

Community & Economic Development
Department
Planning Division

City of Arts & Innovation

October 15, 2025

Lauren Miracle

San Bernardino County Land Use Services Department/Planning Division
385 North Arrowhead Avenue, First Floor
San Bernardino, CA 92415

Subject: City of Riverside's Review of Notice of Public Hearing for PMISC-2024-00020 (General Plan Amendment for AB 98 Truck Routes)

Dear Lauren,

Thank you for the opportunity to comment on the Notice of Public Hearing for PMISC-2024-00020 (General Plan Amendment). The City of Riverside understands that this project will adopt truck routes on Policy Map TM-5 (Goods Movement) and refine Policies TM 5.5 and 5.6 within the Transportation and Mobility Element of the Countywide Policy Plan in compliance with Assembly Bill 98 (AB 98).

Given the proximity to the City of Riverside, the City would like to provide the following comments:

Public Works – Traffic Engineering:

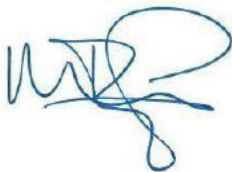
- The proposed Agua Mansa Road and Rubidoux Boulevard routes both travel south and converge at the Market Street and SR-60 Freeway interchange, which will be heavily impacted by truck traffic from these proposed routes. Please identify alternative routing options or complete a technical analysis that identifies fair share contributions to appropriately mitigate roadway maintenance impacts and interchange improvements based on the additional truck trip impacts in this area.
 - Given the potential impacts and likely need to identify mitigation, an Addendum to the 2020 Countywide Plan Program Environmental Impact Report (CWP PEIR) is an inadequate level of California Environmental Quality Act Review. The Project should be the subject of, at minimum, a Supplemental Environmental Impact Report in order to allow for an adequate level of evaluation, disclosure and mitigation of potential impacts associated with proposed truck routes entering the City of Riverside and accessing State Highway facilities located within the City's jurisdiction.
 - Additionally, a potentially significant impact exists under Impact Threshold 3.17.2(a) (Conflict with a program, plan, ordinance or policy addressing the circulation system) in that the proposed Main Street truck route conflicts with Riverside Municipal Code 10.56, which restricts heavy vehicles on Main Street between Columbia Avenue and SR-60 within the City. This potentially significant impact must be appropriately evaluated, disclosed and mitigated through an Environmental Impact Report and, as such, an Addendum to the CWP PEIR is not appropriate.

- The proposed Main Street Truck Route extends into the City of Riverside's Northside residential area. This is an established neighborhood, and the City is currently implementing the [Northside Specific Plan](#), which includes additional residential development. In accordance with AB 98 [Section 65098.2.7\(a\)](#), which aims to ensure that logistics-related developments (beginning January 1, 2026) are located to minimize adverse impacts on residential communities and enhance transportation efficiency, these truck trips must be rerouted to avoid impacts on residential communities.
- Please be advised, based on [City of Riverside Municipal Code Section 10.56](#), that commercial vehicles exceeding three (3) axles are prohibited from using Main Street between Columbia Avenue and the SR-60 Freeway. Furthermore, a proposed truck restriction on Placentia Lane is scheduled for adoption at the City Council Meeting on November 18, 2025.

The City of Riverside appreciates your consideration of the comments provided in this letter. Should you have any questions regarding this letter, please contact me at (951) 826-5944, or by e-mail at mtaylor@riversideca.gov.

We thank you again for the opportunity to provide comments on this proposal and look forward to working with you in the future.

Sincerely,



Matthew Taylor
Principal Planner

cc: Patricia Lock Dawson, Mayor
Riverside City Council Members
Mike Futrell, City Manager
Rafael Guzman, Assistant City Manager
Jennifer A. Lilley, Community & Economic Development Director
Maribeth Tinio, City Planner
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Rebecca McKee-Reimbold, Interim City Attorney

Colton Joint Unified School District

Frank Miranda, Ed.D., Superintendent

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Commitment to Equal Opportunity

October 21, 2025

San Bernardino County Planning Commission

385 North Arrowhead Avenue

San Bernardino, CA 92415

Transmitted Via Email: PlanningCommissionComments@lus.sbcounty.gov; Vincent.acuna@lus.sbcounty.gov; lauren.miracle@lus.sbcounty.gov

Subject: Comments on October 23, 2025, Planning Commission Meeting Agenda Item 3, San Bernardino County AB 98 Transportation and Mobility Element Update: Proposed Truck Routes – Impacts to Colton Joint Unified School District Schools and Properties in the Bloomington Community

Dear Honorable San Bernardino County Planning Commissioners:

The Colton Joint Unified School District (CJUSD or District) submits this letter to express serious concerns regarding the proposed designation of truck routes in the Bloomington community of unincorporated San Bernardino County. While the District recognizes the County's obligation to adopt truck routes by January 1, 2026, per Assembly Bill 98 (AB 98), the plan now under consideration seems ill-conceived. We strongly urge the County to prioritize student health and safety— particularly in the Bloomington community, which is one of the most densely populated and underserved communities in the County. The District provides the below comments based on the County's presentation, "AB 98: Updating Truck Routes in Bloomington," for the Bloomington Municipal Advisory Council Meeting held on October 1, 2025 (AB 98 Presentation), as well as proposed EIR Addendum and Planning Commission Staff Report. It is worth noting that the latter were only made available for review on October 17, 2025, making it impossible to provide feedback sooner.

I. CJUSD Schools in and Near Unincorporated Bloomington

The District serves thousands of students across 11 properties in and near the Bloomington area, including existing schools and a planned future school. All are located adjacent to or within close proximity to truck-travelled roadways and warehouse developments. The District properties are shown in **Figure 1 – Adopted Truck Routes Surrounding Bloomington**; they include:

1. Bloomington High School (10750 Laurel Avenue)



2. Slover Mountain High School and Bloomington Head Start (18829 Orange Street)
3. Ruth O. Harris Middle School (11150 Alder Avenue)
4. Walter Zimmerman Elementary School (11050 Linden Avenue)
5. Mary B. Lewis Elementary School (18040 San Bernardino Avenue)
6. Crestmore Elementary School (18870 Jurupa Avenue)
7. Smith Elementary School (9551 Linden Avenue)
8. Grimes Elementary School (1609 Spruce Avenue)
9. Joe Baca Middle School (1640 South Lilac Avenue)
10. Future School Site (APNs 0257-101-23, -13, -03; southwest of Santa Ana and Larch)
11. Sycamore Hills Elementary School (11036 Mahogany Drive-Fontana)

II. Deficient Infrastructure and Existing Pedestrian Conflicts

The existing roadway network in Bloomington remains significantly underdeveloped and has not kept pace with the rapid expansion of warehouses and industrial development. As a result, many streets lack essential pedestrian infrastructure and are ill-equipped to handle semitruck and heavy truck traffic. Whether roads are formally designated as truck routes or not, the current conditions pose ongoing safety risks for students who walk, bike, or wait for buses along these corridors, and the County must initiate a process to improve existing roadway facilities and remedy dangerous conditions.

The County must prioritize comprehensive upgrades to the Bloomington roadway network, especially in the context of semitruck route planning, to protect the most vulnerable road users: students and pedestrians. This need becomes all the more urgent as additional warehouse and truck-related projects are planned and approved with scarcely any pedestrian safety upgrades. Key improvements should include:

- **Continuous sidewalks** on both sides of the road
- **Marked crosswalks** with shortened crossing distances
- **Medians** to support safe two-stage pedestrian crossings
- **Physical separation** of truck and pedestrian paths at intersections
- **Advisory speed signage** and traffic calming measures in school zones
- **Pedestrian bridges**, where appropriate, to ensure safe passage across high-volume truck corridors
- **Speed humps and bulb-out curbs** on streets that are not designated truck routes to deter semitrucks from accessing

III. Transportation Planning and Data-Driven Route Selection

AB 98 requires thoughtful consideration of sensitive receptors such as schools in the designation of truck routes. The District recommends the County retain a qualified transportation planner to prepare an active transportation plan for the entire Bloomington community, with an emphasis in south Bloomington where risks are most acute. The plan should consider all users: semitrucks, bicyclists, and student pedestrians; account for existing and planned warehouse, residential, and school developments; and not just the adopted land use map for the Bloomington community.

The District understands substantial relevant data is available from the San Bernardino County Transportation Authority and San Bernardino County Public Works who have been preparing Safe Routes to Schools Plans for

Colton Joint Unified School District

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schools in the Bloomington community. This information—including traffic counts, vehicle and pedestrian conflict and crash analyses, and pedestrian safety studies—along with additional analysis from the qualified transportation planning firm should inform final truck route designations. The District sees this lack of such an effort as an unjustifiable shortcoming of the proposed plan.

In identifying semitruck routes, the District recommends that the County consider proposed and approved warehouse, residential, and school development plans in Bloomington and the adjacent areas, including in the cities of Fontana and Rialto, that will generate semitruck traffic, automobile traffic, as well as pedestrians on the roadway network. This will help the County understand where potential vehicle and pedestrian conflicts and roadway hazards may occur. Where truck route designation near schools is unavoidable, the District recommends enhanced mitigation in addition to those identified in AB 98.

IV. Roads to Avoid Truck Route Designation

AB 98 explicitly calls for avoiding truck routes near schools and sensitive receptors. Accordingly, the District urges the County not to designate truck routes on streets that directly abut District properties:

| CJUSD Property | Streets to Avoid Truck Route Designation |
|---|--|
| 1. Bloomington High School | 1. Laurel Avenue (east frontage) 2. Santa Ana Avenue (south boundary) 3. Alder Avenue (west boundary) |
| 2. Slover Mountain High School and Bloomington Head Start | 4. Orange Street (north frontage) 5. Slover Avenue (south boundary) 6. Cedar Avenue (west boundary) 7. Larch Avenue (east boundary) |
| 3. Ruth O. Harris Middle School | 8. Alder Avenue (east frontage) 9. Maywood Street (north boundary) 10. Tamarind Avenue (west boundary) |
| 4. Walter Zimmerman Elementary School | 11. Linden Avenue (east frontage) |
| 5. Mary B. Lewis Elementary School | 12. San Bernardino Avenue (south frontage) 13. Locust Avenue (east boundary) |
| 6. Crestmore Elementary School | 14. Jurupa Avenue (south frontage) 15. Larch Avenue (east boundary) |
| 7. Smith Elementary School | 16. Linden Avenue (west frontage) |
| 8. Grimes Elementary School | 17. Spruce Avenue (west frontage) |
| 9. Joe Baca Middle School | 18. Lilac Avenue (east frontage) 19. Valley Boulevard (south boundary) 20. Cactus Avenue (west boundary) |



| | |
|--------------------------------------|--|
| 10. Future School Site | 21. Santa Ana Avenue (north boundary) 22. Cedar Avenue (west boundary) 23. Linden Avenue (east boundary) |
| 11. Sycamore Hills Elementary School | 24. Mahogany Drive (east frontage) 25. Under Wood Drive (south boundary) 26. Torrey Pine Street (north boundary) |

V. CJUSD Comments on Truck Routes in Bloomington

[Page 13 of the AB 98 Presentation](#) depicts the County’s recommended truck routes and is included as **Figure 2 – AB 98 Proposed Truck Routes**. The truck routes **do not** correspond with those proposed on the County’s [website](#), [AB 98: Truck Routes in Unincorporated San Bernardino County](#). The County has not been consistent with the truck routes shown on the interactive map from its website and what has been presented at meetings. Specifically, the interactive map shows a “City Truck Route” the entire stretch of Santa Ana Avenue in the Bloomington community. This segment of Santa Ana Avenue was decommissioned as a truck route by the City of Rialto in 2023 ([Exhibit A of Ordinance No. 1684](#)). The District worked with the City to facilitate this change, as Santa Ana Avenue is developed with residential and school uses. **The District respectfully requests that the County remove Santa Ana Avenue as a City Truck Route on the interactive map of the County website.**

Per Government Code Section 65302.02(b), truck routes should prioritize interstate and state highways. Where these are unavailable, arterial roads and commercially oriented streets may be considered. The District has considered the following truck routes proposed by the County:

- County Designation of Cedar Avenue and Slover Avenue as Truck Routes (Conditionally Support).** The County recommends designation of Cedar Avenue and Slover Avenue as truck routes. Despite the roads’ adjacency to Slover Mountain High School and Bloomington Head Start, given the roads’ designation as “Major Highway” per Countywide Plan Policy Map TM-1A and connectivity to Interstate 10 and existing commercial development on Slover Avenue and Cedar Avenue in Bloomington, the Cities of Fontana and Rialto, and the Agua Mansa area, the District does not object to their designation as truck routes. However, the District requests that the County require warehouse applicants of projects that will generate truck traffic along Cedar Avenue and Slover Avenue in front of both schools provide enhanced mitigation beyond that recommended by AB 98 to reduce potential vehicle and pedestrian conflicts and improve health and safety at the schools (see Section VII, below).
- County Elimination of San Bernardino Avenue and Valley Boulevard as Truck Routes (Strongly Support).** The County recommends not designating San Bernardino Avenue and Valley Boulevard as County truck routes and further requests that the City of Fontana remove their designation as truck routes within the Bloomington community. The District strongly agrees with and supports the County’s recommendations, especially since Lewis Elementary School is adjacent to San Bernardino Avenue, east of Locust Avenue. The District urges the County to protect and preserve housing opportunities and the health of students and residents in North Bloomington.
- County Designation of Existing and Proposed Weight-Restricted Truck Routes (Oppose).** The County identifies both proposed and existing weight-restricted truck routes in the Bloomington community. The District views this as one of the primary infirmities of the County’s plan. The County’s identification of



existing “weight-restricted” truck routes appears to be based on posted signs restricting vehicle weights on those road segments. When those segments are viewed on a map, it is clear that the signs were posted simply to protect the road surface from damage rather than to identify a coherent truck route network. The District therefore urges the County to disregard the presumed “weight-restricted truck route” designation of those road segments.

A. District Requests Removal of “Existing” and Proposed Weight-Restricted Truck Routes. The District is not aware of any existing County-designated weight-restricted truck routes in Bloomington. The County has not previously notified the District about the adoption of this truck route designation. County-adopted truck routes in the Bloomington area are illustrated in Countywide Policy Map TM-1A Roadway Network | Valley Region, which are illustrated in Figure 1. As shown, there are no “County – Existing Weight-Restricted” truck routes in the Policy Map. **The existing and proposed weight-restricted truck routes do not constitute a coherent roadway network**, rather a jumble of disjointed segments, many of which are adjacent to schools and District properties:

- Bloomington High School (Santa Ana Avenue)
- Zimmerman Elementary School (Linden Avenue)
- Crestmore Elementary School (Jurupa Avenue, east of Cedar Avenue)
- Harris Middle School (Tamarind Avenue)
- Proposed Future School (Santa Ana Avenue and Linden Avenue, north of Santa Ana Avenue).

The segments of these weight-restricted roadways, adjacent to schools and District properties, are underdeveloped. They have missing sidewalks and uneven roadway widths; some segments are extremely narrow with barely enough space for automobile access, let alone semitrucks. In addition to the lack of proper infrastructure, there are inherent hazards, including large blind spots and conflicts between vehicles and pedestrians, bike riders, distracted drivers, and school buses in school zones.

Despite posted roadway signage along the above street segments next to existing schools, the District has observed unsafe speeds and driving behaviors by truck drivers that endanger students arriving to and departing from Bloomington High School, Crestmore Elementary School, Zimmerman Elementary School, as well as Slover Mountain High School and Bloomington Head Start. Even if the roadway facilities on the street segments adjacent to schools were improved, the District remains strongly opposed to any truck traffic, weight-restricted or not, adjacent to schools and District properties. Therefore, the District requests that the County remove all existing and proposed weight-restricted truck routes.

B. County’s Improper Truck Route Designation of Local Streets. Government Code Section 65302.02 states that cities and counties must establish truck routes that avoid residential areas and sensitive receptors. Accordingly, the County must maximize use of arterial roads, major thoroughfares, and predominantly commercially oriented local streets. Major or minor collector streets and roads that predominantly serve commercially oriented uses may be used for truck routes only when strictly necessary to reach existing industrial zones. Government Code Section (b)(3)(B) further provides, “local roads shall be considered to predominantly serve commercial uses if more than 50 percent of the properties fronting the road within 1000 feet are designated for commercial or industrial use according



to the local zoning ordinance.”

The land uses where existing and proposed weight-restricted truck routes are located are designated by the Countywide Plan as Very Low Density Residential (VLDR), Low Density Residential (LDR), and Public Facility (PF) (see Slide 12 of the AB 98 Presentation). As shown in Figure 2, these weight-restricted street segments are local streets and are currently developed with residential and school uses. While some of the residential uses have nonconforming semitruck operations, the underlying zones are residential and public facility, not industrial or commercial. Since these streets do not have compatible zoning and the uses and existing development along these streets are residential and schools, the District requests that they not be designated as truck routes, weighted or not. Due to the conflict with existing sensitive uses, the District requests that all weight-restricted truck routes in Bloomington, as shown in Figure 2, be eliminated from consideration as truck routes.

- C. District Opposes County Designation of Santa Ana Avenue as a Weight-Restricted Truck Route.** Santa Ana Avenue is adjacent to residences, Bloomington High School, and the District’s future school site located southwest of Santa Ana Avenue and Larch Avenue. It is also within 900 feet of Zimmerman Elementary and Sycamore Hills Elementary. This road is underdeveloped, lacks continuous sidewalks, and poses serious safety risks to student pedestrians and bicyclists. There is excessive traffic and speeding along Santa Ana Avenue.

When the City of Rialto updated its truck routes in 2023, the District worked with the City to decommission Santa Ana Avenue as a truck route. As shown in the City’s adopted truck route map, included as [Exhibit A of Ordinance No. 1684](#), Santa Ana Avenue is not a truck route. This is reflected in the AB 98 Presentation, but not the County’s website. The District respectfully requests that the County remove Santa Ana Avenue as a designated truck route on both the AB 98 Presentation and County website. The District also requests that the County not designate Santa Ana Avenue east of Cedar Avenue as a truck route and suggests the County install and enforce “No Truck” signage along Santa Ana Avenue.

The District continues to actively voice concerns with the growth of logistics development in Bloomington and the surrounding areas. We have submitted comments on their potential effects and impacts on school facilities and operations, the public safety, and health risks on students and staff. The District makes significant decisions based on the County and adjacent cities’ development activities, as they have irreversible, consequential effects on the planning of long-term school operations and the health and safety of vulnerable children.

In particular, the District is extremely concerned with the environmental effects, including traffic hazards, if truck traffic associated with the County’s proposed Bloomington Business Park Specific Plan Project and the City of Fontana’s West Valley Logistics Center Project. The proposed developments’ respective environmental impact reports propose truck traffic access via Jurupa Avenue (west of Cedar Avenue) and Cedar Avenue to the Interstate 10 and State Route 60 freeways. Both developments also identify use of the north-south local streets between Alder Avenue and Linden Avenue for automobile traffic. Truck traffic from these developments are not allowed on Santa Ana Avenue. The District hopes that previous efforts to funnel truck traffic away from existing residences and schools along Santa Ana



Avenue are maintained. Therefore, the District requests the County to eliminate Santa Ana Avenue as a truck route, weighted or not.

Consistent with the City of Rialto's elimination of Santa Ana Avenue as a truck route, the City of Fontana does not identify Santa Ana Avenue east of Sierra Avenue as a truck route. Both the Bloomington Business Park Specific Plan and West Valley Logistics Center would therefore use Jurupa Avenue for truck traffic. Land uses between Jurupa Avenue and Slover Avenue are currently residential and public facilities, and development along Santa Ana Avenue includes residences, Bloomington High School, and the future school. The District thus respectfully requests that the County not designate the entire stretch of Santa Ana Avenue in Bloomington as a truck route. Instead, the District requests the County install and enforce "No Truck" signage along the entire stretch of Santa Ana Avenue.

- D. District Requests Replacement of Existing and Proposed Weight-Restricted Truck Signage with "No Truck" Signage.** Observations of signage along roads in Bloomington identified as existing weight-restricted routes indicate the County has posted signage prohibiting trucks over 5 tons on these roads. It is unclear why the County has identified 5 tons as the limit. For reference, an average pickup truck weighs 3 tons, delivery trucks vary in sizes and can weigh around 6 tons, a school bus with passengers can weigh 17 tons. Garbage and dump trucks can weigh between 25 and 36 tons and loaded semitrucks can weigh 40 tons.

A 5-ton weight limit appears **not** to be meaningful as it covers mainly small pickup and delivery trucks (classified as Class 1 or 2); moreover, a full-length school bus could weigh three times more than the limit. It is also unclear why the County has installed these signs at the existing roadway segments, other than to address complaints regarding semitrucks prohibited from traveling and parking on a street that is not already a designated truck route.

Therefore, the District recommends replacing the 5-ton weight-restricted truck signage with "No Truck" signage instead, especially at key entry points of residential and school areas. The outright prohibition and use of stronger language will further deter semitruck access to local streets that predominantly serve residential and school uses. Weight-restricted signage suggests that trucks, including those without trailers, may legally travel on the roadway. It is possible that truck drivers assume compliance and proceed without verifying their actual loaded weight. The result is that even heavy semitrucks may use these corridors as shortcuts, staging areas, or overnight parking zones. By contrast, "No Truck" signage provides a clear, enforceable message: trucks of all sizes are prohibited, except where local delivery exemptions apply. This clarity eliminates ambiguity for drivers, simplifies enforcement, and prevents the incremental creep of truck traffic into residential neighborhoods. For communities like Bloomington—where schools and homes directly front narrow or under-improved local streets—this distinction is critical. Clear "No Truck" signage, rather than nominal weight-limit postings, helps prevent truck cut-through behavior and roadside parking that increase pedestrian hazards and degrade air quality near sensitive receptors. In addition to replacing the existing weight-restricted signage with "No Truck" signage, **the District suggests installing "No Truck" signage at the following locations:**

- Westbound (WB) Santa Ana Avenue, west of Cedar Avenue
- Eastbound (EB) Santa Ana Avenue, east of each driveway of the Pilot Gas Station on Cedar Avenue
- EB Santa Ana Avenue, east of Tamarind Avenue



- SB Santa Ana Avenue, west of Cactus Avenue
- EB Jurupa Avenue, east of Cedar Avenue
- WB Jurupa Avenue, west of Lilac Avenue
- Northbound (NB) Alder Avenue, south of Jurupa Avenue
- Southbound (SB) of Alder Avenue, Laurel Avenue, Locus Avenue, Maple Avenue, Linden Avenue, and Larch Avenue, south of Slover Avenue
- EB and WB of the local streets off Cedar Avenue in Crestmore Heights.

- E. **District Opposes Adding the Weight-Restricted Roadways in Bloomington Listed in Table TM-2 to the Transportation & Mobility Element.** The October 23, 2025, Agenda 3 Report includes Exhibit C – Policy Plan Text Changes (Proposed), which recommends adding Table TM-2: Weight-Restricted Roadways to the Countywide Plan’s Transportation & Mobility Element. Table TM-2 presents proposed restricted roadways across the County, including segments within the Bloomington community. However, it is unclear whether the listed roadways are intended to serve as designated truck routes or simply as restricted roadways.

As discussed above, the District strongly opposes the inclusion of any weight-restricted truck routes, incoherent or disconnected roadway segments, and weight-restricted signage in Bloomington. The proposed segments are located adjacent to residential neighborhoods and schools, and many remain underdeveloped—lacking sidewalks, curbs, and other facilities necessary to safely separate truck and pedestrian movements.

Moreover, the presence of signage implying that these roadways are available for truck use (as opposed to “No Truck” signage) may unintentionally encourage truck drivers to cut through residential areas, adjacent to schools or use these streets for parking. Such conditions would further endanger student pedestrians and exacerbate existing conflicts between heavy vehicles and local traffic. Therefore, the District opposes the addition of TM-2 to the Transportation & Mobility Element. **District Suggests Consideration of Jurupa Avenue west of Cedar Avenue as a Truck Route.** As mentioned above, the County and City have set forth irreversible activities with their previous approvals of the Bloomington Business Park Specific Plan and West Valley Logistics Center. The District anticipates their eventual developments and hopes the County and City will have the health and safety of students and residents in mind. With this said, students from Crestmore Heights attend Zimmerman and Crestmore Elementary Schools, Ruth O. Harris Middle School, and Bloomington High School. Many students who walk to and from school are required to cross Jurupa Avenue, which is underdeveloped and lacks sidewalks and separated truck and pedestrian crossings.

The District understands that designation of truck routes may open opportunities for state and federal grants and other funding sources. Although we oppose students crossing truck routes, the District also understands the previous approvals of the Bloomington Business Park Specific Plan and West Valley Logistics Center will result in significant truck traffic along Jurupa Avenue, west of Cedar Avenue. Therefore, we conditionally support the potential designation of Jurupa Avenue, west of Cedar Avenue with the County’s commitment to provide enhanced and separated pedestrian facilities to aid students and pedestrians across Jurupa Avenue. The County should focus on the Linden Avenue and Cedar Avenue intersections. The District requests enhanced pedestrian safety features at these intersections,



including but not limited to pedestrian bridges. Using traffic impact fees collected from the developments combined with grants would reduce the cost of such features and provide the underserved Crestmore Heights community with improved pedestrian access between home and schools.

4. **County Proposed Policy LU-6.5 Industrial Amendments and Truck Routes (Strongly Oppose)**

The October 23, 2025, Agenda 3 Report includes Exhibit C – Policy Plan Text Changes (Proposed), which recommends adding Policy LU-6.5 Industrial amendments and truck routes to the San Bernardino Countywide Plan. Currently, Countywide Plan Policy LU-6.4, an adopted and operative policy, provides the following directive:

Policy LU-6.4 Industrial amendments near schools and parks. We approve Land Use Plan amendments for new industrial development only if they are at least one-half mile from an existing or planned public primary or secondary school or public park. We may waive this requirement for obsolete school or park sites or for industrial amendments submitted through a specific plan.

The District fully supports **Policy LU-6.4** and urges the County to continue enforcing this important safeguard for all existing and proposed warehouse developments, particularly within the Bloomington community, where schools and residences are directly adjacent to industrial areas. However, Exhibit C introduces a new Policy LU-6.5 Industrial Amendments and Truck Routes, which is not discussed in the body of the staff report. Furthermore, in EIR Addendum Section 2.2.1, the proposed policy is not underscored—as would typically denote new language—leaving it unclear whether Policy LU-6.5 will be formally considered by the Planning Commission, and whether the EIR Addendum has properly evaluated its potential environmental implications.

The proposed policy reads as follows:

Policy LU-6.5 Industrial amendments and truck routes. We approve Land Use Plan amendments for new industrial development within the Valley region only if they have direct access to federal-, state-, city-, or county-designated truck routes that minimize impacts on residents and other sensitive receptors. We also establish routes where trucks are prohibited to ensure that the truck trips generated by such amendments do not deviate from designated truck trips.

The District strongly opposes the adoption of Policy LU-6.5. This proposed policy weakens the clear protections established in Policy LU-6.4 by introducing an exception that would allow new industrial development in the Valley Region solely based on proximity to designated truck routes. In effect, Policy LU-6.5 could allow industrial and warehouse projects immediately adjacent to schools or residential areas, so long as trucks have access to nearby truck routes such as Cedar Avenue or Slover Avenue.

Such a policy would undermine the purpose and intent of Policy LU-6.4, eroding protections for students, residents, and other sensitive receptors—particularly within Bloomington, where the impacts of industrial encroachment and truck traffic are already significant. By substituting proximity to truck routes for distance from schools, the proposed policy would create a loophole that contradicts established County policy and environmental protection principles.



Accordingly, the District strongly opposes the adoption of proposed Policy LU-6.5 and respectfully urges the County and Planning Commission to retain and enforce Policy LU-6.4 as written, ensuring that future industrial development maintains a safe buffer from schools and parks and upholds the County's commitments to public health, safety, and community livability.

VI. Environmental Compliance and Enhanced Mitigation Measures

The proposed designation of truck routes and inclusion of the routes would update the San Bernardino Countywide Plan and Transportation and Mobility Element. At the October 1, 2025, BMAC Meeting, the County indicated that the proposed activity is a project under the California Environmental Quality Act (CEQA) and that an Addendum to the County-certified Countywide Plan Environmental Impact Report (EIR) would be adequate to comply with the provisions of CEQA.

The District disagrees. While truck trips exist on the roadway network, all truck traffic would now be funneled through Cedar Avenue and Slover Avenue, and possibly Jurupa Avenue (west of Cedar Avenue), which could exacerbate existing hazardous conditions in the Bloomington area. The District requests the following environmental issues be further evaluated in a Supplemental EIR to the certified Final Countywide Plan EIR:

- Increased transportation hazards related to the lack of adequate roadway facilities to ensure the separation of and reduction or elimination of potential conflicts between truck traffic and pedestrians and bicyclists (CEQA Appendix G Checklist Section XVII, Transportation [c]). Due to the lack of adequate roadway facilities, the County must address increased hazards due to semitruck traffic on the proposed truck routes and the existing and proposed weight-restricted truck routes and roadways, the new policy would exacerbate existing conditions.
- Increased exposure of substantial pollutant concentrations to sensitive receptors upwind of emissions generated along Cedar Avenue, Slover Avenue, and possibly Jurupa Avenue west of Cedar Avenue due to south- southwesterly winds in the Bloomington area (CEQA Appendix G Checklist Section III, Air Quality [c]). Section 3.3.2 of the Addendum states the certified EIR concluded that portions of the Valley Region are exposed to elevated levels of cancer risk and that, although individual projects may result in emissions under the 10 in a million-cancer risk threshold, cumulative impacts from non-permitted sources associated with industrial and commercial development could be significant. The Addendum further provides that a Health Risk Assessment was prepared as part of the Final EIR for the Bloomington and Muscoy communities. The Health Risk Assessment for the Bloomington area evaluated Valley Boulevard, I-10, Slover Avenue, and Cactus Avenue. The Health Risk Assessment did not consider Cedar Avenue, which is one of the proposed truck routes and which likely operates more traffic than the roadways studied (Valley Boulevard, Cactus Avenue, and Slover Avenue). For the health and safety of sensitive receptors, including students residing in the Bloomington community, the District requests that additional evaluation be provided to ensure adequate programmatic mitigation is provided by truck operators along the proposed truck routes. This may be in the form of a new implementation policy, such as introducing IMP-2025-TM-12 Truck Route Emissions [new]:



- **IMP-2025-TM-12 Truck Route Emissions (new)** Coordinate with the South Coast Air Quality Management District to require warehouse operators of facilities over 100,000 square feet who participate in SCAQMD Rule 2305 and operate trucks on Cedar Avenue and Slover Avenue to select mitigation measures and/or create a fee collection mechanism that would be directly applied to improvements in the Bloomington community, including but not limited to the following:
 - Roadway and pedestrian infrastructure, including sidewalks, safe walking and biking crossings, barriers and grade separations from truck traffic to protect pedestrians, including pedestrian bridges and roadway medians to support safe two-stage pedestrian crossings on designated truck routes.
 - Enforcement of truck access on non-truck designated roads and anti-idling rules with conspicuous signage.
 - Collection fees to the installation of high-efficiency air filtration and ventilation systems in school buildings and other sensitive land uses.
 - Vegetative or structural buffers along the road edges adjacent to school properties (e.g., sound walls, green belts).
 - Strict noise mitigation (lower speed limits, restricted hours for heavy truck traffic).
- Increased exposure of hazardous emissions, materials, or substances generated by trucks and/or accidentally released by trucks transporting hazardous materials within one-quarter mile of existing or proposed schools (CEQA Appendix G Checklist Section IX, Hazards and Hazardous Materials [b] and [c]). The California Department of Education's School Site Selection and Approval Guide recommends setback distances of at least 2,500 feet are advisable when explosives are transported on major roadways and at least 1,500 feet when gasoline, diesel, propane, chlorine, oxygen, pesticides, and other combustible or poisonous gases are transported on major roadways.¹ The Supplemental EIR must consider also the potential accidental release of hazardous materials along the proposed truck routes and identify potential mitigation to ensure public health and safety of sensitive receptors.

The District supports San Bernardino County's obligation to comply with AB 98 by adopting designated truck routes. However, this process must be carried out in a manner that protects the health, safety, and mobility of Bloomington students and residents—particularly those in close proximity to schools and sensitive receptors.

VII. Scoping Meeting

Public Resources Code (PRC) Section 21083.9(a)(2) provides that notwithstanding PRC Section 21080.4, 21104, or 21153, a lead agency must call at least one scoping meeting for a project of statewide, regional, or areawide significance. The County has held public meetings regarding the truck route plan, however, it has not held a public scoping meeting or directly contacted the District for a scoping meeting. The District is an agency with jurisdiction by law (PRC Section 21083.9(b)(3)) as it owns and operates schools that would be directly affected by the proposed truck routes and policy changes and has statutory duties to protect student safety and facility operations from environmental hazards.

¹ <https://www.cde.ca.gov/ls/fa/schoolsiteguide.asp>

Colton Joint Unified School District

Frank Miranda, Ed.D., Superintendent

Gregory Fromm, Assistant Superintendent, Business Services Division

Owen Chang, Director of Facilities and Energy Management



VIII. Conclusion and Request

The District supports San Bernardino County's obligation to comply with AB 98 by adopting designated truck routes. However, this process must be carried out in a manner that protects the health, safety, and mobility of Bloomington students and residents—particularly those in close proximity to schools and sensitive receptors.

Accordingly, the District respectfully requests that the County:

1. **Avoid truck route designations** on streets with school and residential developments.
2. Where avoidance is infeasible, **require enhanced mitigation or a new implementation policy** in addition to AB 98 mitigation that prioritize student health and safety.
3. **Implement enhanced pedestrian safety protections**, including continuous sidewalks, marked crosswalks, traffic calming in school zones, pedestrian refuge islands, and—where feasible—pedestrian bridges or grade-separated crossings to protect student travel paths.

The County should **engage with CJUSD** throughout the planning and environmental review process to ensure that student health and safety remain central to all decisions. The District remains committed to working collaboratively with the County to ensure that truck route planning reflects the needs of the Bloomington community and protects its most vulnerable residents and students.

Thank you for your consideration.

On behalf of **Colton Joint Unified School District**

Sincerely,

A handwritten signature in blue ink, appearing to read "Owen Chang", with a stylized flourish at the end.

Owen Chang

Director of Facilities & Energy Management

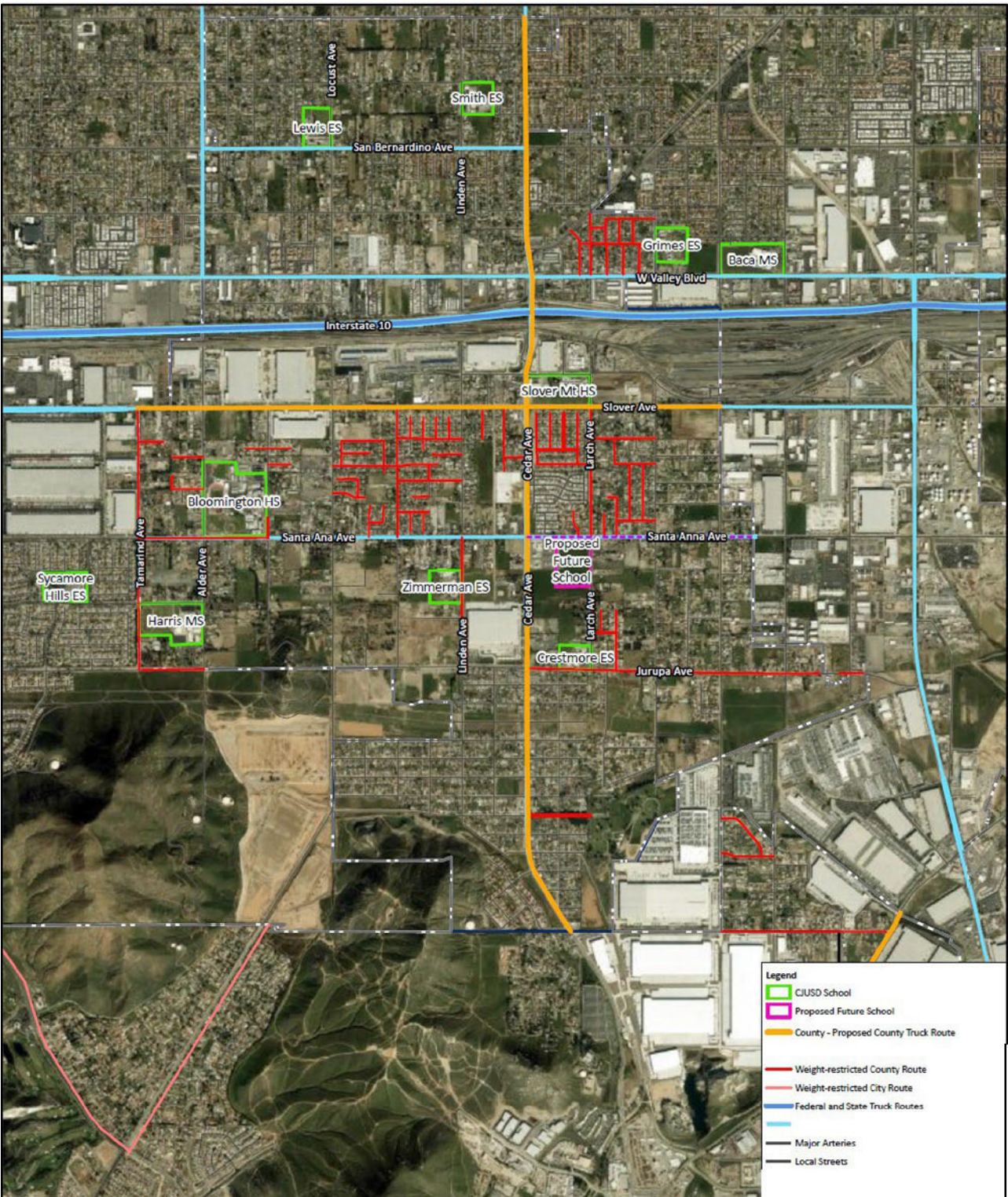
Cc: Dr. Frank Miranda, Superintendent, Colton Joint Unified School District
Mr. Gregory Fromm, Assistant Superintendent Business Services, Colton Joint Unified School District
File

Owen Chang, Director of Facilities and Energy Management





Figure 2 - AB 98 Proposed Truck Routes



Miracle, Lauren

From: Chuck Bell <chuckb193@outlook.com>
Sent: Monday, October 20, 2025 2:07 PM
To: Miracle, Lauren
Subject: FW: PC - Trans. and Mobility element

Follow Up Flag: Follow up
Flag Status: Flagged

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From: Chuck Bell
Sent: Monday, October 20, 2025 12:43 PM
To: PlanningCommissionComments@lus.sbcounty.gov
Subject: PC - Trans. and Mobility element

PC: 10/23/25

RE: Agenda #3 - AB 98 Transportation and Mobility Element Update

You missed a “weight restricted roadway”. Lucerne Valley – Camprock and Northside Roads.

The Lucerne Valley Economic Development Association (LVEDA) previously commented on this Plan - and strongly supports MBCA’s position which directly applies to us as well. (We incorporate their points by reference).

We are also affected by traffic and road conditions on Hwy. 247 – (Old woman Springs and Barstow Roads) - but also Hwy. 18 between Lucerne and Apple Valleys. The Victor Valley road project list does not seem to include either highway. They have to be addressed. We need new traffic counts to prove the necessity of their inclusions.

We need to be involved in this plan.

Please include us on your distribution list – and acknowledge receipt of this.

Thank You.

Chuck Bell, Pres. [REDACTED] chuckb193@outlook.com

From MBCA:

Dear Planning Commissioners,

As means of compliance with this Bill is now being discussed, this is the opportunity to address the continuing evolution of the intensity of use of State Highway 247. This route is being used ever more by trucks and the growing population, and visitors to the High Desert.

MBCA commented upon the Long Range Multi-Modal Transportation Plan and those comments are applicable for consideration at this time:

For your consideration:

As one of the six regions within the LRMTP, the Morongo Basin is distinct among the regions studied. Its predominantly rural character, ecological diversity and natural beauty draws millions of visitors from the nearby megalopolis of Southern California.

Its proximity to the I-10, I-15, and I-40 makes the Morongo Basin a thoroughfare to these major highways.

The projection of the 40% increase in growth of the Morongo Basin is in stark contrast to the limited growth projected for the Morongo Basin within the Countywide plan (CWP). The lack of infrastructure (water and sewer) will constrain future growth.

The discrepancy between these two visions of the future must be reconciled or fully explained and not codified in the LTMTP.

The following issues must be acknowledged and addressed within this forward-looking

plan:

1. The Barstow International Gateway (BIG) logistics center will generate additional traffic on State Highway 247. This highway will serve as a shortcut to the massive warehouses along the I-10 corridor. More roadway maintenance will be needed with this increase of traffic.
2. State Highway 247 is in the process of receiving Scenic Highway status that will increase traffic on this highway.
3. State Highway 247 is a notoriously unsafe highway and an increase in traffic will further exacerbate safety issues.
4. The constraints on the ability to improve this highway due to existing improvements, Right of Ways and topography.
5. The use of State Highway 247 by trucks transporting agricultural products from the Imperial Valley. Trucks may be using this highway to circumvent weight limitations.
6. The increased traffic on State Highway 62 due to the above issues on 247.
7. State Highways 247 and 62 sever wildlife corridors between the desert and mountains. The need for safe passage of wildlife must be considered and anticipated with the LRMTTP.

The North Desert area will be significantly impacted by the construction of the Brightline West high speed rail project. The LRMTTP could take the opportunity to advocate for the inclusion of a rail stop in the north desert for this rail project. One can imagine the frustration of commuters stuck on their commute on I-15 as they watch the train passing at high speed!

Miracle, Lauren

From: Esteban Ortiz <estebanortizmsa@gmail.com>
Sent: Friday, October 24, 2025 3:34 PM
To: Miracle, Lauren; Acuna, Vincent; Supervisor Rowe
Subject: Rosena Place II: Truck Route Concern, lack of CHP Law enforcement, Vehicle codes not being enforced, 18 Wheeler in Residential Area

Follow Up Flag: Follow up
Flag Status: Completed

You don't often get email from estebanortizmsa@gmail.com. [Learn why this is important](#)

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Hello Lauren and Vincent,

My name is Esteban Ortiz and I live in Rosena Place II community North of Fontana. USPS informed me we are classified as the unincorporated area of Devore Heights. I am writing because for the past 3.5 years, I have been calling CHP and San Bernardino County Sheriff to report loud noise nuisances that occur at all hours of the day, evening, night, and into the early morning with vehicles with loud illegally modified exhaust that use Glen Helen Parkway as a race track. They enter and exit the Rosena Ranch community at all hours of the day expelling the loud noise nuisances from their vehicles into our community as they exit and enter Rosena Ranch. We also have encountered 18-Wheelers that drive through Glen Helen Parkway in either direction to get to their destination that are out of state with loud modified exhausts.

The county has decibel readings for residential areas which are blatantly exceeded in our community. Rosena Ranch is a 10,000 person community x 2 vehicles it puts the estimation at about 20,000 vehicles with just 2 roads that are an entry and exit for this community. With the estimation of just 5% of vehicles being illegally modified, it puts that stat of 1,000 vehicles being illegally modified to sound louder than vehicle code regulating exhausts allow. These vehicles consistently on an every day basis bombard our community. Literally every day. Rosena Place II is located at the intersection of Glen Helen Parkway and Gray Pine Place. We are consistently and constantly bombarded by vehicles that are illegally modified that enter and exit Rosena Ranch. I have called CHP, but CHP only has one patrol car to patrol a 20 square mile radius. How was this approved by the county with policing being severely undermanned, how can the county guarantee the decibel measurements as stated in county regulations for unincorporated areas? For the past 3.5 years we have been managing these loud noise nuisances on a regular basis. I have called CHP over the past 3.5 years with no noise abatement. I have reported it to my HOA, and they don't wish to engage in any litigation with Rosena Ranch. I have asked for the protocols to report these drivers to the Rosena Ranch HOA, and my HOA at Rosena Place II has yet to answer this question after being consistently asked. We are in dire need of enforcement for vehicle code 27150 at this intersection and at entry points into this area. I have called CHP to inquire about the statistics on state referring these vehicles for modified exhausts, and have not gotten any answers. It has been an extremely frustrating situation.

Seeing the new projects being reviewed for the area with no new roads being created, it is going to be a catastrophic disaster once the new homes are in sycamore flats, the 18-wheeler parking garage industrial corridor which noise pollution will worsen even more along with traffic, and the expansion of the bridge is futile. It serves no purpose whatsoever. I ask that you please come up on a Friday afternoon and sit in our community from 3- 7:30 pm and see how traffic is, the noise pollution, and the safety risks that exists when vehicles exit out of the 15 north to go on Sierra to get on GHP just to try to buy a few more minutes if possible. It is horrendous. The ergonomics of all this planning is a blatant failure. There are no new roads, but new homes means more vehicles and traffic. At the corner of Glen Helen Parkway and Gray Pine Place, we have a local park. Children play there while all these vehicles with modified exhausts expel loud noise nuisances, that at times include backfires, into our community. This is literally a health hazard and it is a trigger for children with developmental disabilities like autism who are a protected class. All of these noise nuisances lead to hearing loss, and I have kept calling and calling CHP without these noise being abated. I have started to explore legal ways to address these matters because my property taxes have increased but the quality of life has been severely impacted by the county's poor planning and projects that don't take public health into consideration.

Not only that, but we hear the 18- Wheelers traveling on Glen Helen Parkway at 2- 3 am as they leave the Amazon Fulfillment Center off of Lytle Creek Road. These trucks enter our community to do 3 point turns with cargo. Here is a video of my decibel meter catching the amount of noise these vehicles emit and them coming into our residential areas. Is anything above 55 db acceptable? That's what the county has for residential areas with the lowest being at 45 db.

I am aware that the hearing was held yesterday 10/23 at 9 am, however, it is important that these decisions take serious consideration on the legal environmental and public health liabilities the county is signing up for when these projects are approved. Why are local residents not asked about how these projects would impact us? I called about the pointless project on expanding the bridge because I received the notice, but didn't get anything about the Sycamore Flats project and the commercial corridor. On September 9, 2025, a motorcyclist crashed and killed themselves on the 15 freeway between Sierra and Sycamore Creek Drive. Traffic was so jammed up all the way down Sierra near Gabion Ranch and into Sierra Lakes Parkway, vehicles exiting Duncan Canyon to get on Sierra to get on GHP, and my neighbor informed me that it took them 2 hours just to get home. Where are the new roads? Why doesn't Rosena Ranch have multiple exits that go into Rialto to help alleviate all of this traffic? I know for a fact that Rosena Ranch can't stand the traffic that comes with the concerts held at Glen Helen Amphitheatre. They are in constant communicating with Baca. Why aren't more roads planned? This is a sub par project where developers and those with special interest look at selling property, but won't communicate the other logistics that come with their poor planning. I as a member of this community disagree with all of these developments 100%. I live up here and my experience has been horrible with my HOA, with the lack of CHP vehicle code enforcement, San Bernardino County limited vehicle code enforcement because they don't have access to sending vehicles to be state referee. I have an HOA

board that refuses to implement tow truck services as explained in the CC&Rs, and have informed me to contact CHP, even though, our CC&Rs states that the board has the duty to enforce our parking regulations. When I communicated about the noise ordinance and these vehicles being too loud and interfering with the peaceful enjoyment of my property, the board has stated it is a neighbor to neighbor dispute instead of them taking on the duties they are responsible for. Now, the board is exploring expanding these areas by 140 homes? It is not worth it.

Please assist me with getting statistics on CHP's enforcement with vehicle codes on exhaust violations in the Rosena Ranch community, Glen Helen Parkway, Lytle Creek, and Devore area. WE NEED MORE CHP and SBCS ENFORCEMENT!

Thank you,
Esteban Ortiz, MHA

Miracle, Lauren

From: gollatz@gollatz.com
Sent: Friday, October 31, 2025 10:25 AM
To: Miracle, Lauren
Subject: RE: AB 98 PC Meeting/ Devore Weight Restricted Roads Follow-up

Follow Up Flag: Follow up
Flag Status: Completed

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Lauren: The DRPA (Devore Rural Protection Assoc.) has a NEW email: DevoreDRPA@gamil.com (please make a note of this) - I can receive messages from both the Gollatz email and now the new DRPA email. I did want to FYI since you were sending my questions to Anthony Pham. The Devore water line from our Well #4 at the Cajon Wash goes through the Devore overpass and (of course) needs to be protected. It has been the Devore Water Companies concern that the 80,000++ pound heavy semi's that use the overpass 24/7 that they are compromising perhaps our water source by weight.

Regards, Darcee Klapp

From: Miracle, Lauren <Lauren.Miracle@lus.sbcounty.gov>
Sent: Thursday, October 30, 2025 4:25 PM
To: gollatz@gollatz.com; Pham, Anthony - DPW <Anthony.Pham@dpw.sbcounty.gov>
Cc: Acuna, Vincent <Vincent.Acuna@lus.sbcounty.gov>
Subject: RE: AB 98 PC Meeting/ Devore Weight Restricted Roads Follow-up

Hi there,

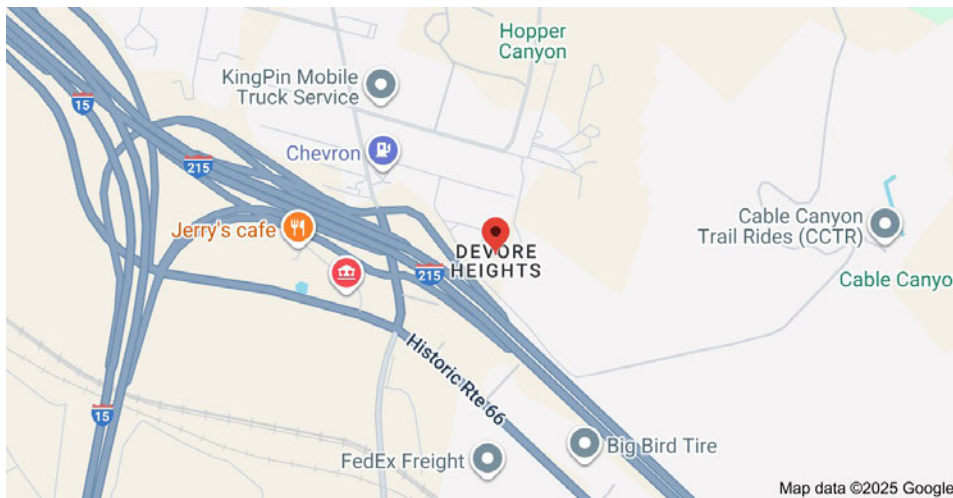
I'm including Anthony Pham from our DPW Traffic Division as their division handles weight restricted roads. Anthony, can you address Darcee's question, below?

From: gollatz@gollatz.com <gollatz@gollatz.com>
Sent: Friday, October 24, 2025 3:14 PM
To: Miracle, Lauren <Lauren.Miracle@lus.sbcounty.gov>
Subject: RE: AB 98 PC Meeting/ Devore Weight Restricted Roads Follow-up

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Lauren: Thank you so much – you were quick!

Question: How would Devore go about adding the Devore overpass to the max weight of 10,000lbs. It is just the 200 feet from Cajon Blvd. onto Devore Road the beginning of the overpass that the heavy truck accidents occur. With all of the distributions going up around us no one is protecting the Devore overpass and residents in case of wildfire, earthquake, or heavy truck accidents. Remember this is our ONLY way into Devore or out (one way in – the same way out). Can the County address this concern or should I go to Governor Newsom directly as he is the one who mandated this AB98.



**

** Devore Road north from Route 66 (Cajon Blvd.) to the 215 freeway. / my apologies my computer won't put color where I want to direct you

Regards, Darcee Klapp / DRPA President

From: Miracle, Lauren <Lauren.Miracle@lus.sbcounty.gov>

Sent: Thursday, October 23, 2025 4:12 PM

To: gollatz@gollatz.com

Cc: Pham, Anthony - DPW <Anthony.Pham@dpw.sbcounty.gov>; Acuna, Vincent <Vincent.Acuna@lus.sbcounty.gov>

Subject: AB 98 PC Meeting/ Devore Weight Restricted Roads Follow-up

Hi Darcee,

It was nice meeting you today. I spoke with our Department of Public Works- Traffic Division team, cc'd here, about your question.

The Devore Road weight restriction goes from the east of Interstate 215 northbound of the ramp at Devore Road north to Kenwood Avenue.

The Kenwood Avenue weight restriction is from Interstate 15 northerly and easterly to Devore Road.

I hope that provides the clarification you were seeking. Please let us know if you have any additional questions or concerns.

Lauren Miracle

Planner

Land Use Services

Phone: 909-659-5384

385 N. Arrowhead Ave., 1st Floor

San Bernardino, CA 92415-0187



Our job is to create a county in which those who reside and invest can prosper and achieve well-being.

www.SBCounty.gov

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Miracle, Lauren

From: charlie judyandcharlie.com <charlie@judyandcharlie.com>
Sent: Thursday, December 4, 2025 2:44 PM
To: Miracle, Lauren; Acuna, Vincent
Subject: Truck routes in the San Bernardino Mountains

Some people who received this message don't often get email from charlie@judyandcharlie.com. [Learn why this is important](#)

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To both of you!

I do not understand the truck routes in our mountains. There are three which are, quite frankly, a puzzlement. The most egregious is Kuffel Canyon from Rte. 18 to Rte. 173. THAT F'ING NUTS!!! THERE ARE TWO HAIRPIN TURNS AND A STEEP STOP AT THE INTERSECTION TO 173 YET IT'S POSTED AS A TRUCK ROUTE! The other two may or may not have been addressed. One is, mostly buses, turning left on Live Oak Drive off of 330. I don't know if buses and larger have been warned off of that, but it's been a recurring clusterf**k. The last one that comes to mind is the turn off of the 330 into the town of Running Springs for vehicles that need t go to Lake Arrowhead. There needs to be a clear indication that THEY SHOULD NOT TRY TO MAKE A LEFT HAND TURN!!! Now I get that AB 98 appears to be a state thing and these are insignificant roads in the grand state of things, but, if you can't address these at the county level, can you please push these up the food chain so that they may be incorporated in the bill being deliberated upon? Also, it would be helpful if the various GPS software out there could be alerted to the stupidity that misdirects these oversized vehicles.

From someone whose GPS once told them to take a hard right off the 330 for a 4k foot drop shortcut.

Charles Downing [REDACTED]