

Addendum to the Draft IS-MND for the Bloomington Center Project

This Addendum to the Draft Initial Study – Mitigated Negative Declaration (IS-MND) has been prepared by Rincon Consultants, Inc. for the County of San Bernardino (County) for the P-2019-00079 Bloomington Center Project (project) located at 10951 Cedar Avenue, Bloomington, San Bernardino County, California. This Addendum has been prepared to provide clarification on several topics in the Draft IS-MND. The Draft IS-MND was circulated for a 30-day public review period that began on October 14, 2020 and ended on November 13, 2020.

IS-MND Clarifications

Clarification #1

On Page 2, the IS-MND project description notes that no development would occur on Lots 4 and 5, but the site plan shows development of a surface parking lot and on-site vehicular circulation drive aisles.

The project description would be modified as follows:

3. A Tentative Parcel Map (TPM) to divide the parcel into 6 commercial lots:
 - Lot 1: 9,900 sf. Convenience Store and 8 pump Fuel Station – 1.47 acres
 - Lot 2: 3,000 sf. Quick Serve Drive-thru Restaurant – 0.80 acres
 - Lot 3: 2,800 sf. Quick Serve Drive-thru Restaurant – 1.03 acres
 - Lot 4: ~~No Development~~ On-site vehicular drive aisle - 0.83 acres
 - Lot 5: ~~No Development~~ On-site truck parking – 0.57 acres
 - Lot 6: Truck fuel canopy with 6 pumps, truck scale and fuel tanks – 3.74 acres

This clarification does not alter the conclusions of the IS-MND.

Clarification #2

Beginning on Page 27, a discrepancy between the maximum annual throughput of 3.6 million gallons of gasoline per year used in the VOC emissions calculations and 2.5 million gallons per year used in the gasoline dispensing facility screening health risk assessment was noticed.

As described in detail in the air quality study, the air quality analysis prepared for the project includes separate calculations for VOC emissions from the proposed gasoline dispensing facility because the CalEEMod does not report VOC emissions created from the transfer and dispensing of gasoline. The VOC emissions calculations are based on the methodology provided in the California Air Pollution Control Officers Association (CAPCOA) *Gasoline Service Station Industrywide Risk Assessment Guidelines* and provide a reasonable worst-case emissions scenario. Section 6.2, *Gasoline Transfer and Dispensing VOC Modeling*, of the air quality study erroneously states that the 4,572 pounds (lbs) per year of VOC emissions would result in 9.94 lbs per day of VOC emissions from gasoline transfer and dispensing. The corrected daily VOC emissions from gasoline dispensing and transfer would equal approximately 12.53 lbs per day (4,572 lbs per year/365 days).

The VOC emissions calculations described above were prepared to more accurately compare the project's anticipated operational emissions to SCAQMD's operational VOC criteria pollutant threshold. For the purposes of analyzing project health risk impacts, however, SCAQMD's RiskTool V1.103 was used. The RiskTool V1.103 is a spreadsheet tool used to provide health risk screening values for various emissions sources, including gasoline dispensing facilities. By their nature, screening tools are intended to provide a conservative assessment of potential health risks in order to determine whether more refined, site-specific analysis is warranted. The RiskTool V1.103 analyzes health risks from gasoline dispensing facilities based on annual throughput, regional meteorological data, and the distance of receptors from the proposed facility. Receptors are conservatively assumed to be downwind of emissions sources. The RiskTool V1.103 does not require project-specific VOC emissions to determine its conservative, screening-level health risk value. As noted in the air quality study and under Threshold c of Section III, *Air Quality*, of the Draft IS-MND, the screening analysis for the gas station determined that potential health risks at the nearest receptor would remain below SCAQMD's health risk thresholds and a refined HRA for the gas station is not warranted. For this reason, the gasoline transfer and dispensing VOC emissions calculated in support the criteria pollutant analysis are not necessary to assess potential health risk from the gasoline dispensing facility.

The screening health risk value for the gasoline dispensing facility reported in the air quality study and Draft IS-MND was correctly based on a distance of 60 meters (146 feet) to the nearest receptor and the Fontana meteorological station. Additionally, the anticipated annual throughput of the gasoline dispensing facility has been revised in the screening analysis to be 3.6 million gallons per year, resulting in an increase in the screening-level maximum incremental cancer risk from 2.56 in one million to 3.68 in one million. Nevertheless, this value remains below SCAQMD's health risk threshold of 10 in one million. As such, the conclusions of the IS-MND have not changed, and impacts would remain less than significant.

This clarification does not alter the conclusions of the IS-MND.

Clarification #3

Under Question d., Section IX., *Hazards and Hazardous Materials*, the IS-MND states that it was determined the project site is not included on existing lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Upon additional review of DTSC's EnviroStor database, the project site is listed on EnviroStor as part of a larger site located between Cedar Avenue and Larch Avenue (40 acres, High School – Cedar Avenue [36010018]). The High School – Cedar Avenue site was listed due to prior agricultural uses that may have used pesticides or herbicides containing heavy metals, carbamates and urea, organophosphates, and/or organochlorine compounds. However, the cleanup status of the High School – Cedar Avenue site is listed as "No Further Action as of 5/30/2002." DTSC issued a letter, dated May 30, 2002, confirming "neither an actual or potential release of hazardous materials nor the presence of a naturally occurring hazardous material, which would pose a threat to human health or the environment under unrestricted land use, was indicated at the site. The PEA [Preliminary Endangerment Assessment] concludes that a further investigation of the site is not required."

This comment does not alter the conclusions of the IS-MND that the project would have a less than significant impact on hazardous emissions or materials to schools located within 0.25 mile of the project site and that the project would have no impact on hazardous sites identified on the Cortese List.

Clarification #4

Traffic noise is discussed in Question a) of Section XIII., *Noise*, of the IS-MND. An error was discovered in the calculation of the traffic noise value for Santa Ana Avenue, east of Cedar Avenue. In the previous calculations, 120 percent of project traffic was assigned to this segment, leading to much higher noise levels than any other segment analyzed. This was an overestimate and unrealistic noise contribution from the project. In rereviewing Figure 9 of the traffic report,¹ it was determined that 50 percent of project traffic would travel on this segment. The noise levels for this segment have been revised as shown in Table 1. This comment does not alter the conclusions of the IS-MND that the project would have a less than significant impact from traffic noise.

Table 1 Revised Traffic Noise Levels For Santa Ana Avenue, East of Cedar Avenue

dBA CNEL								
Existing	Existing + Project	Increase	Opening Year 2021	Opening Year 2021 + Project	Increase	Horizon Year 2040	Horizon Year 2040 + Project	Increase
56.2	58.3	2.1	57.6	59.2	1.6	62.3	62.9	0.6

¹ Final Traffic Impact Study for the Bloomington Commercial Center, Minagar & Associates, Inc. June 2020