



## Interoffice Memo

DATE: June 22, 2023

PHONE: 387-4110

FROM: **HEIDI DURON**, PLANNING DIRECTOR  
Land Use Services Department

TO: **HONORABLE PLANNING COMMISSION**

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SUBJECT: **ENVIRONMENTAL JUSTICE FOCUS AREA CODE AMENDMENT (AGENDA ITEM #2)**

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Since the distribution of the staff report, Staff has received additional comments for the above-referenced Project. These additional comments are attached for your consideration.

HD

## Bruckhart, Jessie

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**From:** Carlos Rodriguez <carlos@biabuild.com>  
**Sent:** Thursday, June 22, 2023 2:57 AM  
**To:** Valdez, Steven; Erik Pfahler; Liang, Aron  
**Cc:** Planning Commission Comments; King, Kristina; Nottingham, Chad; Snoke, Luther; Hernandez, Leonard - CAO  
**Subject:** BIASC Comment Letter to SB County Planning Commission  
**Attachments:** BIASC Comment Letter to SB County Planning Commission - 6-22-23.pdf

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Greetings Steven and Aron,

Thank you for the information and for taking the time to discuss our concerns.

Please forward the attached comment letter to the Planning Commission for today's meeting.

Best,

Carlos



**Carlos Rodriguez**  
Senior VP – Chief Policy Officer

Building Industry Association of Southern California, Inc.

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ph: (909) 641-4630

w: [www.biabuild.com](http://www.biabuild.com)

**Mailing Address: 17192 Murphy Ave., #14445, Irvine, CA 92623**

Los Angeles/Ventura • Orange County • San Bernardino County •  
Riverside County



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**From:** Valdez, Steven <Steven.Valdez@lus.sbcounty.gov>

**Sent:** Wednesday, June 21, 2023 4:50 PM

**To:** Erik Pfahler <Erik@borsteinenterprises.com>; Carlos Rodriguez <carlos@biabuild.com>; Liang, Aron <Aron.Liang@lus.sbcounty.gov>

**Subject:** RE: RHNA allocation - EJFAs discussion

Carlos,

As I promised yesterday, below is a breakdown of what the state, general plan and EJFA code update requires in environmental justice areas.

State Requirements: SB 1000 required the County to identify policies that actually reduce the unique or compounded health risks experienced by disadvantaged communities. (Gov. Code § 65302, subd. (h)(1)(A).) Certain of the County's proposed EJ policies are designed to meet this requirement.

In sum, the state encouraged the County to strengthen the Countywide Plan's EJ policies and supplement with new policies designed to reduce the risks already identified in the EJ Background Report. They recommended that the County review resources prepared by the Governor's Office of Planning and Research and the California Air Resources Board. They also encouraged the County to consider identifying in some way all EJ policies in the Countywide Plan, for example by color coding or copying them into an appendix. They believed that such identification is a best practice for ensuring the County's EJ policies are clear and accessible. The letter sent to the county in 2019 is linked below for reference.

[08/15/2019 - San Bernardino County - Comments/Letter - SB 1000 \(ca.gov\)](#)

Countywide Plan Policy in Response to SB100 recommendations: Policies below were created in response to State Attorney General's Letter.

**Policy HZ- 3.16 Notification**

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

**Policy HZ-3.17 Community stakeholders**

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

**Policy HZ-3.18 Application requirements**

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

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

**Policy HZ-3.19 Community education**

We make educational materials available to the public in unincorporated environmental justice focus areas so that they clearly understand the potential for adverse pollution, noise, odor, vibration, and lighting and glare, and the effects of toxic materials to promote civil engagement. We require that such educational materials be developed in accordance with Plain Language Guidelines. We require that this information be made available in public spaces such as libraries and community centers, as well as on County websites and other appropriate means.

**Policy HZ-3.20 Updating EJFAs.**

We update the assessment of boundaries, issues, policies, objectives, and implementation strategies regarding environmental justice focus areas subsequent to updates in CalEnviroScreen, equivalent state tools, or as the County deems necessary.

**Policy HZ-3.21 Emerging pollutants**

For pollutants that do not yet have established regulatory thresholds, we coordinate with regulatory agencies to assist their efforts to monitor pollutant levels, establish thresholds, and identify funding and mitigation options, particularly for pollutants that are found in environmental justice focus areas.

Implementation of Countywide Policies through EJFA Code Update: The code update being presented tomorrow includes are required to implement the Hazard Element of the Countywide plan. All the above policy recommendations

were included in the code update, along with more specific notification and mailing requirements. To summarize what is state mandated, I outlined Category C in red below because that standard was mandated by the state through public outreach. As for Category A and B - those standards were added by the County through public outreach (including the BIA) to allow for an incremental approach to notifying interested parties:

<i>Table 85-6</i>				
<i>EJFA Notification and Outreach Requirements</i>				
<b>Category</b>	<b>Project Applicability</b>	<b>Notification Area</b>	<b>Outreach Plan</b>	<b>Outreach Meeting</b>
(A) Project is in or within 1,000 ft of EJFA	Development project (excluding Category C amendments) for a proposed use that may have certain negative environmental or operational impacts (noise, dust, odors, operating hours, truck traffic, etc.) on the surrounding EJFA, not requiring an EIR.	Mailed notice of 1,300 feet from subject site boundaries (1/4 mile).	No	No
(B) Project is in or within 1,000 ft of EJFA	Development Project (excluding Category C amendments) for a proposed use that may have the potential for creating undesirable environmental or operational impacts (such as the use of hazardous, toxic, explosive, or flammable materials in large quantities, exposure to high levels of diesel exhaust or fumes, etc.) on the surrounding EJFA. A development project (excluding Category C amendments) that requires an environmental impact report (EIR) or health risk assessment (HRA) shall be classified in this Category.	On-site posting plus mailed notice of 2,640 feet from subject site boundaries (1/2 mile).	Yes	1
(C) Land Use Category or Zone Designation Amendment in or within 1,000 ft of EJFA <sup>(1)</sup>	Land Use Category or Zone Designation amendment.	On-site posting plus mailed notice of 2,640 feet from subject site boundaries (1/2 mile).	Yes	2

Hopefully this summary answers your questions from yesterday. If not, please feel free to give me or Aron a call.

Have a great night.

**Steven Valdez**  
 Planning Manager  
**Land Use Services Department**  
 Phone: 909-387-4421  
 Cell Phone: 909-601-4743  
 Fax: 909-387-3223  
 385 N. Arrowhead Ave, First Floor  
 San Bernardino, CA, 92415-0187



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**From:** Erik Pfahler <[Erik@borsteinenterprises.com](mailto:Erik@borsteinenterprises.com)>

**Sent:** Wednesday, June 21, 2023 1:50 PM

**To:** Carlos Rodriguez <[carlos@biabuild.com](mailto:carlos@biabuild.com)>; Liang, Aron <[Aron.Liang@lus.sbcounty.gov](mailto:Aron.Liang@lus.sbcounty.gov)>

**Cc:** Valdez, Steven <[Steven.Valdez@lus.sbcounty.gov](mailto:Steven.Valdez@lus.sbcounty.gov)>

**Subject:** RE: RHNA allocation - EJFAs discussion

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Carlos,

Take a look at page three of the Planning Commission Report link below. The category list is on page 3 of this report.

**Planning Commission Report:**

[5 CodeAmendments SR.pdf \(sbcounty.gov\)](#)

**Amended Code, per PC direction:**

[https://www.sbcounty.gov/uploads/LUS/Planning/Chapter%2085.22\\_Exhibit\\_53123\\_webiste.pdf](https://www.sbcounty.gov/uploads/LUS/Planning/Chapter%2085.22_Exhibit_53123_webiste.pdf)

Thanks,

**Erik Pfahler** / Senior Vice President

[erik@borsteinenterprises.com](mailto:erik@borsteinenterprises.com)

**Borstein Enterprises**

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Phone: 310-582-1991 x203 / Cell: 310-864-3330 Fax: 310-582-1999

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**From:** Carlos Rodriguez <[carlos@biabuild.com](mailto:carlos@biabuild.com)>

**Sent:** Tuesday, June 20, 2023 4:40 PM

**To:** Liang, Aron <[Aron.Liang@lus.sbcounty.gov](mailto:Aron.Liang@lus.sbcounty.gov)>; Erik Pfahler <[Erik@borsteinenterprises.com](mailto:Erik@borsteinenterprises.com)>

**Cc:** Valdez, Steven <[Steven.Valdez@lus.sbcounty.gov](mailto:Steven.Valdez@lus.sbcounty.gov)>

**Subject:** RE: RHNA allocation - EJFAs discussion

Thank you Aron,

Do you have a file with the descriptions of Category A, B, C with distinctions on which projects are subject to requirements that are state requirements vs the county proposed requirements?

Please advise

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**From:** Liang, Aron <[Aron.Liang@lus.sbcounty.gov](mailto:Aron.Liang@lus.sbcounty.gov)>  
**Sent:** Tuesday, June 20, 2023 2:30 PM  
**To:** Carlos Rodriguez <[carlos@biabuild.com](mailto:carlos@biabuild.com)>; Erik Pfahler <[Erik@borsteinenterprises.com](mailto:Erik@borsteinenterprises.com)>  
**Cc:** Valdez, Steven <[Steven.Valdez@lus.sbcounty.gov](mailto:Steven.Valdez@lus.sbcounty.gov)>  
**Subject:** RHNA allocation - EJFAs discussion

Hi Carlos, Erik,

I have attached the sites inventory that was submitted to the State.

The mapped version can be viewed here:

<https://sbcountycwp.maps.arcgis.com/apps/webappviewer/index.html?id=20af7c94a96f49dfbf17a8bb4074ab2b>

All housing element information can be located here:

<https://countywideplan.com/policy-plan/housing/>

If you need anything else, let me know.

**Aron Liang**

Planning Manager

**Land Use Services Department**

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Cell: 909.601.4672

Fax: 909-387-3223

385 N. Arrowhead Ave

San Bernardino, CA, 92415-0187



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SCAG 6TH CYCLE FINAL RHNA ALLOCATION PLAN

ALLOCATION BY LOCAL JURISDICTION

County	Jurisdiction	Total	Very-low income	Low income	Moderate income	Above moderate income
San Bernardino	Montclair city	2593	698	383	399	11
San Bernardino	Needles city	87	10	11	16	
San Bernardino	Ontario city	20854	5640	3286	3329	85
San Bernardino	Rancho Cucamonga	10525	3245	1920	2038	33
San Bernardino	Redlands city	3516	967	615	652	12
San Bernardino	Rialto city	8272	2218	1206	1371	34
San Bernardino	San Bernardino city	8123	1415	1097	1448	41
San Bernardino	Twentynine Palms ci	1047	231	127	185	5
San Bernardino	Unincorporated San	8832	2179	1360	1523	37
San Bernardino	Upland city	5686	1584	959	1013	21
San Bernardino	Victorville city	8165	1735	1136	1504	37
San Bernardino	Yucaipa city	2866	708	493	511	11
San Bernardino	Yucca Valley town	750	155	117	145	3
Ventura	Camarillo city	1376	353	244	271	5
Ventura	Fillmore city	415	73	61	72	2
Ventura	Moorpark city	1289	377	233	245	4
Ventura	Ojai city	53	13	9	10	
Ventura	Oxnard city	8549	1840	1071	1538	41
Ventura	Port Hueneme city	125	26	16	18	
Ventura	San Buenaventura (\	5312	1187	865	950	23
Ventura	Santa Paula city	657	102	99	121	3
Ventura	Simi Valley city	2793	749	493	518	10
Ventura	Thousand Oaks city	2621	735	494	532	8
Ventura	Unincorporated Ven	1262	319	225	250	4

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June 22, 2023

San Bernardino County Planning Commission  
 385 N. Arrowhead Avenue  
 San Bernardino, CA 92415

**RE: Recommendation to the Board of Supervisors a Development Code Amendment to Title 8 of San Bernardino County Code, to add Chapter 85.22 to establish application and review procedures for projects located in, or near, an Environmental Justice Focus Areas - AGENDA ITEM #2**

Dear Chairman Weldy and fellow Planning Commissioners,

The Building Industry Association of Southern California, (BIASC) is a non-profit trade association with over 1,000 member companies employing over 100,000 professionals in the home building industry. **On behalf of our membership we respectfully request your consideration to exempt residential development from the proposed Development Code Amendments including the proposed EJFA Notification and Outreach Requirements - Table 85-6.**

<b>Table 85-6</b>				
<b>EJFA Notification and Outreach Requirements</b>				
<b>Category</b>	<b>Project Applicability</b>	<b>Notification Area</b>	<b>Outreach Plan</b>	<b>Outreach Meeting</b>
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(C) Land Use Category or Zone Designation Amendment in or within 1,000 ft of EJFA <sup>(1)</sup>	Land Use Category or Zone Designation amendment.	On-site posting plus mailed notice of 2,640 feet from subject site boundaries (1/2 mile).	Yes	2
<b>Notes:</b>				
(1) A compressive amendment initiated by the Director, Commission or Board shall be exempt from the notification and outreach requirements.				

CEQA and Title-24 requirements set the highest bar in the nation for new home development and result in the most environmentally friendly, water and energy efficient housing stock in the nation. Unfortunately, housing in California is also among the most expensive in the nation and the current proposal will add costs, delays, uncertainty and discourage new residential development in the midst of a statewide housing crisis. As noted by the California Department of Housing and Community Development (HCD) the current housing challenges include the following issues.

- **Not enough housing being built:** During the last ten years, state housing production averaged fewer than 80,000 new homes each year, and ongoing production continues to fall far below the projected need of 180,000 additional homes annually.
- **Increased inequality and lack of opportunities:** Lack of supply and rising costs are compounding growing inequality and limiting advancement opportunities for younger Californians. Without intervention, much of the new housing growth is expected to be focused in areas where fewer jobs are available to the families that live there.
- **Too much of people's incomes going toward rent:** The majority of Californian renters — more than 3 million households — pay more than 30 percent of their income toward rent, and nearly one-third — more than 1.5 million households — pay more than 50 percent of their income toward rent.
- **Fewer people becoming homeowners:** Overall homeownership rates are at their lowest since the 1940s.
- **Disproportionate number of Californians experiencing homelessness:** California is home to 12 percent of the nation's population, but a disproportionate 22 percent of the nation's homeless population.

Likewise, the housing shortage and resulting increasing costs due in part to public policy that discourages new development has a disproportional impact on communities of color. As noted by the Washington Post, *the pattern of homeownership and generational wealth building is broken for many black families. In the first quarter of 2020, 44 percent of black families owned their home, compared with 73.7 percent of white families, according to the Census Bureau. "The homeownership gap between blacks and whites is larger today than it was in 1934, which is when the Federal Housing Administration [FHA] was established," says Donnell Williams, president of the National Association of Real Estate Brokers, a Lanham, Md.-based organization formed in 1947 to promote equal housing. "Half of all blacks born between 1956 and 1965 were homeowners by the age of 50, but blacks born from 1966 to 1976 have a homeownership rate of just 40 percent. If trends continue, black millennials may not even reach a homeownership rate of 40 percent by the time they turn 50."* [Washington Post – click here](#)

73.7% of white households are homeowners  
 6.15% mortgage denial rates for all races  
 \$139,300 median household net worth in 2019 for white households  
 80 times homeowner households' net worth is as large as renter households' net worth

Source: Redfin; Census Bureau; Lending Tree; Zillow

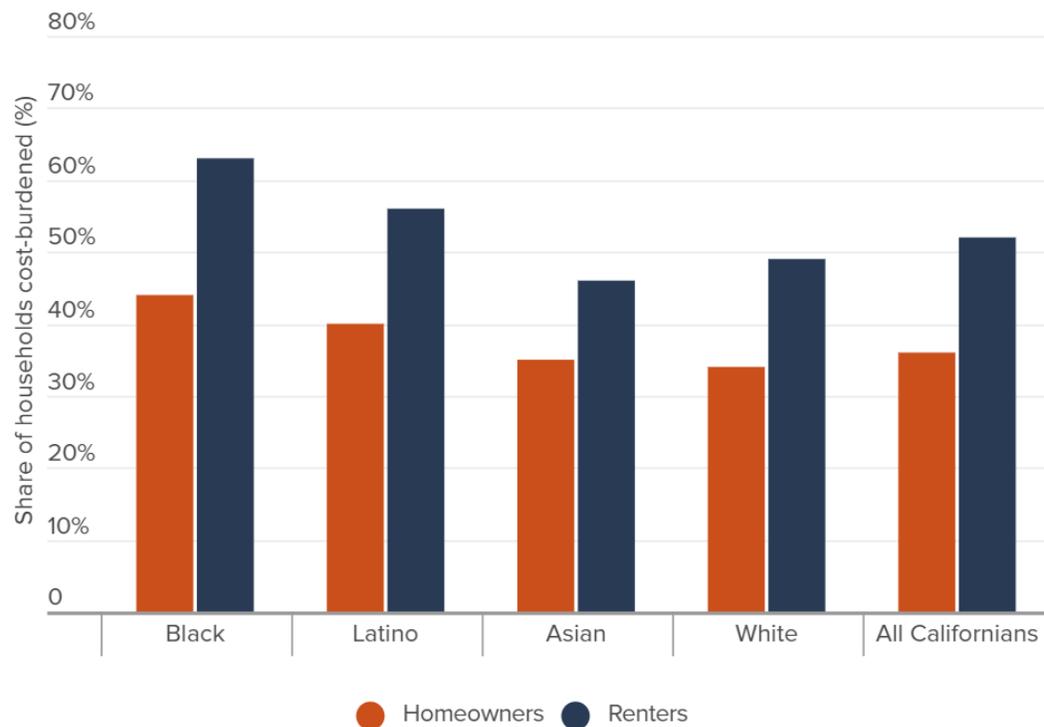
44% of black households are homeowners  
 12.64% mortgage denial rates for black buyers  
 \$12,780 median household net worth in 2019 for black households  
 52% less appreciation for a typical house in redlined neighborhoods than in greenlined neighborhoods

Between January 2007 and December 2015, homes in majority black neighborhoods were twice as likely to be foreclosed on than homes in majority white neighborhoods

DWLAN D. JUNE/THE WASHINGTON POST; ISTOCKPHOTO

Similarly, Black and Latinos are more vulnerable to increasing housing costs as noted below:

### Black and Latino residents are more likely to spend a high share of their income on rent or mortgage



**Source:** US Census Bureau, American Community Survey; PPIC calculations. PPIC – California’s Housing Divide, May 2022

**Notes:** Cost burden defined as spending more than 30% of income on housing payments. Shares computed using 2019 1-year ACS data for California.

**From:** PPIC Blog, May 2022.

In conclusion, we urge you to exempt residential development from the proposed Development Code Amendments including the proposed EJFA Notification and Outreach Requirements - Table 85-6. The proposed amendments add requirements above and beyond state law and result in the unintended consequence of creating additional barriers to housing which have a disproportionate impact on communities of color.

Thank you for your consideration and we look forward to working with you to address the housing needs in San Bernardino County.

Sincerely,



Carlos Rodriguez, Senior VP  
BIA San Bernardino County Chapter

**Bruckhart, Jessie**

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**From:** Hallie Kutak <hkutak@biologicaldiversity.org>  
**Sent:** Wednesday, June 21, 2023 11:43 PM  
**To:** Planning Commission Comments; Liang, Aron  
**Cc:** ana.g@ccaej.org; Elizabeth Reid-Wainscoat  
**Subject:** Environmental Justice Focus Areas Draft Development Code Chapter  
**Attachments:** EJFA SanBernardino\_CenterforBiologicalDiversity\_2023-06-21.pdf

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Commissioners,

Please accept these comments submitted on behalf of the Center for Community Action and Environmental Justice and the Center for Biological Diversity regarding the **Environmental Justice Focus Areas Draft Development Code Chapter**.

Please confirm receipt of the attached letter and of the references included at the link below.

[San Bernardino Warehouse Ordinance References](#)

Best,  
Hallie

Hallie Kutak  
Attorney  
Urban Wildlands Program  
CENTER for BIOLOGICAL DIVERSITY  
510-844-7117  
[hkutak@biologicaldiversity.org](mailto:hkutak@biologicaldiversity.org)





June 21, 2023

*Sent via email*

San Bernardino County Planning Commission  
385 N. Arrowhead Ave.  
San Bernardino, CA 92415  
[PlanningCommissionComments@lus.sbcounty.gov](mailto:PlanningCommissionComments@lus.sbcounty.gov)

Aron Liang, Senior Planner  
Land Use Services Department, Planning Division  
County of San Bernardino  
385 North Arrowhead Ave, First Floor  
San Bernardino, CA 94215  
[Aron.Liang@lus.sbcounty.gov](mailto:Aron.Liang@lus.sbcounty.gov)

**Re: Planning Commission’s June 22, 2023 Consideration of the Environmental Justice Focus Areas Draft Development Code Chapter**

Dear Commissioners,

These comments are submitted on behalf of the Center for Community Action and Environmental Justice (“CCAIEJ”) and the Center for Biological Diversity (“CBD”) (collectively, “Commenters”) regarding the Environmental Justice Focus Areas Draft Development Code Chapter (Draft Ordinance). The Commenters have reviewed the Draft Ordinance and welcome the County’s effort to address some deficiencies in the County’s notice and public engagement processes. However, the Commenters are concerned that the Draft Ordinance offers virtually no substantive measures to address the cumulative impacts on air quality, greenhouse gas emissions, sensitive receptors, land use, and noise of future development on environmental justice communities. The Commenters urge the County to commit to clear, enforceable, and impactful measures that address these issues.<sup>1</sup>

CCAIEJ is a progressive equity-based organization that embodies hope and unites people y pueblos to create intersectional solutions that transform communities to bring people together to improve their social and natural environment. Utilizing the lens of environmental health,

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<sup>1</sup> CCAIEJ and CBD are petitioners, along with other parties, in a suit challenging the County’s adoptions and approvals related to the Bloomington Business Park Specific Plan. No comment or omission in this letter is intended to address the allegations in that lawsuit or to waive any rights or claims in that lawsuit.

CCA EJ achieves regenerative change by developing resilient BIPOC intergenerational leadership, through the power of community base-building. Through strategic campaigns, CCA EJ cultivates inclusive self-sustaining neighborhoods, where everyone can live, work, play, and thrive.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and online activists throughout the United States and has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in California.

Given the staggering cumulative public health impacts brought on by the County's neglect in regulating warehouse development, one would expect the County to implement substantive measures that address the public health impacts such commercial developments pose. Instead, the Draft Ordinance focuses on notice and process requirements, which are a welcome addition, but should not constitute the entirety of the ordinance. This Draft Ordinance, if implemented as written, would merely alert current residents to the additive pollution burdens, rather than utilize and require the readily available feasible mitigation measures that the County appears not to have considered. To address these concerns the County must consider and incorporate enforceable, evidence-backed measures into the Draft Ordinance.

#### **I. Warehouse Projects Have Documented Air Quality Impacts That the Draft Ordinance Must Address.**

Air quality is a significant environmental and public health concern in California. Unhealthy, polluted air contributes to and exacerbates many diseases and increases mortality rates. The U.S. government has estimated that between 10 to 12 percent of total health costs can be attributed to air pollution. (VCAPCD 2003.) Greenhouse gases, such as the air pollutant carbon dioxide, which is released by fossil fuel combustion, contribute directly to human-induced climate change (EPA 2016), and in a positive feedback loop, poor air quality that contributes to climate change will in turn worsen the impacts of climate change and attendant air pollution. (BAAQMD 2016.)

Air pollution and its impacts are felt most heavily by young children, the elderly, pregnant women and people with existing heart and lung disease. People living in poverty are also more susceptible to air pollution as they are less able to relocate to less polluted areas, and their homes and places of work are more likely to be located near sources of pollution, such as freeways or ports, as these areas are more affordable. (ALA 2022.) Some of the nation's most polluted counties are in Southern California, and San Bernadino County continually tops the list. (ALA 2022.) According to the American Lung Association's 2022 "State of the Air" report, San Bernadino County is the ninth-worst ranked county in the state for both ozone pollution and year-round particulate matter (PM2.5) pollution, with a "Fail" grade and an average number of 180 days per year with ozone levels in the unhealthy range. (*Id.*) Even more disturbing, the same report found that San Bernadino County is one of only fourteen counties in the country that received a "Fail" grade in all air quality metrics. (*Id.*)

Although there are many different types of air pollution, Ozone, PM2.5, and Toxic Air Contaminants (TACs) are of greatest concern in San Bernadino County. These three air pollutants have been linked to an increased incidence and risk of cancer, birth defects, low birth weights and premature death, in addition to a variety of cardiac and lung diseases such as asthma, COPD, stroke and heart attack. (Laurent 2016; ALA 2022.) Ozone (commonly referred to as smog) is created by the atmospheric mixing of chemicals released from fossil fuel combustion – such as reactive organic gases (ROG) and nitrogen oxides (NOx) – and sunlight. Although it is invisible, ozone poses one of the greatest health risks, prompting the EPA to strengthen its National Ambient Air Quality Standard for Ozone in 2015. (ALA 2022.) PM2.5 is a common component of vehicle exhaust emissions and contributes to visible air pollution. These tiny particles are dangerous because they are small enough to escape our body’s natural defenses and enter the blood stream. Fugitive dust is a term used for fine particulate matter that results from disturbance by human activity such as construction and road-building operations. (VCAPCD 2003.) TACs are released from vehicle fuels, especially diesel, which accounts for 70% of the cancer risk from TACs. (CARB 2022a.) This is especially relevant for Southern California with its abundance of diesel shipping traffic. (Bailey; Betancourt 2012.)

Warehouse projects are well-documented sources of air quality degradation that can create serious, negative health outcomes for surrounding communities. (Betancourt 2012, pp. 4-5.) Particulate emissions from diesel vehicles that carry freight to and from warehouses contribute to “cardiovascular problems, cancer, asthma, decreased lung function and capacity, reproductive health problems, and premature death.” (*Id.* at 5.) With the rapid increase in global trade, the Ports of LA and Long Beach have become a primary entryway for goods, processing over 40 percent of all imports into the United States, and accounting for 20 percent of diesel particulate pollutants in southern California—more than from any other source. (Minkler, et al. 2012.) These goods are often ‘transloaded’ before leaving Southern California, meaning that they spend some time in warehouse storage facilities before they reach their final destination. (Betancourt 2012, p. 2.) This has resulted in a massive expansion of warehouse development in Southern California.

## **II. San Bernardino County Has A Public Health Crisis.**

Nowhere has this growth been more drastic than in San Bernadino County. (Betancourt 2012.) The number of warehouses in San Bernardino and Riverside counties has grown from 162 in 1975 to 4,299 in 2021, according to a recent mapping project from the Robert Redford Conservancy for Southern California Sustainability at Pitzer College. (Rode 2022.) There were 970 warehouses by 2000, which almost doubled to 1,574 in 2005, then 2,089 in 2010 and to 2,757 in 2015. (*Ibid.*) From 2020 to 2021, the number rose again from 3,727 to 4,299. (*Ibid.*) The 1 billion square feet of warehouse space, with an additional 170 million square feet currently approved or pending—and the roads and railyards that serve them – has permanently altered the landscape of the Inland Valley area, creating a logistics hub so massive that it is now visible from space. (Pitzer 2022.)

However, the impacts of this industry extend beyond its conversion of land. Warehousing and logistic centers pollute the air, increase the region’s carbon emissions, worsen traffic, and create health and safety issues both in the workplace and in the surrounding communities.

According to Warehouse CITY, the Inland Empire's 4,000 warehouses generate:

- Over 600,000 truck trips per day;
- ~1,000 pounds of Diesel PM per day;
- ~100,000 pounds of NOx per day, and
- Over 50,000,000 pounds of CO2 per day.

Annually, this equals

- Over 200 million truck trips;
- Over 300,000 pounds of Diesel PM;
- Over 30 million pounds of NOx, and
- Over 15 billion pounds of CO2 per year

These impacts are most directly felt by the residents that are exposed to these pollutants. Unhealthy air quality days in San Bernardino County rose from 14.8% in 2019 to 19.7% in 2020.<sup>2</sup> In 2010, 337,445 of Inland Empire residents lived within ¼ mile of a warehouse; by 2022 this number grew by 30,000 to 367,584 individuals, roughly 60% of whom are Latino.<sup>3</sup> Over 300 warehouses are 1000 feet or less from 139 Inland Empire schools; over 600 warehouses surround these same schools at 1500 feet.<sup>4</sup>

This proximity has real health consequences. For people who live within a half mile of warehousing facilities, the asthma rate average is 56 per 10,000 individuals (64th percentile) and heart attack rates are 9.2 per 10,000 individuals (65th percentile). This is over ten percentile points higher than comparison areas.<sup>5</sup> Cancer risk is also high, ranking in the 95th percentile near the Ontario warehouse gigacenter— equaling 624 people per million, which is 95% higher than the rest of the basin.<sup>6</sup> These are signs of an escalating health crisis.

Such statistics have led environmental and community groups, including the Commenters, to call on the Governor to declare a public health crisis in San Bernardino. It was also the impetus for AB 1000, which would have set regulations on all future warehouses requiring them to be setback from homes, schools and other sensitive receptors. People across the state recognize this is the most critical environmental justice issue of our time, but the County's Draft Ordinance does not rise to the challenge. Without serious regulation, the region is doomed to continue to suffer from these health impacts indefinitely.

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<sup>2</sup> Source: U.S. Environmental Protection Agency, Air Data ([www.epa.gov/outdoor-air-quality-data](http://www.epa.gov/outdoor-air-quality-data))

<sup>3</sup> ESRI GIS data community summary statistics generated by the David Robinson, Robert Redford Conservancy. These data should be considered preliminary.

<sup>4</sup> Courtesy of warehouse CITY school, Radical Research LLC.

<sup>5</sup> SCAQMD, Second Draft Socioeconomic Impact Assessment for Proposed Rule 2305—Warehouse Source Rule Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316—Fees for Rule 2305.

<sup>6</sup> Data from the Air Quality Management District's (AQMD) MATES V data visualization tool. [https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23?views=view\\_38](https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23?views=view_38)

### **III. The Draft Ordinance fails to include known mitigation measures to lessen the pollution burden for surrounding communities**

#### **a. Buffer zones are the most effective measure to protect residents from pollution sources and therefore should be a central provision of the Draft Ordinance.**

A setback is necessary as proximity to pollution is the biggest factor for communities who live near warehouses. Per the California Air Resources Board's (CARB) guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors is considered best practice.

Without such protections, projects continue to be built near schools, homes, healthcare facilities and other sensitive receptors. In the community of Bloomington alone, 6 out of the 8 schools are located within 1,000 feet of a warehouse. If this Draft Ordinance does not prohibit such developments we could see that number increase to 100% in the next 5 to 10 years.

A 1,000 foot buffer zone when siting warehouses over 100,000 square feet next to schools, homes, healthcare facilities, and other sensitive receptors would decrease the rates of asthma, heart disease, cancer and other public health issues. Even the California Attorney General has recommended 1,000 feet as a buffer zone because it reduces exposure to diesel particulate matter by 80%.

#### **b. Best practices for warehouse operations and maintenance should be integrated into the Draft Ordinance.**

There are numerous resources that have outlined best practices for warehouse operations and maintenance, both regionally and at the State level. To not adopt these as part of an attempt to protect environmental justice communities is a bad faith commitment to the communities the County is supposed to serve. Below is a list of potential measures and standards that could greatly improve the Draft Ordinance and achieve substantial protections for the communities most impacted by development in the region.

One regional example is the Fontana General Plan Update and Fontana Ordinance No. 1891, which were specifically formulated to mitigate these impacts and protect Fontana residents and the air basin from cumulative environmental impacts. (City of Fontana 2022.) The standards in the ordinance include:

- Requiring a landscape buffer, including trees and a solid decorative wall at least 10 feet in height, for any warehouse larger than 50,000 square feet constructed adjacent to sensitive receptors.
- Idling restrictions for diesel engines 40% more stringent than the five-minute idling restriction adopted by the California Air Resources Board (CARB).

- Requiring facility operations to establish and enforce truck routing based on the City’s latest Truck Route Map, which is designed to mitigate vehicle emissions and wear and tear on local roads.
- A requirement that on-site motorized operational equipment be zero-emission, that 10% of passenger-vehicle parking spaces be set aside for elective vehicles, and that all buildings greater than 400,000 square feet include solar panels that will provide 100% of the power needed for all non-refrigerated uses within the facility.
- A requirement to include power sources at loading docs to ensure all refrigerated trucks have “plugin” capacity, which will eliminate prolonged idling while loading and unloading perishable material.

The South Coast Air Quality Management District (“SCAQMD”) recently adopted Rule 2305 - Warehouse Indirect Source Rule—Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, which contains a host of mitigation measures that warehouse facilities can adopt. (SCAQMD 2021, Table 3.) The rule applies to individual warehouses and distribution facility projects like the Project and is intended to reduce air quality emissions from mobile sources associated with the projects. (*Ibid.*) The mitigation measures include, but are not limited to:

- Requiring that a certain percentage of trucks in warehouse operators’ fleet(s) be Zero Emissions or Near Zero Emissions.
- Requiring the installation of Zero Emissions charging or fueling infrastructure
- Requiring installation and use of onsite solar panels
- Installing high-efficiency air filters or filtering systems in residences, schools, daycares, hospitals, or community centers.

The California Office of the Attorney General also has published a document entitled “Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act” to help lead agencies comply with these requirements. (AGO 2022.) Nearly all of the example mitigation measures in this document have been adopted in a warehouse project in California, demonstrating their feasibility. (*Ibid.*) Unfortunately, the County has not incorporated any of them. At minimum, the County should consider the following best practices and mitigation measures:

### **Recommended Best Practices for Warehouse Design**

- Providing adequate amounts of on-site parking to prevent trucks and other vehicles from parking or idling on public streets and to reduce demand for off-site truck yards.
- Establishing setbacks from the property line of the nearest sensitive receptor to warehouse dock doors, loading areas, and truck drive aisles, and locating

warehouse dock doors, loading areas, and truck drive aisles on the opposite side of the building from the nearest sensitive receptors—e.g., placing dock doors on the north side of the facility if sensitive receptors are near the south side of the facility.

- Placing facility entry and exit points from the public street away from sensitive receptors—e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Ensuring heavy duty trucks abide by the on-site circulation plans by constructing physical barriers to block those trucks from using areas of the project site restricted to light duty vehicles or emergency vehicles only.
- Preventing truck queuing spillover onto surrounding streets by positioning entry gates after a minimum of 140 feet of space for queuing, and increasing the distance by 70 feet for every 20 loading docks beyond 50 docks.
- Locating facility entry and exit points on streets of higher commercial classification that are designed to accommodate heavy duty truck usage.
- Screening the warehouse site perimeter and onsite areas with significant truck traffic (e.g., dock doors and drive aisles) by creating physical, structural, and/or vegetative buffers that prevent or substantially reduce pollutant and noise dispersion from the facility to sensitive receptors.
- Planting exclusively 36-inch box evergreen trees to ensure faster maturity and four-season foliage.
- Requiring all property owners and successors in interest to maintain onsite trees and vegetation for the duration of ownership, including replacing any dead or unhealthy trees and vegetation.
- Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.
- Including signs and drive aisle pavement markings that clearly identify onsite circulation patterns to minimize unnecessary onsite vehicle travel.
- Posting 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.

### **Recommended Mitigation Measures**

#### *Air quality and greenhouse gas impacts from construction:*

- Requiring off-road construction equipment to be hybrid electric-diesel or zeroemission, 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.
- Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power.
- Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.
- 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 three 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.

*Air quality and greenhouse gas impacts from operation:*

- Requiring all heavy-duty vehicles engaged in drayage to or from the project site to be zero-emission beginning in 2030.
- Requiring all on-site motorized operational equipment, such as forklifts and yard trucks, to be zero-emission with the necessary charging or fueling 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 three 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 local air district, and the building manager.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building’s projected energy needs, including all electrical chargers.

- Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible. • Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.
- Running conduit to designated locations for future electric truck charging stations.
- Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide refrigerated warehouse space, constructing electric plugs for electric transport refrigeration units at every dock door and requiring truck operators with transport refrigeration units to use the electric plugs when at loading docks.
- Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.
- Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces (for example, requiring at least 10% of all employee parking spaces to be equipped with electric vehicle charging stations of at least Level 2 charging performance)
- Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.
- 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.
- 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.
- Designing to LEED green building certification 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 who own, operate, or hire trucking carriers with more than 100 trucks 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.

*Noise impacts:*

- Constructing physical, structural, or vegetative noise barriers on and/or off the project site.
- Planning and enforcing truck routes that avoid passing sensitive receptors. •
- Locating or parking all stationary construction equipment as far from sensitive receptors as possible, and directing emitted noise away from sensitive receptors. •
- Verifying that construction equipment has properly operating and maintained mufflers.
- Requiring all combustion-powered construction equipment to be surrounded by a noise protection barrier
- Limiting operation hours to daytime hours on weekdays.
- Paving roads where truck traffic is anticipated with low noise asphalt.
- Orienting any public address systems onsite away from sensitive receptors and setting system volume at a level not readily audible past the property line.

*Traffic impacts:*

- Designing, clearly marking, and enforcing truck routes that keep trucks out of residential neighborhoods and away from other sensitive receptors.
- Installing signs in residential areas noting that truck and employee parking is prohibited.
- Requiring preparation and approval of a truck routing plan describing the facility's hours of operation, types of items to be stored, and truck routing to and from the facility to designated truck routes that avoids passing sensitive receptors. The plan should include measures for preventing truck queuing, circling, stopping, and parking on public streets, such as signage, pavement markings, and queuing analysis and enforcement. The plan should hold facility operators responsible for violations of the truck routing plan, and a revised plan should be required from any new tenant that occupies the property before a

business license is issued. The approving agency should retain discretion to determine if changes to the plan are necessary, including any additional measures to alleviate truck routing and parking issues that may arise during the life of the facility.

- Constructing new or improved transit stops, sidewalks, bicycle lanes, and crosswalks, with special attention to ensuring safe routes to schools.
- Consulting with the local public transit agency and securing increased public transit service to the project area.
- Designating areas for employee pickup and drop-off.
- Implementing traffic control and safety measures, such as speed bumps, speed limits, or new traffic signs or signals.
- Placing facility entry and exit points on major streets that do not have adjacent sensitive receptors.
- Restricting the turns trucks can make entering and exiting the facility to route trucks away from sensitive receptors.
- Constructing roadway improvements to improve traffic flow.
- Preparing a construction traffic control plan prior to grading, detailing the locations of equipment staging areas, material stockpiles, proposed road closures, and hours of construction operations, and designing the plan to minimize impacts to roads frequented by passenger cars, pedestrians, bicyclists, and other non-truck traffic.

Additionally, the California Air Resources Board (“CARB”) has compiled a list of “Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers.” (CARB 2019). These measures include:

### **Recommended Construction Measures**

- Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment, and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.
- Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating onsite. This includes the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, onsite vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.
- In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers, etc.) used during project construction be battery powered.
- In construction contracts, include language that requires all heavy-duty trucks entering the construction site, during either the grading or building construction phases be model year 2014 or later. Starting in the year 2022, all heavy-duty haul trucks should also meet CARB's lowest optional low-NO<sub>x</sub> standard.

- In construction contracts, include language that requires all construction equipment and fleets to be in compliance with all current air quality regulations. CARB staff is available to provide assistance in implementing this recommendation.

### **Recommended Operation Measures**

- Include contractual language in tenant lease agreements that require tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating onsite.
- Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the site to be electric or powered by compressed natural gas.
- Include contractual language in tenant lease agreements that requires the tenant be in, and monitor compliance with, all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program (PSIP), and the Statewide Truck and Bus Regulation.
- Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering the project site to be model year 2014 or later.
- Include contractual language in tenant lease agreements that limits onsite TRU diesel engine runtime to no longer than 15 minutes. If no cold storage operations are planned, include contractual language and permit conditions that prohibit cold storage operations unless a health risk assessment is conducted, and the health impacts mitigated.
- Include contractual language in tenant lease agreements that requires all trucks entering the project site to meet CARB's lowest optional low-NOx standard.
- Install rooftop solar panels, with a capacity that matches the maximum allowed for distributed solar connections to the grid.

These measures would directly address the air pollution impacts associated with industry and help protect San Bernardino County residents from the associated impacts of future projects. To not incorporate these known best practices is a blatant dismissal of the issue current residents face and signifies that the County is more concerned with industry profits than actually implementing a solution that protects those most vulnerable.

#### **c. Regional carbon offset programs should be implemented only when emissions-reduction has been exhausted.**

Additionally, where all opportunities for emissions-reduction from onsite-mitigation and alternatives have been exhausted, agencies should consider the use of legally adequate localized carbon offset programs.

CARB and the courts have indicated that “direct investments in local projects to offset carbon emissions” may help to mitigate projects’ GHG-related impacts. (*See Golden Door, supra*, 50 Cal.App.5th at 492.) A direct investment project is an action that reduces, avoids or

sequesters GHG emissions, such as weatherization or tree planting projects. (*Ibid.*) Direct investment projects are valid as long as they (1) comply with protocols approved by the California Air Resources Board, the California Air Pollution Control Officers Association or the local air pollution control district which received public review prior to adoption; and (2) yield GHG reductions that are additional to reductions that would not otherwise occur. (*Id.* at 492-493.) The newest draft of CARB’s Scoping Plan provides useful examples of direct, local investment projects. (CARB 2022b, pp. 16-17.) These include local urban forestry projects, building retrofit programs, financing the installation of electric vehicle charging stations, and the funding of the electrification of public buses. (*Ibid.*)

**IV. The Draft Ordinance should include a provision confirming that nothing in the ordinance changes or alters an applicant and the County’s obligations under CEQA.**

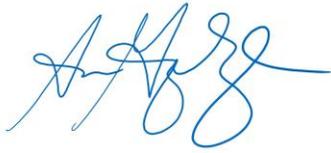
While this ordinance has the potential to significantly reduce the projected increase in pollution burden for the region, it should not be considered a substitute for the CEQA process. CEQA’s fundamental purpose is to ensure that a lead agency fully evaluates, discloses, and mitigates wherever feasible a project’s significant environmental effects. (Pub. Resources Code, §§ 21000, et seq.) An EIR serves as an “informational document” that informs the public and decisionmakers of the significant environmental effects of a project and ways in which those effects can be minimized. (CEQA Guidelines, § 15121, subd. (a).)

This ordinance could codify best practices for such projects, but that should just set the baseline for future projects, while CEQA continues to allow for detailed analysis, project specific mitigation and public engagement. Without such a provision, developers would likely claim that the measures listed in the ordinance are sufficient to offset the project impacts, without conducting the necessary review to determine if that is accurate. This would leave the residents with less information and less legal power to challenge future projects, therefore disempowering the very communities this ordinance intends to protect.

**V. CONCLUSION**

Thank you for the opportunity to submit comments on the Environmental Justice Focus Areas Draft Development Code Chapter. Given that the region’s residents are already experiencing some of the worst air quality in the nation, it is imperative that this Draft Ordinance include measures that protect communities from the compounding ills of additional commercial development. Adding provisions around notice and process, while a necessary first step, fails to address the root cause of the issue, which is direct exposure to the pollution source. If the County is serious about its commitment to protect the most vulnerable members of its community, it must regulate the industries that continue to exacerbate an already dire situation.

Sincerely,



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## Bruckhart, Jessie

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**From:** Planning Commission Comments  
**Sent:** Wednesday, June 21, 2023 9:54 AM  
**To:** Planning Commission Comments  
**Subject:** Land Use Services "Public Comments for Planning Commission Meeting for 2 from Michael"

From: Michael  
Subject: 2

Message Body:  
Michael McCarthy  
510-928-8256  
Riverside, California 92508

Dear Planning Commission,

Thank you putting forward an Environmental Justice Focus Area ordinance. This is an improvement, specifically in the noticing requirements.

Environmental Justice is two-pronged - meaningful involvement and reduction of disproportional environmental harms.

This ordinance does nothing to reduce disproportional environmental harms by EJ focus area communities through actual requirements for implementing all feasible mitigation measures, following review agency recommendations, or any other extra requirements for developers. As such, it is merely an ordinance requiring developers to meet with community members but not a requirement to mitigate the negative impacts of their projects in the poorest and hardest hit communities of San Bernardino County. That's disappointing.

Please do better. Require ALL feasible mitigation measures to be implemented in projects adjacent to EJ focus areas. Require battery-electric trucks and delivery vehicles on an accelerated schedule.

Sincerely,  
Mike McCarthy  
Riverside Neighbors Opposing Warehouses

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This e-mail was sent from a contact form on Land Use Services  
(<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fus.sbcounty.gov%2F&data=05%7C01%7CPlanningCommissionComments%40us.sbcounty.gov%7C689369f5d52e40a7909b08db727827bb%7C31399e536a9349aa8caec929f9d4a91d%7C1%7C0%7C638229632607398210%7CUnknown%7CTWFpbGZsb3d8eyJWljoijoiMC4wLjAwMDAiLCJQIjoijoiV2luMzliLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=YmzoARXQ980ZvtiAoSgwMIiEl12nOrLk%2BT3MDZK9UM4%3D&reserved=0>)