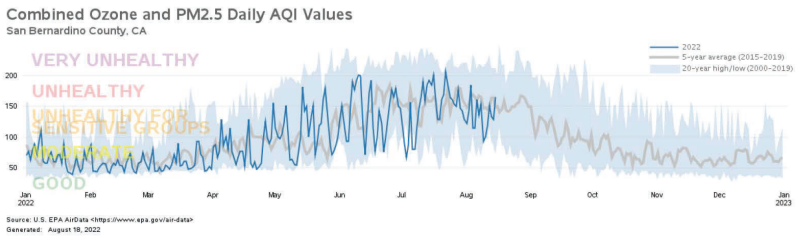
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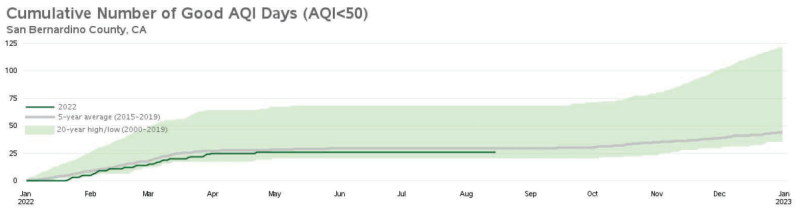
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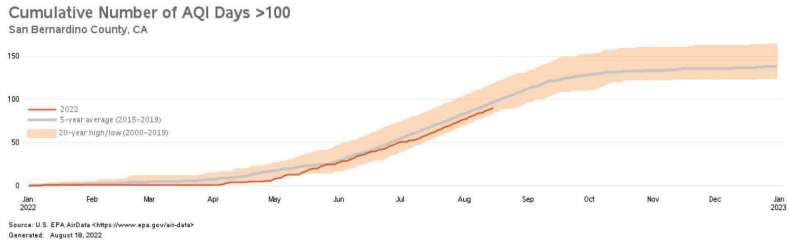
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pollutants that cause forced sterilization on disadvantaged and communities of color accountable?

Image 5. https://www.epa.gov/outdoor-air-quality-data/air-data-daily-air-quality-tracker







O2.9 Cont.

Although the Project description provided in the DEIR does state that the proposed warehouse would not be used for cold storage, there remains a possibility that trucks and trailers visiting the Project site would be equipped with Transport Refrigeration Units (TRUs). TRUs on trucks and trailers can emit copious quantities of diesel exhaust while operating within the Project-site. Residences and other sensitive receptors (e.g., daycare facilities, senior care facilities, and schools) located near where these TRUs could be operating would be exposed to diesel exhaust emissions that would result in a significant cancer risk impact to the nearby community. If the Project would be used for cold storage, the County must model air pollutant emissions from on-site TRUs in the

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DEIR, as well as include potential cancer risks from on-site TRUs in the Project's HRA. If the Project will not be used for cold storage, the County and applicant should include one of the following design measures in the EIR: A Project design measure requiring contractual language in tenant lease agreements that prohibits tenants from operating TRUs within the Project-site; or 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 and completes an updated EIR for those operations. O2.9 Cont.

The HRA prepared in support of the Project should be based on the latest Office of Environmental Health Hazard Assessment's (OEHHA) guidance (2015 Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments), and CARB's Hot Spots Analysis and Reporting Program (HARP2 model). The Project's mobile diesel PM emissions used to estimate the Project's cancer risk impacts should be based on CARB's latest 2021 Emission Factors model (EMFAC2021). Mobile emission factors can be easily obtained by running the EMFAC2021 Web Database: https://arb.ca.gov/emfac/.

The HRA should evaluate and present the existing baseline (current conditions), future baseline (full build-out year, without the Project), and future year with the Project. The health risks modeled under both the existing and the future baselines should reflect all applicable federal, state, and local rules and regulations. By evaluating health risks using both baselines, the public and planners will have a complete understanding of the potential health impacts that would result from the Project. In addition to the health risks associated with operational diesel PM emissions, health risks associated with construction diesel PM emissions should also be included in the air quality section of the EIR and the Project's HRA. Construction of the Project would result in short-term diesel PM emissions from the use of both on-road and off-road diesel equipment. O2.10

The OEHHA guidance recommends assessing cancer risks for construction projects lasting longer than two months. Since the DEIR states that construction would occur over a period lasting longer than two months, the HRA prepared for the Project must include health risks for existing residences near the Project-site during construction. The HRA should account for all diesel PM emission sources related to Project construction, including, but not limited to, off-road mobile equipment, diesel generators, and on-road heavy-duty trucks. As previously stated in Section I of this letter, the cancer risks evaluated in the construction HRA should be based on the latest OEHHA guidance and CARB's HARP2 model. The cancer risks reported in the HRA should be calculated using the latest emission factors obtained from CARB's latest EMFAC (currently EMFAC 2021) and off-road models. O2.11

Based on Pitzer College's Warehouse Cumulative Impact Tool, numbers associated with Bloomington data, the impact is high enough to merit a rejection of the project. Even while these numbers are an underestimation, the area and nearby neighborhoods are dealing with almost 26,445 truck trips per day, emissions of over 35 pounds per day O2.12

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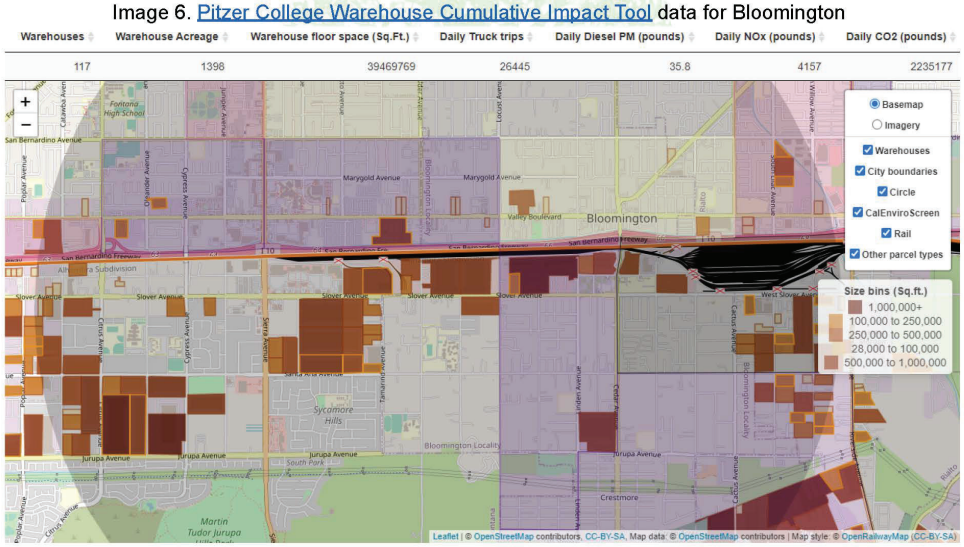
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of diesel particulate matter, over 4 thousand pounds of NOx per day, and more than 2.2 million pounds of carbon emitted per day. This project proposes 700 additional polluting trips a day. O2.12 Cont.

Table 2. Pitzer College Warehouse Cumulative Impact Tool data for Bloomington

Bloomington Warehouses Growth and Pollution Impact from 2010 to present 5Km Radius of the project	
Total Number of New Warehouses	117
Warehouse Acreage increase	1,398
Increase in Warehouse Floor Space (sf)	39,469,769
More Daily Truck Trips	26,445
Increase in Daily Diesel PM (pounds)	35.8
Increase in Daily NOx (pounds)	4,157
Increase inDaily CO_2 (pounds)	2,235,177

Image 6. Pitzer College Warehouse Cumulative Impact Tool data for Bloomington



The EIR fails to account for the massive amount of truck traffic on Cedar, Slover, and Alder. There are no realistic mitigations that would provide a drivable pathway for both the project and the community unless we make a dedicated truck onramp and offramp from the 10 freeway. This project in its Draft EIR is in violation of California Code Section 65302 amended by SB1000 section O2.13

> *(2)(A). Upon any substantive revision of the circulation element, the legislative body shall modify the circulation element to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways for safe and convenient travel in a manner that is suitable to the rural, suburban, or urban context of the general plan.*

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10

(B) For purposes of this paragraph, "users of streets, roads, and highways" mean bicyclists, children, persons with disabilities, motorists, movers of commercial goods, pedestrians, users of public transportation, and seniors.

O2.13 Cont.

It is apparent that the DEIR fails to mitigate per SB1000 requirements because the people of Bloomington have been strategically selected to endure an exponential increase of pollution because as the EnviroScreen 4.0 data (table 1) shows, they have a lower education level, high poverty, and are more linguistically isolated. The idea is "these people" will not fight back. If Duke had any intention of being a partner in the community they would not present mitigations that were contingent on the owner/tenant determining if the measure was feasible as seen in Image 7.

Image 7. Mitigation measures proposed Duke are dependant on "feasible" a bait and switch tactic used to get the project included with no reality of ever implementing real mitigation measures

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-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 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.

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.

O2.14

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 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 if feasible.

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 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.

County of San Bernardino 5.2-38
Draft EIR
June 2022

Duke Warehouse at Slover and Alder Project *5.2 Air Quality*

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.

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For example, to increase compliance to California Code 65302, we ask that all truck routes be painted on the main streets of traffic. All truck routes should be painted and Poka-Yoke (mistake proofing with clear visual aids) to be able to clearly tell the Truck Driver what lanes they should enter to get to the specific dock doors. Signage is essential to ensure that the drivers stay on the correct truck routes. The community is asking that each dock door have a plan for entry from the Freeway and as it transitions City to City along the streets surrounding the project. This will reduce idling time, and drivers from entering our communities and putting our community at risk of deadly truck accidents. We ask that this site install an air quality monitor to get a more accurate assessment of the pollution that this site creates. The project should include a pathway once in the project to allow for the conveyance of trucks to the dock door through electric automation, to eliminate idling of any kind once on the project site. The project should include a location for drivers to use the bathroom and eat at a local restaurant to prevent the following: O2.15

- *The epidemic of **BOTTLES OF URINE** and trash that litter our streets. This is a biological hazard to our entire community.*
- *The increased costs to our communities by Public Works having to exponentially increase services rather than hold the project accountable to properly plan for this.*
- *Truck parking in the middle of the streets to be able to get a bite to eat.*
- *Trucks being parked in residential communities.*
- *Trucks being parked in parking lots designed for Class C drivers.*

This project fails to properly mitigate GHG (Green House Gases) and instead is basing all its mitigation on the current CARB Draft plan. By stating that the project is mitigating GHG does not tip the scale for the millions of truck trips it will bring to our community a year. The community expects to see all 259,481 square feet be covered in solar panels, thus REQUIRING the project to be 100% self-powered from the day the project is completed. This building, powered by 100% onsite solar power would be a physical reminder that this project is not just about PROFITS, but PEOPLE! Regarding SB1000, the community demands that cumulative impacts are considered. To mitigate this, we propose all parking to be covered in Solar Panels, creating a micro grid for the community to have a source of shared power to the Bloomington Residents. This would show excellent partnership in the community and increase the community's confidence that we can partner with this developer. To mitigate VMT, the community is proposing that partnership with Transportation should include free public transportation to all workers within the warehouse. O2.16

In Image 7 Duke defines a mitigation measure PDF AQ-21, "The Project Owner /Tenant shall provide meal options onsite or shuttles between the facility and nearby meal destinations if feasible," this is insulting to all the thousands of children who will develop conditions that will shorten their lives, the men who will suffer erectile dysfunction, and the mothers and wives who will have to for care for sick children, and a flacid partner– who due to a failure in mitigation – feels inadequate in his manhood. O2.17

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The community would like all the businesses within the project to pay 6% of all revenue (on site and worldwide) to a scholarship fund to increase the trades, and health professions. We ask that this scholarship fund be provided to all residents of San Bernardino County in Partnership with Valley College. In the long run, this will prove to be beneficial to the project and the community, as trades will be in high demand for this project's longevity, and trades provide excellent union careers that increase our community's disposable income. Regarding this project increasing the health burdens on our communities, we will need more respiratory therapists and we will need scholarships to help meet the demand this project will have on our community. O2.18

We know urban green spaces such as parks and urban forests can help reduce heat and improve air quality. Recent systematic reviews have assessed a range of evidence to understand the benefits and value of urban trees, urban parks and the overall effectiveness of green space to reduce heat, ozone and ultraviolet (UV) radiation in urban areas (see Roy, Byrne & Pickering, 2012; Konijnendijk et al, 2013 and Bowler, Buyung-Ali, Knight & Pullin, 2010). Trees and plants have a varying capacity to capture and/or filter air pollution, improve air circulation and decrease ambient temperatures. We encourage that any and all projects encourage native species that are drought tolerant in place of grass. We also would like to ask that a standard for any landscaping include Live oak trees, cypress trees, mediterranean pines, and other plants that are carbon capturing. We would ask that there is a 500 foot offset from the property line that consists of two rings of trees. The inner ring would be a complete set of mature cypress trees, creating a noise and $PM_{2.5}$ buffer. The outer ring facing the community would consist of either live oak trees and or mediterranean pines to be planted at maturity of 15 to 20 feet in height. The community does not have time to wait for sapling trees to mature to scrub our air, we need full grown trees that can help scrub the air to prevent the shrapnel effects of contaminated air on children's lungs, the developing bodies of the unborn, the sanctity of a mothers womb, and the penile function of hardworking men bravely working in such an environment for their families. O2.19

If the County would advance this project it would violate not only the people of Bloomington but statute Title 14, Division 6, Chapter 3 of the California Code of Regulations as mitigation within the EIR is in violation of SB1000. California Code Section 65040.12(e) states that:

> *Fairness in the context means that the benefits of a healthy environment should be available to everyone, and the burdens of pollution should not be focused on sensitive populations or on communities that are already experiencing its adverse effects.*

O2.20

We reject the applicants misleading EIR SCH: 2021120526 and encourage the County to be in alignment of Code Section 65302 regarding disadvantaged communities.

> ***Disadvantaged Communities*** *means an area identified by the California Environmental Protection Agency pursuant to Section 39711 of the Health and Safety Code or an area that is a low-income area that is disproportionately affected by environmental pollution and other hazards*

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that can lead to negative health effects, exposure, or environmental degradation.

The data is readily available to identify this community as a **Disadvantaged Community**, and therefore it is the responsibility of the County of San Bernardino to protect the community pursuant to California Code Section 65858(a):

> *The legislative body of a county, city, including a charter city, or city and county, to protect the public safety, health, and welfare, may adopt as an urgency measure an interim ordinance prohibiting any uses that may be in conflict with a contemplated general plan, specific plan, or zoning proposal that the legislative body, planning commission or the planning department is considering or studying or intends to study within a reasonable time.*

O2.20 Cont.

Therefore, the approval of such a project would be a dereliction of duty by the County of San Bernardino. We encourage you to reject the proposed Projects. There are developers and planners who like to convince our local leaders that:

> *"The city/county cannot tell a property owner what to do on their land."*

However, California Code Section 65858(a) as quoted above clearly states that statute allows for urgent measures such as a **WAREHOUSE MORATORIUM**, for the protection of public safety, health, and welfare. In a recent action against Moreno Valley AG Bonta stated:

> "*We're intervening today so that those communities do not continue to bear the brunt of poor land use decisions that site* warehouses *outside their doors*."

CCAEJ in partnership with the community of Bloomington urges you to not certify the EIR and deny the Conditional Use Permit.

Sincerely,

Amparo Muñoz
Policy and Special Projects Director (she/her/hers)

CCAEJ is a long-standing community-based organization with over 40 years of experience advocating for stronger regulations through strategic campaigns and building a base of community power. Most notably, CCAEJ's founder Penny Newman won a landmark federal case against Stringfellow Construction which resulted in the `Stringfellow Acid Pits' being declared one of the first Superfund sites in the nation. ***CCAEJ*** prioritizes community voices as we continue our grassroots efforts to bring lasting environmental justice to the Inland Valley Region.

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Response to Comment Letter O2: Center for Community Action and Environmental Justice, dated August 22, 2022

Comment O2.1: This comment provides a summary of the proposed Project description, the Project location, and nearby sensitive receptors.

Response O2.1: 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 O2.2: This comment provides an introduction to the comment letter and states that Center for Community Action and Environmental Justice is concerned about pollution due to the exponential growth of warehouses in the area. This comment states that the Project Applicant is not mitigating impacts and the Draft EIR fails to report the real impacts related to health, traffic, air quality, energy, and water quality.

Response O2.2: The comment does not provide any substantial evidence concerning any environmental impact. 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, including cumulative impacts, related to traffic congestion.

As detailed in the Impact AQ-2 discussion that begins on page 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, air quality impacts would be less than significant, and no mitigation measures are required.

As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project 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 Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. The Operational Mobile Health Risk Assessment and Construction Health Risk Assessment were prepared pursuant to the guidelines set forth by SCAQMD and the Office of Environmental Health Hazard Assessment (OEHHA). In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emissions would be less than significant.

The SCAQMD thresholds serve to determine whether or not a given project has a potentially significant project-level or cumulative impact. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. Thus, the project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are not considered to be cumulatively significant. Since the Project would not exceed the SCAQMD health risk or air quality thresholds, the Project would not result in a cumulative impact pursuant to SCAQMD guidance.

As detailed in Draft EIR Section 5.5, *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 with 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.

As discussed in Draft EIR Section 5.9, *Hydrology and Water Quality*, mandatory compliance with the SWPPP and WQMP prepared for the Project 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. Therefore, the Project would not result in any water quality impacts.

Comment O2.3: This comment states that industrial developments result in high daily volumes of heavy-duty diesel truck traffic and operation of on-site equipment that emit toxic diesel emissions and contribute to pollution issues. The comment states that residences are located directly on the Project boundary and Bloomington High School (330 feet), Ruth O. Harris Middle School (3,500 feet), Sycamore Hills Elementary School (3,615 feet), Sycamore Hills Park (4,065 feet), and Walter Zimmerman Elementary School (4,500 feet) are all located within a mile radius of the Project. This comment states that the Project is in violation of the Countywide Plan.

Response O2.3: As described on page 5.2-32 of the Draft EIR, a Construction 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 Construction Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 0.98 in one million after implementation of Mitigation Measure AQ-1 (use of Tier 4 Final construction equipment), 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 school children, all other receptors would experience less risk than what is identified for the residence adjacent to the site. As such, construction of the Project would not cause a significant DPM emissions impact on nearby sensitive receptors.

As described on page 5.2-34 of the Draft EIR, an Operational 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 Operational Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 1.4 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 school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.6 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 Project 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, to substantial pollutant concentrations. As detailed in Draft EIR Table 5.2-10, emissions during construction activities would not exceed the SCAQMD's localized significance thresholds. Also, as detailed in Draft EIR Table 5.2-11, emissions from operation of the Project 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.

As discussed on page 5.10-7 in Table 5.10-3 of Section 5.10, *Land Use and Planning,* the Project would be consistent with applicable Countywide Plan policies. Therefore, the Project would not conflict with the Countywide plan.

Comment O2.4: This comment states that the NOP received comments from Colton Joint Unified School District regarding the proximity of schools and that the Applicant chose not to mitigate impacts related to schools. This comment provides screenshots from CalEnviroScreen 4.0 that show the pollution burden of the area surrounding the Project site. The comment states that there are two pollutants of concern for the community, ozone and particulate matter.

Response O2.4: Refer to Response O2.2. 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 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required. As

such, pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B) there is no nexus for requiring a wall as mitigation to reduce air quality impacts.

Comment O2.5: This comment states that CCAEJ is concerned with the potential cumulative health risk effects of the Project and that the community is concerned about the air quality and health risk impacts resulting from the Project. The comment states that Bloomington's air quality has become similar to China's.

Response O2.5: As further discussed in Response O2.4, the Project would not result in any significant and unavoidable impacts related to air quality pollutants on a project-level or cumulative basis. Further, this comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Therefore, no further response is required or provided.

Comment O2.6: This comment states that the Project is in a community which is already in the 97th percentile of pollution burden according to CalEnviroScreen 4.0 and the Project would decrease the life expectancy in the community and impact members of the community financially.

Response O2.6: The comment does not provide any substantial evidence concerning any environmental impact. As described in Response O2.4, construction and operation of the Project 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 EIR for use of Tier 4 Final equipment during construction activities. Also, as detailed on page 5.2-37 to 5.2-39 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 5.3-37 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 include 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 widely available and economically feasible.
- 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 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.
- 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 Project. Because the Project would not exceed thresholds for either DPM or localized significance thresholds, the Project would not adversely impact sensitive receptors surrounding the Project 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 EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of financial impacts to residents. 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 financial impacts to residents is not provided.

Comment O2.7: This comment states that the Project is near residences and schools that are burdened by multiple air pollution sources and the Applicant should prepare a health risk assessment for all potentially operational health risks from Project DPM sources. This comment states that the HRA should determine if the Project would result in a cumulative health risk in conjunction with past, present, and near future projects and mitigation should be provided requiring air quality monitoring equipment. This comment provides examples of potential health risks that could result from exposure to DPM and PM2.5.

Response O2.7: Refer to Response O2.2. The comment does not provide any substantial evidence concerning any environmental impact.

Since operational emissions of DPM would be below SCAQMD thresholds and construction emissions would be below SCAQMD thresholds with implementation of Mitigation Measure AQ-1, pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B), there is no nexus between mitigation suggested in the comment letter (i.e., provision of onsite air quality monitoring equipment) and the Project's air quality and health risk impacts.

Comment O2.8: This comment states that air quality in the region is in nonattainment for certain pollutants, such as ozone and that developers feel that since air quality is poor they have a right to further increase pollution levels. The comment states that the County is not holding developers accountable for the health risks from pollution and that SB1000 requires developers to consider cumulative impacts on a community.

Response O2.8: Refer to Response O2.2. The comment does not provide any substantial evidence concerning any environmental impact. The Draft EIR uses thresholds set forth by SCAQMD. The air quality thresholds set by SCAQMD are health protective and are based on Clean Air Act standards and recommendations by the U.S. Environmental Protection Agency. The air quality regional daily emissions thresholds are purposefully set low to ensure that most projects would exceed these levels which triggers mitigation, and for projects to do their fair share in mitigating the potential impacts. This approach has largely been proven to work; although there has been tremendous growth and development in the South Coast Air Basin, emissions concentrations have actually declined, and air quality within the region has generally improved over the last 30 years. In addition, these SCAQMD thresholds take into account the existing nonattainment status of Ozone, PM10, and PM2.5 and are set in order to achieve attainment.

In order to determine if concentrations are exceeded, the Draft EIR considers two separate criteria. In addition to regional daily air quality emissions, the Draft EIR includes a thorough evaluation of localized impacts based on methodology and criteria established by SCAQMD. The SCAQMD's localized impact methodology and thresholds were borne out of its Environmental Justice Initiative, specifically. As shown in the Draft EIR and supported by the underlying technical studies, the Project does not exceed the localized emissions thresholds.

Secondly, the Draft EIR and underlying technical analysis includes a robust assessment of potential Health Risks from exposure to diesel exhaust. The methodology utilized in the Construction and Operational Health Risk Assessments is consistent with published guidance from SCAQMD and is intended to be health protective.

Comment O2.9: This comment states that individuals are under attack by particulate matter and the Project does not mitigate any of the impacts. This comment states that the Project is speculative and the Draft EIR underestimates truck traffic volumes. This comment states that the Project results in forced sterilization of the community. This comment states that although the Draft EIR states that the Project would not be used for cold storage, there is a possibility that transport refrigeration units (TRUs) could visit the site and this should be modeled or a condition should be placed on the Project to not allow TRUs.

Response O2.9: The comment does not provide any substantial evidence concerning any environmental impact. The Trip Generation and Vehicle Miles Traveled (VMT) Screening Analysis, included as Appendix J

to the Draft EIR, trip generation used the trip rates provided by Institute of Transportation Engineer's *Trip Generation, 11th Edition, 2021* for High-Cube Transload and Short Term Storage Warehouse and truck splits provided in the *SCAQMD Warehouse Truck Trip Study, 2017*. 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 Slover and Alder trip generation. Thus, the traffic 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 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. Therefore, the trip generation for the Slover and Alder Project is a reasonable representation of the potential Project impacts and complies with CEQA.

Furthermore, as described in Section 3.0, *Project Description*, of the Draft EIR, the Project does not include refrigerated warehousing areas and would not involve the use of TRUs. Thus, an analysis related to TRUs is not applicable to the Project and would not be included or required within the Draft EIR. However, the County would include operational conditions during the permitting process which would prohibit the use of TRUs onsite without additional CEQA documentation.

Comment O2.10: This comment states that the HRA should be based on the latest OEHHA guidelines and the HRA should evaluate the existing baseline, future baseline without Project, and future year with the Project. Additionally, the comment states that health risks associated with construction should also be evaluated.

Response O2.10: The comment does not provide any substantial evidence concerning any environmental impact. Refer to Response O2.2. Further, Section 7.4 of the Air Quality Report (included as Appendix B to the Draft EIR) provides the existing baseline conditions, which were calculated in the SCAQMD MATES IV study that analyzed all major roadways and stationary sources of TAC emissions in the Air Basin and provides health risk calculations broken down to one kilometer square areas throughout the Air Basin. As shown in the Air Quality Report, the Project vicinity has an estimated cancer risk of 727 per million persons, which is below the average cancer risk for the Air Basin of 991 per million persons. As detailed in Section 10.3 of the Air Quality Report, the SCAQMD has published a White Paper on how to address cumulative impacts from air pollution, which found that a project would need to exceed the same cancer risk thresholds utilized in the Air Quality Report before it could create a significant cumulative impact. Since the proposed Project was found to be well below the SCAQMD's cancer and non-cancer Hazard Index thresholds for operation without mitigation and for construction with implementation of Mitigation Measure AQ-1, it is not possible for the Project to create a cumulative heath risk impact. Therefore, the commenter's request for additional cumulative HRAs to be performed is not warranted.

Comment O2.11: This comment states that OEHHA recommends assessing cancer risks for construction lasting longer than two months so the Project should prepare a construction HRA.

Response O2.11: A Construction Health Risk Assessment was prepared and included as Appendix K to the Draft EIR; refer to Response O2.2.

Comment O2.12: This comment states that based on Pitzer College's Warehouse Cumulative Impact tool, impacts in Bloomington are high enough to merit rejection of the Project as the Bloomington community is dealing with almost 26,445 truck trips per day, emissions of over 35 pounds per day of DPM, emissions of over 4,000 pounds of NOx per day, and more than 2.2 million pounds of carbon per day. This comment states that the Project proposes 700 additional polluting trips per day.

Response O2.12: The comment does not provide any substantial evidence concerning any environmental impact. As discussed throughout this Response to Comments and Final EIR, the Project would not result in any significant and unavoidable impacts related to the increase in truck trips, passenger vehicle trips, air quality emissions, health risks, or noise associated with construction of the Project. Additionally, the commenter incorrectly states that the Project would result in 700 trips. The Project would only result in 363 total trips each day with only 113 of those trips being from trucks. Regarding cumulative impacts from warehouse development, the commenter is referred to Response O2.8. Furthermore, , there are multiple limitations to the tool including the use of a 0.65 floor area ratio (FAR) for all warehouse parcels which

greatly overestimates the square footage of warehouses built in the vicinity, and the fact that the tool uses general classifications for buildings and might duplicate records.

Comment O2.13: This comment states that the Draft EIR fails to account for truck traffic on Cedar Avenue, Slover Avenue, and Alder Avenue and there is no pathway for trucks to feasibly reach I-10. This comment states that the Project is in violation of California Government Code Section 65302 amended by SB 1000.

Response O2.13: The comment does not provide any substantial evidence concerning any environmental impact. The commenter misconstrues California Government Code Section 65302, which does not apply to the Project as the Project does not revise the San Bernardino Countywide Plan Circulation Element. Furthermore, the Project accounts for truck trips on Slover Avenue, Cedar Avenue, and Sierra Avenue as trucks would utilize the driveways on Slover Avenue with half of the trucks traveling to Sierra Avenue to access I-10 and half traveling to Cedar Avenue to access the I-10. These routes are currently utilized by trucks accessing the I-10 onramps from warehouses along Slover Avenue. Trucks do not need to be accounted for on Alder Avenue, as trucks would not utilize the driveway on Alder Avenue to access the Project site.

Comment O2.14: This comment states that the Project fails to mitigate per SB 1000 requirements as the people of Bloomington have been selected to endure an exponential increase of pollution because they have a lower education level, high poverty, and are more linguistically isolated. This comment states that Duke should not rely on mitigation measures that are determined to be feasible by the owner/tenant and provides a screenshot of the Project Design Features that are included in the air quality section.

Response O2.14: The comment provides the commenter's opinion and does not provide any substantial evidence concerning any environmental impact. Furthermore, as set forth in Draft EIR Table 5.10-3 of Section 5.10, *Land Use and Planning,* the Project would be consistent with applicable Countywide Plan policies, including those related to Environmental Justice. 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[3]. 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[4]. 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 and Applicant. 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.

The County's determination whether 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 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.

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

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 Project 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 Project site. 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. Due to the infeasibility and enforceability of this recommended PDF, it has not been included.

Comment O2.15: This comment states that to increase compliance with California Government Code Section 65302, the truck routes should be painted and mistake proofed by providing signage. This comment requests that each dock door have a plan for truck routing and limit idling. This comment states that the Project should have a location for drivers to use the bathroom and eat at a local restaurant.

Response O2.15: The comment provides the commenter's opinion and does not provide any substantial evidence concerning any environmental impact. As set forth by PDF AQ-22, the Project is required to post signs at every truck exit driveway providing directional information to the truck route. Further, per CCR Title 13, Section 2449(d)(3), no vehicle or engines may idle for more than 5 consecutive minutes. In addition, PDF AQ-1 would require the Project to include signage in order to limit idling. Pursuant to SCAQMD, the owner/operator of the warehouse is required to implement Rule 2305. The rule applies to owners and operators of new and existing warehouses located in the Basin "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. In addition, the Project would include bathrooms for use by Project employees and truck drivers and would implement PDF AQ-21 requiring the Project to provide meal options onsite or shuttles between the site and nearby meal destinations.

Comment O2.16: This comment states that the Project fails to mitigate GHG emissions and is basing its mitigation on the current CARB draft plan, which does not fix the millions of polluting trucks that the Project would bring to the community each year. This comment states that the Project should be 100 percent solar powered and create a microgrid for the community of Bloomington. In addition, the comment states that in order to mitigate for VMT the Project should provide free public transportation to all workers.

Response O2.16: As discussed in Section 5.7, *Greenhouse Gas Emissions*, annual GHG emissions associated with construction and operation of the proposed Project would generate a net total of approximately 2,237.56 MTCO2e/yr, which is below the County's screening threshold of 3,000 MTCO2e/yr. According to the County's 2021 GHG Emissions Reduction Plan Update, any project that is under the 3,000 MTCO2e/yr screening threshold or adopts at least 100 points of GHG performance standards listed in the GHG Reduction Plan Screening Tables, would be consistent with the County's GHG Emissions Reduction Plan to reduce emissions to 40 percent below 2007 levels. Meeting this reduction 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. Thus, impacts would be less than significant and no mitigation would be required.

As discussed in Section 5.12, *Transportation*, because the Project is located in a low-VMT generating area, the Project is presumed to have a less than significant impact on VMT, and no further VMT analysis is required. Pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B), there is no nexus between mitigation outlined in the comment letter and impacts from the Project on GHG emissions and VMT.

Comment O2.17: This comment provides a quote of PDF AQ-21 and states that it is insulting due to the children who will develop health issues, the men who will suffer from erectile dysfunction, and women who will have to care for the children and men.
Response O2.17: In regard to health risk impacts, the commenter is referred to Response O2.7. 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 O2.18: This comment states that the community would like the Project to pay 6 percent of all revenues to a scholarship fund to increase the trade and health professions and to provide this to all residents of San Bernardino County in partnership with Valley College.
Response O2.18: As discussed in Responses O2.1 through O2.17, the Project would not result in any significant impacts to air quality, greenhouse gas emissions, or health risks with implementation of Mitigation Measure AQ-1. Therefore, pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B), there is no nexus between mitigation outlined in the comment letter and impacts from the Project. 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 O2.19: This comment states that urban green spaces reduce heat and improve air quality and provides standards for landscaping that the Project should implement. The comment states that the Project should have a 500-foot offset from the property line with two rings of trees to create an air pollutant and noise buffer.
Response O2.19: As discussed in Responses O2.1 through O2.17, the Project would not result in any significant impacts to air quality or health risks with implementation of Mitigation Measure AQ-1. In regard to noise, as detailed in the Impact NOI-1 discussion that begins on page 5.11-13 of the Draft EIR, 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. As such, the Project would not generate a significant daytime or nighttime operational noise level increase at nearby receiver locations.

As detailed in the Draft EIR in Section 5.11, *Noise,* starting on page 5.11-15, the proposed Project would generate traffic related noise from operation. As described in Section 3.0, *Project Description*, of the Draft EIR, the proposed building would be accessed from Slover Avenue and Alder Avenue. As discussed, the Opening Year with Project and General Plan Buildout with Project conditions would result in increases less than the 1.5 and 3.0 dBA CNEL threshold. Thus, off-site traffic noise impacts from the Project would be less than significant. Therefore, pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B), there is no nexus between mitigation outlined in the comment letter and impacts from the Project. 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 O2.20: This comment states that the Project would violate the people of Bloomington and multiple State regulations. This comment states that a warehouse moratorium should be initiated and quoted a recent action against Moreno Valley from the Attorney General's office.
Response O2.20: The comment provides the commenter's opinion and does not raise any specific concerns with the adequacy of the Draft EIR. In addition, the comment does not provide any evidence that the Project would violate any State or County regulations. Therefore, no further response is required.

LETTER O3: Concerned Neighbors of Bloomington (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.

Dear Mr. Liang, We are a community group called Concerned Neighbors of Bloomington. We work to inform the community about potentially hazardous projects near homes and schools. We are writing in regards to the Duke Warehouse at Slover/Alder project. Our concerns are that there are so many industrial type projects coming into the area. How can one report properly examine the true health and significant irreversible effects that it brings into the community when there are so many projects coming into review at the same time, each one with an independent report and not a cumulative report? Here in Bloomington, we have this Duke at Slover/Alder project, we have the proposed Bloomington Bus. Park Specific Plan, we have the Cactus/Slover project, we have the 2 truck stops on Cedar Ave, we have multiple warehouses that sit empty and useless. These are just the current projects that even yourself at the county has trouble keeping up with. What kind of traffic and air quality would we have if all of these projects were actually functioning at the same time. We want a report that takes this into consideration. We also want to know the ratio or percent of projects that get presented to the San Bernardino County Board of Supervisors and the Planning Commission and those that actually get denied or approved. We have noticed that ALL projects in Bloomington are being approved without the community accepting it. O3.1

We as residents live in this neighborhood and our children attend school in this neighborhood and walk home everyday. This is unacceptable. The reality is that trucks do not respect "truck route" signage and are often taking shortcuts through neighborhoods. This neighborhood has Bloomington High School on Alder Ave and we would not like to take a chance that trucks come through their street. In addition, Alder Ave is where the student parking lot is located and big rig trucks are an accident risk to our minors driving on the road. The county of San Bernardino has been irresponsible in approving and allowing so many industrial projects in Bloomington. We would also like an independent investigation, study, and analysis from a contractor that the community and Concerned Neighbors of Bloomington could choose in regards to the Environmental Impacts from this project. We do not have enough confidence in the current way the county is handling these reports. O3.2

This project is too close to residential homes, Bloomington High School students, and their athletic field. Students attend PE classes and sports just feet away, we are very concerned about their O3.3

health.

If you haven't heard, just recently Zimmerman Elementary school in Bloomington was approved to potentially be closed down and sold to a warehouse developer because it would have too many warehouses in its proximity if the Bloomington Business Park gets approved. The school district was "forced" to come to this decision. This project would cause the same risk to Bloomington High School, the heart of the South Bloomington Community and this is unacceptable. Is the risk of Bloomington High School closing included in any report regarding this project? We have included survey results from Concerned Neighbors of Bloomington to be taken into consideration.

O3.3 Cont.

We would also like it to be considered by the people at the San Bernardino County level who allow these types of projects into small rural neighborhoods to consider that they are participating in environmental racism. Environmental racism is defined as "the disproportionate impact of environmental hazards on people of color." As you know Bloomington is over 90% people of color and the majority is Spanish speaking.

O3.4

Response to Comment Letter O3: Concerned Neighbors of Bloomington, dated August 22, 2022

Comment O3.1: This comment provides an introduction to the comment letter and states that the organization is concerned that there are so many industrial projects in the Bloomington area. The comment questions how the Draft EIR can analyze all environmental impacts with all of the other projects being proposed without a cumulative document for all of the projects. The comment questions what kind of traffic and air quality impacts all of these projects will bring cumulatively, and the commenter wants a cumulative report to be prepared. The comment asks how many projects get approved by the San Bernardino Planning Commission and Board of Supervisors as it appears all projects get approved.

Response O3.1: Individual industrial projects are approved on a case-by-case basis by the Planning Commission and Board of Supervisors, and a cumulative analysis is required per CEQA Guidelines 15130. A cumulative analysis was provided in each section of Chapter 5 of the Draft EIR. This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. 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, including cumulative impacts, related to traffic congestion.

As detailed in the Impact AQ-2 discussion that begins on page 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, air quality impacts would be less than significant, and no mitigation measures are required.

As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project 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 Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. The Operational Mobile Health Risk Assessment and Construction Health Risk Assessment were prepared pursuant to the guidelines set forth by SCAQMD and the Office of Environmental Health Hazard Assessment (OEHHA). In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emissions would be less than significant.

The SCAQMD thresholds serve to determine whether or not a given project has a potentially significant project-level or cumulative impact. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. Thus, the project specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are not considered to be cumulatively significant. Since the Project would not exceed the SCAQMD health risk or air quality thresholds, the Project would not result in a cumulative impact pursuant to SCAQMD guidance.

Comment O3.2: This comment states that trucks do not respect truck route signage and the community does not want to take the risk of trucks utilizing Alder Avenue as Bloomington High School is located on Alder Avenue. The comment states that the commenter would like a private contractor to properly analyze the environmental impacts of the Project as Concerned Neighbors of Bloomington does not trust how the County is preparing these reports.

Response O3.2: As shown on Figure 3-6 in Chapter 3 of this Final EIR, Project trucks would utilize established truck routes as identified in the Focused Traffic Impact Analysis prepared for the County which would be directed away from existing residential neighborhoods and Bloomington High School. 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. Further, truck access would not be provided on the driveway on Alder Avenue, which would further limit any potential for trucks utilizing Alder Avenue for site access.

The preparation of the Draft EIR was conducted pursuant to CEQA Statute and 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 an independent investigation should be conducted by a contractor that the community chooses, and does not raise any specific concerns with the adequacy of the Draft EIR. The County is entitled to rely upon the opinions of its qualified experts. (*City of Maywood v. Los Angeles Unified School Dist.* (2012) 208 Cal.App.4th 362 at 424).The comment will be forwarded to County decisionmakers as part of the Final EIR. Therefore, no further response is required or provided.

Comment O3.3: This comment states that the Project is too close to homes and Bloomington High School. The comment states that Zimmerman Elementary School was forced to close due to the amount of warehouses in the vicinity and states that this Project would result in the same risk for Bloomington High School.

Response O3.3: As discussed on page 5.2-16 of the Draft EIR, the nearest receptors to the Project site are single-family residences located 30 feet south of the Project site. Bloomington High School is located 330 feet south of the Project site. As described on page 5.2-32 of the Draft EIR, a Construction 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 Construction Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 0.98 in one million after implementation of Mitigation Measure AQ-1 (use of Tier 4 Final construction equipment), 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 school children, all other receptors would experience less risk than what is identified for the residence adjacent to the site. As such, construction of the Project would not cause a significant DPM emissions impact on nearby sensitive receptors.

As described on page 5.2-34 of the Draft EIR, an Operational 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. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.6 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 Project would not cause a significant DPM emissions impact on nearby sensitive receptors at Bloomington High School.
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 Table 5.2-10, emissions during construction activities would not exceed the SCAQMD's localized significance thresholds. Also, as detailed in Draft EIR Table 5.2-11, emissions from operation of the Project 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. As such, the Project would not result in a direct or indirect impact on Bloomington High School.

Comment O3.4: This comment states that the County is participating in environmental racism as Bloomington is over 90 percent people of color and Spanish speaking.

Response O3.4: 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). As discussed in Master Response 2, although the issue of whether or not environmental racism has occurred is not required to be analyzed in an EIR, as set forth in Draft EIR Table 5.10-3 of Section 5.10, Land Use and Planning, the Project would be consistent with applicable Countywide Plan policies, including those related to Environmental Justice.

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. This comment does not provide any substantial evidence concerning the adequacy of the Draft EIR. As such, no further response is required.

LETTER O4: Peoples Collective for Environmental Justice (3 pages)

August 22, 2022

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

RE: SCH NO. 2021120526

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 'Duke Warehouse on Slover/Alder'. We believe that the County of San Bernardino is underestimating the potential impacts this project will have. 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 Duke Warehouse. O4.1

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. O4.2

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. O4.3

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, O4.4

implementation, and enforcement of environmental laws, regulations, and policies" (Government Code Section 65040.12(e).

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. O4.4 Cont.

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. O4.5

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 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. 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. O4.6

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 O4.7

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. O4.7 Cont.

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. O4.8

Sincerely,

Andrea Vidaurre
Peoples Collective for Environmental Justice

Response to Comment Letter O4: Peoples Collective for Environmental Justice, dated August 22, 2022

Comment O4.1: 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 sections of the Draft EIR and believes that the County is underestimating Project impacts. 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 O4.1: This comment does not provide any substantial evidence concerning an environmental impact. 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 Draft EIR did not identify any significant and unavoidable impacts that are not capable to being mitigated to a level that is less than significant.

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 approving the Project. Through the public hearing process, the decision-makers within the County will take into consideration the environmental impacts caused by the project.
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 O4.2: 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 particulate matter, ozone, particulate pollution, drinking water contamination, hazardous waste, groundwater threats, and more.

Response O4.2: This comment does not provide any substantial evidence concerning an environmental impact. It only provides demographic information. Refer to Master Response 3. The comment does not raise a specific issue with the adequacy of the Draft EIR. Therefore, no further response is provided.

Comment O4.3: The comment defines environmental racism and states that the County in approving past industrial projects has practiced environmental racism.

Response O4.3: This comment does not provide any substantial evidence concerning an environmental impact. It only 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 O4.4: 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 O4.4: 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). Although the issue of whether or not environmental racism has occurred is not required to be analyzed in an EIR, as set forth in Table 5.10-3 of Section 5.10, Land Use and Planning, the Project would be consistent with applicable Countywide Plan policies, including those related to Environmental Justice..
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. This section also 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 Project site is not located within a disadvantaged community earmarked for Cap-and-Trade funds investment (https://oehha.ca.gov/calenviroscreen/sb535, accessed November 7, 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. This comment does not provide any substantial evidence concerning the adequacy of the Draft EIR. As such, no further response is required.

Comment O4.5: This comment states that the Draft EIR found that multiple air quality impacts would be significant and unavoidable. The comment asks how the County analyzes how the Project contributes to air quality impacts, port congestions, and other cumulative impacts.

Response O4.5: The comment does not provide any substantial evidence concerning any environmental impact and erroneously states that the Draft EIR concludes that certain air quality impacts would be significant and unavoidable. The Draft EIR uses thresholds set forth by SCAQMD. The air quality thresholds set by SCAQMD are health protective and are based on Clean Air Act standards and recommendations by the U.S. Environmental Protection Agency. The air quality regional daily emissions thresholds are purposefully set low to ensure that most projects would exceed these levels which triggers mitigation, and for projects to do their fair share in mitigating the potential impacts. This approach has largely been proven to work; although there has been tremendous growth and development in the South Coast Air Basin, emissions concentrations have actually declined, and air quality within the region has generally improved over the last 30 years. In addition, these SCAQMD thresholds take into account existing nonattainment status of Ozone, PM10, and PM2.5 and are set in order to achieve attainment. As detailed in the Impact AQ-2 discussion that begins on page 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required.

In order to determine if concentrations are exceeded, the Draft EIR considers two separate criteria. In addition to regional daily air quality emissions, the Draft EIR includes a thorough evaluation of localized impacts based on methodology and criteria established by SCAQMD. The SCAQMD's localized impact methodology and thresholds were borne out of its Environmental Justice Initiative, specifically. As shown in the Draft EIR and supported by the underlying technical studies, the Project does not exceed the localized emissions thresholds.

Secondly, the Draft EIR and underlying technical analysis includes a robust assessment of potential Health Risks from exposure to diesel exhaust. The methodology utilized in the Construction and Operational Health Risk Assessments is consistent with published guidance from SCAQMD and is intended to be health protective. Please also refer to Response to Comment O2.2.

Comment O4.6: This comment states that trucks associated with the Project are severely undercounted and states that the Draft EIR concluded that a health risk assessment could not be performed for the Project. This comment states that the mobile health risk assessment does not account for cumulative impacts of emissions in the area. The comment states that there is not enough information on how much these truck routes will contribute to wear and tear in the roads and pose a risk to pedestrians.

Response O4.6: The Trip Generation and Vehicle Miles Traveled (VMT) Screening Analysis, included as Appendix J to the Draft EIR, trip generation used the trip rates provided by Institute of Transportation Engineer's *Trip Generation, 11th Edition, 2021* for High-Cube Transload and Short Term Storage Warehouse and truck splits provided in the *SCAQMD Warehouse Truck Trip Study, 2017*. 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 Slover and Alder trip generation. Thus, the traffic 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 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. Therefore, the trip generation for the Slover and Alder Project is a reasonable representation of the potential Project impacts and complies with CEQA.
As discussed in Response O4.5, the Draft EIR includes a robust assessment of potential Health Risks from exposure to diesel exhaust. The methodology utilized in the Construction and Operational Health Risk Assessments is consistent with published guidance from SCAQMD and is intended to again, be health protective. Please also refer to Response to Comment O2.2.

As discussed in the Focused Transportation Impact Analysis, with the Project's provided fair share improvements, the LOS Analysis demonstrates that the LOS at impacted intersections, including intersections along Slover Avenue, 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). The Project does not propose the removal of any sidewalk or bike lanes and proposes to develop sidewalks along Slover Avenue and Alder Avenue. Finally, the intersection of Slover Avenue/Cedar Avenue adjacent to Slover Mountain High School is currently a signalized intersection with striped crosswalks; therefore, roadway safety measures are in place to facilitate pedestrian circulation. As shown on Focused TIA Figure 8, Project trucks would not utilize other roadways within close vicinity of nearby schools.

Comment O4.7: 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 O4.7: 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 5.2-37 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 25 PDFs. Regarding buffer zones, the Project incorporates walls, setbacks, and landscape buffers as detailed in the proposed Project plans and Section 3.0 of the Draft EIR. As detailed in Response O4.5, 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 speculative, tilt-up warehouse building. There are no identified tenants. However, future tenants would be required to go through the County's permitting process for occupation of the proposed building, which would ensure that future operations conform to 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 O4.8: 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 O4.8: 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.

LETTER O5: Blum Collins (44 pages)

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August 9, 2022

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

VIA EMAIL TO:
aron.lian@lus.sbcounty.gov

Subject: Comments on Duke Slover and Alder Warehouse EIR (SCH NO. 2021120526)

Dear Mr. Liang,

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed Duke Slover and Alder Warehouse. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877. O5.1

1.0 Summary

The project proposes the construction and operation of one 259,481 square foot (sf) high-cube warehouse/distribution building on a 12.23 net acre project site. The building also proposes 5,000 sf of ancillary office space and will be 50 feet tall. The building includes 38 truck/trailer loading dock doors, 85 truck/trailer parking spaces, and 131 passenger car parking spaces.

2.0 Introduction

The EIR states that "the County determined through *the initial review process* that impacts related to the following topics are not potentially significant and are not required to be analyzed in this Draft EIR: Agriculture & Forest Resources, Population and Housing, Mineral Resources, Public Services, and Wildfire." However, the County's initial review process, analysis, and determination are not included for public review. The EIR must be revised and recirculated to include the County's initial review process, analysis, and determination for public review in order to comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). O5.2

2.3 Impacts Found Not to be Significant - Population and Housing

The EIR utilizes uncertain language to describe the project's employment generation and does not provide any calculation of construction employees. The EIR states that "employees are *anticipated* to live within *the region* prior to Project development." However, the EIR does not define the boundaries of "the region," or demonstrate that the project will not need any workers from outside the "region." Relying upon the workforce of the greater SCAG region will increase VMT and air quality/greenhouse gas emissions, and a revised EIR must be prepared to reflect this. A revised EIR must also include information and analysis regarding the number of construction jobs generated by the project and their potential to relocate to the County.

O5.3

SCAG's 2020-2045 RTP/SCS Connect SoCal Demographics and Growth Forecast[1] notes that the unincorporated areas of San Bernardino County will add 14,100 jobs between 2016 - 2045. Utilizing the EIR's calculation of 217 employees, the project represents 1.5% 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 0.5% of unincorporated San Bernardino County's population growth from 2016 - 2045. A single project accounting for this amount of the projected employment and 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 will exceed SCAG's employment and/or population growth forecast. For example, other recent industrial projects such as Bloomington Business Park SP

[1] 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

(2,708 employees), Speedway Commerce Center II SP (3,732 employees), and Arrow Route Warehouse (180 employees) combined with the proposed project will cumulatively generate 7,017 employees, which is 49.7% of the County's employment growth forecast over 29 years. O5.3 Cont.

3.0 Project Description

The EIR does not include a detailed floor plan, detailed grading plan, detailed building elevations, or detailed site plan for the warehouse development site. The basic components of a Planning Application include a detailed site plan, floor plan, grading plan, and elevations. The site plan provided in Figure 3-4: Conceptual Site Plan has been edited for public review and does not provide any detailed information such as the earthwork quantity notes, parking requirements, building heights, site coverage, or floor area ratio calculation. The edited version of the site plan inserted for public review is meaningless and provides no useful information. The EIR has excluded the proposed floor plan, detailed grading plan, detailed building elevations, and detailed site plan from public review, which does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). Incorporation by reference (CEQA § 15150 (f)) is not appropriate as the detailed floor plan, detailed grading plan, detailed building elevations, and detailed site plan contribute directly to analysis of the problem at hand. The EIR must be revised to include all application items for review, analysis, and comment by the public and decision makers. O5.4

5.2 Air Quality, 5.5 Energy, and 5.7 Greenhouse Gas Emissions

Please refer to attachments from SWAPE for a complete technical commentary and analysis.

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 proposed project's census tract (6071002601) ranks worse than 97% of the rest of the state overall. The proposed project's census tract (6071002601) and surrounding community, including residences to the south, east and west, and Bloomington High School to the south, bears the impact of multiple sources of pollution and is more polluted than average on several pollution indicators measured by CalEnviroScreen. For example, the project census tract ranks in the 95th percentile for ozone burden, the 94th percentile for PM 2.5 burden, the 78th O5.5

[2] CalEnviroScreen 4.0 https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40

percentile for diesel particulate matter burden, and the 80th percentile for traffic impacts. All of these environmental factors are typically attributed to heavy truck activity in the area. O5.5 Cont.

The census tract also ranks in the 94th percentile for hazardous waste impacts. Hazardous waste generators and facilities contribute to the contamination of air, water and soil near waste generators and facilities can harm the environment as well as people[3]. Additionally, the census tract ranks in the 87th percentile for solid waste facility impacts, which can expose people to hazardous chemicals, release toxic gases into the air (even after these facilites are closed), and chemicals can leach into soil around the facility and pose a health risk to nearby populations[4]. O5.6

Further, the census tract is a diverse community including 66% Hispanic, 9% Asian-American, and 8% African-American residents that 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 incidence of asthma.

California's Building Energy Code Compliance Software (CBECC) is the State's only approved energy compliance modeling software for non-residential buildings in compliance with Title 24[5]. CalEEMod is not listed as an approved software. The CalEEMod modeling in Appendix B does not comply with the 2022 Building Energy Efficiency Standards and under-reports the project's significant Energy impacts and fuel consumption to the public and decision makers. Since the EIR did not accurately or adequately model the energy impacts in compliance with Title 24, a finding of significance must be made. A revised EIR with modeling using the approved software (CBECC) must be circulated for public review in order to adequately analyze the project's significant environmental impacts. This is vital as the EIR utilizes CalEEMod as a source in its methodology and analysis, which is clearly not the approved software. O5.7

[3] OEHHA Hazardous Waste Generators and Facilities https://oehha.ca.gov/calenviroscreen/indicator/hazardous-waste-generators-and-facilities
[4] OEHHA Solid Waste Facilities https://oehha.ca.gov/calenviroscreen/indicator/solid-waste-sites-and-facilities
[5] California Energy Commission 2022 Energy Code Compliance Software https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency-1

5.10 Land Use and Planning

Table 5.10-2: Project Consistency with Applicable SCAG Regional Transportation Plan/Sustainable Communities Strategy erroneously finds consistency with SCAG's Connect SoCal RTP/SCS document. Due to errors in modeling and modeling without supporting evidence as noted throughout this comment letter and attachments, 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 a finding of significance due to inconsistency with SCAG's Connect SoCal RTP/SCS.

Additionally, due to errors in in modeling and modeling without supporting evidence as noted throughout this comment letter and attachments, the project is inconsistent with the following applicable items from the General Plan and the EIR has provided misleading consistency analysis, if any analysis at all:

Goal NR-1 Air Quality. Air quality that promotes health and wellness of residents in San Bernardino County through improvements in locally-generated emissions.

O5.8

Policy NR-1.7 Greenhouse gas reduction targets. We strive to meet the 2040 and 2050 greenhouse gas emission reduction targets in accordance with state law.

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.

Policy 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.

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. Analysis of the proposed project in accordance with these goals and policies is vital as there is significant potential for inconsistency with the General Plan. For example, the greenhouse gas emissions summer analysis determined the project will generate 11,390 MTCO2e during project

operations (10,538 MTCO2e as a result from mobile source emissions). The winter analysis determined the project will generate 11,205 MTCO2e during project operations (10,403 MTCO2e as a result from mobile source emissions). However, the annual analysis reduces these emissions 2,197 MTCO2e during project operations (1,719 MTCO2e as a result from mobile source emissions). There is no explanation for the reductions given or the manner in which the reductions were achieved. These reductions serve to skew emissions downwards, specifically below the County's 3,000 MTCO2e significance threshold for industrial projects. Additionally, modeling errors such as those noted in the Energy, Air Quality, and Transportation discussions must be corrected in order to adequately analyze the project's GHG emissions. A revised EIR must be prepared which presents this for analysis and a finding of significance, including in the context of consistency with the Countywide Plan.

O5.8 Cont.

5.12 Transportation

The EIR concludes that the project is in a low VMT generating TAZ. The project's VMT impacts are misrepresented by the SBCTA model and the EIR. The EIR relies upon Appendix J: VMT Screening Analysis, which concludes that the proposed project site is located in a low VMT-generating Traffic Analysis Zone (TAZ) which results in less than significant Transportation impacts. The project is located in TAZ ID 53733301, which is bound by Slover Ave. to the north, Locust Ave. to the east, Santa Ana Ave. to the south, and Tamarind Ave. to the west. The TAZ is mostly comprised of low-density residential, Bloomington High School, vacant land and underdeveloped properties. The proposed project is unique in that the TAZ in which the Project site is located does not contain any other operational warehouse buildings. The VMT screening analysis does not adequately or accurately represent the VMT impacts of the proposed project and a revised EIR must be prepared with a project-specific VMT analysis.

O5.9

Further, the VMT analysis does not adequately or accurately represent the VMT impacts of the proposed project and an EIR must be prepared 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. Table 4.2 Trip Summary of the Air Quality Appendix CalEEMod output sheets (Appendix B) indicates that the project will generate approximately 2,066,689 annual VMT (2,066,689 / 365 days = 5,662 daily total VMT). This is exponentially higher than the VMTs reported in Appendix J and the EIR. 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. A revised EIR must be prepared to reflect a project-specific quantified VMT analysis that includes truck/trailer activity to adequately and accurately analyze the potentially significant project transportation impacts.

The EIR is internally inconsistent in its analysis of the proposed project, rendering it an inadequate informational document. The transportation analysis concludes that the project is in a low VMT generating TAZ and will not have significant VMT impacts. Alternatively, the Population and Housing analysis states that "employees are anticipated to live within the region prior to Project development." The Transportation analysis relies upon a workforce in close proximity to the project in order to artificially reduce impacts, yet the Population and Housing analysis relies on the entire available workforce/unemployment rates of the Inland Empire region to demonstrate there will be no significant impacts. The VMT analysis only assumed a 16.30 mile trip for employees. The Transportation analysis must be revised to reflect longer trip distances that employees will realistically travel to work at the proposed project, including but not limited to 84 miles from Coachella to the project site and approximately 50 miles from Victorville to the project site. The revised EIR must also include a construction worker employment trip analysis must also be included to adequately and accurately analyze all potentially significant environmental impacts. O5.10

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 two alternatives chosen for analysis include the CEQA required "No Project" alternative and only one other alternative - Reduced Development Footprint Alternative. The EIR does not evaluate a reasonable range of alternatives as only one alternative beyond the required No Project alternative are analyzed. The EIR must be revised to include analysis of a reasonable range of alternatives and foster informed decision making by providing at least four total alternatives (CEQA § 15126.6). O5.11

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. O5.12

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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August 9, 2022

Gary Ho
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Subject: Comments on the Duke Warehouse at Slover and Alder Project (SCH No. 2021120526)

Dear Mr. Ho,

We have reviewed the June 2022 Draft Environmental Impact Report ("DEIR") for the Duke Warehouse at Slover and Alder Project ("Project") located in the unincorporated community of Bloomington, in San Bernardino County ("County"). The Project proposes to demolish all existing structures and construct a 259,481-square-feet ("SF") warehouse with 5,000-SF of office space and 216 parking spaces on the 13.23-acre site.

O5.13

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 and operation of the proposed Project are underestimated and inadequately addressed. A revised 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 environment.

Unsubstantiated Input Parameters Used to Estimate Project Emissions

The DEIR's air quality analysis relies on emissions calculated with California Emissions Estimator Model ("CalEEMod") Version 2020.4.0 (p. 5.2-28).[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

O5.14

[1] "CalEEMod Version 2020.4.0." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* http://www.aqmd.gov/caleemod/download-model.

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.

O5.14 Cont.

When reviewing the Project's CalEEMod output files, provided in the Air Quality, Energy, Greenhouse Gas Emissions, and Health Risk Assessment Impact Analysis ("AQ, Energy, GHG, & HRA Analysis") as Appendix B to the DEIR, we found that the following model inputs are not consistent with information disclosed in the DEIR. As a result, the Project's construction and operational emissions are underestimated. A revised EIR should be prepared to include an updated air quality analysis that adequately evaluates the impacts that construction and operation of the Project will have on local and regional air quality.

Failure to Model All Proposed Land Uses

According to the DEIR:

> "The Project would demolish existing residential and commercial structures to develop a new 259,481 square foot high-cube warehouse/distribution use. The Project building would include 5,000 square feet of office space, a 2,975 square foot mezzanine, and 38 dock doors along the north side of the building, facing Slover Avenue" (p. 1-1).

As such, the model should have included 5,000-SF of office space. However, review of the CalEEMod output files demonstrates that the "Slover-Alder Avenue Industrial" model includes all 259,481-SF as "Unrefrigerated Warehouse-No Rail" (see excerpt below) (Appendix B, pp. 91, 119, 212).

O5.15 Cont.

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area
Unrefrigerated Warehouse-No Rail	259.48	1000sqft	7.94	259,481.00
Parking Lot	5.29	Acre	5.29	230,432.40

As you can see in the excerpt above, the models fail to distinguish between the proposed warehouse and office spaces. This inconsistency presents an issue, as CalEEMod includes 63 different land use types that are each assigned a distinctive set of energy usage emission factors.[2] Thus, by failing to include all proposed land use types, the model may underestimate the Project's construction-related and operational emissions and should not be relied upon to determine Project significance.

Unsubstantiated Operational Off-Road Equipment Input Parameters

Review of the CalEEMod output files demonstrates that the "Slover-Alder Avenue Industrial" model includes several changes to the default operational off-road equipment input parameters (see excerpt below) (Appendix B, pp. 93, 121, 214).

O5.16

[2] "Appendix D – Default Data Tables" California Air Pollution Control Officers Association (CAPCOA), June 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. D-305.

Table Name	Column Name	Default Value	New Value
tblOperationalOffRoadEquipment	OperFuelType	Diesel	CNG
tblOperationalOffRoadEquipment	OperHoursPerDay	8.00	7.00

As a result, the model includes 1 compressed natural gas ("CNG") forklift that would operate for 7 hours per day (see excerpt below) (Appendix B, pp. 118, 146, 244).

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
Forklifts	4	7.00	260	89	0.20	CNG

As previously mentioned, the CalEEMod User's Guide requires any changes to model defaults be justified.[3] According to the "User Entered Comments and Non-Default Data" table, the justification provided for the inclusion of operational off-road equipment is:

> "4 Forklifts 7 hours per day. Per PDF 1, analyzed as CNG fuel" (Appendix B, pp. 92, 120, 213).

Furthermore, the DEIR incorporates Project Design Feature ("PDF") AQ-4, which states:

> "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" (p. 5.2-37).

O5.16 Cont.

However, these changes remain unsubstantiated for two reasons.

First, while the DEIR incorporates PDF AQ-4, the DEIR fails to include this feature as a formal mitigation measure. This is incorrect, as 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."[4]

As demonstrated above, PDFs that are not formally included as mitigation measures may be eliminated from the Project's design altogether. Thus, as PDF AQ-4 is not formally included as a mitigation measure in the DEIR, we cannot guarantee that the use of non-diesel fuel or electric tools would be implemented, monitored, and enforced on the Project site.

[3] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 1, 14.
[4] "CEQA Portal Topic Paper Mitigation Measures." AEP, February 2020, *available at:* https://ceqaportal.org/tp/CEQA%20Mitigation%202020.pdf, p. 6.

Second, the DEIR and associated documents fail to mention the reduction to the number of hours per day whatsoever. As such, we cannot verify that the forklifts would operate for only 7 hours a day.

These unsubstantiated changes present an issue, as CalEEMod uses operational off-road equipment to calculate the emissions associated with the Project's area-source operational emissions. [5] Thus, by including unsubstantiated input parameters associated with the Project's operational off-road equipment, the model may underestimate the Project's area-source operational emissions and should not be relied upon to determine Project significance.

O5.16 Cont.

Disproportionate Health Risk Impacts of Warehouses on Surrounding Communities

Upon review of the DEIR, we have determined that the development of the proposed Project would result in disproportionate health risk impacts on community members living, working, and going to school within the immediate area of the Project site. According to the SCAQMD:

> "Those living within a half mile of warehouses are more likely to include communities of color, have health impacts such as higher rates of asthma and heart attacks, and a greater environmental burden."[6]

In particular, the SCAQMD found that more than 2.4 million people live within a half mile radius of at least one warehouse, and that those areas not only experience increased rates of asthma and heart attacks, but are also disproportionately Black and Latino communities below the poverty line.[7] Another study similarly indicates that "neighborhoods with lower household income levels and higher percentages of minorities are expected to have higher probabilities of containing warehousing facilities."[8] Additionally, a report authored by the Inland Empire-based People's Collective for Environmental Justice and University of Redlands states:

O5.17

> "As the warehouse and logistics industry continues to grow and net exponential profits at record rates, more warehouse projects are being approved and constructed in low-income communities of color and serving as a massive source of pollution by attracting thousands of polluting truck trips daily. Diesel trucks emit dangerous levels of nitrogen oxide and particulate matter that cause devastating health impacts including asthma, chronic obstructive pulmonary

[5] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 42.
[6] "South Coast AQMD Governing Board Adopts Warehouse Indirect Source Rule." SCAQMD, May 2021, *available at:* http://www.aqmd.gov/docs/default-source/news-archive/2021/board-adopts-waisr-may7-2021.pdf?sfvrsn=9.
[7] "Southern California warehouse boom a huge source of pollution. Regulators are fighting back." Los Angeles Times, May 2021, *available at:* https://www.latimes.com/california/story/2021-05-05/air-quality-officials-target-warehouses-bid-to-curb-health-damaging-truck-pollution.
[8] "Location of warehouses and environmental justice: Evidence from four metros in California." Metro Freight Center of Excellence, January 2018, *available at:* https://www.metrans.org/assets/research/MF%201.1g_Location%20of%20warehouses%20and%20environmental%20justice_Final%20Report_021618.pdf, p. 21.

disease (COPD), cancer, and premature death. As a result, physicians consider these pollution-burdened areas 'diesel death zones."[9]

It is evident that the continued development of industrial warehouses within these communities poses a significant environmental justice challenge. However, the acceleration of warehouse development is only increasing despite the consequences on public health. The Inland Empire alone is adding 10 to 25 million SF of new industrial space each year.[10]

O5.17

Cont.

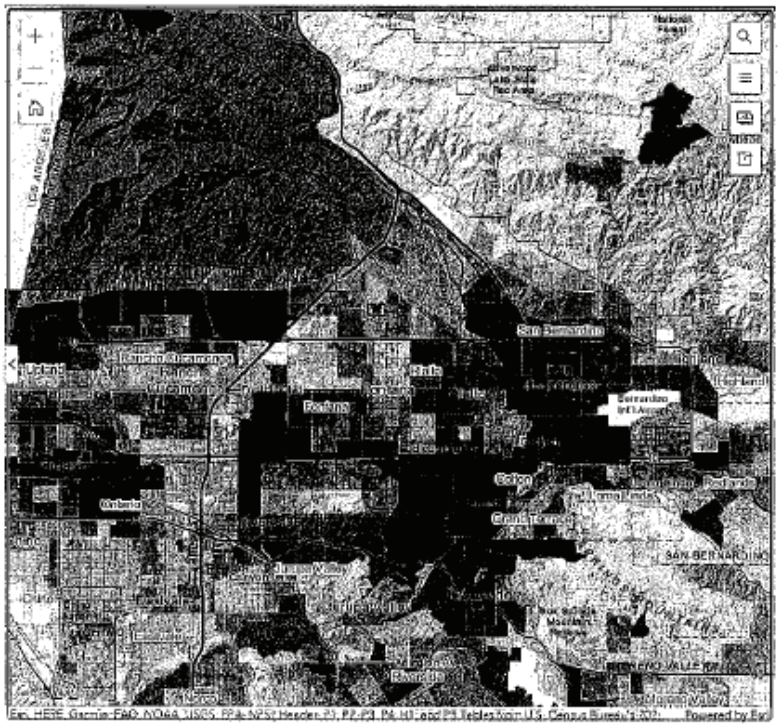
San Bernardino County, the setting of the proposed Project, has long borne a disproportionately high pollution burden compared to the rest of California. When using CalEnviroScreen 4.0, CalEPA's screening tool that ranks each census tract in the State for pollution and socioeconomic vulnerability, we found that the Project's census tract is in the 71st percentile of most polluted census tracts in the State (see excerpt below).[11]

[9] "Warehouses, Pollution, and Social Disparities: An analytical view of the logistics industry's impacts on environmental justice communities across Southern California." People's Collective for Environmental Justice, April 2021, *available at:* https://earthjustice.org/sites/default/files/files/warehouse_research_report_4.15.2021.pdf, p. 4.

[10] "2020 North America Industrial Big Box Review & Outlook." CBRE, 2020, *available at:* https://www.cbre.com/-/media/project/cbre/shared-site/insights/local-responses/industrial-big-box-report-inland-empire/local-response-2020-ibb-inland-empire-overview.pdf, p. 2.

[11] "CalEnviroScreen 4.0." California Office of Environmental Health Hazard Assessment (OEHHA), October 2021, *available at:* https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40.

5



O5.17 Cont.

Therefore, development of the proposed warehouse would disproportionately contribute to and exacerbate the health conditions of the residents of Bloomington.

In April 2022, the American Lung Association ranked San Bernadino County as the worst for ozone pollution in the nation.[12] The Los Angeles Times also reported that San Bernardino County had 130 bad air days for ozone pollution in 2020, violating federal health standards on nearly every summer day.[13] Downtown Los Angeles, by comparison, had 22 ozone violation days in 2020. This year, the County continues to face the worst ozone pollution, as it has seen the highest recorded Air Quality Index ("AQI") values for ground-level ozone in California.[14] The U.S. Environmental Protection Agency ("EPA") indicates that ozone, the main ingredient in "smog," can cause several health problems, which includes aggravating lung diseases and increasing the frequency of asthma attacks. The U.S. EPA states:

O5.18

[12] "State of the Air 2022." American Lung Association, April 2022, *available at:* https://www.lung.org/research/sota/key-findings/most-polluted-places.
[13] "Southern California warehouse boom a huge source of pollution. Regulators are fighting back." Los Angeles Times, May 2021, *available at:* https://www.latimes.com/california/story/2021-05-05/air-quality-officials-target-warehouses-bid-to-curb-health-damaging-truck-pollution.
[14] "High Ozone Days." American Lung Association, 2022, *available at:* https://www.lung.org/research/sota/city-rankings/states/california.

> "Children are at greatest risk from exposure to ozone because their lungs are still developing and they are more likely to be active outdoors when ozone levels are high, which increases their exposure. Children are also more likely than adults to have asthma."[15]

Furthermore, regarding the increased sensitivity of early-life exposures to inhaled pollutants, the California Air Resources Board ("CARB") states:

> "Children are often at greater risk from inhaled pollutants, due to the following reasons:
>
> - Children have unique activity patterns and behavior. For example, they crawl and play on the ground, amidst dirt and dust that may carry a wide variety of toxicants. They often put their hands, toys, and other items into their mouths, ingesting harmful substances. Compared to adults, children typically spend more time outdoors and are more physically active. Time outdoors coupled with faster breathing during exercise increases children's relative exposure to air pollution.
>
> - Children are physiologically unique. Relative to body size, children eat, breathe, and drink more than adults, and their natural biological defenses are less developed. The protective barrier surrounding the brain is not fully developed, and children's nasal passages aren't as effective at filtering out pollutants. Developing lungs, immune, and metabolic systems are also at risk.
>
> - Children are particularly susceptible during development. Environmental exposures during fetal development, the first few years of life, and puberty have the greatest potential to influence later growth and development."[16]

O5.18 Cont.

A Stanford-led study also reveals that children exposed to high levels of air pollution are more susceptible to respiratory and cardiovascular diseases in adulthood.[17] Thus, given children's higher propensity to succumb to the negative health impacts of air pollutants, and as warehouses release more smog-forming pollution than any other sector, it is necessary to evaluate the specific health risk that warehouses pose to children in the nearby community.

O5.19

According to the above-mentioned study by the People's Collective for Environmental Justice and University of Redlands, there are 640 schools in the South Coast Air Basin that are located within half a mile of a large warehouse, most of them in socio-economically disadvantaged areas.[18] Regarding the proposed Project itself, the DEIR states:

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[15] "Health Effects of Ozone Pollution." U.S. EPA, May 2021, *available at:* https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution.
[16] "Children and Air Pollution." California Air Resources Board (CARB), *available at:* https://ww2.arb.ca.gov/resources/documents/children-and-air-pollution.
[17] "Air pollution puts children at higher risk of disease in adulthood, according to Stanford researchers and others." Stanford, February 2021, *available at:* https://news.stanford.edu/2021/02/22/air-pollution-impacts-childrens-health/.
[18] "Warehouses, Pollution, and Social Disparities: An analytical view of the logistics industry's impacts

> "The nearest school is Bloomington High School, which is located approximately 330 feet south of the Project site" (p. 5.11-6).

This poses a significant threat because, as outlined above, children are a vulnerable population that are more susceptible to the damaging side effects of air pollution. As such, the Project would have detrimental short-term and long-term health impacts on local residents and children if approved.

O5.19 Cont.

A revised EIR should be prepared to evaluate the disproportionate impacts of the proposed warehouse on the community adjacent to the Project, including an analysis of the impact on children and people of color who live and attend school in the surrounding area. Finally, in order to evaluate the cumulative air quality impact from the several warehouse projects proposed or built in a one-mile radius of the Project site, the revised EIR should prepare a cumulative health risk assessment ("HRA") to quantify the adverse health outcome from the effects of exposure to multiple warehouses in the immediate area in conjunction with the poor ambient air quality in the Project's census tract.

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 a quantified construction and mobile-source operational HRA. Specifically, the DEIR estimates that the maximum incremental cancer risk posed to nearby, existing residential sensitive receptors associated with exposure to diesel particulate matter ("DPM") emissions from heavy-duty diesel trucks and equipment activities during Project construction would be 0.98 in one million, which would not exceed the SCAQMD significance threshold of 10 in one million (p. 5.2-32). Furthermore, the DEIR estimates that the maximum incremental cancer risk posed to nearby, existing residential sensitive receptors associated with exposure to DPM emissions from heavy-duty diesel trucks traveling to and from the Project site, maneuvering onsite, and entering and leaving the site during Project operation would be 1.4 in one million, which also would not exceed the SCAQMD significance threshold of 10 in one million (see excerpt below) (p. 5.2-34 – 5.2-34, Table 5.2-12).

O5.20

on environmental justice communities across Southern California." People's Collective for Environmental Justice, April 2021, *available at:* https://earthjustice.org/sites/default/files/files/warehouse_research_report_4.15.2021.pdf, p. 4.

Table 5.2-12: Project Operational DPM Emission Cancer Risks at Nearby Sensitive Receptors

Sensitive Receptor	Annual PM10 Concentration (µg/m³)			Cancer Risk Per Million People[2]
	2023-2025	2026-2040	2041-2052	
1	0.0007	0.0007	0.0006	0.5
2	0.0011	0.0010	0.0010	0.8
3	0.0020	0.0019	0.0019	1.4
4	0.0014	0.0013	0.0013	1.0
5	0.0005	0.0005	0.0005	0.3
6	0.0005	0.0005	0.0005	0.3
7	0.0005	0.0005	0.0005	0.4
8	0.0009	0.0009	0.0009	0.6
9	0.0012	0.0012	0.0012	0.9
10	0.0010	0.0009	0.0009	0.7
11	0.0008	0.0008	0.0007	0.6
12	0.0008	0.0007	0.0006	0.5
			Threshold of Significance	10
			Exceed Threshold?	No

Source: AQ, 2022 (Appendix B).

However, 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 three reasons. O5.20 Cont.

First, the DEIR's construction HRA is incorrect, as it relies upon emissions estimates that are underestimated. Specifically, the DEIR's construction HRA states:

> "[T]he Project applicant will use reasonable best efforts to deploy the highest rated CARB Tier technology that is available at the time of construction. As such, this analysis assumes the use of Tier 4 equipment, resulting in a 90% reduction in PM emissions compared to Tier 3 equipment" (Appendix K, p. 4).

However, the assumption that Project construction would use Tier 4 equipment is incorrect, as the DEIR fails to mention Tier 4 emissions standards whatsoever. Moreover, the use of Tier 4 construction equipment was not included as a formal mitigation measure. This is incorrect as 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]

As demonstrated above, PDFs that are not formally included in a mitigation monitoring and reporting program ("MMRP") may be eliminated from the Project's design altogether. Thus, as the use of Tier 4 construction equipment is not formally included as a mitigation measure, nor mentioned in the DEIR whatsoever, we cannot guarantee that these standards would be implemented, monitored, and enforced on the Project site. Thus, by assuming a 90% reduction in particulate matter emissions, the HRA utilizes a greatly underestimated DPM concentration to calculate the health risk associated with Project construction. As such, the DEIR's construction HRA and resulting cancer risk should not be relied upon to determine Project significance. O5.20 Cont.

Second, the construction HRA utilizes an incorrect Fraction of Time At Home ("FAH") values. Specifically, the HRA utilizes a FAH value of 0.85 for the infant (age 0 to 2) stage of life (see excerpt below) (Appendix K, p. 8, Table 2-4).

TABLE 2-4: EXPOSURE ASSUMPTIONS FOR INDIVIDUAL CANCER RISK (CONSTRUCTION ACTIVITY)

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 to 2	1,090	10	1.38	0.85	260	8

O5.21

However, the FAH value used for the infant stage is incorrect, as SCAQMD guidance states:

> "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." [20]

As such, per SCAQMD guidance, the construction HRA should have used an FAH of 1 for the infant receptors. Thus, by utilizing incorrect FAH values, the DEIR underestimates the cancer risk posed to nearby, existing sensitive receptors as a result of Project construction and operation.

Third, while the DEIR includes two HRAs evaluating the health risk impacts to nearby, existing receptors as a result of Project construction and operation, the DEIR fails to evaluate the combined lifetime cancer risk to nearby receptors as a result of Project construction and operation together. According to OEHHA guidance, "the excess cancer risk is calculated separately for each age grouping and then summed to O5.22

[19] "CEQA Portal Topic Paper Mitigation Measures." AEP, February 2020, *available at:* https://ceqaportal.org/tp/CEQA%20Mitigation%202020.pdf, p. 6.
[20] "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.

yield cancer risk at the receptor location." [21] However, the DEIR fails to sum the total cancer risks in order to evaluate the combined cancer risk over the course of the Project's total construction and operation. This is incorrect and, as such, an updated analysis should quantify and sum the Project's construction and operational cancer risks to compare to the SCAQMD threshold of 10 in one million, as referenced by the DEIR (p. 5.8-10). O5.22 Cont.

Greenhouse Gas

Failure to Adequately Evaluate Greenhouse Gas Impacts

The DEIR estimates that the Project would generate net annual greenhouse gas ("GHG") emissions of 2,237.56 metric tons of carbon dioxide equivalents per year ("MT CO_2e/year"), which would not exceed the SCAQMD threshold of 3,000 MT CO_2e/year (p. 5.7-10, Table 5.7-1).

Table 5.7-1: Proposed Project Generated Greenhouse Emissions

	Greenhouse Gas Emissions (Metric Tons per Year)			
Category	**CO_2**	**CH_4**	**N_2O**	**CO_2e**
Area Sources[1]	0.01	<0.00	<0.00	0.01
Energy Usage[2]	148.90	0.01	<0.00	149.69
Mobile Sources[3]	1,654.10	0.06	0.22	1,719.70
Off-Road Equipment[4]	79.82	0.03	<0.00	80.46
Solid Waste[5]	24.76	1.46	<0.00	61.33
Water and Wastewater[6]	133.02	1.66	0.04	186.49
Construction[7]	39.31	0.01	<0.00	39.89
Total Emissions	2,079.90	3.22	0.26	**2,237.56**
County of San Bernardino GHG Emissions Reduction Plan Screening Threshold				**3,000**
Exceed Screening Threshold?				No

Source: AQ, 2022 (Appendix B).
[1] Area sources consist of GHG emissions from consumer products, architectural coatings, and landscaping equipment.
[2] Energy usage consists of GHG emissions from electricity and natural gas usage.
[3] Mobile sources consist of GHG emissions from vehicles.
[4] Off-road equipment consists of emissions from forklifts utilized onsite (Project Design Feature 1 requires all off-road equipment to be non-diesel-powered).
[5] Waste includes the CO_2 and CH_4 emissions created from the solid waste placed in landfills.
[6] Water includes GHG emissions from electricity used for transport of water and processing of wastewater.
[7] Construction emissions amortized over 30 years as recommended in the SCAQMD GHG Working Group on November 19, 2009.
Source: CalEEMod Version 2020.4.0.

O5.23

Furthermore, the DEIR's analysis relies upon the Project's consistency with the County's General Plan and the CARB 2017 Scoping Plan to conclude that the Project would result in a less-than-significant GHG impact (p. 5.7-18). However, the DEIR's analysis, as well as the subsequent less-than-significant impact conclusion, is incorrect for four reasons.

(1) The DEIR's quantitative GHG analysis relies upon an incorrect and unsubstantiated air model;
(2) The DEIR's quantitative GHG analysis relies upon an outdated threshold;
(3) The DEIR fails to identify a potentially significant GHG impact; and
(4) The DEIR fails to consider the performance-based standards under CARB's *Scoping Plan*.

[21] "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.

1) Incorrect and Unsubstantiated Quantitative Analysis of Emissions

As previously stated, the DEIR estimates that the Project would generate net annual GHG emissions of 2,237.56 MT CO_2e/year (p. 5.7-10, Table 5.7-1). However, the DEIR's quantitative GHG analysis is unsubstantiated. As previously discussed, when we reviewed the Project's CalEEMod output files, provided in the AQ, Energy, GHG, & HRA Analysis as Appendix B, to the DEIR, we found that several of the values inputted into the model are not consistent with information disclosed in the DEIR. As a result, the model underestimates the Project's emissions, and the DEIR's quantitative GHG analysis should not be relied upon to determine Project significance. A revised EIR should be prepared that adequately assesses the potential GHG impacts that construction and operation of the proposed Project may have on the environment. O5.24

2) Incorrect Reliance on an Outdated Quantitative GHG Threshold

As previously stated, the DEIR estimates that the Project would generate net annual GHG emissions of 2,237.56 MT CO_2e/year, which would not exceed the SCAQMD bright-line threshold of 3,000 MT CO_2e/year (p. 5.7-10, Table 5.7-1). However, the guidance that provided the 3,000 MT CO_2e/year threshold, the SCAQMD's 2008 *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules, and Plans* report, was developed when the Global Warming Solutions Act of 2006, commonly known as "AB 32", was the governing statute for GHG reductions in California. AB 32 requires California to reduce GHG emissions to 1990 levels by 2020. [22] Furthermore, AEP guidance states:

> "[F]or evaluating projects with a post 2020 horizon, the threshold will need to be revised based on a new gap analysis that would examine 17 development and reduction potentials out to the next GHG reduction milestone." [23]

O5.25

As it is currently August 2022, thresholds for 2020 are not applicable to the proposed Project and should be revised to reflect the current GHG reduction target. As such, the SCAQMD bright-line threshold of 3,000 MT CO_2e/year is outdated and inapplicable to the proposed Project, and the DEIR's less-than-significant GHG impact conclusion should not be relied upon. Instead, we recommend that the Project apply the SCAQMD 2035 service population efficiency target of 3.0 metric tons of carbon dioxide equivalents per service population per year ("MT CO_2e/SP/year"), which was calculated by applying a 40% reduction to the 2020 targets. [24]

3) Failure to Identify a Potentially Significant GHG Impact

In an effort to quantitatively evaluate the Project's GHG emissions, we compared the Project's GHG emissions, as estimated by the DEIR, to the SCAQMD 2035 efficiency target of 3.0 MT CO_2e/SP/year. O5.26

[22] "Health & Safety Code 38550." California State Legislature, January 2007, *available at:* https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=HSC&sectionNum=38550.
[23] "Beyond Newhall and 2020: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California." Association of Environmental Professionals (AEP), October 2016, *available at:* https://califaep.org/docs/AEP-2016_Final_White_Paper.pdf, p. 39.
[24] "Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15." SCAQMD, September 2010, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf, p. 2.

When applying this threshold, the Project's incorrect and unsubstantiated air model indicates a potentially significant GHG impact.

As previously stated, the DEIR estimates that the Project would generate net annual GHG emissions of 2,237.56 MT CO_2e/year (p. 5.7-10, Table 5.7-1). According to CAPCOA's *CEQA & Climate Change* report, a service population ("SP") is defined as "the sum of the number of residents and the number of jobs supported by the project."[25] The DEIR indicates that the Project would generate approximately 217 jobs (p. 5.10-12). As the proposed Project does not include any residential land uses, we estimate a SP of 217 people. When dividing the Project's net annual GHG emissions, as estimated by the DEIR, by a SP of 217 people, we find that the Project would emit approximately 10.3 MT CO_2e/SP/year (see table below).[26]

DEIR Greenhouse Gas Emissions	
Annual Emissions (MT CO_2e/year)	2,227.56
Service Population	217
Service Population Efficiency (MT CO_2e/SP/year)	10.3
SCAQMD 2035 Target	3.0
Exceeds?	***Yes***

O5.26 Cont.

As demonstrated above, the Project's service population efficiency value, as estimated by the DEIR's provided net annual GHG emission estimates and SP, exceeds the SCAQMD 2035 efficiency target of 3.0 MT CO_2e/SP/year, indicating a potentially significant impact not previously identified or addressed by the DEIR. As a result, the DEIR's less-than-significant GHG impact conclusion should not be relied upon. A revised EIR should be prepared, including an updated GHG analysis and incorporating additional mitigation measures to reduce the Project's GHG emissions to less-than-significant levels.

4) Failure to Consider Performance-based Standards Under CARB's 2017 Scoping Plan

As previously discussed, the DEIR concludes that the Project would be consistent with CARB's 2017 Climate Change Scoping Plan (p. 4.7-20). However, this is incorrect, as the DEIR fails to consider performance-based measures proposed by CARB.

I. Passenger & Light Duty VMT Per Capita Benchmarks per SB 375

In reaching the State's long-term GHG emission reduction goals, CARB's 2017 *Scoping Plan* explicitly cites to SB 375 and the VMT reductions anticipated under the implementation of Sustainable Community Strategies.[27] CARB has identified the population and daily VMT from passenger autos and light-duty vehicles at the state and county level for each year between 2010 to 2050 under a "baseline scenario" that includes "current projections of VMT included in the existing Regional Transportation

[25] "CEQA & Climate Change." California Air Pollution Control Officers Association (CAPCOA), January 2008, *available at:* http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA-White-Paper.pdf, p. 71-72.
[26] Calculated: (2,237.56 MT CO_2e/year) / (217 service population) = (10.3 MT CO_2e/SP/year).
[27] "California's 2017 Climate Change Scoping Plan." CARB, November 2017, *available at:* https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf, p. 25, 98, 101-103.

Plans/Sustainable Communities Strategies (RTP/SCSs) adopted by the State's 18 Metropolitan Planning Organizations (MPOs) pursuant to SB 375 as of 2015."[28] By dividing the projected daily VMT by the population, we calculated the daily VMT per capita for each year at the state and county level for 2010 (baseline year), 2023 (Project operational year), and 2030 (target years under SB 32) (see table below).

2017 Scoping Plan Daily VMT Per Capita

	San Bernardino County			State		
Year	Population	LDV VMT Baseline	VMT Per Capita	Population	LDV VMT Baseline	VMT Per Capita
2010	2,043,484	55,741,307.23	27.28	37,335,085	836,463,980.46	22.40
2023	2,302,993	62,347,922.72	27.07	41,659,526	924,184,228.61	22.18
2030	2,478,888	65,538,854.28	26.44	43,939,250	957,178,153.19	21.78

O5.27

As the DEIR fails to evaluate the Project's consistency with the CARB 2017 *Scoping Plan* performance-based daily VMT per capita projections, the DEIR's claim that the proposed Project would not conflict with the CARB 2017 *Scoping Plan* is unsupported. A revised EIR should be prepared for the proposed Project to provide additional information and analysis to conclude less-than-significant GHG impacts.

Mitigation

Feasible Mitigation Measures Available to Reduce Emissions

Regarding mitigation recommended in the California Department of Justice ("DOJ") "Warehouse Project Best Practices" Memorandum, the DEIR states:

> "In response to the increase in warehouse development in California, in March 2021, the California Department of Justice published a Memorandum entitled "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act". The Memorandum encourages warehouse projects to implement certain best practices and mitigation measures regarding community engagement, siting and design considerations, air quality and greenhouse gas emissions, noise impacts, and traffic impacts. In response to the memorandum, the Project applicant has voluntarily incorporated numerous measures recommended in the Memorandum. These measures will be enforced by the County of San Bernardino and will be implemented by the Project applicant as Project Design Features (PDFs) which are incorporated into the Project's Mitigation Monitoring and Reporting Program" (p. 5.2-35).

O5.28

However, this is insufficient. As discussed above, PDFs that are not formally included as mitigation measures may be eliminated from the Project's design altogether.[29] Therefore, to reduce the Project's

[28] Supporting Calculations for 2017 Scoping Plan-Identified VMT Reductions," California Air Resources Board (CARB), January 2019, *available at*: https://ww2.arb.ca.gov/sites/default/files/2019-01/sp_mss_vmt_calculations_jan19_0.xlsx; *see also:* https://ww2.arb.ca.gov/resources/documents/carb-2017-scoping-plan-identified-vmt-reductions-and-relationship-state-climate.

[29] "CEQA Portal Topic Paper Mitigation Measures." AEP, February 2020, *available at:* https://ceqaportal.org/tp/CEQA%20Mitigation%202020.pdf, p. 6.

emissions, the following measures from the DOJ "Warehouse Project Best Practices" Memorandum should be incorporated as formal mitigation measures: [30]

- 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.
- 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.

O5.28 Cont.

[30] "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. 7, 8.

- 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. O5.28 Cont.
- 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.

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.

Furthermore, our analysis demonstrates that the Project results in significant GHG impacts that should be mitigated further. Thus, as it is policy of the State that eligible renewable energy resources and zero-carbon resources supply 100% of retail sales of electricity to California end-use customers by December 31, 2045, we emphasize the applicability of incorporating solar power system into the Project design. Until the feasibility of incorporating on-site renewable energy production is considered to reduce the Project's GHG emissions, the DEIR should not be approved. O5.28 Cont.

A revised EIR should be prepared to include all feasible mitigation measures, as well as include updated air quality and GHG analyses to ensure that the necessary mitigation measures are implemented to reduce emissions to below thresholds. The revised 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 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. O5.29

Sincerely,



Matt Hagemann, P.G., C.Hg.



Paul E. Rosenfeld, Ph.D.

Attachment A: Matt Hagemann CV
Attachment B: Paul E. Rosenfeld CV

Attachment A

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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Investigation and Remediation Strategies
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Industrial Stormwater Compliance
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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 B

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

SOIL WATER AIR PROTECTION ENTERPRISE
2656 29th Street, Suite 201
Santa Monica, California 90405
Attn: Paul Rosenfeld, Ph.D.
Mobil: (310) 795-2335
Office: (310) 452-5555
Fax: (310) 452-5550
Email: prosenfeld@swape.com

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). Perfluoroctanoic Acid (PFOA) and Perfluoroactane 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., Tarn, 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
Warrn 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
Jaeanette 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

Response to Comment Letter O5: Blum Collins, dated August 9, 2022

Comment O5.1: 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 Project and provides a summary of the Project description.

Response O5.1: 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 O5.2: This comment states that the County's initial review process determined that impacts related to Agricultural & Forest Resources, Population & Housing, Mineral Resources, Public Services, and Wildfire would be less than significant and were not required to be analyzed in the EIR. The comment states that the EIR must be recirculated to include the County's initial review process, analysis, and determination in order to comply with CEQA's requirements for adequate information documents and meaningful disclosure.

Response O5.2: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed in the Notice of Preparation (NOP) that was circulated for public review between December 22, 2021 and January 21, 2022, an Initial Study was not prepared for the Project as the County determined that an EIR was clearly required (State CEQA Guidelines Section 15063(a)). Further, pursuant to CEQA Guidelines Section 15126.2(a), an EIR shall only identify and focus on the significant effects of the project on the environment. Therefore, the EIR did not include a separate chapter of analysis for agricultural & forest resources, mineral resources, population & housing, public services, and wildfire, but did include a discussion of the potential impacts related to those resources in Chapter 2 of the Draft EIR. Therefore, the discussion of these impact areas within the Draft EIR meets the requirements set forth by CEQA.

Comment O5.3: This comment states that EIR uses uncertain language to describe the Project's employment generation and does not provide any calculation of construction employees. The comment states that the EIR does not provide proof that the Project will not need any workers from outside the region and a revised EIR should be prepared to demonstrate that relying on the workforce of the greater SCAG region will increase VMT and air quality/greenhouse gas emissions. The comment provides SCAG demographic growth data and states that the EIR does not provide any analysis of whether the Project and other projects would cumulatively exceed SCAG's employment growth forecast.

Response O5.3: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. In response to Comment O5.3, page 2-3 of the Draft EIR has been revised to include the amount of construction workers required for the Project. As discussed, the Project would require approximately 103 construction workers during peak construction. 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 discussed in Section 3.0, *Project Description*, the Project would develop the site consistent with the Countywide Plan land use designation and County ordinances. The County's Countywide Plan EIR Section 5.13, Population and Housing, and Section 9, Other CEQA Considerations, includes development of the Project site pursuant to the existing land use designations. Buildout of the Countywide Plan (including the Project site) estimates that light industrial businesses employ one worker for every 1,195 square feet of building area. Thus, the Project would generate the need for approximately 217 employees, which is within growth projections of the Countywide Plan and SCAG's RTP/SCS. Thus, impacts the cumulative impacts of the Project are accounted for and would be less than significant.

Comment O5.4: This comment states that the Draft EIR does not include a floor plan, grading plan, or detailed site plan for the proposed Project, which does not comply with CEQA's requirements for adequate informational documents or meaningful disclosure. Additionally, the comment states that the figures of the plans in the EIR remove pertinent information. The comment also states that there is no method to verify that grading work of soils would balance onsite.

Response O5.4: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. 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 proposed Project is thoroughly described within Draft EIR Section 3.0, *Project Description,* on pages 3-1 through 3-18. 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 3-5 provides a conceptual elevation for the proposed building. 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 O5.5: 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. 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 4.0, the census tract including the Project site 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 traffic impacts.

Response O5.5: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Refer to Master Response 1. CalEnviroScreen was developed by OEHHA and the California Environmental Protection Agency (CalEPA). While CalEnviroScreen can assist CalEPA in prioritizing resources and helping promote greater compliance with environmental laws, it does have several limitations. The tool's output provides a relative ranking of communities based on a selected group of available datasets, through the use of a summary score. Unlike the health risk assessments prepared for the proposed Project, a CalEnviroScreen score is not an expression of health risk and does not provide quantitative information on increases in cumulative impacts for specific sites or projects. Further, as a comparative screening tool, the results do not provide a basis for determining when differences between scores are significant in relation to public health or the environment. Accordingly, CalEnviroScreen is not intended to be used as a health or ecological risk assessment for a specific area or site. Therefore, the fact that the Project is located in an area that CalEnviroScreen identifies as in the 97th percentile for pollution burden is not indicative of a CEQA impact.

Regarding the existing pollution burden, the existing air quality in the Project area is described in Draft EIR Section 5.2, *Air Quality*. Table 5.2-2 provides data from the Central San Bernardino Valley 1 monitoring station that is located approximately 5.7 miles northwest of the Project site and details that in 2020 there were 56 days that exceeded the state ozone standard and 89 days that exceeded the federal standard. In addition, 6 days exceeded the PM10 state standard and 4 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). In addition, the Draft EIR includes a discussion of CalEnviroScreen and environmental justice focus areas in San Bernardino County starting on page 5.2-16 of the Draft EIR.
As detailed in the Impact AQ-2 discussion that begins on page 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required.

As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project 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 Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. The Operational Mobile Health Risk Assessment and Construction Health Risk Assessment were prepared pursuant to the guidelines set forth by SCAQMD and the Office of Environmental Health Hazard Assessment (OEHHA). In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

The SCAQMD thresholds serve to determine whether or not a given project has a potentially significant project-level or cumulative impact. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. Thus, the project specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are not considered to be cumulatively significant. Since the Project would not exceed the SCAQMD health risk or air quality thresholds, the Project would not result in a cumulative impact pursuant to SCAQMD guidance.

Comment O5.6: This comment states that Project's census tract is in the 94th percentile for hazardous waste impacts and 87th percentile for solid waste facility impacts. The comment also states that the census tract is a diverse community with a high rate of low educational attainment.

Response O5.6: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed in Response O5.5, the Draft EIR includes a discussion of the existing environmental justice setting in Bloomington in Section 5.2, *Air Quality*. In addition, as described in Section 5.8, *Hazards and Hazardous Materials*, 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. 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 hazards and hazardous materials would reduce potential impacts related to hazardous materials from Project operation to less than significant. Therefore, the Project would not expose the surrounding community to hazards related to the use of hazardous materials.

Comment O5.7: This comment states that CalEEMod is not listed as an approved energy compliance modeling software. The comment states that since the Draft EIR did not accurately or adequately model impacts in compliance with Title 24, a revised EIR must be prepared with modeling in one of the three approved software types must be circulated for public review in order to adequately analyze the Project's potentially significant environmental impacts.

Response O5.7: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The commenter incorrectly assumes the purpose of Title 24 and California Energy Commission approved software programs. The approved programs serve the purpose of being used under the performance approach (energy budget) method of compliance for the 2019 Energy Standards. The programs mentioned are not utilized for CEQA analysis. CalEEMod, the California Emissions Estimator Model, is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod contains default values for estimating water and energy use which may be useful for preparing hydrology and energy analyses in other sections of a CEQA document. The model was developed for the California Air Pollution Officers Association (CAPCOA) in collaboration with the California Air Districts. Additionally, the Project would be compliant with measures set forth in Title 24. Compliance with Title 24 would be verified through the plan check process. The comment does not contain any information requiring changes to the Draft EIR. No further response is warranted.

Comment O5.8: This comment states that the Draft EIR does not provide any substantial evidence to support the SCAG RTP/SCS consistency analysis in Table 5.10-2. 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. The comment also states that due to errors in modeling, the Project is inconsistent with Countywide Plan policies NR-1, NR-1.7, NR-1.9, LU-2.3, and LU-4.5. The comment states that the Greenhouse Gas analysis determined the Project will generate 11,390 MTCO2e during the summer and 11,205 during winter, but the annual analysis reduces these emissions to 2,197 MTCO2e during Project operations.

Response O5.8: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed in Response 5.14 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 5.2, *Air Quality* and Section 5.7, *Greenhouse Gas Emissions*. The Project consistency discussion within Table 5.10-2 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.

Further, Table 5.10-3 in Section 5.10, *Land Use and Planning,* provides a discussion of consistency with applicable policies from the San Bernardino Countywide Plan. The goal of the consistency analysis is to provide the reader with a general overview of whether the Project is in harmony with the overall intent of the applicable goals and policies. It is within the County's purview to decide if the project is consistent or inconsistent with applicable goals or policies. Under state law, a Specific Plan must be consistent with the General Plan (Cal. Gov't Code Section 65454) and cannot be approved if it is inconsistent with the General Plan.

The commenter erroneously claims that the EIR relies on incorrect CalEEMod output sheets from the Air Quality Analysis. To the contrary, the 2,197 MT CO2e annual metric value is included in Appendix F of the Air Quality, Energy, Greenhouse Gas Emissions and Health Risk Assessment Impact Analysis (Appendix B to the Draft EIR). It appears as though the commenter is incorrectly referencing the *daily operational emissions summary* in the Air Quality, Energy, Greenhouse Gas Emissions and Health Risk Assessment Impact Analysis and ignores the *annual* and pounds per day value included in the Air Quality, Energy, Greenhouse Gas Emissions and Health Risk Assessment Impact Analysis. The information provided in the Draft EIR regarding Project-generated GHG emissions is correct. Impacts would be less than significant.

Comment O5.9: The comment states that the Project's VMT impacts are misrepresented by the SBCTA model because the Traffic Analysis Zone the Project is mostly comprised of low-density residential, Bloomington High School, and vacant land. The comment states that the VMT in the Air Quality Appendix CalEEMod output sheets indicates that the Project will generate approximately 2,066,589 annual VMT. Therefore, the comment concludes the VMT screening analysis does not adequately or accurately represent the VMT impacts of the Project and a project-specific VMT analysis should be prepared in a revised EIR.

Response O5.9: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The SBCTA screening tool is based on the SBTAM transportation model for the County which takes into account all planned land uses per the Countywide Plan and assigns trip distribution based on County socio-economic data. The proposed development is consistent with the zoning and land use designated as light industrial, which would mean that the SBCTA tool would take into account warehouse land use coded into the analysis model when determining the TAZ VMT. Therefore, Project impacts are accurately deemed less than significant as represented in the Draft EIR.

The Energy Analysis calculates VMT by multiplying the number of vehicles with an average travel distance set by the air quality district (SCAQMD), as compared to SBTAM which is a verified travel-demand model specific to the County of San Bernardino. CalEEMod is not an approved screening and calculating tool for assessing VMT within the County. 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.

As per the Governor's Office of Planning and Research Technical Advisory on Evaluation Transportation Impacts in CEQA, proposed Section 15064.3, subdivision (a), states, "For the purposes 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, trucks/trailers are excluded from transportation VMT analysis.

The 16.30 vehicle miles traveled/employee is the average of all the trips assumed by the SBTAM model to/from the proposed Project site. These trips range from within the immediate vicinity of the Project to the longer distances in the County of San Bernardino. The average VMT/employee for the County as calculated by SBTAM is 18.9, which represents all trips made within the County. The 16.30 VMT/employee for the Project site represents an average of all trips made to and from the proposed site based on socioeconomic data. The transportation analysis therefore adequately represents the VMT, and the VMT impacts are found to be less than significant.

Comment O5.10: This comment states that the Draft EIR is internally inconsistent because the transportation analysis concludes that VMT would be less than significant, but the population and housing analysis states that employees are anticipated to live within the region. The comment states that the VMT analysis only assumed a 16.30 mile trip for employees and should be revised to reflect longer distances for employees traveling to and from the site. In addition, the comment states that the revised EIR should include a construction worker employment trip analysis.

Response O5.10: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The SBCTA screening tool is based on SBTAM transportation model for the County which takes into account all planned land uses per the Countywide Plan and assigns trip distribution based on County socio-economic data. The proposed development is consistent with the zoning and land use designated as light industrial and hence the project impacts are accurately deemed less than significant as represented in the Draft EIR. Refer to Response O5.9.
Construction impacts are short term while VMT analyses are based on long term impacts. The number of employees during operations are anticipated to be more than the number of construction workers on site on any given day. Therefore, San Bernardino County does not require an analysis of VMT impacts for construction.

Comment O5.11: This comment states that the EIR does not evaluate a reasonable range of alternatives as only one alternatives is analyzed beyond the required No Project/No Development Alternative. The comment states that the EIR should be revised to include at least four total alternatives.

Response O5.11: 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 a certain amount of alternatives. As such, the alternatives utilized by the Draft EIR (No Project/No Development Alternative and Reduced Development Footprint Alternative) are sufficient pursuant to CEQA Guidelines Section 15126.6. No further response is required.

Comment O5.12: 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 O5.12: 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 O5.13: This comment states that SWAPE has reviewed the Draft EIR and provides a summary of the project description. 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 O5.13: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The Draft EIR includes air quality, health risk, and greenhouse gas analyses pursuant to SCAQMD methodology and the proposed Project information. In response to these analyses, one mitigation measure was applied, and the Project includes 25 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.
Despite the differing opinion offered by commenter's air quality consultant, the existence of disagreement among experts concerning the conclusions of an EIR or the propriety of the analytical methods employed in an EIR are not indicative of any deficiency. The County, as CEQA lead agency, is entitled to choose among conflicting expert opinions. (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988)

47 Cal. 3d 376, 409; *Greenbaum v. City of Los Angeles* (1984) 153 Cal.App.3d at 412, 413; (*Browning-Ferris v. City Council* (1986) 181 Cal.App.3d 852 at 863).

Comment O5.14: 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 commenter provides more detailed comments after this statement and this comment merely serves as an introduction.

Response O5.14: 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. Responses to substantive comments are provided below.

Comment O5.15: This comment states that the CalEEMod output files show that the model did not include the 5,000 SF of office space. The comment states that by failing to include all proposed land use types, the model may underestimate the Project's construction-related and operation emissions and the analysis should not be relied upon to determine Project significance.

Response O5.15: The land uses provided in CalEEMod are from the Institute of Transportation Engineer's Trip Generation Report. According to the ITE Trip Generation User's Guide, under 150 Warehousing it states: "Warehouses are primarily devoted to the storage of materials, but they may also include office and maintenance areas." The proposed warehouse does not deviate from the ITE's definition above, since the majority of the proposed warehouse will be devoted to storage of materials and will include a small office area. As such, the proposed Project was appropriately modeled in CalEEMod.

Comment O5.16: This comment states that CalEEMod output files show several changes to default operation off-road equipment input parameters, including use of a compressed natural gas forklift for seven hours per day instead of a diesel forklift for eight hours per day. The comment states that these changes are unsubstantiated and that the Project design features should be included as 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 be guaranteed that they would be implemented, monitored, and enforced on the Project site.

Response O5.16: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The inclusion of off-road equipment within the operational analysis is not included in the CalEEMod default values, so the Draft EIR provides for a worst-case analysis with inclusion of air emissions created from off-road equipment from operation of the Project. Furthermore, as detailed in Draft EIR Table 5.2-9, the 18.17 pounds per day of NOx is the criteria pollutant that is closest to an exceedance of the SCAQMD thresholds of 55 pounds per day. The commenter provides no evidence that the NOx emissions that could potentially be created from off-road equipment would be anywhere near the 36.83 pounds per day of NOx that would be required to change the level of significance set forth in the Draft EIR.

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 25 PDFs related to air quality and greenhouse gas emissions. These PDFs are included in the Project's MMRP to ensure implementation by with the Project.

Comment O5.17: This comment states that the Project would result in disproportionate health risk impacts to community members within the vicinity of the Project site and discussed the environmental burden placed on communities of color. The comment stats that when using CalEnviroScreen 4.0, the Project census tract is in the 71st percentile of most polluted census tracts in the state.

Response O5.17: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Regarding the existing pollution burden, the existing air quality in the Project area is described in Draft EIR Section 5.2, *Air Quality*. Table 5.2-2 provides data from the Central San Bernardino Valley 1 monitoring station that is located approximately 5.7 miles northwest of the Project site and details that in 2020 there were 56 days that exceeded the state ozone standard and 89 days that exceeded the federal standard. In addition, 6 days exceeded the PM10 state standard and 4 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). In addition, the Draft EIR includes a discussion of CalEnviroScreen and environmental justice focus areas in San Bernardino County starting on page 5.2-16 of the Draft EIR. Refer also to Response 05.5.

Comment O5.18: This comment states that the American Lung Association ranks San Bernardino County as the worst for ozone pollution in the nation. The comment states that ozone can cause several health problems and lists some of the potential health problems from ozone.

Response O5.18: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The commenter is referred to Response O5.5 and O5.17 for a discussion of Project air quality and health risk impacts. No further response is required.

Comment O5.19: This comment states that children exposed to high levels of pollution are more susceptible to respiratory and cardiovascular diseases in adulthood; therefore, it is necessary to evaluate the specific health risk of warehouses. The comment states that the Project is in close proximity to Bloomington High School and the Project would have detrimental short term and long term health impacts on local residents. The comment states that a revised EIR should be prepared to evaluate the disproportionate impacts of the Project on the community and should prepare a cumulative health risk assessment.

Response O5.19: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The commenter is referred to Response O5.5 and O5.17 for a discussion of Project air quality and health risk impacts. No further response is required.

Comment O5.20: This comment states that DPM health risk emissions were inadequately evaluated and provides a summary of the construction and operational health risk analysis included in the Draft EIR. The comment states that the construction HRA relies on the use of Tier 4 equipment, but this is not mentioned in the Draft EIR and was not included as a formal mitigation measure.

Response O5.20: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. In response to this comment, the EIR has been revised to include Mitigation Measure AQ-1, which requires the use of Tier 4 equipment. Mitigation Measure AQ-1 will be included within the MMRP for the proposed Project to ensure that it is enforced. No further response is required.

Comment O5.21: This comment states that the construction HRA uses an incorrect Fraction of Time at Home (FAH) value. The comment states that per SCAQMD guidance the construction HRA should have used a FAH of 1 for the infant receptors and the Draft EIR underestimates the cancer risk to nearby receptors.

Response O5.21: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Even if the FAH were adjusted to 1.0, this would result in a risk total of 1.15 in one million at the MEIR, which is less than the applicable threshold of 10 in one million. Therefore, even with changing the FAH to 1.0 for infant receptors, impacts related to construction DPM emissions would be less than significant.

Comment O5.22: This comment states that the Draft EIR includes construction and operational HRAs but fails to evaluate the combined lifetime cancer risk to nearby receptors as a result of Project construction and operation together and quotes OEHHA guidance. The comment states that the EIR should quantify and sum the Project's construction and operational cancer risks to compare to SCAQMD thresholds.

Response O5.22: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The primary purpose of an HRA is to determine long-term health risks, such as cancer risks over, for example, a 30-year residency or 70-year lifetime. Additionally, the County follows SCAQMD and OEHHA guidance for air quality analysis. SCAQMD's HRA procedures recommend evaluating risk from extended exposures measured across several years. There would be no scenario where the Project construction would overlap with Project operation, and therefore, the type of analysis provided by the commenter would not be required pursuant to OEHHA and SCAQMD requirements. Further, the commenter misconstrues OEHHA Guidance, which is intended to require the sum of separate age group exposures over a lifetime and not exposures during separate Project stages. Therefore, a combined construction and operational health risk analysis is not warranted per existing SCAQMD and OEHHA guidance.

Comment O5.23: This comment states that the Draft EIR estimates the Project would result in 2,237.56 MTCO2e of greenhouse gas emissions per year, which would not exceed SCAQMD thresholds. The comment states that the Draft EIR's quantitative analysis relies on an unsubstantiated air model, the GHG analysis relies on an outdated threshold, the analysis fails to identify a potentially significant GHG impact, and fails to consider performance based standards under CARB's scoping plan.

Response O5.23: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As substantiated in the Responses above, the Draft EIR and associated analysis utilizes accurate and Project-specific CalEEMod modeling. The County and Draft EIR utilized the interim 3,000 $MTCO_2e/yr$ threshold recommended by SCAQMD staff for residential and commercial sector projects against which to compare Project-related GHG emissions.

The 3,000 MTCO2e per year threshold is based on a 90% emission "capture" rate methodology. Prior to its use by the SCAQMD, the 90% emissions capture approach was one of the options suggested by the California Air Pollution Control Officers Association (CAPCOA) in their *CEQA & Climate Change* white paper (2008). A 90% emission capture rate means that unmitigated GHG emissions from the top 90% of all GHG-producing projects within a geographic area – the SCAB in this instance – would be subject to a detailed analysis of potential environmental impacts from GHG emissions, while the bottom 10% of all GHG-producing projects would be excluded from detailed analysis. A GHG significance threshold based on a 90% emission capture rate is appropriate to address the long-term adverse impacts associated with global climate change because medium and large projects will be required to implement measures to reduce GHG emissions, while small projects, which are generally infill development projects that are not the focus of the State's GHG reduction targets, are allowed to proceed. Further, a 90% emission capture rate sets the emission threshold low enough to capture a substantial proportion of future development projects and demonstrate that cumulative emissions reductions are being achieved while setting the emission threshold high enough to exclude small projects that will, in aggregate, contribute approximate 1% of projected statewide GHG emissions in the Year 2050.

In setting the threshold at 3,000 $MTCO_2e/yr$, SCAQMD researched a database of projects kept by the Governor's Office of Planning and Research (OPR). That database contained 798 projects, 87 of which

were removed because they were very large projects and/or outliers that would skew emissions values too high, leaving 711 as the sample population to use in determining the 90th percentile capture rate. The SCAQMD analysis of the 711 projects within the sample population combined commercial, residential, and mixed-use projects. It should be noted that the sample of projects included warehouses and other light industrial land uses but did not include industrial processes (i.e., oil refineries, heavy manufacturing, electric generating stations, mining operations, etc.). Emissions from each of these projects were calculated by SCAQMD to provide a consistent method of emissions calculations across the sample population and from projects within the sample population. In calculating the emissions, the SCAQMD analysis determined that the 90th percentile ranged between 2,983 to 3,143 $MTCO_2e$/yr. The SCAQMD set their significance threshold at the low-end value of the range when rounded to the nearest hundred tons of emissions (i.e., 3,000 $MTCO_2e$/yr) to define small projects that are considered less than significant and do not need to provide further analysis.

The County understands that the 3,000 $MTCO_2e$/yr threshold for residential/commercial uses was proposed by SCAQMD a decade ago and was adopted as an interim policy; however, no permanent, superseding policy or threshold has since been adopted. The 3,000 $MTCO_2e$/yr threshold was developed and recommended by SCAQMD, an expert agency, based on substantial evidence as provided in the *Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold* (2008) document and subsequent Working Group meetings (latest of which occurred in 2010). SCAQMD has not withdrawn its support of the interim threshold and all documentation supporting the interim threshold remains on the SCAQMD website on a page that provides guidance to CEQA practitioners for air quality analysis (and where all SCAQMD significance thresholds for regional and local criteria pollutants and toxic air contaminants also are listed). Further, as stated by SCAQMD, this threshold "uses the Executive Order S-3-05 goal [80% below 1990 levels by 2050] as the basis for deriving the screening level" and, thus, remains valid for use in 2022. Lastly, this threshold has been used for hundreds, if not thousands of GHG analyses performed for projects located within the SCAQMD jurisdiction. Therefore, the Draft EIR adequately analyzes potential impacts related to GHG emissions.

Comment O5.24: This comment states that the Draft EIR does not accurately estimate Project GHG emissions due to input changes in CalEEMod. The comment states that the qualitative analysis underestimates emissions and a revised EIR should be prepared that adequately assesses potential GHG impacts.

Response O5.24: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed in Response O5.16, CalEEMod changes to default accurately represent Project-specific conditions and are not inaccurate. Therefore, no changes to the modeling or Draft EIR are necessary or warranted.

Comment O5.25: This comment states that the Draft EIR relies on the outdated SCAQMD threshold of 3,000 MTCO2e per year, which was adopted in 2008. The comment states that 2020 thresholds are no longer applicable to the Project and should be revised to reflect the current GHG reduction target. The comment recommends relying on a 2035 service population efficiency target of 3.0 CO2e per service population per year, which was calculated by applying a 40 percent reduction to 2020 targets.

Response O5.25: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed in Response O5.23, the County understands that the 3,000 $MTCO_2e$/yr threshold for residential/commercial uses was proposed by SCAQMD a decade ago and was adopted as an interim policy; however, no permanent, superseding policy or threshold has since been adopted. The 3,000 $MTCO_2e$/yr threshold was developed and recommended by SCAQMD, an expert agency, based on substantial evidence as provided in the *Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold* (2008) document and subsequent Working Group meetings (latest of which occurred in 2010). SCAQMD has not withdrawn its support of the interim threshold and all documentation supporting the interim threshold remains on the SCAQMD website on a page that provides

guidance to CEQA practitioners for air quality analysis (and where all SCAQMD significance thresholds for regional and local criteria pollutants and toxic air contaminants also are listed). Further, as stated by SCAQMD, this threshold "uses the Executive Order S-3-05 goal [80% below 1990 levels by 2050] as the basis for deriving the screening level" and, thus, remains valid for use in 2022. Lastly, this threshold has been used for hundreds, if not thousands of GHG analyses performed for projects located within the SCAQMD jurisdiction.

Further, the 3.0 MTCO2e/SP/year threshold would be accurate for Projects becoming operational in 2035. The Project would become operational in 2024. As such, a 2035 threshold would not be applicable for a qualitative analysis of GHG emissions related to the Project. Therefore, the Draft EIR adequately analyzes potential impacts related to GHG emissions.

Comment O5.26: This comment states that SWAPE compared the Project's GHG emissions to the SCAQMD 2035 efficiency target of 3.0 MTCO2e/SP/year. The comment states that based on analysis included in the Draft EIR, the Project would emit approximately 10.3 MTCO2e/SP/year. The comment states that there is a potentially significant impact not previously identified or relied upon in the Draft EIR.

Response O5.26: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed in Response O5.25, the 3.0 MTCO2e/SP/year threshold would be accurate for Projects becoming operational in 2035. The Project would become operational in 2024. As such, a 2035 threshold would not be applicable for a qualitative analysis of GHG emissions related to the Project. Therefore, the Draft EIR adequately analyzes potential impacts related to GHG emissions.

Comment O5.27: This comment states that the Draft EIR fails to consider performance-based measures proposed by CARB. The comment states that the Draft EIR fails to rely on CARB's 2017 Scoping Plan performance based daily VMT per capita projections and the Project would conflict with the CARB 2017 Scoping Plan.

Response O5.27: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed in Chapter 5.12, *Transportation*, the SBCTA VMT Screening Tool was used to determine if the Project is located in a low-VMT generating area. San Bernardino Guidelines specify that a low-VMT generating area is an area where the VMT/employee is not greater than 4% below the existing VMT per employee for unincorporated San Bernardino County. Using the VMT Screening Tool, the VMT/employee in the Project zone is 16.3 which is 13.64% less than the unincorporated County VMT/employee of 18.9. Because the Project is located in a low-VMT generating area, the Project is presumed to have a less than significant impact on VMT. Therefore, the Project would not conflict with CARB's performance standards for VMT as the Project TAZ's VMT/employee is below the performance standards set forth by CARB.

Comment O5.28: This comment states that while the Project incorporates PDFs from the California Attorney General's Warehouse Best Practices Memo, the PDFs are not formally included as mitigation measures. The comment states that, therefore, the measures should be incorporated formally as mitigation measures.

Response O5.28: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The PDFs included in the Draft EIR 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 Project. As stated on page 5.2-37 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. Therefore, these PDFs are not considered mitigation, but would serve to further reduce potential impacts. 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 25 PDFs related to air quality and

greenhouse gas emissions. These PDFs are included in the Project's MMRP to ensure implementation along with the Project.

Comment O5.29: 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 O5.29: 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.

LETTER O6: Law Office of Abigail Smith on behalf of the Sierra Club – San Gorgonio Chapter (3 pages)

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VIA E-MAIL ONLY

August 23, 2022

Aron Liang, Senior Planner
County of San Bernardino
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Re: ***Duke Warehouse at Slover and Alder Project - PROJ-2021-00081; Draft EIR - SCH No. 2021120526***

Dear County of San Bernardino:

Please accept these comments on behalf of the Sierra Club-San Gorgonio Chapter regarding the Duke Warehouse at Slover and Alder project ("the Project") including the proposed Draft Environmental Impact Report ("Draft EIR"). O6.1

The Project Proposes to Locate an Industrial Building Adjacent to Sensitive Uses Including a High School

The Project proposes the construction and operation of a 259,481 square foot warehouse/distribution building on a site surrounded by sensitive receptors. (Draft EIR, Figure 5.2-2.). Bloomington High School is located 330 feet to the south of the Project site. Existing single-family homes are located immediately west of Alder Avenue and the Project site shares a boundary with existing single family residential homes to the immediate south. The nearest homes are located 30 feet from the Project site. Sierra Club strongly encourages the County to follow the recommendation of the California Air Resources Board ("CARB") that warehouse land uses should not be located within 1,000 feet of residential uses or areas designated for residential development. According to CARB, individuals most likely to be affected by air pollution include children under 14, athletes, or other persons who exercise outdoors. Land uses considered sensitive receptors include **residences**, **schools, and playgrounds.** O6.2

Site design measures, including increasing the distance between the Project building and sensitive receptors, should be imposed. Changes to the site design to avoid placement of

buildings near sensitive receptors or 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. At present, the building site is maximized with development, whereas a design utilizing buffering could provide measurable and important environmental and public health benefits. The Project's big-rig trucks will bring pollution, noise, and generally degrade the quality of life for residents of the communities that must endure these warehouse projects. The proposed warehouses, with their influx of trucks, are simply incompatible with the surrounding residential community and school uses for various reasons including air quality. O6.2 Cont.

Further Environmental Analysis and Mitigation is Required

The Draft EIR must be revised in several areas.

By way of example, the air quality analysis concludes that the Project does not have cumulatively significant air quality impacts because it purportedly has a less than significant air quality impact on an individual level. The Draft EIR therefore does not evaluate cumulative air quality at any level or disclose the Project's cumulative air quality impacts. This is a glaring omission and a failure to provide relevant information to the public. The Draft EIR must be revised to include an analysis of cumulative air quality. And, to the extent impacts are significant, all appropriate mitigation must be adopted. O6.3

By way of further example, the noise analysis appears to assume that operational noise levels due to various on-site noise sources can be isolated. The analysis does not consider or disclose the combined or cumulative effect of the various noise sources such as on-site truck movements and noise at loading dock areas. (Table 5.11-7) The analysis therefore minimizes impacts. Also, the construction noise analysis indicates a significant impact during construction activities in that construction noise levels will exceed noise thresholds. O6.4

By way of further example, the conclusion that the Project does not require a Vehicle Miles Traveled ("VMT") analysis is not shown to be based on substantial evidence. O6.5

By way of further example, the County must, pursuant to CEQA, adopt the Reduced Development Footprint Alternative because it reduces Project impacts and is feasible. O6.6

In terms of Project design and mitigation, Sierra Club submits at this time that the following changes must be implemented: O6.7

- Trucks must be prohibited on Alder Avenue and Laurel Avenue. The Project must be designed, at a minimum, to prohibit trucks from turning left or south from the Project site onto Alder Avenue. Enforceable truck routes must be established with

appropriate signage and penalties to protect surrounding sensitive uses from heavy duty truck traffic.

- The truck entrance on Alder Avenue must be eliminated to prevent heavy duty truck traffic on Alder Avenue.
- The Project must incorporate PV solar panels for 100% of the Project's energy usage including parking areas.
- Vehicle parking stalls must be eliminated on the southeast corner of the site and enhanced buffering must be incorporated into the Project's design with respect to the southwest elevation to provide greater separation between the Project facility and existing residences and the high school.
- The approximately 14-foot landscape area between the Project's southern drive aisle and the southern property line must be expanded to allow for increased landscaping.
- A wall of at least 14 feet in height of masonry construction must be installed along the entire length of the southern property line.
- Appropriate mitigation must be considered to mitigate Project impacts to neighboring uses including funding for air filtration units and noise mitigation such as new windows for homeowners.

O6.7 cont.

Sierra Club reserves the right to comment further on the Project's environmental analysis.

Sincerely,

AaS

Abigail Smith
Attorney for Sierra Club – San Gorgonio Chapter

Response to Comment Letter O6: Law Office of Abigail Smith on behalf of the Sierra Club – San Gorgonio Chapter, dated August 23, 2022

Comment O6.1: This comment provides an introduction to the comment letter and states that the comment letter is written on behalf of the Sierra Club – San Gorgonio Chapter.

Response O6.1: 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 O6.2: This comment provides a summary of the Project description and states that the County should follow CARB guidance and not site warehouses within 1,000 feet of sensitive receptors. This comment states that site design measures, including buffering should be imposed, and states that the Project's big rig trucks will bring air pollution and noise, which will reduce quality of life in the area.

Response O6.2: The comment does not provide any substantial evidence concerning any environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required.

As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project 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 Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

Further, as part of the Draft EIR, a Construction Health Risk Assessment (Appendix K to the Draft EIR) and Operational Health Risk Assessment (Appendix B) to the Draft EIR were prepared pursuant to the requirements and guidelines set forth by SCAQMD and the Office of Environmental Health Hazard Assessment (OEHHA). As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project would result in exposure of sensitive receivers to DPM as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

In regard to noise, as detailed in the Impact NOI-1 discussion that begins on page 5.11-13 of the Draft EIR, 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. As such, the Project would not generate a significant daytime or nighttime operational noise level increase at nearby receiver locations.

As detailed in the Draft EIR in Section 5.11, *Noise,* starting on page 5.11-15, the proposed Project would generate traffic related noise from operation. As described in Section 3.0, *Project Description*, of the Draft

EIR, the proposed building would be accessed from Slover Avenue and Alder Avenue. As discussed, the Opening Year with Project and General Plan Buildout with Project conditions would result in increases less than the 1.5 and 3.0 dBA CNEL threshold. Thus, off-site traffic noise impacts from the Project would be less than significant. Therefore, pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B), there is no nexus between mitigation for increased buffering outlined in the comment letter and impacts from the Project. 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.

Comment O6.3: This comment states that the Draft EIR concludes that there is no cumulative impact on air quality by relying on the Project-level air quality impact. This comment states that the Draft EIR should be revised to provide a cumulative analysis of air quality impacts.

Response O6.3: his 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 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required.

As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project 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 Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

Further, as part of the Draft EIR, a Construction Health Risk Assessment (Appendix K to the Draft EIR) and Operational Health Risk Assessment (Appendix B) to the Draft EIR were prepared pursuant to the requirements and guidelines set forth by SCAQMD and the Office of Environmental Health Hazard Assessment (OEHHA). As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project would result in exposure of sensitive receivers to DPM as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

The SCAQMD thresholds serve to determine whether or not a given project has a potentially significant development-specific and cumulative impact. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. Thus, the project specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are not considered to be cumulatively significant. Since the Project would not exceed the SCAQMD health risk or air quality thresholds, the Project would not result in a cumulative impact pursuant to SCAQMD guidance.

Comment O6.4: This comment states that the noise analysis appears to assume that operational noise levels from various onsite noise sources can be isolated. This comment states that the analysis does not look at the combined effect or the cumulative effect of various noise sources, which minimizes impacts. This comment states that the analysis shows a significant impact during construction activities as noise levels will exceed thresholds.

Response O6.4: Since the Project site is over 700 feet long, and the locations of the analyzed onsite noise sources shown in Table J of the Noise Impact Analysis (Appendix I to the Draft EIR) are located in distinct areas of the Project site, each noise specific noise source would be the only noise source that would make a quantifiable noise contribution to the nearest sensitive receptor. As such, the noise sources were not combined in Table J of the Noise Impact Analysis or Table 5.11-7 of the Draft EIR. It should also be noted that as detailed in Appendix D to the Noise Impact Analysis, the noise source "Onsite Truck Operations" includes the combined noise from truck unloading and trailer transfer as well as from a mechanical push sweeper that was operating nearby, as such this noise source captured all of the noise sources associated with loading dock activities. Therefore, the noise analysis accurately captures onsite operational noise levels.

Comment O6.5: This comment states that the conclusion that the Project does not require a VMT analysis is not based on substantial evidence.

Response O6.5: The comment does not provide any substantial evidence concerning any environmental impact. As discussed in Section 5.12, *Transportation*, the San Bernardino County Transportation Impact Study Guidelines (July 19, 2019) provide VMT analysis methodology, impact thresholds, and screening thresholds to determine if projects would require a VMT analysis. If a project meets one of the following criteria, then the VMT impact of the project is considered less-than significant and no further analysis of VMT would be required:

- The project serves the local community and thereby has the potential to reduce VMT.
- The project generates less than 110 daily vehicle trips.
- The project is located within a Transit Priority area.
- The project is located in a low-VMT generating area.

To determine if the Project is located in a low-VMT generating area, the SBCTA VMT Screening Tool was utilized. The County's guidelines specify that a low-VMT generating area is an area where the VMT/employee is not greater than four percent below the existing VMT per employee for the unincorporated County. Using the VMT Screening Tool, the VMT per employee in the Project zone is 16.3 which is 13.64 percent less than the unincorporated County VMT per employee of 18.9. Therefore, since the Project is located in a low-VMT generating area, the Project is presumed to have a less than significant impact on VMT, and no further VMT analysis is required.

Comment O6.6: This comment states that the County must adopt the Reduced Development Footprint Alternative because it reduces Project impacts and is feasible.

Response O6.6: The comment does not provide any substantial evidence concerning any environmental impact. As discussed in Section 7.0, *Alternatives,* the Draft EIR provides two alternatives for consideration. 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 in order to approve the proposed Project.

Comment O6.7: This comment provides multiple Project design measures and mitigation measures. The comment requests trucks be prohibited on Alder Avenue and Laurel Avenue and truck routes must be established. The comment states that the truck entrance on Alder Avenue must be eliminated. The comment requests that the Project incorporate solar panels for 100 percent of the Project's energy usage. The comment states that vehicle parking stalls should be eliminated from the southeast corner of the site in order to increase buffering from Bloomington high school. The comment states that the landscape area between the Project's southern drive aisle and southern property line should be expanded and a wall of at least 14-feet in height should be installed along the entire southern property line. The comment states that mitigation including funding for air filtration units and noise mitigation such as new windows should be considered. The comment concludes by stating that Sierra Club reserves the right to comment further on the Project's environmental analysis.

Response O6.7: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed in Chapter 3 of this Final EIR, the driveway along Alder Avenue would be limited to passenger vehicles only. Therefore, trucks would only be allowed to utilize the driveways on Slover Avenue, which would provide a truck route to the freeway that does not include routing on Alder Avenue or Laurel Avenue. In addition, as set forth by PDF AQ-22, the Project is required to post signs at every truck exit driveway providing directional information to the truck route.

Regarding solar use, PDF AQ-15 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 regard to noise, as detailed in the Impact NOI-1 discussion that begins on page 5.11-13 of the Draft EIR, 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. As such, the Project would not generate a significant daytime or nighttime operational noise level increase at nearby receiver locations. Therefore, pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B), there is no nexus between mitigation outlined in the comment letter regarding noise walls or increased setbacks and impacts from the Project.

In regard to increased buffering and air filters, as detailed in the Impact AQ-2 discussion that begins on page 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required. As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project 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 Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant. As such, pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B) there is no nexus for requiring increased buffers or air filtration systems as mitigation to reduce air quality impacts.

LETTER I1: Ana Carlos (2 pages)

From: Ana Carlos <ana26ana.ac@gmail.com>
Sent: Monday, August 22, 2022 4:10 PM
To: Liang, Aron <Aron.Liang@lus.sbcounty.gov>
Subject: Duke Warehouse at Slover/Alder comment

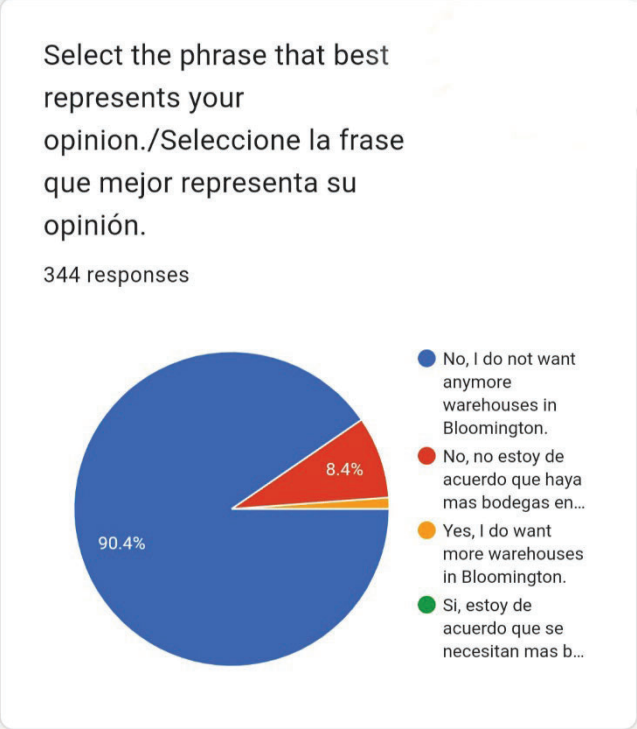
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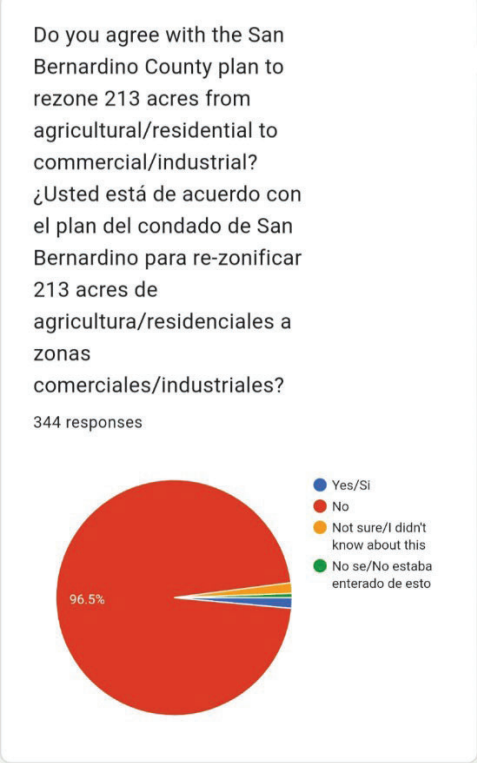
Dear Mr. Liang, My name is Ana Carlos. I am writing in regards to the Duke Warehouse at Slover/Alder project. I live in Bloomington. My concerns are that there are so many industrial type projects coming into the area. How can one report properly examine the true health and significant irreversible effects that it brings into the community when there are so many projects coming into review at the same time, each one with an independent report and not a cumulative report? Here in Bloomington, we have this Duke at Slover/Alder project, we have the proposed Bloomington Bus. Park Specific Plan, we have the Cactus/Slover project, we have the 2 truck stops on Cedar Ave, we have multiple warehouses that sit empty and useless. These are just the current projects that I am sure even yourself has trouble keeping up with. What kind of traffic and air quality would we have if all of these projects were actually functioning at the same time. That is the report I want to be taken into consideration. I also want to know the ratio or percent of projects that get presented to the San Bernardino County Board of Supervisors and the Planning Commission and those that actually get denied or approved. I feel like ALL projects in Bloomington are being approved without the community accepting it. I1.1

I live in this neighborhood and my children attend school in this neighborhood and walk home everyday. This is unacceptable. The reality is that trucks do not respect "truck route" signage and are often taking shortcuts through neighborhoods. This neighborhood has Bloomington High School on Alder Ave and I would not like to take a chance that trucks come through their street. In addition, Alder Ave is where the student parking lot is located and big rig trucks are an accident risk to our minors driving on the road. The county of San Bernardino has been irresponsible in approving and allowing so many industrial projects in Bloomington. I would also like an independent investigation, study, and analysis from a contractor that the community could choose in regards to the Environmental Impacts from this project. I do not have enough confidence in the current way the county is handling these reports. I1.2

This project is too close to residential homes, Bloomington High School students, and their athletic field. My children attend PE classes and sports just feet away, I am very concerned about their health.

If you haven't heard, just recently Zimmerman Elementary school in Bloomington was approved to potentially be closed down and sold to a warehouse developer because it would have too many warehouses in its proximity. The school district was concerned about this and was "forced" to come to this decision. This project would cause the same risk to Bloomington High School, the heart of my South Bloomington Community and this is unacceptable. Is the risk of Bloomington High School closing included in any report regarding this project? I have included survey results from a community survey from Concerned Neighbors of Bloomington to be taken into consideration. I1.3 I1.3 Cont.


Select the phrase that best represents your opinion./Seleccione la frase que mejor representa su opinión.
344 responses
8.4%
90.4%
No, I do not want anymore warehouses in Bloomington.
No, no estoy de acuerdo que haya mas bodegas en...
Yes, I do want more warehouses in Bloomington.
Si, estoy de acuerdo que se necesitan mas b...


Do you agree with the San Bernardino County plan to rezone 213 acres from agricultural/residential to commercial/industrial? ¿Usted está de acuerdo con el plan del condado de San Bernardino para re-zonificar 213 acres de agricultura/residenciales a zonas comerciales/industriales?
344 responses
96.5%
Yes/Si
No
Not sure/I didn't know about this
No se/No estaba enterado de esto

Response to Comment Letter I1: Ana Carlos, dated August 22, 2022

Comment I1.1: This comment states that the commenter is concerned about the amount of industrial projects coming into the area. The comment asks how the true health and significant irreversible effects of the Project and additional projects can be analyzed without a cumulative report. The comment also asks what kind of traffic and air quality would result if all of the projects were operating at the same time. The comment requests to know the ratio or percent of projects that get presented to the Board of Supervisors and the Planning Commission and those that get denied or approved.

Response I1.1: Individual industrial projects are approved on a case-by-case basis by the Planning Commission and Board of Supervisors. This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. 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, including cumulative impacts, related to traffic congestion.

As detailed in the Impact AQ-2 discussion that begins on page 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required.

As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project 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 Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

Further, as part of the Draft EIR, a Construction Health Risk Assessment (Appendix K to the Draft EIR) and Operational Health Risk Assessment (Appendix B) to the Draft EIR were prepared pursuant to the requirements and guidelines set forth by SCAQMD and the Office of Environmental Health Hazard Assessment (OEHHA). As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project would result in exposure of sensitive receivers to DPM as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

The SCAQMD thresholds serve to determine whether or not a given project has a potentially significant development-specific and cumulative impact. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. Thus, the project specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are not considered to be cumulatively significant. Since the Project would not exceed the

SCAQMD health risk or air quality thresholds, the Project would not result in a cumulative impact pursuant to SCAQMD guidance.

Comment I1.2: This comment states that the trucks do not respect truck route signage and take shortcuts through the neighborhoods. The comment mentions that Bloomington High School is on Alder Avenue and the commentor does not want to take a chance that trucks come through that street. The comment also states that Alder Avenue is where the student parking lot is located, and big rigs are an accident risk to minors driving on the road. The comment states that the County has been irresponsible in approving and allowing so many industrial projects in Bloomington. The comment requests an independent investigation by a contractor that the community chooses.

Response I1.2: As shown in Figure 3-6 in Chapter 3 of this Final EIR, Project trucks would utilize established truck routes as identified in the Focused Traffic Impact Analysis prepared for the County which would be directed away from existing residential neighborhoods and Bloomington High School. 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. Further, truck access would not be provided on the driveway on Alder Avenue, which would further limit any potential for trucks utilizing Alder Avenue for site access.
The preparation of the Draft EIR was conducted pursuant to CEQA Statute and 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 an independent investigation from a contractor that the community chooses 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 I1.3: The comment states that the Project is too close to residential homes, Bloomington High School students, and their athletic field. The comment expresses health concerns regarding the proximity of PE classes and sports just feet away. The comment states that Zimmerman Elementary School in Bloomington was approved to potentially be closed down and sold to a warehouse developer because it would have too many warehouses in its proximity. The comment expresses concern that the Project would cause the same risk to Bloomington Highschool and asks if the Project could risk Bloomington High School closing. The comment mentions that survey results from a community survey from the Concerned Neighbors of Bloomington should be taken into consideration. The surveys present two pie charts with 90.4 percent of the surveyors stating that they do not want warehouses built. The second survey states that 96.5 percent of the surveyors do not agree with rezoning 213 acres to industrial.

Response I1.3: As discussed on page 5.2-16 of the Draft EIR, the nearest receptors to the Project site are single-family residences located 30 feet south of the Project site. Bloomington High School is located 330 feet south of the Project site. As described on page 5.2-32 of the Draft EIR, a Construction 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 Construction Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 0.98 in one million after implementation of Mitigation Measure AQ-1 (use of Tier 4 Final construction equipment), 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 school children, all other receptors would experience less risk than what is identified for the residence adjacent to the site. As such, construction of the Project would not cause a significant DPM emissions impact on nearby sensitive receptors.

As described on page 5.2-34 of the Draft EIR, an Operational 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. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.6 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 Project would not cause a significant DPM emissions impact on nearby sensitive receptors at Bloomington High School.
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 Table 5.2-10, emissions during construction activities would not exceed the SCAQMD's localized significance thresholds. Also, as detailed in Draft EIR Table 5.2-11, emissions from operation of the Project 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. As such, the Project would not result in a direct or indirect impact on Bloomington High School.

The surveys included as part of the comment include opinions of residents in Bloomington 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 I2: Annie Marie Whiteker (2 pages)

From: Annie Rose Marie Whiteker <anne.boshoven@yahoo.com>
Sent: Monday, August 22, 2022 5:54 PM
To: Liang, Aron <Aron.Liang@lus.sbcounty.gov>; anne.boshoven@yahoo.com
Subject: Duke, Stover Warehouse

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The reason we support warehouses in our area, as seen in the attached pictures, is that they replace the trash filled, landfill looking properties that are found all over Bloomington. "Beautiful Bloomington" bull!!

A2.1

Two of these pictures are at the corner of Slover and Laurel - wish you had been able to purchase that dump. The other 3 are right behind our wall, where they dump manure and the obvious broken down vehicles, among other things. This property will be right next to your warehouse. Wish you could purchase this eyesore and constant heartache as well.

The Whitekers
17822 Otilla St.,
Bloomington, 92316











Response to Comment Letter I1: Annie Marie Whiteker, dated August 22, 2022

Comment I2.1: This comment states that the commenter supports warehouses in the area and mentions that they replace trash filled landfill looking properties. The comment also states that the pictured property is right next to the warehouse and mentions that they wish the developer could purchase the land.

Response I2.1: The comment expresses support for the Project. The adjacent parcel is not a part of the proposed Project and would not be purchased as part of the Project. The comment provides the commenter's opinion 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 or provided.

Letter I3: Connor Squellati (1 page)

CONNOR SQUELLATI
170 E. SIXTH STREET BOX 806
CLAREMONT CA 91711
530 - 604 - 9667

8 · 22 · 2022

SAN BERNADINO COUNTY BOARD OF SUPERVISORS
Attn: SUPERVISOR CURT HAGMAN, BOARD CHAIR
385 N. ARROWHEAD AVE., 2ND FLOOR
SAN BERNADINO CA 92415

Re: WAREHOUSE DEVELOPMENT

Dear Sopervisor Hagman,
My name is Connor and I'm a student at Pomona College in Claremont, CA. I'm writing to provide input on warehouse development in the Inland Empire. I recognize the attractive investment to optimize both labor and capital, but I believe long-run returns on over-proliferation of warehouses has not been fully realized. The pollution in consequence of these developments will detrimentally harm the health of hard working Americans, leading to decrease in ability to work, a lower incentive to remain in the area, and growing political tensions that could interupt societal integrity. I recommend to halt further warehouse development until local environment & ecological standards improve. In the meantime, please fund for more production in green space, water conservation, and public transit for reduced air pollution. Thanks,

I3.1

Response to Comment Letter I3: Connor Squellati, dated August 22, 2022

Comment I3.1: This commenter introduces himself and states that he recognizes the attractive investment to optimize labor and capitol but states that the pollution resulting from warehouse developments will detrimentally harm the health of Americans. The commenter recommends halting further warehouse development until local environmental and ecological standards improve. The comment requests funding production in green space, water conservation, and public transit to reduce air pollution.

Response I3.1: The comment expresses opposition to further warehouse development and requests funding production in green space, water conservation, and public transit. As detailed in the Impact AQ-2 discussion that begins on page 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required. As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project 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 Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

Further, as part of the Draft EIR, a Construction Health Risk Assessment (Appendix K to the Draft EIR) and Operational Health Risk Assessment (Appendix B) to the Draft EIR were prepared pursuant to the requirements and guidelines set forth by SCAQMD and the Office of Environmental Health Hazard Assessment (OEHHA). As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project would result in exposure of sensitive receivers to DPM as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to air quality would be less than significant.
As discussed on Page 2-4 of Section 2.0, *Introduction*, of the Draft EIR, the Countywide Plan EIR addressed the demand increase in park services and provides that development (residential and nonresidential) in the community of Bloomington 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 funds would be used to maintain and operate the existing park facilities and construct additional facilities, as deemed warranted by the Parks and Recreation District. 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.

Letter I4: Efren Perez (1 page)

From: Efren Perez <2perros12@gmail.com>
Sent: Monday, August 22, 2022 5:06 PM
To: Liang, Aron <Aron.Liang@lus.sbcounty.gov>
Subject: Warehouses in our town

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.

My name is Efren Pérez
Im a resident of bloomington and after 7 years living here i can see the change like all these
Warehouses, gas stations
And other construction
Along with these truckers
That have no consept on how they are not supposed
Use Residencial streets and destroying our streets
And nothing is being done
About fixing them . They dont obey the signs that are posted and many
Are parked in residential homes im sure the city is just keeping quiet .
Pls do something so this does not keep happening

I4.1

Response to Comment Letter I4: Efren Perez, dated August 22, 2022

Comment I4.1: This commenter states that they are a resident of Bloomington and have seen many changes occur including warehouses and gas stations. The commenter states that trucks do not obey the signs and go into the residential areas.

Response I4.1: As shown on Figure 3-6 in Chapter 3 of this Final EIR, Project trucks would utilize established truck routes as identified in the Focused Traffic Impact Analysis prepared for the County which would be directed away from existing residential neighborhoods and Bloomington High School. 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. Further, truck access would not be provided on the driveway on Alder Avenue, which would further limit any potential for trucks utilizing Alder Avenue for site access. 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 warranted.

Letter I5: Emmanuel Perez (1 page)

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Dear Mr. Liang,

My name is Emmanuel and I'm a resident of Bloomington. My family, neighbors and friends are opposed to future warehousing development in the city of Bloomington. Please support the people of Bloomington and stop the sale of Zimmerman Elementary for another warehouse. I5.1

Response to Comment Letter I5: Emmanuel Perez, dated August 22, 2022

Comment I5.1: This comment states the commenters opposition to warehouse developments in Bloomington and requests that the sale of Zimmerman Elementary School is stopped.

Response I5.1: The comment provides the commenter's opinion 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 warranted.

Letter I6: Eze Miguel Iheanacho (1 page)

Eze Miguel Iheanacho
170 East Sixth Street, Box #629
91711-7004
203-214-8408

08/22/2022

San Bernadino County Board of Supervisors

Re: ~~Slover~~ Warehouse development

Hello,
I'm a student at Pomona College in Claremont, California.
I am writing to provide input on the development of
ware houses in San Bernadino County. After reviewing information
I6.1 pertaining to warehouse development, I would like to say that
I am against ~~these~~ these developments and I encarage
you all to oppose any further development of warehouses in
the county.

Additionally, I would like to point out that the development
of warehouses in the county has several negative affects on
the surrounding environment and community. First, ~~the~~
warehouse projects displace local residents and forces them
to move from their homes. Second, warehouses would add
I6.2 air pollution to the surrounding environment and consume a
significant amount of ~~electricity~~ energy. This leads to an increase
in carbon dioxide emissions from the energy sector directly
caused by the expansion of warehousing. ~~The more warehouses~~
More warehouses lead to a larger carbon footprint which worsens
the climate in the short and long term. Noise pollution and
traffic congestion also increase as a result of these warehouses
and worsens the public's health. Lastly, warehouse projects
are eliminating "temples of education" and ~~parks~~ replacing them
with warehouses that destroy the environment and local community.

Response to Comment Letter I6: Eze Miguel Iheanacho, dated August 22, 2022

Comment I6.1: This commenter introduces himself and states that he is against warehouse developments and encourages the County to oppose any further development of warehouses.

Response I6.1: The comment expresses opposition to the Project and expresses the commenter'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 I6.2: This comment states that warehouse development in the County has several negative effects on the surrounding environment and community. The comment states that the warehouse projects displace local residents, would add air pollution to the surrounding environment and consume a significant amount of energy. The comment also states that more warehouses lead to a larger carbon footprint which worsens the climate in the short and long term. The comment states that noise pollution and traffic congestion will also increase as a result of these warehouses. The comment also states that warehouse projects remove schools and replace them with warehouses that destroy the environment and local community.

Response I6.2: As discussed in Impact LU-1 on page 5.10-4 of Draft EIR Section 5.10, *Land Use and Planning*, the Project is consistent with the County's land use designation and zoning designation with the approval of a conditional use permit to allow for warehousing and distribution uses. In addition, the site contains two existing single-family residential structures and three commercial/industrial buildings that support businesses currently operating on the site. The demolition of two existing residences would not result in displacement as the property owners have voluntarily sold their properties to the Project Applicant. Thus, the Project would not displace residents of Bloomington and would develop the site consistent with the County's General Plan Land Use Designation and Zoning.

As discussed on page 5.5-6 of Section 5.5, *Energy*, once operational, the Project building would generate demand for electricity, natural gas, as well as gasoline for motor vehicle trips. Operational use of energy includes the heating, cooling, and lighting of buildings, water heating, operation of electrical systems and plug-in appliances within buildings, parking lot and outdoor lighting, and the transport of electricity, natural gas, and water to the areas where they would be consumed. This use of energy is typical for urban development, and no operational activities or land uses would occur that would result in extraordinary energy consumption.

As detailed in the Impact AQ-2 discussion that begins on page 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required.

As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project 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 Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

Further, as part of the Draft EIR, a Construction Health Risk Assessment (Appendix K to the Draft EIR) and Operational Health Risk Assessment (Appendix B) to the Draft EIR were prepared pursuant to the requirements and guidelines set forth by SCAQMD and the Office of Environmental Health Hazard Assessment (OEHHA). As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project would result in exposure of sensitive receivers to DPM as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

In regard to noise, as detailed in the Impact NOI-1 discussion that begins on page 5.11-13 of the Draft EIR, 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. As such, the Project would not generate a significant daytime or nighttime operational noise level increase at nearby receiver locations. PDF NOI-1 has been incorporated to ensure construction noise would not exceed thresholds and would require the Project to implement construction best practices to reduce construction noise.

As detailed in the Draft EIR in Section 5.11, *Noise,* starting on page 5.11-15, the proposed Project would generate traffic related noise from operation. As described in Section 3.0, *Project Description*, of the Draft EIR, the proposed building would be accessed from Slover Avenue and Alder Avenue. As discussed, the Opening Year with Project and General Plan Buildout with Project conditions would result in increases less than the 1.5 and 3.0 dBA CNEL threshold. Thus, off-site traffic noise impacts from the Project would be less than significant.

As discussed in Section 5.12, impacts related to transportation would be less than significant. As shown in Table 5.12-1, the Project is forecast to generate 531 daily PCE trips including 30 PCE trips during the AM peak hour and 38 PCE trips during the PM peak hour. Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating Transportation impacts. SB743 specified that the new criteria should promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks and a diversity of land uses. The bill also specified that delay-based level of service could no longer be considered an indicator of a significant impact on the environment. Thus, traffic congestion is no longer a CEQA issue and is not required to be addressed in the Draft EIR.

The commenter raises the concern that warehouse projects remove 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 or provided.

Letter I7: Gary Grossich (1 page)

Hi Aron,

My only current comments for the record are that this project should include all the environmental mitigation safeguards that were included on the previous Slover and Locust warehouse adapted by the County several years ago. Also included should be an upfront one time payment as was provided in the Slover/Cactus ASG warehouse project. Also an ongoing annual payment in line with the calculation used for the Slover/Cactus ASG warehouse project to the Bloomington Community Benefit Fund needs to be provided in perpetuity with an annual CPI increase of no less than 3% along with an agreement to vote for and support a future Industrial CFD or CSD to fund community services. I7.1

Of course we also need to make sure the truck traffic only travels along Slover to the I-10 freeway, with no ingress or egress to or from the site on Alder.

Regards,
Gary Grossich
Bloomington MAC Vice chair

Response to Comment Letter I7: Gary Grossich, dated August 22, 2022

Comment I7.1: This commenter requests that the Project include all environmental mitigation that were included on the previous Slover and Locust Warehouse and requests an upfront payment along with an ongoing annual payment to the Bloomington Community Benefit Fund.

Response I7.1: The Project includes Project-specific mitigation measures and includes voluntary project design features from the California Attorney General's Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. The mitigation measures included in the Draft EIR would reduce potential impacts to less than significant. Thus, pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B), there is no nexus for requiring addition mitigation measures to reduce Project impacts.

Concerning the commenter's request for payment toward the Bloomington Community Benefit fund, 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 community benefit payments. 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 benefit payments is not provided. 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.

Letter I8: Irma Garcia (1 page)

[NON-EPD]

fyi

-----Original Message-----
From: Irma Oliveros <icoliveros25@gmail.com>
Sent: Monday, August 22, 2022 4:43 PM
To: Liang, Aron <Aron.Liang@lus.sbcounty.gov>
Subject: Opposing sale of Zimmerman

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.

To Aron Liang,

My name is Irma Garcia, and my husband and I have lived in Bloomington for 34 years at 18312 Mindanao St. We are writing to say that we strongly oppose more warehouses in Bloomington. We are not for sale and neither is our town.

We demand that no more warehouses be built in our neighborhood. If you want warehouses so much, sell your own house and put a warehouse on it.

We will oppose warehouses for as long as there are residents in Bloomington.

Bloomington no se vende. No more warehouses.

Irma and José García

I8.1

Response to Comment Letter I8: Irma Oliveros, dated August 22, 2022

Comment I8.1: This commenter states that they have lived in Bloomington for 34 years and are writing to state that they strongly oppose more warehouses in Bloomington. The commenter demands that no more warehouses are built in the neighborhood and states that Bloomington is not for sale.

Response I8.1: The comment expresses the commenter's opposition to the Project 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.

Letter I9: Jorge Perez (1 page)

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.

Mi nombre es Jorge Pérez y estoy en total desacuerdo con el proyecto de Duke Realty de alder y slover no más tráfico no más contaminante Gracias

I9.1

Response to Comment Letter I9: Jorge Perez, dated August 22, 2022

Comment I9.1: This commenter introduces himself and states that he disagrees with the Slover and Alder Project and does not want any more traffic or pollutants.

Response I9.1: The comment expresses the commenter's opposition to the Project and does not raise a specific issue with the adequacy of the Draft EIR. 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, including cumulative impacts, related to traffic congestion.

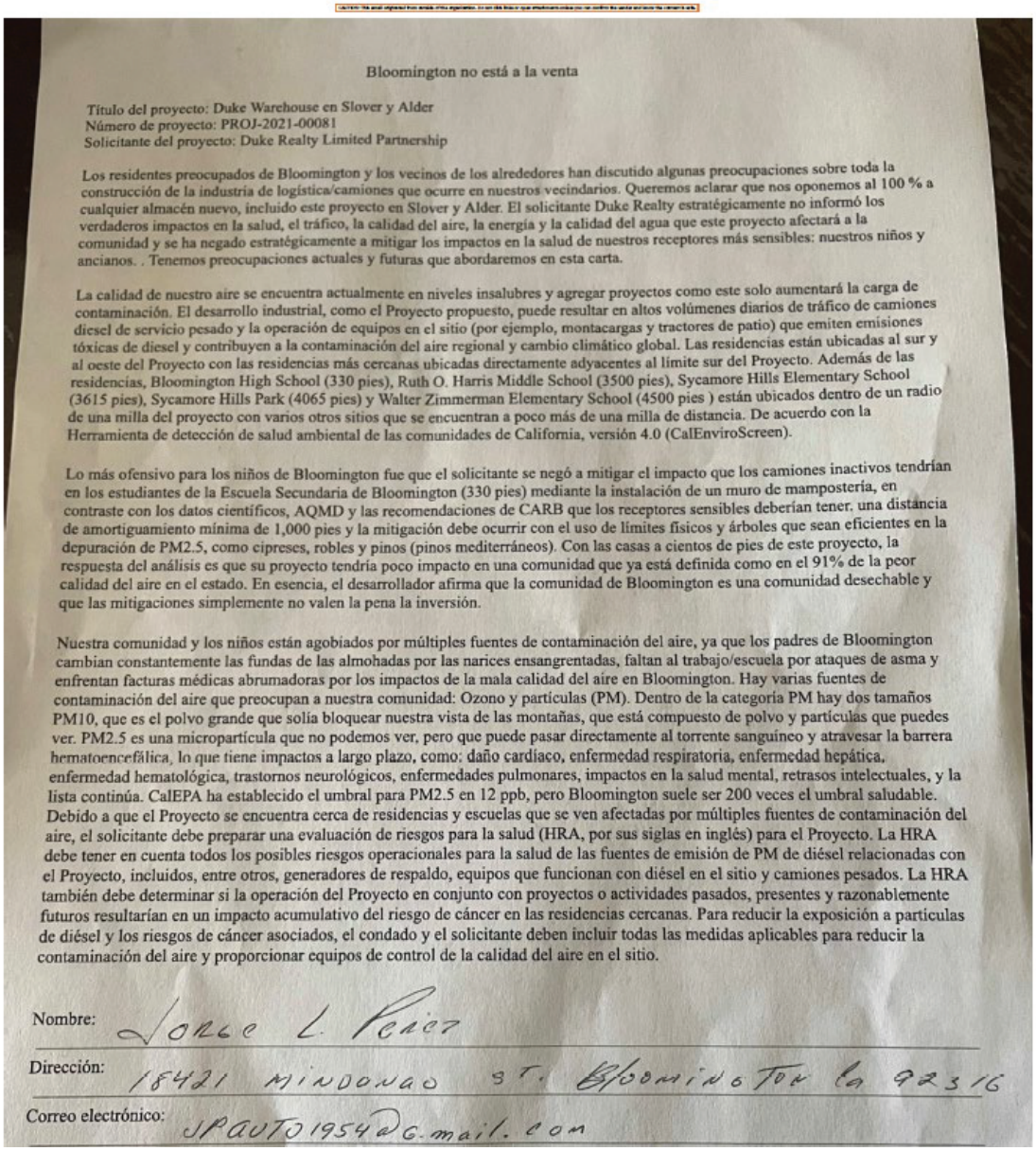
As detailed in the Impact AQ-2 discussion that begins on page 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required.

As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project 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 Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

Further, as part of the Draft EIR, a Construction Health Risk Assessment (Appendix K to the Draft EIR) and Operational Health Risk Assessment (Appendix B) to the Draft EIR were prepared pursuant to the requirements and guidelines set forth by SCAQMD and the Office of Environmental Health Hazard Assessment (OEHHA). As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project would result in exposure of sensitive receivers to DPM as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

The SCAQMD thresholds serve to determine whether or not a given project has a potentially significant development-specific and cumulative impact. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. Thus, the project specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are not considered to be cumulatively significant. Since the Project would not exceed the SCAQMD health risk or air quality thresholds, the Project would not result in a cumulative impact pursuant to SCAQMD guidance.

Letter I10: Jorge Perez (1 page)



Bloomington no está a la venta

Título del proyecto: Duke Warehouse en Slover y Alder
Número de proyecto: PROJ-2021-00081
Solicitante del proyecto: Duke Realty Limited Partnership

Los residentes preocupados de Bloomington y los vecinos de los alrededores han discutido algunas preocupaciones sobre toda la construcción de la industria de logística/camiones que ocurre en nuestros vecindarios. Queremos aclarar que nos oponemos al 100 % a cualquier almacén nuevo, incluido este proyecto en Slover y Alder. El solicitante Duke Realty estratégicamente no informó los verdaderos impactos en la salud, el tráfico, la calidad del aire, la energía y la calidad del agua que este proyecto afectará a la comunidad y se ha negado estratégicamente a mitigar los impactos en la salud de nuestros receptores más sensibles: nuestros niños y ancianos. . Tenemos preocupaciones actuales y futuras que abordaremos en esta carta.

I10.1

La calidad de nuestro aire se encuentra actualmente en niveles insalubres y agregar proyectos como este solo aumentará la carga de contaminación. El desarrollo industrial, como el Proyecto propuesto, puede resultar en altos volúmenes diarios de tráfico de camiones diesel de servicio pesado y la operación de equipos en el sitio (por ejemplo, montacargas y tractores de patio) que emiten emisiones tóxicas de diesel y contribuyen a la contaminación del aire regional y cambio climático global. Las residencias están ubicadas al sur y al oeste del Proyecto con las residencias más cercanas ubicadas directamente adyacentes al límite sur del Proyecto. Además de las residencias, Bloomington High School (330 pies), Ruth O. Harris Middle School (3500 pies), Sycamore Hills Elementary School (3615 pies), Sycamore Hills Park (4065 pies) y Walter Zimmerman Elementary School (4500 pies) están ubicados dentro de un radio de una milla del proyecto con varios otros sitios que se encuentran a poco más de una milla de distancia. De acuerdo con la Herramienta de detección de salud ambiental de las comunidades de California, versión 4.0 (CalEnviroScreen).

I10.2

Lo más ofensivo para los niños de Bloomington fue que el solicitante se negó a mitigar el impacto que los camiones inactivos tendrían en los estudiantes de la Escuela Secundaria de Bloomington (330 pies) mediante la instalación de un muro de mampostería, en contraste con los datos científicos, AQMD y las recomendaciones de CARB que los receptores sensibles deberían tener, una distancia de amortiguamiento mínima de 1,000 pies y la mitigación debe ocurrir con el uso de límites físicos y árboles que sean eficientes en la depuración de PM2.5, como cipreses, robles y pinos (pinos mediterráneos). Con las casas a cientos de pies de este proyecto, la respuesta del análisis es que su proyecto tendría poco impacto en una comunidad que ya está definida como en el 91% de la peor calidad del aire en el estado. En esencia, el desarrollador afirma que la comunidad de Bloomington es una comunidad desechable y que las mitigaciones simplemente no valen la pena la inversión.

I10.3

Nuestra comunidad y los niños están agobiados por múltiples fuentes de contaminación del aire, ya que los padres de Bloomington cambian constantemente las fundas de las almohadas por las narices ensangrentadas, faltan al trabajo/escuela por ataques de asma y enfrentan facturas médicas abrumadoras por los impactos de la mala calidad del aire en Bloomington. Hay varias fuentes de contaminación del aire que preocupan a nuestra comunidad: Ozono y partículas (PM). Dentro de la categoría PM hay dos tamaños PM10, que es el polvo grande que solía bloquear nuestra vista de las montañas, que está compuesto de polvo y partículas que puedes ver. PM2.5 es una micropartícula que no podemos ver, pero que puede pasar directamente al torrente sanguíneo y atravesar la barrera hematoencefálica, lo que tiene impactos a largo plazo, como: daño cardíaco, enfermedad respiratoria, enfermedad hepática, enfermedad hematológica, trastornos neurológicos, enfermedades pulmonares, impactos en la salud mental, retrasos intelectuales, y la lista continúa. CalEPA ha establecido el umbral para PM2.5 en 12 ppb, pero Bloomington suele ser 200 veces el umbral saludable. Debido a que el Proyecto se encuentra cerca de residencias y escuelas que se ven afectadas por múltiples fuentes de contaminación del aire, el solicitante debe preparar una evaluación de riesgos para la salud (HRA, por sus siglas en inglés) para el Proyecto. La HRA debe tener en cuenta todos los posibles riesgos operacionales para la salud de las fuentes de emisión de PM de diésel relacionadas con el Proyecto, incluidos, entre otros, generadores de respaldo, equipos que funcionan con diésel en el sitio y camiones pesados. La HRA también debe determinar si la operación del Proyecto en conjunto con proyectos o actividades pasados, presentes y razonablemente futuros resultarían en un impacto acumulativo del riesgo de cáncer en las residencias cercanas. Para reducir la exposición a partículas de diésel y los riesgos de cáncer asociados, el condado y el solicitante deben incluir todas las medidas aplicables para reducir la contaminación del aire y proporcionar equipos de control de la calidad del aire en el sitio.

I10.4

Nombre: Jorge L. Perez

Dirección: 18421 Mindoro ST. Bloomington Ca 92316

Correo electrónico: JPAUTO1954@G.mail.com

Response to Comment Letter I10: Jorge Perez, dated August 22, 2022

Comment I10.1: This comment states that concerned residents of Bloomington have discussed concerns about logistics/trucking industry construction occurring in neighborhoods. The comment states that they are fully opposed to new warehouses including the Slover and Alder project. The comment states that the applicant failed to report the health, traffic, air quality, energy, and water quality impacts that will burden the community and states that the project refused to mitigate health impacts to the most sensitive receptors.

Response I10.1: The comment states the commentors' opinion regarding logistics and trucking and their opposition to the project and other new warehouses. This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. 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, including cumulative impacts, related to traffic congestion.

As detailed in the Impact AQ-2 discussion that begins on page 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required.

As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project 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 Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

Further, as part of the Draft EIR, a Construction Health Risk Assessment (Appendix K to the Draft EIR) and Operational Health Risk Assessment (Appendix B) to the Draft EIR were prepared pursuant to the requirements and guidelines set forth by SCAQMD and the Office of Environmental Health Hazard Assessment (OEHHA). As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project would result in exposure of sensitive receivers to DPM as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

The SCAQMD thresholds serve to determine whether or not a given project has a potentially significant development-specific and cumulative impact. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. Thus, the project specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-

specific thresholds are not considered to be cumulatively significant. Since the Project would not exceed the SCAQMD health risk or air quality thresholds, the Project would not result in a cumulative impact pursuant to SCAQMD guidance.

As detailed in Draft EIR Section *5.5*, *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.

As discussed in Draft EIR Section *5.9*, *Hydrology and Water Quality*, mandatory compliance with the SWPP and WQMP prepared for the Project 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. Therefore, the Project would not result in any water quality impacts.

Comment I10.2: The comment states that the quality of the air is at unhealthy levels and adding projects will only increase the pollution burden. The comment also states that the Project can result in high daily volumes of heavy-duty diesel truck traffic and operation of on-site equipment that emit toxic diesel emissions and contribute to regional air pollution. The comment states that residences are located to the west of the Project with the closest residence located directly adjacent to the Project's southern boundary. The comment also states that Bloomington High School (330 ft), Ruth O. Harris Middle School (3,500 ft), Sycamore Hills Elementary School (3,615 ft), Sycamore Hills Park (4,065 ft) and Walter Zimmerman Elementary School (4,500 ft) are all located within a mile radius of the project.

Response I10.2: As discussed on page 5.2-16 of the Draft EIR, the nearest receptors to the Project site are single-family residences located 30 feet south of the Project site. Bloomington High School is located 330 feet south of the Project site. As described on page 5.2-32 of the Draft EIR, a Construction 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 Construction Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 0.98 in one million after implementation of Mitigation Measure AQ-1 (use of Tier 4 Final construction equipment), 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 school children, all other receptors would experience less risk than what is identified for the residence adjacent to the site. As such, construction of the Project would not cause a significant DPM emissions impact on nearby sensitive receptors.

As described on page 5.2-34 of the Draft EIR, an Operational 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. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.6 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 Project would not cause a significant DPM emissions impact on nearby sensitive receptors at Bloomington High School.
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 Table 5.2-10, emissions during construction activities would not exceed the SCAQMD's localized significance thresholds. Also, as detailed in Draft EIR Table 5.2-11, emissions from operation of the Project 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. As such, the Project would not result in a significant direct or indirect health risk impact on any area schools or residences.

Comment I10.3: The comment says that the applicant refused to mitigate the impact of idling trucks by installing a mason wall in contrast to scientific data, AQMD, and CARB recommendations that sensitive receptors should have a minimum of 1,000 ft buffering distance and mitigation should occur with the use of physical boundaries and trees that are efficient in $PM_{2.5}$ scrubbing. The comment states that the community has 91% of the worst air quality in the state. The comment also states that the developer is implying that Bloomington is a community that is disposable and mitigations aren't worth the investment.

Response I10.3: As discussed in Chapter 3, Errata, the Project would include an 8-foot-high wall along the southern boundary of the Project site that would separate the Project from the residences to the south. 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 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required.

As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project 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 Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant. As such, pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B) there is no nexus for requiring trees, a wall, or increased setbacks as mitigation to reduce air quality impacts.

Comment I10.4: The comment states that the community and children are burdened by multiple sources of air pollution as Bloomington parents are constantly changing pillowcases from bloody noses, missing work or school for asthma attacks, and facing overwhelming medical bills from the impacts of the poor air quality in Bloomington. The comment also states that there are several sources of air pollution which are concerning for the community including ozone and particulate matter. The comment defines PM_{10} and $PM_{2.5}$ and states that CalEPA has set the threshold for PM2.5 at 12 ppb but Bloomington is often 200 times the healthy threshold.

Response I10.4: As discussed on page 5.2-32 of Draft EIR Section 5.2, *Air Quality*, a Construction Health Risk Assessment, included as part of Appendix K, was prepared to evaluate the health risk impacts as a result of exposure to DPM as a result of heavy-duty diesel trucks and equipment activities from Project construction. SCAQMD recommends using a 10 in one million cancer risk threshold. A risk level of 10 in one million implies a likelihood that up to 10 people, out of one million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the levels of toxic air contaminants over a specified duration of time. At the maximum incremental cancer risk attributable to Project construction DPM source emissions is estimated by the Construction Health Risk Assessment modeling to be 0.98 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 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 activity, and impacts would be less than significant. An operational health risk assessment was prepared for the Project and included as Appendix B. Table 5.2-12 in Section 5.2, *Air Quality*, shows that the cancer risk from the proposed Project's DPM emissions would be as high as 1.4 per million persons at

the closest residential structure to the Project site boundary. The TAC concentrations at the nearby sensitive receptors would be below the SCAQMD's threshold of 10 per million persons. Therefore, operation of the proposed Project would result in a less than significant impact related to the cancer risk from TAC emissions. As discussed in Responses I13.2 and I13.3 above, emissions from operation of the proposed Project would not exceed SCAQMD's thresholds for any criteria pollutants and would not expose sensitive receptors to substantial pollutant concentrations. Therefore, no further response is warranted.

Comment I10.5: This comment states that a HRA must be prepared for the Project to account for all potential operational health risks from Project-related diesel PM emission source. The comment also states that the HRA should determine if the operation of the Project in conjunction with past, present, and reasonably near future projects or activities would result in a cumulative cancer risk impact on nearby residences. The comment concludes by stating that the County and applicant should include all applicable air pollution reduction and provide onsite air quality monitoring equipment.

Response I10.5: As discussed in Response I13.4 above, a construction HRA and operational HRA were prepared and included in Draft EIR Section 5.2, *Air Quality*. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. As described in Responses I13.2 through I13.4 above, emissions from operation of the proposed Project would not exceed SCAQMD's thresholds for any criteria pollutants and would not expose sensitive receptors to substantial pollutant concentrations. Because emissions from implementation of the proposed Project would not exceed applicable thresholds, they would not be cumulatively considerable, and cumulative air quality impacts would be less than significant. Therefore, no further response is warranted.

Letter I11: Jose Becerra (1 page)

Hello Aron Liang,

My name is Jose Becerra, I am a San Bernardino County resident and environmental researcher for the region. I am emailing you regarding PROJ-2021-00081 to express my concern for public health safety.

I am personally against this project because of the heightened air contamination, noise pollution, and traffic density already damaging the health and well-being of the community. Studies illuminating the effects of pollutants like particulate matter are clear - air contamination kills people and decreases the well-being of others through a multitude of associated detriments to physical and mental health.

Not only are communities already suffering from pollution today, but studies are increasingly showing that contamination likely has intergenerational adverse effects on health.
e.g. https://academic.oup.com/eep/article/3/3/dvx011/4061580

I11.1

While the Environmental Impact Report assesses the effects of one additional warehouse, for residents it is clear that they are suffering the cumulative increase of pollution from the larger logistics apparatus and their rapid warehouse development over the last 30+ years.

For the health of our current population and the generations to come, my comment is: that the potential risk of death and devastation is not worth the low-wage jobs this warehouse will bring to the community.

Best,

Response to Comment I11: Jose Becerra, dated August 22, 2022

Comment I11.1: This commenter introduces himself and expresses his concern for public health safety. The commenter states that they are against the Project because of heightened air contamination, noise pollution, and traffic density that is already damaging the health and well-being of the community. The comment states that studies state air contamination kills people and decreases the well-being of others through a multitude of associated detriments to physical and mental health. The comment includes a link to an article that discusses transgenerational epigenetics and exposures to pesticide, lead, and diesel exhaust.

The document states that the EIR assesses the effects of one additional warehouse but states that it is clear that residents are suffering from the cumulative increase of pollution from the larger logistics and rapid warehouse development over the last 30 plus years. The commenter concludes that the potential risk of death and devastation is not worth the low-wage jobs the warehouse will bring to the community.

Response I11.1: The comment does not include any substantial evidence relating to any environmental impact. As detailed in the Impact AQ-2 discussion that begins on page 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required.

As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project 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 Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

Further, as part of the Draft EIR, a Construction Health Risk Assessment (Appendix K to the Draft EIR) and Operational Health Risk Assessment (Appendix B) to the Draft EIR were prepared pursuant to the requirements and guidelines set forth by SCAQMD and the Office of Environmental Health Hazard Assessment (OEHHA). As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project would result in exposure of sensitive receivers to DPM as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

The SCAQMD thresholds serve to determine whether or not a given project has a potentially significant development-specific and cumulative impact. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. Thus, the project specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are not considered to be cumulatively significant. Since the Project would not exceed the SCAQMD health risk or air quality thresholds, the Project would not result in a cumulative impact pursuant to SCAQMD guidance.

In regard to noise, as detailed in the Impact NOI-1 discussion that begins on page 5.11-13 of the Draft EIR, 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. As such, the Project would not generate a significant daytime or nighttime operational noise level increase at nearby receiver locations.

As detailed in the Draft EIR in Section 5.11, *Noise,* starting on page 5.11-15, the proposed Project would generate traffic related noise from operation. As described in Section 3.0, *Project Description*, of the Draft EIR, the proposed building would be accessed from Slover Avenue and Alder Avenue. As discussed, the Opening Year with Project and General Plan Buildout with Project conditions would result in increases less than the 1.5 and 3.0 dBA CNEL threshold. Thus, off-site traffic noise impacts from the Project would be less than significant.

In regard to traffic, 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, including cumulative impacts, related to traffic congestion.

Concerning the commenter's discussion of warehouse 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)) (*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 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. 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.

Letter I12: Jose Garcia (1 page)

To the office if Aron Liang and all affiliated parties,

I wish to add that I would rather you demolish your house and put a warehouse on it.

Bloomington will outlast you and Bloomington will resist all developers until our last.

No more warehouses. You work for us, not the other way around. I12.1

If any of this message upsets you, feel free to contact me in person at 18312 Mindanao St. Or hide, be a coward, and cave to the whims of developers.

Jose L G

On Mon, Aug 22, 2022, 16:37 Jose Garcia <j.garci155@gmail.com> wrote:

> To whom it may concern,
>
> My name is Jose L Garcia, 34 year resident of Bloomington CA at 18312 Mindanao St, and I want to state my vehement opposition to the sale of more Bloomington land to warehousing. I12.2
>
> The community demands that our officials do not enable more developers and instead focus on improving the quality of life for our community.
>
> Bloomington no se vende!
> Bloomington is not for sale!

Response to Comment I12: Jose Garcia, dated August 22, 2022

Comment I12.1: This comment states that developers should demolish the County planner's house and put a warehouse on it. The comment states that Bloomington will resist all developers and does not want more warehouses.

Response I12.1: This comment provides the commenter's opinion on the Project 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 I12.2: The commenter introduces himself and states his opposition to the Project. The comment states that the community demands County officials focus on improving the quality of life for the community.

Response I12.2: This comment provides the commenter's opinion on the Project 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 I13: Lily and Lizeth Gutierrez (2 pages)

Bloomington is Not for Sale

Project Title: Duke Warehouse on Slover and Alder
Project Number: PROJ-2021-00081
Project Applicant: Duke Realty Limited Partnership

Concerned residents of Bloomington and surrounding neighbors have discussed some concerns about all the logistics/trucking industry construction occurring in our neighborhoods. We want to clarify that we are 100% opposed to any new warehouses including this project on Slover and Alder. The applicant Duke Realty strategically failed to report the true Health, Traffic, Air Quality, Energy, and Water Quality impacts this project will burden the community with and has strategically refused to mitigate the health impacts to our most sensitive receptors: our children and the elderly. We have current and future concerns that we will address in this letter. I13.1

The quality of our air is currently at unhealthy levels and adding projects like this will only increase the pollution burden. Industrial development, such as the proposed 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. Residences are located south and west of the Project with the closest residences located directly adjacent the Project's southern boundary. In addition to the residences, Bloomington High School (330 feet), Ruth O. Harris Middle School (3,500 feet), Sycamore Hills Elementary School (3,615 feet), Sycamore Hills Park (4,065 feet), and Walter Zimmerman Elementary School (4,500 feet) are all located within a mile radius of the project with several other sites lying just over a mile away. According to the California Communities Environmental Health Screening Tool Version 4.0 (CalEnviroScreen). I13.2

Most offensive to Bloomington's children the applicant refused to mitigate the impact of idling trucks would have to the students of Bloomington High School (330 feet) by installing a mason wall, in contrast to scientific data, AQMD, and CARB recommendations that sensitive receptors should have a minimum of 1,000 ft buffering distance and mitigation should occur with the use of physical boundaries and trees that are efficient in $PM_{2.5}$ scrubbing, such as cypress trees, live oak trees, and pine trees (mediterranean pines). With the homes hundreds of feet from this project, the response from the analysis is that their project would have little impact on a community that is already defined as in the 91% of the wose air quality in the state. In essence, the developer is stating that the community of Bloomington is a community that is disposable and mitigations are just not worth the investment. I13.3

Our community and children are burdened by multiple sources of air pollution, as Bloomington parents are constantly changing pillowcases from bloody noses, missing work/school for asthma attacks, and facing overwhelming medical bills from the impacts of the poor air quality in Bloomington. There are several sources of air pollution which are concerning for our community: Ozone and Particulate Matter (PM). Within the PM category there are two sizes PM_{10}, which is the large dust that used to block our views of the mountains, which is made up of dust and particles that you can see. $PM_{2.5}$ is a microparticle that we cannot see but is able to pass directly into the bloodstream and pass the blood brain barrier having long term impacts such as: heart damage, respiratory illness, hepatic diseases, hematological diseases, neurological disorders, pulmonary diseases, mental health impacts, intellectual delays, and the list goes on. CalEPA has set the threshold for $PM_{2.5}$ at 12ppb, but Bloomington is often 200 times the healthy threshold. I13.4

Because the Project is near residences and schools that are burdened by multiple air pollution sources, the applicant must prepare a health risk assessment (HRA) for the Project. The HRA should account for all potential operational health risks from Project-related diesel PM emission sources, including, but not limited to, back-up generators, on-site diesel-powered equipment, and heavy duty trucks. The HRA should also determine if the operation of the Project in conjunction with past, present, and reasonably near future projects or activities would result in a cumulative cancer risk impact on nearby residences. To reduce diesel PM exposure and associated cancer risks, the County and applicant should include all applicable air pollution reduction and provide onsite air quality monitoring equipment. I13.5

Name: Lily Gutierrez
Address: 17833 Otilla Street, Bloomington, CA 92316
Email: lily gutierrez@ucla.edu
Phone: (909) 503-6085
Signature: Lily Gutierrez

Bloomington is Not for Sale

Project Title: Duke Warehouse on Slover and Alder
Project Number: PROJ-2021-00081
Project Applicant: Duke Realty Limited Partnership

Concerned residents of Bloomington and surrounding neighbors have discussed some concerns about all the logistics/trucking industry construction occurring in our neighborhoods. We want to clarify that we are 100% opposed to any new warehouses including this project on Slover and Alder. The applicant Duke Realty strategically failed to report the true Health, Traffic, Air Quality, Energy, and Water Quality impacts this project will burden the community with and has strategically refused to mitigate the health impacts to our most sensitive receptors: our children and the elderly. We have current and future concerns that we will address in this letter.

The quality of our air is currently at unhealthy levels and adding projects like this will only increase the pollution burden. Industrial development, such as the proposed 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. Residences are located south and west of the Project with the closest residences located directly adjacent the Project's southern boundary. In addition to the residences, Bloomington High School (330 feet), Ruth O. Harris Middle School (3,500 feet), Sycamore Hills Elementary School (3,615 feet), Sycamore Hills Park (4,065 feet), and Walter Zimmerman Elementary School (4,500 feet) are all located within a mile radius of the project with several other sites lying just over a mile away. According to the California Communities Environmental Health Screening Tool Version 4.0 (CalEnviroScreen).

Most offensive to Bloomington's children the applicant refused to mitigate the impact of idling trucks would have to the students of Bloomington High School (330 feet) by installing a mason wall, in contrast to scientific data, AQMD, and CARB recommendations that sensitive receptors should have a minimum of 1,000 ft buffering distance and mitigation should occur with the use of physical boundaries and trees that are efficient in $PM_{2.5}$ scrubbing, such as cypress trees, live oak trees, and pine trees (mediterranean pines). With the homes hundreds of feet from this project, the response from the analysis is that their project would have little impact on a community that is already defined as in the 91% of the wose air quality in the state. In essence, the developer is stating that the community of Bloomington is a community that is disposable and mitigations are just not worth the investment.

Our community and children are burdened by multiple sources of air pollution, as Bloomington parents are constantly changing pillowcases from bloody noses, missing work/school for asthma attacks, and facing overwhelming medical bills from the impacts of the poor air quality in Bloomington. There are several sources of air pollution which are concerning for our community: Ozone and Particulate Matter (PM). Within the PM category there are two sizes PM_{10}, which is the large dust that used to block our views of the mountains, which is made up of dust and particles that you can see. $PM_{2.5}$ is a microparticle that we cannot see but is able to pass directly into the bloodstream and pass the blood brain barrier having long term impacts such as: heart damage, respiratory illness, hepatic diseases, hematological diseases, neurological disorders, pulmonary diseases, mental health impacts, intellectual delays, and the list goes on. CalEPA has set the threshold for $PM_{2.5}$ at 12ppb, but Bloomington is often 200 times the healthy threshold.

Because the Project is near residences and schools that are burdened by multiple air pollution sources, the applicant must prepare a health risk assessment (HRA) for the Project. The HRA should account for all potential operational health risks from Project-related diesel PM emission sources, including, but not limited to, back-up generators, on-site diesel-powered equipment, and heavy duty trucks. The HRA should also determine if the operation of the Project in conjunction with past, present, and reasonably near future projects or activities would result in a cumulative cancer risk impact on nearby residences. To reduce diesel PM exposure and associated cancer risks, the County and applicant should include all applicable air pollution reduction and provide onsite air quality monitoring equipment.

Name: Lizeth Gutierrez
Address: 17833 Otilia St., Bloomington, CA 92316
Email: lizeth.gutierrez100@gmail.com
Phone: 909-512-2828
Signature:

Response to Comment I13: Lily and Lizeth Gutierrez, dated August 22, 2022

Comment II3.1: This comment states that concerned residents of Bloomington have discussed concerns about logistics/trucking industry construction occurring in neighborhoods. The comment states that they are fully opposed to new warehouses including the Slover and Alder project. The comment states that the applicant failed to report the health, traffic, air quality, energy, and water quality impacts that will burden the community and states that the project refused to mitigate health impacts to the most sensitive receptors.

Response I13.1: The comment states the commentors' opinion regarding logistics and trucking and their opposition to the project and other new warehouses. This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. 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, including cumulative impacts, related to traffic congestion.

As detailed in the Impact AQ-2 discussion that begins on page 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required.

As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project 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 Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

Further, as part of the Draft EIR, a Construction Health Risk Assessment (Appendix K to the Draft EIR) and Operational Health Risk Assessment (Appendix B to the Draft EIR) to the Draft EIR were prepared pursuant to the requirements and guidelines set forth by SCAQMD and the Office of Environmental Health Hazard Assessment (OEHHA). As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project would result in exposure of sensitive receivers to DPM as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

The SCAQMD thresholds serve to determine whether or not a given project has a potentially significant development-specific and cumulative impact. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. Thus, the project specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project

specific thresholds are not considered to be cumulatively significant. Since the Project would not exceed the SCAQMD health risk or air quality thresholds, the Project would not result in a cumulative impact pursuant to SCAQMD guidance.

As detailed in Draft EIR Section *5.5*, *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.

As discussed in Draft EIR Section *5.9*, *Hydrology and Water Quality*, mandatory compliance with the SWPP and WQMP prepared for the Project 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. Therefore, the Project would not result in any water quality impacts.

Comment I13.2: The comment states that the quality of the air is at unhealthy levels and adding projects will only increase the pollution burden. The comment also states that the Project can result in high daily volumes of heavy-duty diesel truck traffic and operation of on-site equipment that emit toxic diesel emissions and contribute to regional air pollution. The comment states that residences are located to the west of the Project with the closest residence located directly adjacent to the Project's southern boundary. The comment also states that Bloomington High School (330 ft), Ruth O. Harris Middle School (3,500 ft), Sycamore Hills Elementary School (3,615 ft), Sycamore Hills Park (4,065 ft) and Walter Zimmerman Elementary School (4,500 ft) are all located within a mile radius of the project.

Response I13.2: As discussed on page 5.2-16 of the Draft EIR, the nearest receptors to the Project site are single-family residences located 30 feet south of the Project site. Bloomington High School is located 330 feet south of the Project site. As described on page 5.2-32 of the Draft EIR, a Construction 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 Construction Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 0.98 in one million after implementation of Mitigation Measure AQ-1 (use of Tier 4 Final construction equipment), 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 school children, all other receptors would experience less risk than what is identified for the residence adjacent to the site. As such, construction of the Project would not cause a significant DPM emissions impact on nearby sensitive receptors.

As described on page 5.2-34 of the Draft EIR, an Operational 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. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.6 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 Project would not cause a significant DPM emissions impact on nearby sensitive receptors at Bloomington High School.

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 Table 5.2-10, emissions during construction activities would not exceed the SCAQMD's localized significance thresholds.

Also, as detailed in Draft EIR Table 5.2-11, emissions from operation of the Project 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. As such, the Project would not result in a significant direct or indirect health risk impact on any area schools or residences.

Comment I13.3: The comment says that the applicant refused to mitigate the impact of idling trucks by installing a mason wall in contrast to scientific data, AQMD, and CARB recommendations that sensitive receptors should have a minimum of 1,000 ft buffering distance and mitigation should occur with the use of physical boundaries and trees that are efficient in $PM_{2.5}$ scrubbing. The comment states that the community has 91% of the worst air quality in the state. The comment also states that the developer is implying that Bloomington is a community that is disposable and mitigations aren't worth the investment.

Response I13.3: As discussed in Chapter 3, Errata, the Project would include an 8-foot-high wall along the southern boundary of the Project site that would separate the Project from the residences to the south. 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 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required.

As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project 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 Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant. As such, pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B) there is no nexus for requiring trees, a wall, or increased setbacks as mitigation to reduce air quality impacts.

Comment 113.4: The comment states that the community and children are burdened by multiple sources of air pollution as Bloomington parents are constantly changing pillowcases from bloody noses, missing work or school for asthma attacks, and facing overwhelming medical bills from the impacts of the poor air quality in Bloomington. The comment also states that there are several sources of air pollution which are concerning for the community including ozone and particulate matter. The comment defines PM_{10} and $PM_{2.5}$ and states that CalEPA has set the threshold for PM2.5 at 12 ppb but Bloomington is often 200 times the healthy threshold.

Response I13.4: As discussed on page 5.2-32 of Draft EIR Section 5.2, *Air Quality*, a Construction Health Risk Assessment, included as part of Appendix K, was prepared to evaluate the health risk impacts as a result of exposure to DPM as a result of heavy-duty diesel trucks and equipment activities from Project construction. SCAQMD recommends using a 10 in one million cancer risk threshold. A risk level of 10 in one million implies a likelihood that up to 10 people, out of one million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the levels of toxic air contaminants over a specified duration of time. At the maximum incremental cancer risk attributable to Project construction DPM source emissions is estimated by the Construction Health Risk Assessment modeling to be 0.98 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 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 activity, and impacts would be less than significant. An operational health risk assessment was prepared for the Project and included as Appendix B. Table 5.2-12 in Section 5.2, *Air Quality*, shows that

the cancer risk from the proposed Project's DPM emissions would be as high as 1.4 per million persons at the closest residential structure to the Project site boundary. The TAC concentrations at the nearby sensitive receptors would be below the SCAQMD's threshold of 10 per million persons. Therefore, operation of the proposed Project would result in a less than significant impact related to the cancer risk from TAC emissions. As discussed in Responses I13.2 and I13.3 above, emissions from operation of the proposed Project would not exceed SCAQMD's thresholds for any criteria pollutants and would not expose sensitive receptors to substantial pollutant concentrations. Therefore, no further response is warranted.

Comment I13.5: This comment states that a HRA must be prepared for the Project to account for all potential operational health risks from Project-related diesel PM emission source. The comment also states that the HRA should determine if the operation of the Project in conjunction with past, present, and reasonably near future projects or activities would result in a cumulative cancer risk impact on nearby residences. The comment concludes by stating that the County and applicant should include all applicable air pollution reduction and provide onsite air quality monitoring equipment.

Response I13.5: As discussed in Response I13.4 above, a construction HRA and operational HRA were prepared and included in Draft EIR Section 5.2, *Air Quality*. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. As described in Responses I13.2 through I13.4 above, emissions from operation of the proposed Project would not exceed SCAQMD's thresholds for any criteria pollutants and would not expose sensitive receptors to substantial pollutant concentrations. Because emissions from implementation of the proposed Project would not exceed applicable thresholds, they would not be cumulatively considerable, and cumulative air quality impacts would be less than significant. Therefore, no further response is warranted.

Letter I14: Maria Perez (1 page)

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.

Mi nombre es Maria Pérez soy residente de Bloomington por 38 años y estoy totalmente en desacuerdo en proyectos de más bodegas no necesitamos más contaminación mas tráfico no más bodegas

I14.1

Enviado desde mi iPhone

Response to Comment I14: Maria Perez, dated August 22, 2022

Comment I14.1: This comment states that they have been a resident of Bloomington for 38 years and states that they disagree with more warehouse projects and does not want more contamination or more traffic.

Response I14.1: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. 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, including cumulative impacts, related to traffic congestion.

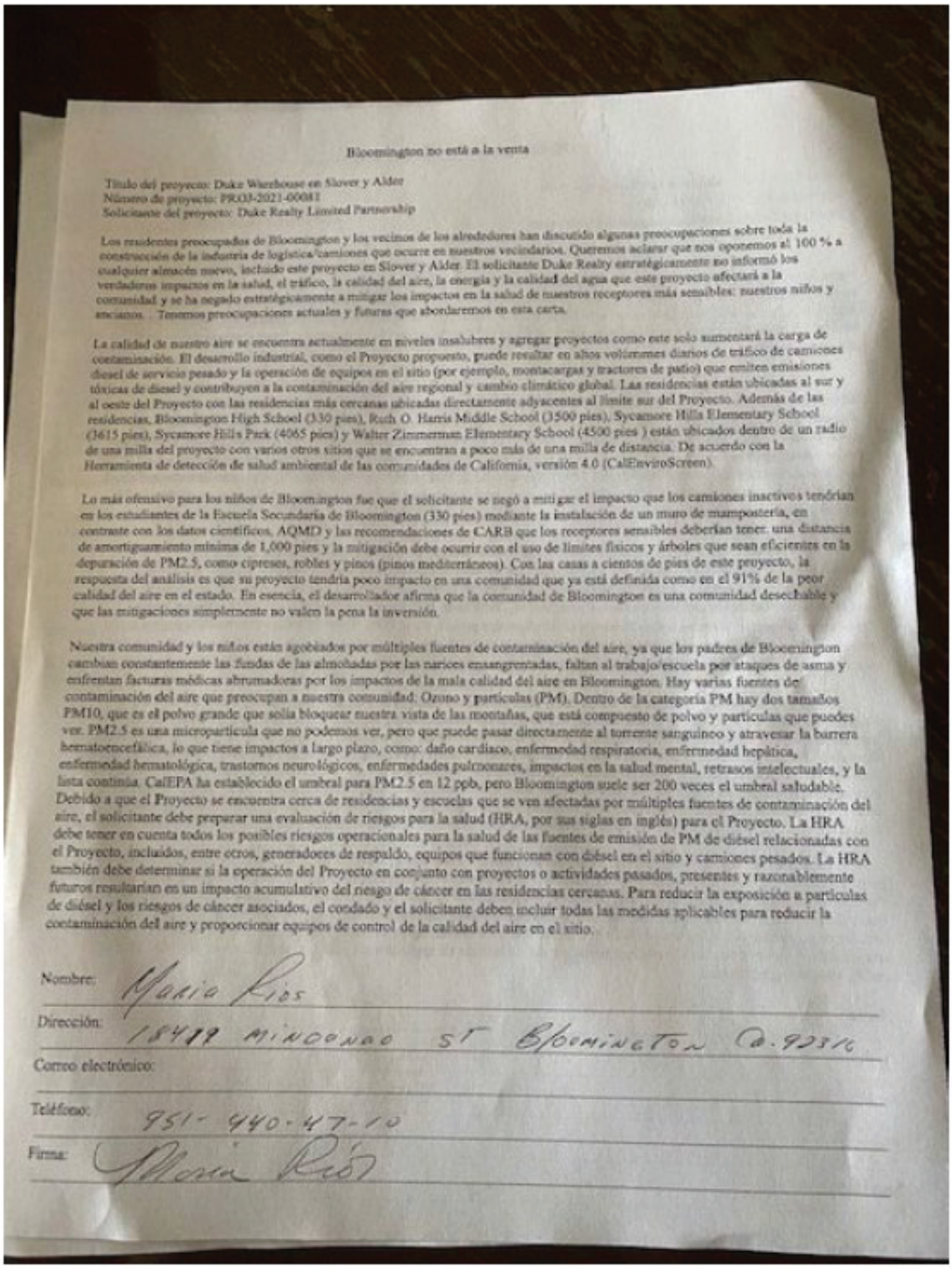
As detailed in the Impact AQ-2 discussion that begins on page 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required.

As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project 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 Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

Further, as part of the Draft EIR, a Construction Health Risk Assessment (Appendix K to the Draft EIR) and Operational Health Risk Assessment (Appendix B) to the Draft EIR were prepared pursuant to the requirements and guidelines set forth by SCAQMD and the Office of Environmental Health Hazard Assessment (OEHHA). As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project would result in exposure of sensitive receivers to DPM as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

The SCAQMD thresholds serve to determine whether or not a given project has a potentially significant development-specific and cumulative impact. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. Thus, the project specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are not considered to be cumulatively significant. Since the Project would not exceed the SCAQMD health risk or air quality thresholds, the Project would not result in a cumulative impact pursuant to SCAQMD guidance.

LETTER I15: Mary Rios (1 page)



Bloomington no está a la venta

Título del proyecto: Duke Warehouse en Slover y Alder
Número de proyecto: PROJ-2021-00081
Solicitante del proyecto: Duke Realty Limited Partnership

Los residentes preocupados de Bloomington y los vecinos de los alrededores han discutido algunas preocupaciones sobre toda la construcción de la industria de logística/camiones que ocurre en nuestros vecindarios. Queremos aclarar que nos oponemos al 100 % a cualquier almacén nuevo, incluido este proyecto en Slover y Alder. El solicitante Duke Realty estratégicamente no informó los verdaderos impactos en la salud, el tráfico, la calidad del aire, la energía y la calidad del agua que este proyecto afectará a la comunidad y se ha negado estratégicamente a mitigar los impactos en la salud de nuestros receptores más sensibles: nuestros niños y ancianos. . Tenemos preocupaciones actuales y futuras que abordaremos en esta carta.

I15.1

La calidad de nuestro aire se encuentra actualmente en niveles insalubres y agregar proyectos como este solo aumentará la carga de contaminación. El desarrollo industrial, como el Proyecto propuesto, puede resultar en altos volúmenes diarios de tráfico de camiones diesel de servicio pesado y la operación de equipos en el sitio (por ejemplo, montacargas y tractores de patio) que emiten emisiones tóxicas de diesel y contribuyen a la contaminación del aire regional y cambio climático global. Las residencias están ubicadas al sur y al oeste del Proyecto con las residencias más cercanas ubicadas directamente adyacentes al límite sur del Proyecto. Además de las residencias, Bloomington High School (330 pies), Ruth O. Harris Middle School (3500 pies), Sycamore Hills Elementary School (3615 pies), Sycamore Hills Park (4065 pies) y Walter Zimmerman Elementary School (4500 pies) están ubicados dentro de un radio de una milla del proyecto con varios otros sitios que se encuentran a poco más de una milla de distancia. De acuerdo con la Herramienta de detección de salud ambiental de las comunidades de California, versión 4.0 (CalEnviroScreen).

I15.2

Lo más ofensivo para los niños de Bloomington fue que el solicitante se negó a mitigar el impacto que los camiones inactivos tendrían en los estudiantes de la Escuela Secundaria de Bloomington (330 pies) mediante la instalación de un muro de mampostería, en contraste con los datos científicos, AQMD y las recomendaciones de CARB que los receptores sensibles deberían tener: una distancia de amortiguamiento mínima de 1,000 pies y la mitigación debe ocurrir con el uso de límites físicos y árboles que sean eficientes en la depuración de PM2.5, como cipreses, robles y pinos (pinos mediterráneos). Con las casas a cientos de pies de este proyecto, la respuesta del análisis es que su proyecto tendría poco impacto en una comunidad que ya está definida como en el 91% de la peor calidad del aire en el estado. En esencia, el desarrollador afirma que la comunidad de Bloomington es una comunidad desechable y que las mitigaciones simplemente no valen la pena la inversión.

I15.3

Nuestra comunidad y los niños están agobiados por múltiples fuentes de contaminación del aire, ya que los padres de Bloomington cambian constantemente las fundas de las almohadas por las narices ensangrentadas, faltan al trabajo/escuela por ataques de asma y enfrentan facturas médicas abrumadoras por los impactos de la mala calidad del aire en Bloomington. Hay varias fuentes de contaminación del aire que preocupan a nuestra comunidad: Ozono y partículas (PM). Dentro de la categoría PM hay dos tamaños PM10, que es el polvo grande que solía bloquear nuestra vista de las montañas, que está compuesto de polvo y partículas que puedes ver. PM2.5 es una microparticula que no podemos ver, pero que puede pasar directamente al torrente sanguíneo y atravesar la barrera hematoencefálica, lo que tiene impactos a largo plazo, como: daño cardíaco, enfermedad respiratoria, enfermedad hepática, enfermedad hematológica, trastornos neurológicos, enfermedades pulmonares, impactos en la salud mental, retrasos intelectuales, y la lista continúa. CalEPA ha establecido el umbral para PM2.5 en 12 ppb, pero Bloomington suele ser 200 veces el umbral saludable. Debido a que el Proyecto se encuentra cerca de residencias y escuelas que se ven afectadas por múltiples fuentes de contaminación del aire, el solicitante debe preparar una evaluación de riesgos para la salud (HRA, por sus siglas en inglés) para el Proyecto. La HRA debe tener en cuenta todos los posibles riesgos operacionales para la salud de las fuentes de emisión de PM de diésel relacionadas con el Proyecto, incluidos, entre otros, generadores de respaldo, equipos que funcionan con diésel en el sitio y camiones pesados. La HRA también debe determinar si la operación del Proyecto en conjunto con proyectos o actividades pasados, presentes y razonablemente futuros resultarían en un impacto acumulativo del riesgo de cáncer en las residencias cercanas. Para reducir la exposición a partículas de diésel y los riesgos de cáncer asociados, el condado y el solicitante deben incluir todas las medidas aplicables para reducir la contaminación del aire y proporcionar equipos de control de la calidad del aire en el sitio.

I15.4

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Firma: Maria Rios

Response to Comment I15: Mario Rios, dated August 22, 2022

Comment I15.1: This comment states that concerned residents of Bloomington have discussed concerns about logistics/trucking industry construction occurring in neighborhoods. The comment states that they are fully opposed to new warehouses including the Slover and Alder project. The comment states that the applicant failed to report the health, traffic, air quality, energy, and water quality impacts that will burden the community and states that the project refused to mitigate health impacts to the most sensitive receptors.

Response I15.1: The comment states the commentors' opinion regarding logistics and trucking and their opposition to the project and other new warehouses. This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. 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, including cumulative impacts, related to traffic congestion.

As detailed in the Impact AQ-2 discussion that begins on page 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required.

As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project 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 Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

Further, as part of the Draft EIR, a Construction Health Risk Assessment (Appendix K to the Draft EIR) and Operational Health Risk Assessment (Appendix B) to the Draft EIR were prepared pursuant to the requirements and guidelines set forth by SCAQMD and the Office of Environmental Health Hazard Assessment (OEHHA). As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project would result in exposure of sensitive receivers to DPM as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

The SCAQMD thresholds serve to determine whether or not a given project has a potentially significant development-specific and cumulative impact. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. Thus, the project specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-

specific thresholds are not considered to be cumulatively significant. Since the Project would not exceed the SCAQMD health risk or air quality thresholds, the Project would not result in a cumulative impact pursuant to SCAQMD guidance.

As detailed in Draft EIR Section 5.5, *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.
As discussed in Draft EIR Section 5.9, *Hydrology and Water Quality*, mandatory compliance with the SWPP and WQMP prepared for the Project 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. Therefore, the Project would not result in any water quality impacts.

Comment I15.2: The comment states that the quality of the air is at unhealthy levels and adding projects will only increase the pollution burden. The comment also states that the Project can result in high daily volumes of heavy-duty diesel truck traffic and operation of on-site equipment that emit toxic diesel emissions and contribute to regional air pollution. The comment states that residences are located to the west of the Project with the closest residence located directly adjacent to the Project's southern boundary. The comment also states that Bloomington High School (330 ft), Ruth O. Harris Middle School (3,500 ft), Sycamore Hills Elementary School (3,615 ft), Sycamore Hills Park (4,065 ft) and Walter Zimmerman Elementary School (4,500 ft) are all located within a mile radius of the project.

Response I15.2: As discussed on page 5.2-16 of the Draft EIR, the nearest receptors to the Project site are single-family residences located 30 feet south of the Project site. Bloomington High School is located 330 feet south of the Project site. As described on page 5.2-32 of the Draft EIR, a Construction 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 Construction Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 0.98 in one million after implementation of Mitigation Measure AQ-1 (use of Tier 4 Final construction equipment), 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 school children, all other receptors would experience less risk than what is identified for the residence adjacent to the site. As such, construction of the Project would not cause a significant DPM emissions impact on nearby sensitive receptors.

As described on page 5.2-34 of the Draft EIR, an Operational 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. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.6 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 Project would not cause a significant DPM emissions impact on nearby sensitive receptors at Bloomington High School.
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 Table 5.2-10, emissions during construction activities would not exceed the SCAQMD's localized significance thresholds. Also, as detailed in Draft EIR Table 5.2-11, emissions from operation of the Project 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. As such, the Project would not result in a significant direct or indirect health risk impact on any area schools or residences.

Comment I15.3: The comment says that the applicant refused to mitigate the impact of idling trucks by installing a mason wall in contrast to scientific data, AQMD, and CARB recommendations that sensitive receptors should have a minimum of 1,000 ft buffering distance and mitigation should occur with the use of physical boundaries and trees that are efficient in $PM_{2.5}$ scrubbing. The comment states that the community has 91% of the worst air quality in the state. The comment also states that the developer is implying that Bloomington is a community that is disposable and mitigations aren't worth the investment.

Response I15.3: As discussed in Chapter 3, Errata, the Project would include an 8-foot-high wall along the southern boundary of the Project site that would separate the Project from the residences to the south. 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 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required.

As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project 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 Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant. As such, pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B) there is no nexus for requiring trees, a wall, or increased setbacks as mitigation to reduce air quality impacts.

Comment 115.4: The comment states that the community and children are burdened by multiple sources of air pollution as Bloomington parents are constantly changing pillowcases from bloody noses, missing work or school for asthma attacks, and facing overwhelming medical bills from the impacts of the poor air quality in Bloomington. The comment also states that there are several sources of air pollution which are concerning for the community including ozone and particulate matter. The comment defines PM_{10} and $PM_{2.5}$ and states that CalEPA has set the threshold for PM2.5 at 12 ppb but Bloomington is often 200 times the healthy threshold.

This comment states that a HRA must be prepared for the Project to account for all potential operational health risks from Project-related diesel PM emission source. The comment also states that the HRA should determine if the operation of the Project in conjunction with past, present, and reasonably near future projects or activities would result in a cumulative cancer risk impact on nearby residences. The comment concludes by stating that the County and applicant should include all applicable air pollution reduction and provide onsite air quality monitoring equipment.

Response I15.4: As discussed on page 5.2-32 of Draft EIR Section 5.2, *Air Quality*, a Construction Health Risk Assessment, included as part of Appendix K, was prepared to evaluate the health risk impacts as a result of exposure to DPM as a result of heavy-duty diesel trucks and equipment activities from Project construction. SCAQMD recommends using a 10 in one million cancer risk threshold. A risk level of 10 in one million implies a likelihood that up to 10 people, out of one million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the levels of toxic air contaminants over a specified duration of time. At the maximum incremental cancer risk attributable to Project construction DPM source emissions is estimated by the Construction Health Risk Assessment modeling to be 0.98 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 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 activity, and impacts would be less than significant. An operational health risk assessment was prepared for the Project and included as Appendix B. Table 5.2-12 in Section 5.2, *Air Quality*, shows that the cancer risk from the proposed Project's DPM emissions would be as high as 1.4 per million persons at the closest residential structure to the Project site boundary. The TAC concentrations at the nearby sensitive receptors would be below the SCAQMD's threshold of 10 per million persons. Therefore, operation of the proposed Project would result in a less than significant impact related to the cancer risk from TAC emissions. As discussed in Responses I13.2 and I13.3 above, emissions from operation of the proposed Project would not exceed SCAQMD's thresholds for any criteria pollutants and would not expose sensitive receptors to substantial pollutant concentrations. Therefore, no further response is warranted.

Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. As described in Responses I13.2 through I13.3 above, emissions from operation of the proposed Project would not exceed SCAQMD's thresholds for any criteria pollutants and would not expose sensitive receptors to substantial pollutant concentrations. Because emissions from implementation of the proposed Project would not exceed applicable thresholds, they would not be cumulatively considerable, and cumulative air quality impacts would be less than significant. Therefore, no further response is warranted.

LETTER I16: Multiple Residents (6 pages)

Bloomington is Not for Sale

Project Title: Duke Warehouse on Slover and Alder
Project Number: PROJ-2021-00081
Project Applicant: Duke Realty Limited Partnership

Concerned residents of Bloomington and surrounding neighbors have discussed some concerns about all the logistics/trucking industry construction occurring in our neighborhoods. We want to clarify that we are 100% opposed to any new warehouses including this project on Slover and Alder. The applicant Duke Realty strategically failed to report the true Health, Traffic, Air Quality, Energy, and Water Quality impacts this project will burden the community with and has strategically refused to mitigate the health impacts to our most sensitive receptors: our children and the elderly. We have current and future concerns that we will address in this letter. I16.1

The quality of our air is currently at unhealthy levels and adding projects like this will only increase the pollution burden. Industrial development, such as the proposed 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. Residences are located south and west of the Project with the closest residences located directly adjacent the Project's southern boundary. In addition to the residences, Bloomington High School (330 feet), Ruth O. Harris Middle School (3,500 feet), Sycamore Hills Elementary School (3,615 feet), Sycamore Hills Park (4,065 feet), and Walter Zimmerman Elementary School (4,500 feet) are all located within a mile radius of the project with several other sites lying just over a mile away. According to the California Communities Environmental Health Screening Tool Version 4.0 (CalEnviroScreen). I16.2

Most offensive to Bloomington's children the applicant refused to mitigate the impact of idling trucks would have to the students of Bloomington High School (330 feet) by installing a mason wall, in contrast to scientific data, AQMD, and CARB recommendations that sensitive receptors should have a minimum of 1,000 ft buffering distance and mitigation should occur with the use of physical boundaries and trees that are efficient in $PM_{2.5}$ scrubbing, such as cypress trees, live oak trees, and pine trees (mediterranean pines). With the homes hundreds of feet from this project, the response from the analysis is that their project would have little impact on a community that is already defined as in the 91% of the wose air quality in the state. In essence, the developer is stating that the community of Bloomington is a community that is disposable and mitigations are just not worth the investment. I16.3

Our community and children are burdened by multiple sources of air pollution, as Bloomington parents are constantly changing pillowcases from bloody noses, missing work/school for asthma attacks, and facing overwhelming medical bills from the impacts of the poor air quality in Bloomington. There are several sources of air pollution which are concerning for our community: Ozone and Particulate Matter (PM). Within the PM category there are two sizes PM_{10}, which is the large dust that used to block our views of the mountains, which is made up of dust and particles that you can see. $PM_{2.5}$ is a microparticle that we cannot see but is able to pass directly into the bloodstream and pass the blood brain barrier having long term impacts such as: heart damage, respiratory illness, hepatic diseases, hematological diseases, neurological disorders, pulmonary diseases, mental health impacts, intellectual delays, and the list goes on. CalEPA has set the threshold for $PM_{2.5}$ at 12ppb, but Bloomington is often 200 times the healthy threshold. I16.4

Because the Project is near residences and schools that are burdened by multiple air pollution sources, the applicant must prepare a health risk assessment (HRA) for the Project. The HRA should account for all potential operational health risks from Project-related diesel PM emission sources, including, but not limited to, back-up generators, on-site diesel-powered equipment, and heavy duty trucks. The HRA should also determine if the operation of the Project in conjunction with past, present, and reasonably near future projects or activities would result in a cumulative cancer risk impact on nearby residences. To reduce diesel PM exposure and associated cancer risks, the County and applicant should include all applicable air pollution reduction and provide onsite air quality monitoring equipment. I16.5

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Bloomington is Not for Sale

Project Title: Duke Warehouse on Slover and Alder
Project Number: PROJ-2021-00081
Project Applicant: Duke Realty Limited Partnership

Concerned residents of Bloomington and surrounding neighbors have discussed some concerns about all the logistics/trucking industry construction occurring in our neighborhoods. We want to clarify that we are 100% opposed to any new warehouses including this project on Slover and Alder. The applicant Duke Realty strategically failed to report the true Health, Traffic, Air Quality, Energy, and Water Quality impacts this project will burden the community with and has strategically refused to mitigate the health impacts to our most sensitive receptors: our children and the elderly. We have current and future concerns that we will address in this letter.

The quality of our air is currently at unhealthy levels and adding projects like this will only increase the pollution burden. Industrial development, such as the proposed 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. Residences are located south and west of the Project with the closest residences located directly adjacent the Project's southern boundary. In addition to the residences, Bloomington High School (330 feet), Ruth O. Harris Middle School (3,500 feet), Sycamore Hills Elementary School (3,615 feet), Sycamore Hills Park (4,065 feet), and Walter Zimmerman Elementary School (4,500 feet) are all located within a mile radius of the project with several other sites lying just over a mile away. According to the California Communities Environmental Health Screening Tool Version 4.0 (CalEnviroScreen).

Most offensive to Bloomington's children the applicant refused to mitigate the impact of idling trucks would have to the students of Bloomington High School (330 feet) by installing a mason wall, in contrast to scientific data, AQMD, and CARB recommendations that sensitive receptors should have a minimum of 1,000 ft buffering distance and mitigation should occur with the use of physical boundaries and trees that are efficient in $PM_{2.5}$ scrubbing, such as cypress trees, live oak trees, and pine trees (mediterranean pines). With the homes hundreds of feet from this project, the response from the analysis is that their project would have little impact on a community that is already defined as in the 91% of the wose air quality in the state. In essence, the developer is stating that the community of Bloomington is a community that is disposable and mitigations are just not worth the investment.

Our community and children are burdened by multiple sources of air pollution, as Bloomington parents are constantly changing pillowcases from bloody noses, missing work/school for asthma attacks, and facing overwhelming medical bills from the impacts of the poor air quality in Bloomington. There are several sources of air pollution which are concerning for our community: Ozone and Particulate Matter (PM). Within the PM category there are two sizes PM_{10}, which is the large dust that used to block our views of the mountains, which is made up of dust and particles that you can see. $PM_{2.5}$ is a microparticle that we cannot see but is able to pass directly into the bloodstream and pass the blood brain barrier having long term impacts such as: heart damage, respiratory illness, hepatic diseases, hematological diseases, neurological disorders, pulmonary diseases, mental health impacts, intellectual delays, and the list goes on. CalEFA has set the threshold for $PM_{2.5}$ at 12ppb, but Bloomington is often 200 times the healthy threshold.

Because the Project is near residences and schools that are burdened by multiple air pollution sources, the applicant must prepare a health risk assessment (HRA) for the Project. The HRA should account for all potential operational health risks from Project-related diesel PM emission sources, including, but not limited to, back-up generators, on-site diesel-powered equipment, and heavy duty trucks. The HRA should also determine if the operation of the Project in conjunction with past, present, and reasonably near future projects or activities would result in a cumulative cancer risk impact on nearby residences. To reduce diesel PM exposure and associated cancer risks, the County and applicant should include all applicable air pollution reduction and provide onsite air quality monitoring equipment.

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Signature:

Bloomington no está a la venta

Título del proyecto: Duke Warehouse en Slover y Alder
Número de proyecto: PROJ-2021-00081
Solicitante del proyecto: Duke Realty Limited Partnership

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La calidad de nuestro aire se encuentra actualmente en niveles insalubres y agregar proyectos como este solo aumentará la carga de contaminación. El desarrollo industrial, como el Proyecto propuesto, puede resultar en altos volúmenes diarios de tráfico de camiones diesel de servicio pesado y la operación de equipos en el sitio (por ejemplo, montacargas y tractores de patio) que emiten emisiones tóxicas de diesel y contribuyen a la contaminación del aire regional y cambio climático global. Las residencias están ubicadas al sur y al oeste del Proyecto con las residencias más cercanas ubicadas directamente adyacentes al límite sur del Proyecto. Además de las residencias, Bloomington High School (330 pies), Ruth O. Harris Middle School (3500 pies), Sycamore Hills Elementary School (3615 pies), Sycamore Hills Park (4065 pies) y Walter Zimmerman Elementary School (4500 pies) están ubicados dentro de un radio de una milla del proyecto con varios otros sitios que se encuentran a poco más de una milla de distancia. De acuerdo con la Herramienta de detección de salud ambiental de las comunidades de California, versión 4.0 (CalEnviroScreen).

Lo más ofensivo para los niños de Bloomington fue que el solicitante se negó a mitigar el impacto que los camiones inactivos tendrían en los estudiantes de la Escuela Secundaria de Bloomington (330 pies) mediante la instalación de un muro de mampostería, en contraste con los datos científicos, AQMD y las recomendaciones de CARD que los receptores sensibles deberían tener. una distancia de amortiguamiento mínima de 1,000 pies y la mitigación debe ocurrir con el uso de límites físicos y árboles que sean eficientes en la depuración de PM2.5, como cipreses, robles y pinos (pinos mediterráneos). Con las casas a cientos de pies de este proyecto, la respuesta del análisis es que su proyecto tendría poco impacto en una comunidad que ya está definida como en el 91% de la peor calidad del aire en el estado. En esencia, el desarrollador afirma que la comunidad de Bloomington es una comunidad desechable y que las mitigaciones simplemente no valen la pena la inversión.

Nuestra comunidad y los niños están agobiados por múltiples fuentes de contaminación del aire, ya que los padres de Bloomington cambian constantemente las fundas de las almohadas por las narices ensangrentadas, faltan al trabajo/escuela por ataques de asma y enfrentan facturas médicas abrumadoras por los impactos de la mala calidad del aire en Bloomington. Hay varias fuentes de contaminación del aire que preocupan a nuestra comunidad: Ozono y partículas (PM). Dentro de la categoría PM hay dos tamaños PM10, que es el polvo grande que solía bloquear nuestra vista de las montañas, que está compuesto de polvo y partículas que puedes ver. PM2.5 es una micropartícula que no podemos ver, pero que puede pasar directamente al torrente sanguíneo y atravesar la barrera hematoencefálica, lo que tiene impactos a largo plazo, como: daño cardíaco, enfermedad respiratoria, enfermedad hepática, enfermedad hematológica, trastornos neurológicos, enfermedades pulmonares, impactos en la salud mental, retrasos intelectuales, y la lista continúa. CalEPA ha establecido el umbral para PM2.5 en 12 ppb, pero Bloomington suele ser 200 veces el umbral saludable. Debido a que el Proyecto se encuentra cerca de residencias y escuelas que se ven afectadas por múltiples fuentes de contaminación del aire, el solicitante debe preparar una evaluación de riesgos para la salud (HRA, por sus siglas en inglés) para el Proyecto. La HRA debe tener en cuenta todos los posibles riesgos operacionales para la salud de las fuentes de emisión de PM de diésel relacionadas con el Proyecto, incluidos, entre otros, generadores de respaldo, equipos que funcionan con diésel en el sitio y camiones pesados. La HRA también debe determinar si la operación del Proyecto en conjunto con proyectos o actividades pasados, presentes y razonablemente futuros resultarían en un impacto acumulativo del riesgo de cáncer en las residencias cercanas. Para reducir la exposición a partículas de diésel y los riesgos de cáncer asociados, el condado y el solicitante deben incluir todas las medidas aplicables para reducir la contaminación del aire y proporcionar equipos de control de la calidad del aire en el sitio.

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Bloomington is Not for Sale

Project Title: Duke Warehouse on Slover and Alder
Project Number: PROJ-2021-00081
Project Applicant: Duke Realty Limited Partnership

Concerned residents of Bloomington and surrounding neighbors have discussed some concerns about all the logistics/trucking industry construction occurring in our neighborhoods. We want to clarify that we are 100% opposed to any new warehouses including this project on Slover and Alder. The applicant Duke Realty strategically failed to report the true Health, Traffic, Air Quality, Energy, and Water Quality impacts this project will burden the community with and has strategically refused to mitigate the health impacts to our most sensitive receptors: our children and the elderly. We have current and future concerns that we will address in this letter.

The quality of our air is currently at unhealthy levels and adding projects like this will only increase the pollution burden. Industrial development, such as the proposed 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. Residences are located south and west of the Project with the closest residences located directly adjacent the Project's southern boundary. In addition to the residences, Bloomington High School (330 feet), Ruth O. Harris Middle School (3,500 feet), Sycamore Hills Elementary School (3,615 feet), Sycamore Hills Park (4,065 feet), and Walter Zimmerman Elementary School (4,500 feet) are all located within a mile radius of the project with several other sites lying just over a mile away. According to the California Communities Environmental Health Screening Tool Version 4.0 (CalEnviroScreen).

Most offensive to Bloomington's children the applicant refused to mitigate the impact of idling trucks would have to the students of Bloomington High School (330 feet) by installing a mason wall, in contrast to scientific data, AQMD, and CARB recommendations that sensitive receptors should have a minimum of 1,000 ft buffering distance and mitigation should occur with the use of physical boundaries and trees that are efficient in $PM_{2.5}$ scrubbing, such as cypress trees, live oak trees, and pine trees (mediterranean pines). With the homes hundreds of feet from this project, the response from the analysis is that their project would have little impact on a community that is already defined as in the 91% of the wose air quality in the state. In essence, the developer is stating that the community of Bloomington is a community that is disposable and mitigations are just not worth the investment.

Our community and children are burdened by multiple sources of air pollution, as Bloomington parents are constantly changing pillowcases from bloody noses, missing work/school for asthma attacks, and facing overwhelming medical bills from the impacts of the poor air quality in Bloomington. There are several sources of air pollution which are concerning for our community: Ozone and Particulate Matter (PM). Within the PM category there are two sizes PM_{10}, which is the large dust that used to block our views of the mountains. which is made up of dust and particles that you can see. $PM_{2.5}$ is a microparticle that we cannot see but is able to pass directly into the bloodstream and pass the blood brain barrier having long term impacts such as: heart damage, respiratory illness, hepatic diseases, hematological diseases, neurological disorders, pulmonary diseases, mental health impacts, intellectual delays, and the list goes on. CalEPA has set the threshold for $PM_{2.5}$ at 12ppb, but Bloomington is often 200 times the healthy threshold.

Because the Project is near residences and schools that are burdened by multiple air pollution sources, the applicant must prepare a health risk assessment (HRA) for the Project. The HRA should account for all potential operational health risks from Project-related diesel PM emission sources, including, but not limited to, back-up generators, on-site diesel-powered equipment, and heavy duty trucks. The HRA should also determine if the operation of the Project in conjunction with past, present, and reasonably near future projects or activities would result in a cumulative cancer risk impact on nearby residences. To reduce diesel PM exposure and associated cancer risks, the County and applicant should include all applicable air pollution reduction and provide onsite air quality monitoring equipment.

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Bloomington no está a la venta

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Response to Comment I16: Multiple Residents, dated August 22, 2022

Comment I16.1: This comment states that concerned residents of Bloomington have discussed concerns about logistics/trucking industry construction occurring in neighborhoods. The comment states that they are fully opposed to new warehouses including the Slover and Alder project. The comment states that the applicant failed to report the health, traffic, air quality, energy, and water quality impacts that will burden the community and states that the project refused to mitigate health impacts to the most sensitive receptors.

Response I16.1: The comment states the commentors' opinion regarding logistics and trucking and their opposition to the project and other new warehouses. This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. 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, including cumulative impacts, related to traffic congestion.

As detailed in the Impact AQ-2 discussion that begins on page 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required.

As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project 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 Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

Further, as part of the Draft EIR, a Construction Health Risk Assessment (Appendix K to the Draft EIR) and Operational Health Risk Assessment (Appendix B to the Draft EIR) to the Draft EIR were prepared pursuant to the requirements and guidelines set forth by SCAQMD and the Office of Environmental Health Hazard Assessment (OEHHA). As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project would result in exposure of sensitive receivers to DPM as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

The SCAQMD thresholds serve to determine whether or not a given project has a potentially significant development-specific and cumulative impact. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. Thus, the project specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-

specific thresholds are not considered to be cumulatively significant. Since the Project would not exceed the SCAQMD health risk or air quality thresholds, the Project would not result in a cumulative impact pursuant to SCAQMD guidance.

As detailed in Draft EIR Section *5.5*, *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.

As discussed in Draft EIR Section *5.9*, *Hydrology and Water Quality*, mandatory compliance with the SWPP and WQMP prepared for the Project 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. Therefore, the Project would not result in any water quality impacts.

Comment I16.2: The comment states that the quality of the air is at unhealthy levels and adding projects will only increase the pollution burden. The comment also states that the Project can result in high daily volumes of heavy-duty diesel truck traffic and operation of on-site equipment that emit toxic diesel emissions and contribute to regional air pollution. The comment states that residences are located to the west of the Project with the closest residence located directly adjacent to the Project's southern boundary. The comment also states that Bloomington High School (330 ft), Ruth O. Harris Middle School (3,500 ft), Sycamore Hills Elementary School (3,615 ft), Sycamore Hills Park (4,065 ft) and Walter Zimmerman Elementary School (4,500 ft) are all located within a mile radius of the project.

Response I16.2: As discussed on page 5.2-16 of the Draft EIR, the nearest receptors to the Project site are single-family residences located 30 feet south of the Project site. Bloomington High School is located 330 feet south of the Project site. As described on page 5.2-32 of the Draft EIR, a Construction 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 Construction Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk to nearby residences attributable to TAC source emissions is 0.98 in one million after implementation of Mitigation Measure AQ-1 (use of Tier 4 Final construction equipment), 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 school children, all other receptors would experience less risk than what is identified for the residence adjacent to the site. As such, construction of the Project would not cause a significant DPM emissions impact on nearby sensitive receptors.

As described on page 5.2-34 of the Draft EIR, an Operational 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. Regarding school children, the Mobile Source Health Risk Assessment determined that the maximum incremental cancer risk is estimated to be 0.6 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 Project would not cause a significant DPM emissions impact on nearby sensitive receptors at Bloomington High School.
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 Table 5.2-10, emissions during construction activities would not exceed the SCAQMD's localized significance thresholds. Also, as detailed in Draft EIR Table 5.2-11, emissions from operation of the Project 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. As such, the Project would not result in a significant direct or indirect health risk impact on any area schools or residences.

Comment I16.3: The comment says that the applicant refused to mitigate the impact of idling trucks by installing a mason wall in contrast to scientific data, AQMD, and CARB recommendations that sensitive receptors should have a minimum of 1,000 ft buffering distance and mitigation should occur with the use of physical boundaries and trees that are efficient in $PM_{2.5}$ scrubbing. The comment states that the community has 91% of the worst air quality in the state. The comment also states that the developer is implying that Bloomington is a community that is disposable and mitigations aren't worth the investment.

Response I16.3: As discussed in Chapter 3, Errata, the Project would include an 8-foot-high wall along the southern boundary of the Project site that would separate the Project from the residences to the south. 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 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required.
As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project 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 Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant. As such, pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B) there is no nexus for requiring trees, a wall, or increased setbacks as mitigation to reduce air quality impacts.

Comment 116.4: The comment states that the community and children are burdened by multiple sources of air pollution as Bloomington parents are constantly changing pillowcases from bloody noses, missing work or school for asthma attacks, and facing overwhelming medical bills from the impacts of the poor air quality in Bloomington. The comment also states that there are several sources of air pollution which are concerning for the community including ozone and particulate matter. The comment defines PM_{10} and $PM_{2.5}$ and states that CalEPA has set the threshold for PM2.5 at 12 ppb but Bloomington is often 200 times the healthy threshold.

Response I16.4: As discussed on page 5.2-32 of Draft EIR Section 5.2, *Air Quality*, a Construction Health Risk Assessment, included as part of Appendix K, was prepared to evaluate the health risk impacts as a result of exposure to DPM as a result of heavy-duty diesel trucks and equipment activities from Project construction. SCAQMD recommends using a 10 in one million cancer risk threshold. A risk level of 10 in one million implies a likelihood that up to 10 people, out of one million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the levels of toxic air contaminants over a specified duration of time. At the maximum incremental cancer risk attributable to Project construction DPM source emissions is estimated by the Construction Health Risk Assessment modeling to be 0.98 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 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 activity, and impacts would be less than significant. An operational health risk assessment was prepared for the Project and included as Appendix B. Table 5.2-12 in Section 5.2, *Air Quality*, shows that the cancer risk from the proposed Project's DPM emissions would be as high as 1.4 per million persons at the closest residential structure to the Project site boundary. The TAC concentrations at the nearby sensitive

receptors would be below the SCAQMD's threshold of 10 per million persons. Therefore, operation of the proposed Project would result in a less than significant impact related to the cancer risk from TAC emissions. As discussed in Responses I13.2 and I13.3 above, emissions from operation of the proposed Project would not exceed SCAQMD's thresholds for any criteria pollutants and would not expose sensitive receptors to substantial pollutant concentrations. Therefore, no further response is warranted.

Comment I16.5: This comment states that a HRA must be prepared for the Project to account for all potential operational health risks from Project-related diesel PM emission source. The comment also states that the HRA should determine if the operation of the Project in conjunction with past, present, and reasonably near future projects or activities would result in a cumulative cancer risk impact on nearby residences. The comment concludes by stating that the County and applicant should include all applicable air pollution reduction and provide onsite air quality monitoring equipment.

Response I16.5: As discussed in Response I13.4 above, a construction HRA and operational HRA were prepared and included in Draft EIR Section 5.2, *Air Quality*. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. As described in Responses I13.2 through I13.4 above, emissions from operation of the proposed Project would not exceed SCAQMD's thresholds for any criteria pollutants and would not expose sensitive receptors to substantial pollutant concentrations. Because emissions from implementation of the proposed Project would not exceed applicable thresholds, they would not be cumulatively considerable, and cumulative air quality impacts would be less than significant. Therefore, no further response is warranted.

LETTER I7: Rahul Niranjan (2 pages)

N. Arrowhead Avenue, [illegible] Floor
San Bernardino, CA 92415

Dear Supervisor Hagman,

My name is Rahul Niranjan, and I am writing to you with great pleasure as a new resident of the surrounding Inland Empire. I am a first-year college student at Pomona College, hoping to major in environmental science. As someone who has long worked to promote preservation of our environment, I hope you'll honor the suggestions I would like to make. The CLAEJ foundation helped highlight to me the ways money and industry have been taking precedence over our local community citizens, and I want you to see this. I would like to provide input on the vote you all will soon hold over the purchase of Zimmerman elementary school and its future at the hands of warehouse developers. Education has and always will remain a fundamental right. You will be doing a disservice to future generations of San Bernardino residents if we give up all our residential areas. I17.1

While the warehouses and business may come and go, the people of San Bernardino County are a priceless resource we cannot afford to lose. People are our most important resource, and to keep the people of San Bernardino County thriving, we must keep our schools and residential areas. I say the same for other schools like Bloomington High School. The warehouses are destroying our environment, and the money gained from warehouse developers will never be as important as the priceless lives of our people. I17.1 Cont.

Please do take into consideration my suggestion for the best of our community. There is only one San Bernardino County, and you can ensure we protect it for future generations and keep our people here. In closing, I strongly oppose the selling of San Bernardino County homes and schools for the development of warehouses for big corporations, and I hope you will too. Thank you. I17.2

Sincerely,

Response to Comment I17: Rahul Niranjan, dated August 22, 2022

Comment I17.1: The commenter introduces himself and states that they are a new resident of the surrounding Inland Empire. The comment states that the CCAEJ helped highlight the ways money and industry have taken precedence over local citizens and wants to provide input on the vote that the County will soon hold over the purchase of Zimmerman Elementary School. The comment states that education has and will always remain a fundamental right and states that the County will be doing a disservice to San Bernardino residents if they give up all residential areas. The comment also states that warehouses are destroying the environment and the money gained from warehouse developers will not be as important as the people.

Response I17.1: The comment states the commenter's opinion regarding warehouse development and does not raise a specific issue with the adequacy of the Draft EIR evaluation or raise any other CEQA issue. In addition, the Project does not include selling or purchasing elementary schools and is consistent with the Countywide Plan land use and zoning designation for the site. Therefore, no further response is required or provided

Comment I17.2: The comment requests that the County takes their suggestions into consideration and states that they strongly oppose the selling of San Bernardino County homes and schools for the development of warehouses for big corporations.

Response I17.2: The comment states the commenter's opinion regarding warehouse development 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 or provided.

LETTER I18: Selena Lopez (2 pages)

San Bernadino County Board of Supervisors
Curt Hagman
385 N. Arrowhead Ave, 2nd Floor
San Bernardino, CA 92415

Dear Chair Hagman and Members of the Board,

Hello there! My name is Selena Lopez, recent graduate of POMONA COLLEGE now working as the Post Bacc Fellow for Community + Educational Outreach. I am writing as a concerned community member of San Bernardino regarding the proposed construction of additional warehouse(s) in the city of Bloomington. The proposed project calls for the sale of Zimmerman Elementary and its potential relocation to the lot next to a truck stop. I18.1

I believe these actions are directly putting the lives of this community in danger as warehouses and the subsequent trucker traffic will inevitably bring harmful chemicals into our already polluted air. Furthermore, this project will harmly impact the education of our younger children as the sale of the school will not cover the cost of construction of a new school, and only reinforces the fact that children and scholars are displaceable and underprioritized. The construction of these I18.2

warehouses will only encourage further expansion, further endangering our health as these chemicals have been proven to cause cancer, illness, chronic conditions, and more. Put a stop to it. Take a stand. Represent your constituents and value the lives and health of the people who are most affected. Amazon and other large corporations will never have our interests in their heart. Their interest is in the money, not the livelihood of these people. They may promote jobs, but these corporations will only automate these jobs and leave these communities in the dust. I18.2 Cont.

VOTE NO on the construction of more warehouses. It's that simple. If you think it's not, then your interests are not with your community. I18.3

Best,

Selena Lopez

843-998-4467

Response to Comment Letter I18: Selena Lopez, dated August 22, 2022

Comment I18.1: The commenter introduces themselves and states that they are writing as a concerned community member of San Bernardino regarding the proposed construction of additional warehouses in Bloomington. The comment states that the proposed Project calls for the sale of Zimmerman Elementary and potential relocation to a lot next to a truck stop.

Response I18.1: The proposed Project does not include the sale of Zimmerman Elementary. The Project site is not currently zoned for residential or school uses and would redevelop the Project site with a warehouse that would be consistent with the Countywide Plan land use and zoning designation for the site. Therefore, no further response is required or provided.

Comment I18.2: The comment states that the actions are putting the lives of the community in danger as warehouses will bring truck traffic and harmful chemicals to the already polluted area. The comment also states that the project will harm the education of younger children as the sale of the school will not cover the cost of constructing a new school and reinforces the idea that children and scholars are displaceable and underprioritized. The comment states that the construction of these warehouses will only encourage further expansion and endanger our health as these chemicals.

Response I18.2: As discussed in Response I18.1, the proposed Project does not include the sale or purchase of Zimmerman Elementary School. This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. 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, including cumulative impacts, related to traffic congestion.

As detailed in the Impact AQ-2 discussion that begins on page 5.2-30 of the Draft EIR, the Project would result in emissions of all criteria pollutants, including NOx, PM2.5, and PM10, that would be below SCAQMD thresholds during construction and operation. Therefore, impacts would be less than significant, and no mitigation measures are required.

As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project 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 Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

Further, as part of the Draft EIR, a Construction Health Risk Assessment (Appendix K to the Draft EIR) and Operational Health Risk Assessment (Appendix B) to the Draft EIR were prepared pursuant to the requirements and guidelines set forth by SCAQMD and the Office of Environmental Health Hazard Assessment (OEHHA). As detailed in the Impact AQ-3 discussion that begins on page 5.2-32 of the Draft EIR, the Project would result in exposure of sensitive receivers to DPM as a result of heavy-duty diesel trucks traveling to and from the site. However, based on the Operational Mobile Health Risk Assessment, included as Appendix B to the Draft EIR, and the Construction Health Risk Assessment, included as Appendix K to the Draft EIR, cancer risk and non-cancer risks from development of the Project would not

exceed applicable SCAQMD significance thresholds with implementation of Mitigation Measure AQ-1, requiring the use of Tier 4 construction equipment. In addition, as detailed in Draft EIR Tables 5.2-10 and 5.2-11, emissions during construction and operation of the Project would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts related to localized emission would be less than significant.

The SCAQMD thresholds serve to determine whether or not a given project has a potentially significant development-specific and cumulative impact. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. Thus, the project specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are not considered to be cumulatively significant. Since the Project would not exceed the SCAQMD health risk or air quality thresholds, the Project would not result in a cumulative impact pursuant to SCAQMD guidance.

Comment I18.3: This comment states that the County should vote no on the construction of more warehouses and states that their interests are not with the community if they vote for them.

Response I18.3: 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.

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.

Section 2.0, Introduction

Section 2.0, Introduction on page 2-3, is revised as follows:

The proposed Project would demolish two single-family residences on the northwest and southwest corner, three commercial/industrial buildings totaling 16,800 square feet, a construction storage site, trailer parking lot, and multiple shipping containers and other storage units are located on the northeast portion of the site. **Construction of the proposed Project would result in a temporary increased demand for construction workers. This Draft EIR assumes that construction of the Project would take approximately 16 months. Construction would require approximately 103 construction workers during this 16-month period. 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, 68,853 individuals are employed in the construction industry in San Bernardino County.**

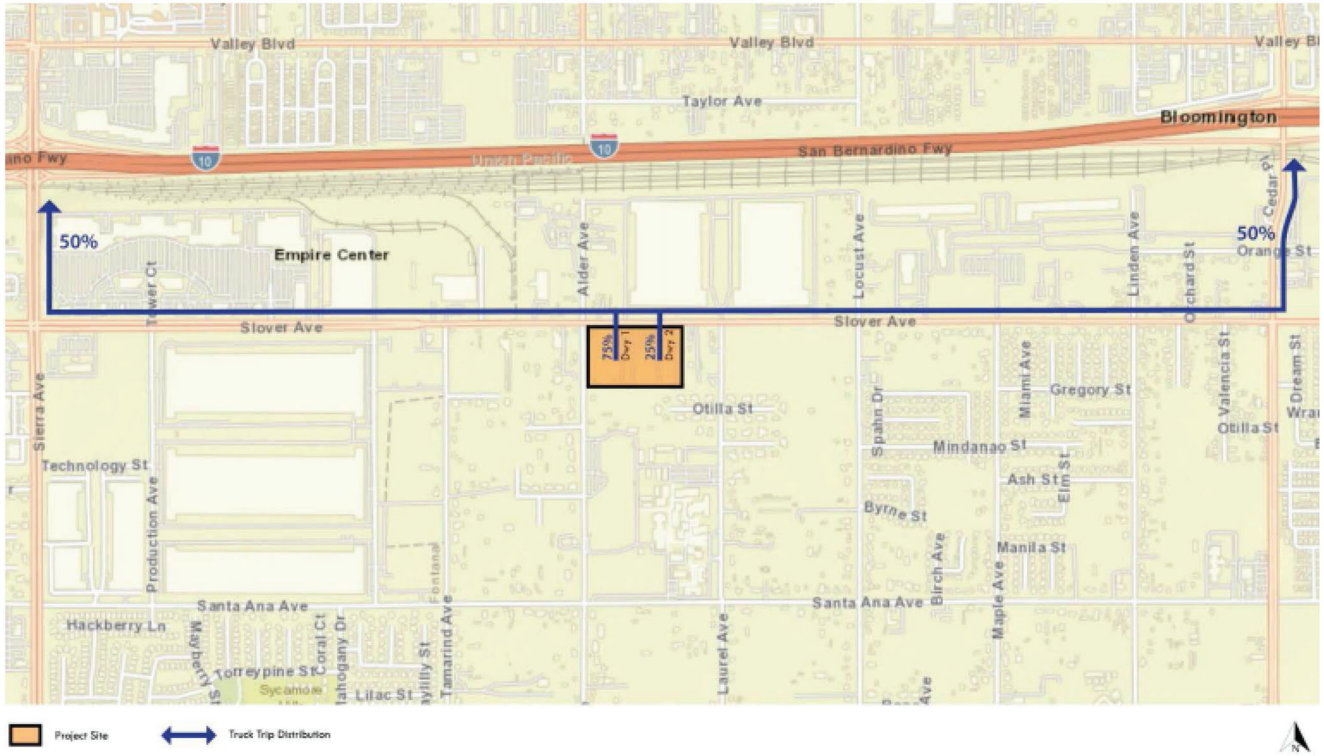
The Project would develop a high-cube warehouse/distribution use in an area that is zoned for industrial development. Implementation of the proposed Project would result in long-term employment opportunities in the community of Bloomington and the Valley Region. Because the future tenants are unknown, the number of jobs generated from operation cannot be precisely determined. However, based on SCAG's employment generation factor of 1,195 square feet of light industrial space per employee, implementation of the proposed Project would create up to an additional 217 jobs in Bloomington. Employees are anticipated to live within the region prior to Project development. In addition, the Project would not require the extension of roads or other infrastructure. Thus, the Project would not induce substantial unplanned population growth in an area and impacts would be less than significant. The Project would positively contribute to employment growth in Bloomington, the Valley Region of San Bernardino County, as well as the inland Southern California region.

Section 3.0, Project Description

Section 3.0, Project Description on page 3-9, is revised as follows:

Vehicle access to the site would be from four new driveways, as shown in Figure 3-4, *Conceptual Site Plan*. Two new driveways along Slover Avenue and a new driveway along Alder Avenue would provide truck and vehicle access to the site. The northwesternmost driveway on Slover is a 50-foot-wide driveway that would be gated and reserved for truck ingress and egress only, providing direct access to truck bays and building loading docks. The northeastern driveway along Slover Avenue is a 40-foot-wide driveway that would

provide direct access to truck bays, building loading docks, and also employee parking. **The 34-foot-wide driveway on Alder Avenue near the northwest corner of the Project site would be limited to passenger vehicle access only.** ~~Along Alder Avenue, trucks and employees would be able to access the site from one 34-foot-wide driveway near the northwest corner of the Project site.~~ A 30-foot-wide gated driveway accessible from the southeast corner of the Project site along Alder Avenue would be reserved for emergency vehicle access. An on-site area for truck circulation would be located in the central portion of the site.


Valley Blvd
Valley Blvd
Taylor Ave
Bloomington
San Bernardino Fwy
Union Pacific
10
10
50%
Empire Center
Tower Ct
Alder Ave
Locust Ave
Linden Ave
Orchard St
Cedar Pl
50%
Orange St
Slover Ave
Slover Ave
25% Dwy 1
25% Dwy 2
Sierra Ave
Technology St
Production Ave
Otilla St
Spahn Dr
Miami Ave
Gregory St
Mindanao St
Ash St
Elm St
Byrne St
Manila St
Birch Ave
Maple Ave
Valencia St
Otilla St
Dream St
Santa Ana Ave
Santa Ana Ave
Hackberry Ln
Torreypine St
Coral Ct
Mahogany Dr
Fontana
Tamarind Ave
Laurel Ave
Lilac St
Sycamore
Project Site
Truck Trip Distribution

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Section 3.0, Project Description on page 3-10, is revised as follows:

Concrete screen walls 12 feet in height would enclose the truck court in the northern portion of the Project site and screen views into the Project site from Slover Avenue and Alder Avenue and adjacent uses. An 8-foot-high solid wall would be included along the southern property line.

Section 4.0, Environmental Setting

Environmental Setting Page 4-1, fifth paragraph has been revised as follows:

The 13.23-acre site consists of two single-family residences on the northwest and southwest corner, three commercial/industrial buildings totaling 16,800 square feet, a construction storage site, trailer parking lot, and multiple shipping containers and other storage units are located on the northeast portion of the site. Land uses surrounding the project site are outlined in Table 4-1 below.

Table 4-1: Surrounding Land Uses

	Existing Land Use	General Plan and Zoning
NORTH	Slover Avenue followed by operating light industrial uses and industrial warehouses.	General Plan: Limited Industrial Zoning: Community Industrial
SOUTH	A single-family home and trailer storage followed by Bloomington High School	General Plan: Limited Industrial Zoning: Community Industrial
EAST	Trailer storage and single family residences followed by Laurel Avenue.	General Plan: Very Low Density Residential Zoning: RS-1-AA
WEST	Alder Avenue followed by single-family residences.	General Plan: Limited Industrial Zoning: Community Industrial

Environmental Setting Page 4-3, second paragraph has been revised as follows:

In 2020, the federal and state ambient air quality standards (NAAQS and CAAQS) were exceeded on one or more days for ozone, PM10, and PM2.5 at most monitoring locations. No areas of the SCAB exceeded federal or state standards for NO2, SO2, CO, sulfates, or lead.

As shown in Table 3-11a in the Environmental Justice and Legacy Communities of the San Bernardino Countywide Plan, the majority of census tracts in Bloomington have high composite and pollution burden scores. The County has identified environmental justice focus areas[3] which includes areas of the community of Bloomington. The Project site is not within a designated environmental justice focus area. However, the nearest designated area is east of the intersection of Slover Avenue and Locust Avenue, approximately 0.33 mile to the east. In addition, the area to the north of the I-10 freeway is within the designated environmental justice focus areas and is located approximately 0.34 mile to the north of the Project site.

Section 5.2, Air Quality

Threshold AQ-3, on Pages 5.2-32 through 5.2-33, has been revised as follows:

Less than Significant with Mitigation Incorporated ~~Impact~~.

Localized Construction Air Quality Impacts

As discussed previously, the daily construction emissions generated onsite by the proposed Project are evaluated against SCAQMD's LSTs for a 4-acre site to determine whether the emissions would cause or contribute to adverse localized air quality impacts.

The appropriate SRA for the LST analysis is the Central San Bernardino Valley 1 air monitoring station (SRA 34). The closest sensitive receptor to the Project area is 30 feet from the site boundary, and the LSTs for a receptor distance of 25 meters (82 feet) (the closest threshold) is used to evaluate LST emissions.

Table 5.2-10 identifies daily localized onsite emissions that are estimated to occur during construction of the Project. As shown, emissions during the peak construction activity would not exceed the SCAQMD's localized significance thresholds, and impacts would be less than significant.

Table 5.2-10: Localized Significance Emissions Peak Construction

Construction Phase	Pollutant Emissions (pounds/day)[1]			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Demolition[2]	26.08	20.76	2.81	1.40
Site Preparation[2]	50.45	20.11	10.68	6.02
Grading[2]	47.55	29.31	5.94	3.23
Building Construction (Year 2022)	16.15	17.58	1.17	0.86
Combined Building Construction (Year 2023), Paving and Architectural Coatings	27.66	34.24	1.83	1.42
Maximum Daily Construction Emissions	**50.45**	**34.24**	**10.68**	**6.02**
SCAQMD Local Construction Thresholds[3]	**237**	**1,488**	**12**	**7**
Exceeds Threshold?	No	No	No	No

Source: AQ, 2022 (Appendix B).
[1] The Pollutant Emissions include 100% of the On-Site emissions (off-road equipment and fugitive dust) and 1/8 of the Off-Site emissions (on road trucks and worker vehicles), in order to account for the on-road emissions that occur within a ¼ mile of the project site.
[2] Demolition, Site Preparation and Grading phases based on adherence to fugitive dust suppression requirements from SCAQMD Rule 403.
[3] The nearest offsite sensitive receptors to the project site are single-family homes located as close as 30 feet (11 meters) south of the project site. According to SCAQMD methodology, all receptors closer than 25 meters are based on the 25-meter threshold.
Source: Calculated from SCAQMD's Mass Rate Look-up Tables for two and five acres in Air Monitoring Area 34, Central San Bernardino Valley.

Construction Diesel Mobile Source Health Risk

A Construction Health Risk Assessment, included as part of Appendix K, was prepared to evaluate the health risk impacts as a result of exposure to DPM as a result of heavy-duty diesel trucks and equipment activities from Project construction. SCAQMD recommends using a 10 in one million cancer risk threshold. A risk level of 10 in one million implies a likelihood that up to 10 people, out of one million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the levels of toxic air contaminants over a specified duration of time.

The land use with the greatest potential exposure to Project construction DPM source emissions is Location R7 (shown on Figure 5.2-2) which is located approximately 29 feet south of the Project site at an existing residence located at 17834 Otilla Street. R7 is placed at the private outdoor living area (backyard) facing the Project site. At the maximum incremental cancer risk attributable to Project construction DPM source emissions is estimated by the Construction Health Risk Assessment modeling to be 0.98 in one million, which is less than the SCAQMD's significance threshold of 10 in one million with implementation of Mitigation

Measure AQ-1, which requires the use of Tier 4 construction equipment. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. All other receptors would experience less risk than what is identified for this location. 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, and impacts would be less than significant with mitigation.

Section 5.2.10, on Pages 5.2-39, has been revised as follows:

5.2.10 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Impacts AQ-1, AQ-2, and ~~through~~ AQ-4 would be less than significant.

Without mitigation, Impact AQ-3 related to construction health risks would be potentially significant.

Section 5.2.11, on Pages 5.2-39, has been revised as follows:

~~No mitigation measures are required.~~

MM AQ-1: 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.

Appendix B, Air Quality, Energy, Greenhouse Gas Emissions, and Health Risk Impact Analysis

Section 11.0, References, is revised as follows:

Breeze Software, *California Emissions Estimator Model* (CalEEMod) version 2020.4.0.

California Air Resources Board, *2017 Off-Road Diesel Emission Factor Update for NOx and PM,* 2017.

~~California Air Resources Board, *Appendix VII Risk Characterization Scenarios,* October 2000.~~

California Air Resources Board, *California's 2017 Climate Change Scoping Plan,* November 2017.

California Air Resources Board, *First Update to the Climate Change Scoping Plan,* May 2014.

California Air Resources Board, *Resolution 08-43,* December 12, 2008.

California Air Resources Board, *Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act,* on October 24, 2008.

~~California Air Resources Board, *Final Staff Report Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets*, October 2017.~~

South Coast Air Quality Management District, Final~~Draft~~ Report Multiple Air Toxics Exposure Study in the South Coast Air Basin, MATES-IV, May 2015~~October 2014~~.

Appendix I, Air Quality, Energy, Greenhouse Gas Emissions, and Health Risk Impact Analysis

Section 8.0, References, is revised as follows:

~~California Department of Transportation, *2016 Annual Average Daily Truck Traffic on the California State Highway System*, 2018.~~

California Department of Transportation (Caltrans), *Technical Noise Supplement to the Traffic Noise Analytics Protocol*, September 2013.

California Department of Transportation, *Transportation and Construction Vibration Guidance Manual*, April 2020.

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 Duke Warehouse at Slover and Alder 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 Duke Warehouse at Slover and Alder Project. The table identifies the Project Design Features; Plans, Programs, and Policies (PPPs); and mitigation measures (MM) required by the County 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
DUKE WAREHOUSE AT SLOVER AND ALDER PROJECT EIR

Project Design Feature / Plan, Programs, and Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
AIR QUALITY			
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.	In Construction Plans and Specifications. Prior to Demolition Permits.	County of San Bernadino Building and Safety Division	

Project Design Feature / Plan, Programs, and Policy / 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 widely available and economically feasible.	Prior to Certificates of Occupancy	County of San Bernadino Building and Safety Division	

Project Design Feature / Plan, Programs, and Policy / 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 widely available and economically feasible.	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 widely available and economically feasible.	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, such as equal to the building's projected energy needs.	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	

Project Design Feature / Plan, Programs, and Policy / 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 if feasible.	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 onsite 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	

Project Design Feature / Plan, Programs, and Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
MM AQ-1: 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.	In Construction Plans and Specifications. Prior to Demolition Permits.	County of San Bernadino Building and Safety Division	
BIOLOGICAL RESOURCES			
MM BIO-1: Nesting Birds: To the extent possible, construction activities (i.e., demolition, earthwork, clearing, and grubbing) within the Project site 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 California Fish & Game Code. The pre-construction survey shall be performed no more than three days prior to the commencement of construction activities. The results of the preconstruction 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.	In Construction Plans and Specifications. Prior to Demolition Permits.	County of San Bernadino Building and Safety Division	

Project Design Feature / Plan, Programs, and Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
CULTURAL RESOURCES			
PPP CUL-1. Cultural and paleontological resources are recognized as nonrenewable resources and receive protection under the PRC and CEQA.	In Construction Plans and Specifications. Prior to Grading Permits	County of San Bernadino Building and Safety	
PPP 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	
PPP CUL-3. 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: Archaeological Monitoring of All Developments. a) Prior to the issuance of a grading permit for the Project, 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 grading activities to a depth of 3 feet below the existing grade. 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	In Construction Plans and Specifications. Prior to Grading Permits.	County of San Bernadino Planning Division and Building and Safety Division	

Project Design Feature / Plan, Programs, and Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
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 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 50-foot radius of the discovery and seek identification 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.			

Project Design Feature / Plan, Programs, and Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
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 —to provide Tribal input with regard 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 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			

Project Design Feature / Plan, Programs, and Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
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).			
GEOLOGY AND SOILS			
MM GEO-1: Paleontological Resources. Prior to issuance of a Grading Permit, the Project Applicant/Developer shall submit a Paleontological Resource Management Program focused upon monitoring, salvaging, and curating any recovered fossils associated with the Project site to the Director of Planning for her/his approval. The Paleontological Resource Management Program shall provide procedures for implementing the following procedures: • A trained and qualified paleontological monitor should perform monitoring of any excavations on the Project site that have the potential to impact paleontological resources. The monitor will have the ability to redirect construction activities to ensure avoidance of adverse impacts to paleontological resources. • The Project paleontologist may reevaluate necessity for paleontological monitoring after examination of affected sediments during excavation with approval from the County of San Bernardino and Client representatives. • Any potentially significant fossils observed shall be collected and recorded in conjunction with Best Management Practices and Society of Vertebrate Paleontology (SVP) professional standards. • Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.	In Construction Plans and Specifications. Prior to Grading Permits	County of San Bernadino Building and Safety Division	

Project Design Feature / Plan, Programs, and Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
• A report documenting results of monitoring, including any salvage activities and significance of any fossils, will be prepared and submitted to the appropriate personnel.			
HAZARDS AND HAZARDOUS MATERIALS			
PPP HAZ-1: SCAQMD Rule 1403. Prior to issuance of a Demolition Permit, the Project Applicant/Developer shall submit verification to the County Building Division that an asbestos survey has been conducted at all existing buildings located on the Project site. If asbestos is found, the Project Applicant/Developer shall follow all procedural requirements and regulations of South Coast Air Quality Management District Rule (SCAQMD) 1403. Rule 1403 regulations require the following actions be taken: notification of SCAQMD prior to construction activity, asbestos removal in accordance with prescribed procedures, placement of collected asbestos in leak-tight containers or wrapping, and proper disposal.	In Construction Plans and Specifications. Prior to Demolition Permits	County of San Bernadino Building and Safety Division	
PPP HAZ-2: Lead. Prior to issuance of a Demolition Permit, the Project Applicant/Developer shall submit verification to the County Building Division that a lead-based paint survey has been conducted at all existing buildings located on the Project site. If lead-based paint is found, the Project Applicant/Developer shall follow all procedural requirements and regulations for proper removal and disposal of the Lead-based paint. Cal-OSHA has established limits of exposure to lead contained in dusts and fumes. Specifically, CCR Title 8, Section 1532.1 provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead.	In Construction Plans and Specifications. Prior to Building Permits	County of San Bernadino Building and Safety Division	
PPP WQ-1: NPDES/SWPPP. As listed in Hydrology and Water Quality.	In Construction Plans and Specifications. Prior to Demolition and Grading Permits	County of San Bernadino Building and Safety Division	
PPP WQ-2: WQMP. As listed in Hydrology and Water Quality.	In Construction Plans and Specifications. Prior to Grading Permits	County of San Bernadino Building and Safety Division	

Project Design Feature / Plan, Programs, and Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
HYDROLOGY AND WATER QUALITY			
PPP WQ-1: NPDES/SWPPP. Prior to issuance of a Demolition Permit or Grading Permit, the Project Applicant/Developer shall provide the County Building Division with 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/Developer 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	
PPP WQ-2: WQMP. Prior to issuance of a Grading Permit, a completed Water Quality Management Plan (WQMP) shall be submitted to and approved by the City Building and Safety Division. The WQMP shall identify all Post-Construction, Site Design. Source Control, and Treatment Control Best Management Practices (BMP) 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	
Noise			

Project Design Feature / Plan, Programs, and Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
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. 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. 4. Construction contractors shall ensure that delivery trucks/haul trucks use designated truck route(s) if possible.	Prior to Grading Permits	Project Applicant and their construction contractors/ County of San Bernardino Building and Safety Division	
TRIBAL CULTURAL RESOURCES			
MM CUL-1: Archaeological Resources. As listed in Cultural Resources.	In Construction Plans and Specifications. Prior to Building Permits	County of San Bernadino Planning Division and Building and Safety Division	

MM TCR-1: Native American Monitoring of Ground-Disturbing Activities a) The Project applicant 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 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 American monitoring services on a rotating basis. b) A copy of the executed monitoring agreement shall be provided to the Lead Agency 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(s) with a minimum of 30 days advance written notice of the commencement of any Project ground-disturbing activity so that the Tribe(s) have sufficient time to secure and schedule a monitor for the Project. d) The Project Applicant/Developer shall hold at least one preconstruction 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 tribal cultural resource mitigation measures and compliance obligations, as well as places of significance located on the Project site (if any), the appearance of potential tribal cultural resources, and other informational and operational guidance to aid in the Project's compliance with the tribal cultural resource mitigation measures. The Native American Tribe(s) shall be notified of and allowed to attend the pregrading 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	In Construction Plans and Specifications. Prior to Building Permits	County of San Bernadino Planning Division and Building and Safety Division	

Project Design Feature / Plan, Programs, and Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
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), 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 and Lead Agency 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 offsite project location possesses the potential to impact tribal cultural resources. 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 and Lead Agency for dissemination to the San Manuel Band of Mission Indians and the Gabrieleno Band of Mission Indians-Kizh Nation. The Lead Agency and/or Project Applicant shall, in good faith, consult with both Tribes throughout the life of the Project.			

Project Design Feature / Plan, Programs, and Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
MM TCR-2: Potential Tribal Cultural Resource Discovery Procedures a) Upon the discovery of a tribal cultural resource, 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 Departments 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 tribal cultural resource unless and until the Tribe has completed its assessment/evaluation/recovery of the discovered tribal cultural resource and surveyed the surrounding area. b) Should the find be deemed significant, as defined by CEQA, a Cultural Resources Monitoring and Treatment Plan shall be prepared and implemented by the Project archaeologist, in coordination with the Mission Indians and Gabrieleno Band of Mission Indians-Kizh Nation and San Manuel Band of Mission Indians. c) The Tribe(s) will recover and retain all discovered tribal cultural resources in the form and/or manner the Tribe(s) deems appropriate in its discretion, per the Cultural Resources Monitoring and Treatment Plan, and for any purpose the Tribe(s) deems appropriate, including but not limited to, educational, cultural and/or historic purposes. d) Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered resources. e) Any historic archaeological material that is not Native American in origin (non-tribal cultural resources) 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.	In Construction Plans and Specifications. Prior to Building Permits	County of San Bernadino Planning Division and Building and Safety Division	