CCAEJ

Center for Community Action and Environmental Justice

Centro de Acción Comunitaria y Justicia Ambiental

Penny Newman
Executive Director

Mailing Address:
PO Box 33124
Riverside, CA 92519

Office Location:
7701 Mission Blvd.
Glen Avon, CA 92509

Phone: 951-360-8451
Fax: 951-360-5950
E-mail: admin@ccaej.org
Website: www. ccaej.org

May 28, 2009

County of Riverside
Transportation and Land Management Agency
Planning Department

Attention Planning Commission
Draft Environmental Impact Report No. 450 (DEIR No. 450)

Project No. and Name: Plot Plan 16979, Plot Plan 17788, Plot Plan 18875, Plot Plan 18876, Plot Plan 18877, Plot Plan 18879

From: Center for Community Action and Environmental Justice
Rachel Lopez
rachel.l@ccaej.org

Comments regarding the Project "Mira Loma Commerce Center"
CCAEJ is in Opposition of the project known as the Mira Commerce Center DEIR No. 450

Air Quality Impacts
This project exceeds the significant thresholds for cancer risk due to diesel exhaust, contributes to exceedance of air quality standards and cumulative cancer risk due to diesel exhaust. While looking at the mitigation measures suggested throughout the project and looking at the conclusion that even with the suggested mitigation the project significantly impacts the adjacent community. We find it unconscionable that this project is before the Planning Commissioners again after 4 years clearly demonstrates **Environmental Racism** at its best.

While there is indication that there have been changes to the size of some of the warehouses however the fact remains that the buildings will still be adjacent to homes which still posses a significant and unacceptable risk level from exposure to diesel exhaust. There are no specific set backs of the proposed warehouses from the homes to mitigate the impacts to visually impair and obstruct these homes.

There is a study conducted by the SCAQMD entitled "Mira Loma Specific Air Management Project" 2002 as presented by Mike Nazemi before the Mira Loma Community Committee. August 29th 2002, recommended a set back of 500 meters (1500 feet) between a diesel source and sensitive receptors.

The ARB and SCAQMD recommends a 1000 foot set back (buffer) for roadways (trucks) Truck Stops, Cold Storage and other diesel sources. CAL-EPA and the Air Resources Board in their Air Quality and Land Use Handbook recommend a separation of 1,000 feet would substantially reduce diesel exposure to sensitive receptors. The Regional Air Quality Task Force for Riverside County in their Guidelines for Siting Warehouses has recommended a 1,000 foot set

back (buffer) between diesel sources and sensitive receptors to address adverse air quality issues in the Inland Region. This practice has been followed as in a settlement between March Business Park and CCAEJ, the business Park committed to removing all warehouses near homes (1500 feet) recognizing the health impacts upon sensitive receptors from close proximity to diesel sources. Riverside County has recognized the need for providing a set back in two warehouse projects in the Mira Loma area.

The project if approved as specified in the Draft Environmental Impact Report NO. 450 will **exceed significance thresholds for cancer risk due to diesel exhaust. Cumulatively significant –contributes to exceedance of air quality standards and cumulative cancer risk due to diesel exhaust.**
This project is located in an area where the existing background Diesel Particulate Matter concentrations currently cause sensitive receptors in the project vicinity to be exposed to cancer risks from Diesel Particulate Matter of greater than 10 in one million. Therefore, the project's contribution to this pre-existing problem is considered a **significant cumulative impact**.

Noise
The residents of Mira Loma Village are currently impacted by the increase in noise and the high volume of traffic on Etiwanda, Highway 60, the UP rail line and the warehouse operations to the east directly behind the homes. The addition of six more mega warehouses with additional truck traffic and refrigeration units will adversely affect the cumulative noise levels in the community. The noise impacts indicate that there is no mitigation feasible that would reduce or eliminate noise impacts and the project would have to request overriding considerations which is unacceptable to residents in close proximity to designated projects.

Increase in Truck Traffic
The additional 6 mega warehouses in an area that is already congested will only add additional truck traffic and health impacts to an area with a pre- existing cancer risk greater than 10 in 1 million thus it is contributing a significant cumulative impact which cannot be mitigated and any suggestion as to approval by overriding consideration is not acceptable.

Conclusion:
The Center for Community Action and Environmental Justice has found this project cannot be mitigated.
With the pre-existing air quality impacts to the area there is no way to mitigate this project and protect the residents of Mira Loma Village who are at the greatest risk of impacts. The EIR also indicates the project violates the SCAQMD thresholds contributing to a cumulatively considerable net increase of criteria pollutants. The close proximity to two other communities such as Country Village Retirement community which is also at high risk and considered sensitive receptors and Rancho Mira Loma should be an indicator to the Planning Commissioners that this project is not acceptable in the proposed area.

Studies:
Recent health studies conducted in our communities clearly show that our communities are heavily impacted by diesel emissions indicate that our local communities are being impacted by diesel emission that are literally killing us and local officials continue to conduct business as usual without considering the harm it is doing to our families especially our children. This project will clearly put Mira Loma Village in a crisis mode due to the increase of diesel emissions as stated in the EIR that it exceeds the significant threshold for cancer as well as exceeding the cumulative cancer risk due to diesel exhaust. This project cannot go forward.

CCAEJ would like to be on record as supporting
Alternative 1- No Project
Alternative 2 - Di Tommaso Property Alternative Site
Alternative 3 – March JPA Meridian Specific Plan Alternative Site

Rachel Lopez
Center for Community Action and Environmental Justice
rachel.l@ccaej.org
951-360-8451

CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE
NATURAL RESOURCES DEFENSE COUNCIL

June 11, 2010

Mr. Jeffrey Childers, Project Planner
County of Riverside
4080 Lemon Street, 9th Floor
P.O. Box 1409
Riverside, CA 92502-1409
Email: jchilder@rctlma.org

RE: JOINT COMMENTS ON RECIRCULATED ENVIRONMENTAL IMPACT REPORT FOR MIRA LOMA COMMERCE CENTER (SCH# 2002121128)

Dear Mr. Childers:

On behalf of the Center for Community Action and Environmental Justice and the Natural Resources Defense Council, we write to provide comments on the Recirculated Environmental Impact Report for the Mira Loma Commerce Center ("EIR"). We request that these comments and the attachments be included in the record for this project. After careful review, we have concluded that the EIR fails in many respects to comply with the requirements of the California Environmental Quality Act ("CEQA"). As described below, the EIR is inadequate because it fails to carry out CEQA's mandates. It does not accurately identify or analyze the significant environmental impacts that would result from the implementation of this major Project in close proximity to sensitive sites, and it fails to provide sufficient mitigation for such impacts as it does identify. The Project also fails to analyze and adopt all feasible mitigation measures as mandated by CEQA. The Project also fails to comply with the County of Riverside's General Plan, which would make certification of this EIR a per se violation of CEQA. Finally, it fails to consider alternatives that effectively protect the environment.

I. The Proposed Project will have an Indelible Impact on Adjacent Communities and the Region in General.

The health impacts and regional air quality impacts from freight activities are well documented. Of all listed Toxic Air Contaminants identified by the California Air Resources Board ("CARB"), diesel particulate matter ("DPM") is known to present the greatest health risks to Californians.[1] Dozens of studies have shown adverse impacts from DPM and Oxides of Nitrogen ("NO_x") including respiratory disease, cardiovascular mortality, cancer, and reproductive effects as well as an increase in regional smog and water contamination. CARB has determined that

[1] CARB, *Emissions Reduction Plan for Ports and Goods Movement in California*, 7 (2006)(hereinafter "ERP").

diesel exhaust is responsible for over 70% of the risk from breathing our air statewide and in the South Coast Air Basin ("SCAB").[2] Further, the South Coast Air Quality Management District ("SCAQMD") in the Multiple Air Toxics Exposure Study III ("MATES III") "indicate[ed] that diesel exhaust is the major contributor to air toxics risk, accounting on average for about 84% of the total" risk from breathing air toxics.[3]

CARB recently revised its analysis of annual impacts from PM2.5 pollution. Previously, CARB estimated that statewide, 2,400 premature deaths annually are linked to goods movement, mostly from particulate pollution and 50% of these deaths are in the SCAB.[4] Now, as the chart below demonstrates, CARB estimates that there are 3,700 premature deaths statewide associated with PM2.5 from Goods Movement activities.[5]

Table 6: Annual premature deaths associated with PM2.5 from Goods Movement activities[1]

Pollutant	*Low*	*Mean*	*High*
Primary Diesel PM	600	2,000	3,500
Secondary Diesel PM (Nitrates)	480	1,600	2,800
Secondary Diesel PM (Organic Aerosols)	15	49	85
Other Primary PM2.5[2]	12	39	68
Statewide Total[3]	***1,100***	***3,700***	***6,500***

[1]For the year 2005, these estimates do not include the contributions from particle sulfate formed from SO_x emissions, which is being addressed with several ongoing emissions, measurement, and modeling studies. Results listed are based on the previous emission inventories used in the Goods Movement Emission Reduction Plan in April of 2006 but with the new PM2.5-mortality relationship of 10 percent per 10 $\mu g/m^3$ increase in PM2.5 exposures; these values may change if emissions inventories are updated.
[2]PM2.5 includes tire wear, brake wear, and particles from boilers, which are not covered under primary diesel PM.
[3]Totals do not add up due to rounding.

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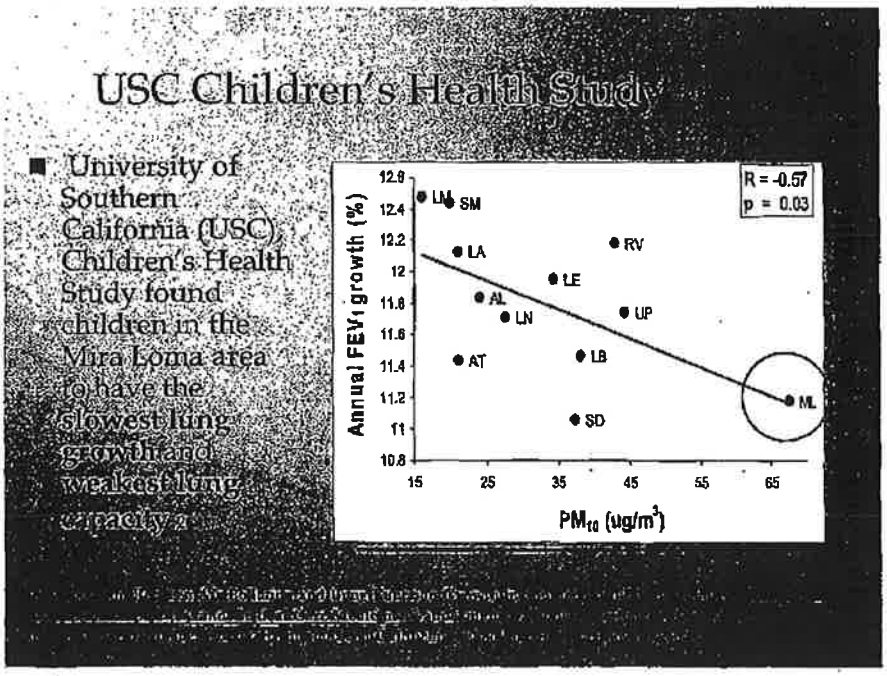
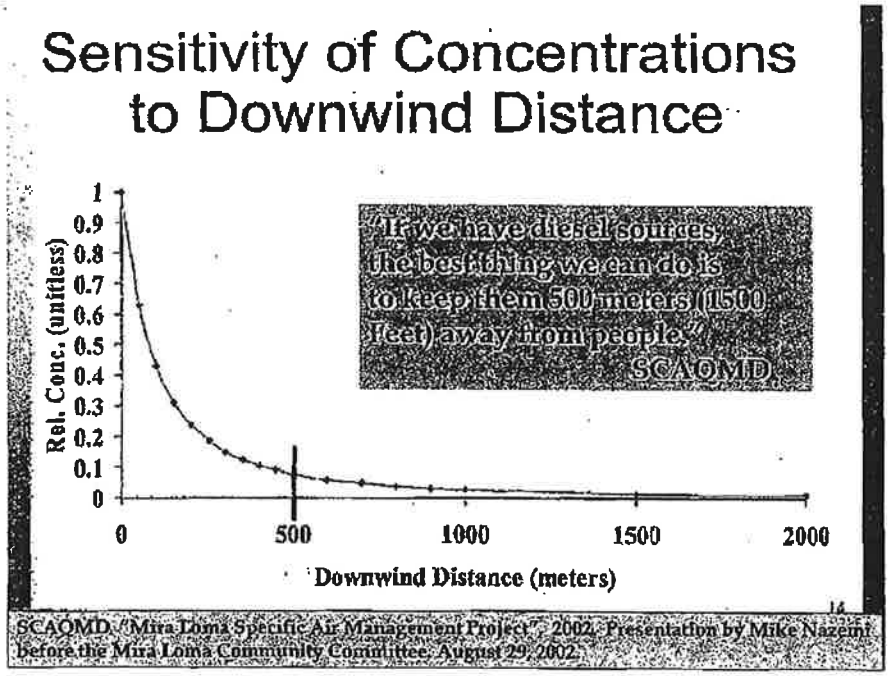
[2] ERP, at 7.
[3] SCAQMD, Multiple Air Toxics Exposure Study for the South Coast Air Basin-III, at ES-3 (September, 2008) *available at http://www.aqmd.gov/prdas/matesIII/Final/Document/ab-MATESIIIExecutiveSummary-Final92008.pdf* (hereinafter "MATES III").
[4] ERP, What's New-1 at 4.
[5] CARB, *Methodology for Estimating Premature Deaths Associated with Long-Term Exposures to Fine Airborne Particulate Matter in California Draft Staff Report*, (May 22, 2008).

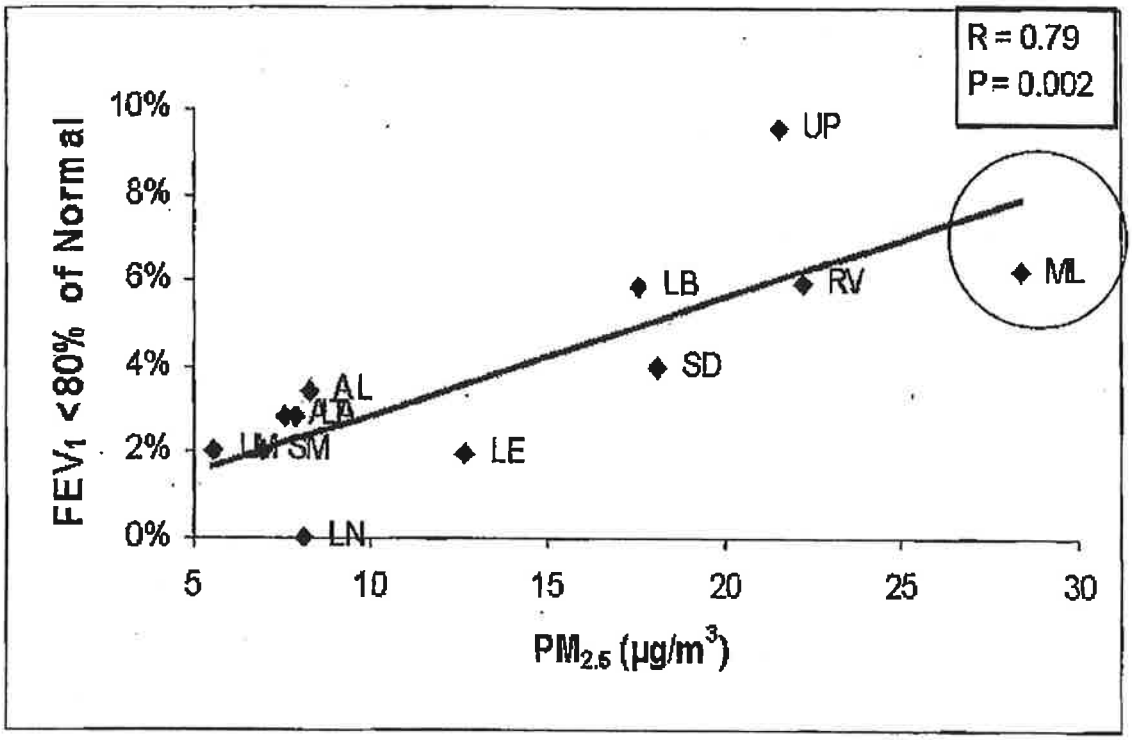
Residents in Inland Empire communities will undoubtedly face additional impacts due to the increased pollution from this project. For sensitive populations, such as children and the elderly, and for those who live and work in close proximity to these major sources of diesel exhaust, the risk will be even higher.

In recent years, environmental health researchers have firmly established the linkage between air pollution exposure and a range of negative health outcomes, including slowed lung growth rates in children (Gauderman et al Cohort C, Cohort D papers), exacerbation of existing respiratory disease (McConnell et al EHP bronchitis/asthmatic paper), increased absences from school due to respiratory illness (Gilliland et al CHS absences paper), and increased mortality. The following charts display the troubling findings of the impacts of air pollution on health of residents in the Inland Empire, including our most vulnerable populations, children.





SCAQMD, "Mira Loma Specific Air Management Project", 2002. Presentation by Mike Nazemi before the Mira Loma Community Committee, August 29, 2002.



South Coast Air Quality Management District, "Multiple Air Toxics Exposure Study in the South Coast Air Basin" (MATES II Study), March 2000.

In addition to the large impacts on residents and workers closest to the sources of emissions, distribution center operations pose a particularly acute threat to regional air quality. The South Coast Air Basin ("SCAB"), where the project area is located, consistently ranks near the top of the lists for the nation's filthiest air quality. Freight transport, including the operations culminating in the Inland Empire, greatly contributes to the persistent failure of the SCAB to meet clean air standards established by the Environmental Protection Agency. Without all feasible mitigation, the SCAB could fail to achieve the federal annual PM2.5 standard by 2014. This project proposes to add additional pollution that would not have occurred if the project was not built. Against this backdrop, there are several deficiencies in the EIR that must be addressed.

II. The Revised EIR Fails to Adequately Analyze Air Quality and Traffic Impacts.

The South Coast Air Quality Management District critiqued the air quality analysis in the EIR on several grounds. We have similar concerns that the Air Quality analysis was designed to mask the true impacts of this project. The air quality analysis uses an unduly narrow trip length that is unrealistic given the type of project proposed for this facility. The primary business in the Inland Empire is from the Ports of Los Angeles and Long Beach, which is much further than the 8.9 miles used for the EIR analysis.[6]

By excluding large portions of the truck trips, the EIR severely understates the Project's traffic impacts and associated air quality impacts. The California Supreme Court has emphasized that "an EIR may not ignore the regional impacts of a project approval, including those impacts that occur outside of its borders; on the contrary, a regional perspective is required."[7] An EIR must analyze environmental impacts over the entire area where one might reasonably expect these impacts to occur.[8] This principle stems directly from the requirement that an EIR analyze all significant or potentially significant environmental impacts.[9] An EIR cannot analyze all such environmental impacts

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[6] *See generally*, SCAG, 2008 Regional Transportation Plan, Goods Movement Report, at 13, *available at* *http://www.scag.ca.gov/rtp2008/pdfs/finalrtp/reports/fGoods_Movement.pdf* ("Most port truck cargo movements associated with intermodal yards, transload facilities, and warehouses are primarily related to import containers from the SPB ports")[Attached as Exhibit A].

[7] *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, 575.

[8] *See Kings County Farm Bureau*, 221 Cal. App. 3d at 721-23.

[9] See Pub. Res. Code §§ 21061, 21068; *see also Citizens to Preserve the Ojai v. County of Ventura* (1986) 176 Cal. App. 3d 421, 432-33 (finding "an absolute

if its study area does not include the geographical area over which these impacts will occur. Here, the fact that trucks will travel to and from the ports is not only corroborated by the South Coast Air Quality Management District, but also meets the low threshold of "reasonable expectat[ions]" that the freight moves from the port areas as detailed in the 2008 Regional Transportation Plan to the Inland Empire.

III. The Revised EIR Includes an Improper Greenhouse Gas Emissions Analysis.

The deficiencies with the air quality analysis also taints the greenhouse gas analysis for this project. The curtailed trip analysis dramatically underestimated the emissions of greenhouse gasses associated with this project.

IV. The Mitigation Measures Fail to Comply with CEQA.

Mitigation of a project's significant impacts is one of the "most important" functions of CEQA.[10] Under CEQA, feasible mitigation measures must be adopted that will avoid or substantially lessen significant environmental effects.[11]

i. The Construction Mitigation Measures Must be Improved.

The mitigation measures for construction are vague. We recommend that the construction mitigation comply with the following requirements:

Construction Equipment
Equipment[12] greater than 25 horsepower must:
(1) Meet current emission standards[13] *and*

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failure to comply [with CEQA]" where information relevant to project's impacts was omitted).

[10] *Sierra Club v. Gilroy City Council*, 222 Cal.App.3d 30, 41 (1990).

[11] Pub. Res. Code § 21002.

[12] Equipment refers to vehicles such as excavators, backhoes, bulldozers propelled by an off-road diesel internal combustion engine.

[13] These standards are described in Division 3 Chapter 9, Article 4, Section 2423(b)(1)(A) of Title 13 of the California Code of Regulations, as amended. An explanation of current and past engine standards can also be accessed at http://www.dieselnet.com/standards/. Currently all new equipment are meeting the US EPA Tier II standards and most equipment also meets Tier III standards (all 100HP to 750HP equipment). Note that Tier IV standards would automatically meet the BACT requirement.

(2) Be equipped with Best Available Control Technology (BACT)[14] for emissions reductions of PM and NOx, *or*
(3) Use an alternative fuel.

Diesel Trucks
On-road trucks used at construction sites, such as dump trucks, must:
(1) Meet current emission standards, *or*
(2) Be equipped with BACT[15] for emissions reductions of PM and NOx, *and*
(3) Any trucks hauling materials such as debris or fill, must be fully covered while operating off-site (i.e. in transit to or from the site).

Generators
Where access to the power grid is limited, on-site generators must:
(1) Meet the equivalent current off-road standards for NOx, *and*
(2) Meet a 0.01 gram per brake-horsepower-hour standard for PM, *or*
(3) Be equipped with Best Available Control Technology (BACT) for emissions reductions of PM.

Special Precautions Near Sensitive Sites
All equipment operating on construction sites within 1,000 feet of a sensitive receptor site (such as schools, daycares, playgrounds and hospitals)[16] would either:
(1) Meet US EPA Tier IV emission standards *or*
(2) Install ARB Verified "Level 3" controls (85% or better PM reductions), and
(3) Notify each of those sites of the project, in writing, at least 30 days before construction activities begin.[17]

ii. The Project's Operational Mitigation Measures Must be Made Enforceable and Augmented.

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[14] Here BACT refers to the "Most effective verified diesel emission control strategy" (VDECS) which is a device, system or strategy that is verified pursuant to Division 3 Chapter 14 of Title 13 of the California Code of Regulations to achieve the highest level of pollution control from an off-road vehicle.
[15] Here BACT also refers to most effective VDECS as defined by the California Air Resources Board (CARB).
[16] Sensitive sites are defined and described in the CARB Air Quality and Land Use Planning Guidelines, 2005; http://www.arb.ca.gov/ch/landuse.htm.
[17] Notification shall include the name of the project, location, extent (acreage, number of pieces of equipment operating and duration), any special considerations (such as contaminated waste removal or other hazards), and contact information for a community liaison who can answer any questions.

Given the significant environmental impacts to air quality associated with this project, the EIR should require additional mitigation. For heavy duty trucks, the Ports of Los Angeles and Long Beach recently adopted a program that will require only 2007 EPA compliant trucks to perform port drayage service by 2012. This program is expected to reduce port truck emissions by at least 80%.[18] These types of requirements should be imposed for this project.

In addition to the vagueness of the existing mitigation measures, the EIR also fails to consider and adopt additional feasible mitigation. We recommend that the operational mitigation comply with the following requirements:

Diesel Trucks

On-road trucks serving a facility, must:

A. If a facility is served by a centrally controlled fleet, trucks should
(1) Be electrified to the extent feasible, *and*
(2) Meet current US EPA emission standards.
B. All independently operated trucks shall meet the following standards, enforced by gate personnel.
(1) Meet current US EPA emission standards, *or*
(2) Be equipped with BACT[19] for emissions reductions of PM and NOx, *and*

Equipment

Equipment[20] greater than 25 horsepower must:

(1) Meet current US EPA emission standards[21] *and*
(2) Be equipped with Best Available Control Technology (BACT)[22] for emissions reductions of PM and NOx, *or*

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[18] Port of Los Angeles, Press Release, http://www.portoflosangeles.org/newsroom/2008_releases/news_061708ctp.asp

[19] Here BACT also refers to most effective VDECS as defined by the California Air Resources Board (CARB), for example, a particulate filter for PM and selective catalytic reduction for NOx.

[20] Equipment refers to vehicles such as yard tractors, forklifts, or other vehicles propelled by an off-road diesel or spark ignition internal combustion engine.

[21] These standards are described in Division 3 Chapter 9, Article 4, Section 2423(b)(1)(A) of Title 13 of the California Code of Regulations, as amended. An explanation of current and past engine standards can also be accessed at http://www.dieselnet.com/standards/. Currently all new equipment are meeting the US EPA Tier II standards and most equipment also meets Tier III standards (all 100HP to 750HP equipment). Note that Tier IV standards would automatically meet the BACT requirement.

[22] Here BACT would apply to diesel equipment and refers to the "Most effective verified diesel emission control strategy" (VDECS) which is a device, system or strategy that is verified pursuant to Division 3 Chapter 14 of Title 13 of the

(3) Use an alternative fuel.[23]

Refrigeration Units
Each warehousing facility must include the following if it is used for any refrigerated cargo:

(1) Provide ample space for refrigerated cargo to be kept cool without the use of transportation refrigeration units or other temporary or inefficient refrigeration means;
(2) All loading docks must be equipped to provide electrical hook-ups for refrigerated cargo;
(3) All trucks transporting refrigerated cargo must be equipped with the ability to connect to electrical power from the loading docks; *and*
(4) On-board refrigeration units on all trucks may not be employed when a vehicle is not in use *and* must meet current US EPA standards.

Recommendations to Limit Global Warming Pollution from Warehousing:

(1) Prohibit all non-essential idling of vehicles and equipment onsite.
(2) All vehicles and equipment should be the most efficient models available; heavy-duty trucks should be US EPA SmartWay certified.[24]
(3) Use the lowest carbon fuels possible (such as biodiesel or other alternative fuels).
(4) Electrify operations to the extent possible. All generators, forklifts and equipment that can be electrified, should be.
(5) All constructed buildings should meet the Leadership in Energy and Environmental Design (LEED) Green Building Rating System™ including the use of locally sourced materials where possible.[25]

iii. The Project Should Include Mitigation Measures for Sensitive Populations.

California Code of Regulations to achieve the highest level of pollution control from an off-road vehicle.

[23] This could include natural gas or biodiesel, which is a fuel comprised of mono-alkyl esters of long chain fatty acids derived from vegetable oils or animal fats, meeting the requirements of ASTM D 6751. However, biodiesel must be proven to be sourced from sustainable feedstocks including waste grease, fats or oil and under certain circumstances, farmed oils that can be proven to be sustainable.

[24] SmartWay is a USEPA partnership with transport companies to reduce fuel use and pollution through improved efficiency. See http://www.epa.gov/smartway/transport/index.htm

[25] For information on LEED standards, see the U.S. Green Building Council: http://www.usgbc.org/DisplayPage.aspx?CategoryID=19

To avoid injury to public health, the project must mitigate its impacts through the reduction of emissions to as near zero as possible, and this comment letter offers numerous measures that should be used in pursuing that goal. Given that increases in pollution are likely even after these measures are implemented and given the lasting effects of baseline pollution, further mitigation is needed to address the extraordinary impact of freight related emissions on the respiratory health of communities in the vicinity of this project.

Many residents of freight movement communities and workers at distribution centers have already suffered irreparable long term damage to their lungs – as noted earlier, diminished lung function in children generates lifelong health effects. The ports should fund the establishment of one or several medical facilities dedicated to the respiratory and general health of the people most affected by distribution center emissions – those living in the neighborhoods closest to the major distribution centers, including this project area, and workers at the distribution centers.

Many of the goods movement adjacent neighborhoods in Riverside and along the I-60 and other routes are heavily populated with low and moderate income families unable to afford health insurance. Similarly, while some workers in the Inland Empire's logistics industry earn relatively high wages with good benefits, thousands of others earn low wages with few or no benefits.

Thus, funding for clinics should be sufficient not only to construct appropriate facilities, but also include adequate support for operations so that two classes of patients – residents of the identified freight movement adjacent communities and distribution center workers can access the facility without out of pocket cost regardless of insurance status.

Finally, the Project should include installation of air filtration system to protect residents from harmful levels of air pollution. The Port of Los Angeles agreed through the TraPac MOU to fund filtration systems in school in the vicinity of that project, and this Project should also include this type of mitigation. Moreover, the Port of Long Beach also developed a school filtration program related to its Middle Harbor Redevelopment Project.

V. The Revised EIR is Inconsistent with the County of Riverside's General Plan.

The County of Riverside General Plan includes the following provisions related to sensitive receptors—

Sensitive Receptors

Sensitive receptors refer to those segments of the population most susceptible to poor air quality (i.e. children, elderly and the sick) and to certain at-risk sensitive land uses such as schools, hospitals, parks, or residential communities. The intent of the following policies is to reduce the negative impacts of poor air quality on the County's sensitive receptors.

Policies:

AQ 2.1 The County land use planning efforts shall assure that sensitive receptors are separated and protected from polluting point sources to the greatest extent possible. (AI 114)

AQ 2.2 Require site plan designs to protect people and land uses sensitive to air pollution through the use of barriers and/or distance from emissions sources when possible. (AI 114)

AQ 2.3 Encourage the use of pollution control measures such as landscaping, vegetation and other materials, which trap particulate matter or control pollution. (AI 114).[26]

The project violates many of the relevant provisions relating to sensitive populations. As the EIR mentions, three of the proposed plot developments are located within 25 meters of the nearest sensitive receptor.[27] The EIR also mentions that another plot is within 50 meters of a sensitive receptor.[28] First, this location for these large industrial sources of pollution violates Policy AQ 2.1 because of their proximity to the senior community of Country Village and Mira Loma Village. Second, this project violates AQ 2.2 because as currently designed the project includes no "barriers and/or distance from emissions sources." Moreover, the EIR fails to provide a credible analysis of why these measures may not be "possible." Third, the project does not include any of the "pollution control measures" to trap or control pollution required by AQ 2.3. Despite these clear inconsistencies, the EIR determines that the Project will be compatible "with existing and planned surrounding land uses or inconsistent with the land use designations and policies of the Riverside County General Plan (including those of any applicable Specific Plan)."[29] This approach of ignoring general plan provisions and the associated inconsistencies amounts to a CEQA violation, which renders the EIR invalid as a lawful document to allow decision-makers to make an informed decision.

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[26] County of Riverside 2003 General Plan, Chapter 9, *available at http://www.tlma.co.riverside.ca.us/genplan/content/gp/chapter09.html#TOC3_2.*
[27] EIR, at 4.3-44.
[28] *Id.*
[29] EIR, at 4.9-20.

This failure to comply with General Plan requirements necessitates a revision to the EIR and the project. For example, the County has rejected the siting of warehouse development in the past because of these considerations.

Moreover, the discussion of land use impacts in the EIR conveniently ignores the impacts to the low income minority community of Mira Loma Village. This occurs despite the fact that EIR used as a significance threshold whether the proposed project will "disrupt or divide the physical arrangement of an established community (including a low income or minority community.)"[30] Here, adding more than 8,000 trips per day in the community area will certainly disrupt the community of Mira Loma Village, which has been an established community since the 1930s. This failure to appropriately catalogue the land use impacts similarly means the EIR is deficient, and this flaw must be cured in future iterations of the EIR.

VI. The DEIR/S Does Not Adequately Discuss Alternatives to the Proposed Project.

The analysis of alternatives to the proposed project lies at "[t]he core of an EIR."[31] In this analysis, the EIR must consider a reasonable range of alternatives that would avoid or substantially lessen this impact while feasibly attaining most of the Project's basic objectives.[32] If the EIR refuses to consider a reasonable range of alternatives or fails to support its analysis with substantial evidence, the purposes of CEQA are subverted and the EIR is legally inadequate.[33] If a feasible alternative exists that will meet the project's objectives while reducing or avoiding its significant environmental impacts, the project may not be approved.[34]

An adequate alternatives analysis is a crucial component of complying with CEQA. Further, CEQA contains a clear mandate that the alternatives must be explored in depth and with the same level of detail as the proposed action. The analysis of the alternatives throughout the document fails in this respect.

A reasonable range of alternatives must include proposals that "offer substantial environmental advantages" over the proposed project.[35] In the present case, the

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[30] EIR, at 4.9-3.
[31] *Citizens of Goleta Valley II*, 52 Cal. 3d at 564; *see also* Pub. Res. Code § 21002.1(a) ("The purpose of an environmental impact report is . . . . to identify alternatives to the project . . . .").
[32] *See* § 21100(b)(4); CEQA Guidelines § 15126.6(a).
[33] *San Joaquin Raptor*, 27 Cal. App. 4th at 735-38; *Kings County Farm Bureau*, 221 Cal. App. 3d at 736-37.
[34] Pub. Res. Code § 21002.
[35] *See Citizens of Goleta Valley*, 52 Cal. 3d at 565-66.

EIR fails to examine an alternative that would utilize the ample open warehouse space that currently exists in Mira Loma to accommodate the additional freight desired by the County.[36] Colliers International estimates that approximately 14.4% of the warehouse space in Mira Loma is vacant.[37] The EIR fails to analyze whether this vacant space could be used instead of building new facilities that would expose several communities to additional toxic exposure.

VII. The EIR Contains No Environmental Justice Analysis Despite Critical Environmental Justice Impacts.

It is no secret that freight operations implicate several environmental justice concerns. Accordingly, we find the lack of any reference to environmental justice impacts deeply disturbing. This lack of information renders the EIR an inadequate informational tool to help the County weigh the benefits against the environmental degradation and health impacts that will result from this project.

VIII. A Revised Draft EIR Must Be Prepared and Recirculated.

Because of the inadequacies discussed above, the County's EIR cannot form the basis of a lawful EIR. CEQA requires preparation and recirculation of a supplemental draft "[w]hen significant new information is added to an environmental impact report" after public review and comment on the earlier draft EIR.[38] The opportunity for meaningful public review of significant new information is essential "to test, assess, and evaluate the data and make an informed judgment as to the validity of the conclusions to be drawn therefrom."[39] An agency cannot simply release a draft report "that hedges on important environmental issues while deferring a more detailed analysis to the final [EIR] that is insulated from public review."[40]

In order to cure the panoply of EIR defects identified in this letter, the County must obtain substantial new information to adequately assess the proposed Project's environmental impacts, and to identify effective mitigation and alternatives capable of alleviating the Project's significant impacts. This new information will clearly necessitate recirculation. CEQA requires that the public

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[36] *See generally*, Colliers International, West Inland Empire Market Report (First Quarter 2010). [Attached as Exhibit B].
[37] *Id.* at 3.
[38] Pub. Resources Code § 21092.1.
[39] *Sutter Sensible Planning, Inc. v. Sutter County Board of Supervisors*, 122 Cal. App. 3d 813, 822 (1981); *City of San Jose v. Great Oaks Water Co.*, 192 Cal. App. 3d 1005, 1017 (1987).
[40] *Mountain Lion Coalition v. California Fish and Game Comm'n*, 214 Cal.App.3d 1043, 1052 (1989).

have a meaningful opportunity to review and comment upon this significant new information in the form of a recirculated draft supplemental EIR.

We appreciate your consideration of our comments. Please feel free to contact us if you have any questions.

Sincerely,

Adriano L. Martinez

Adriano L. Martinez
Project Attorney
Natural Resources Defense Council

Penny J. Newman

Penny Newman
Executive Director
Center for Community Action and Environmental Justice

ATTACHED LITERATURE

(1) 2008 Regional Transportation Plan, Goods Movement Report

(2) Colliers International, West Inland Empire Market Report (First Quarter 2010)

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

THE HEALTH EFFECTS OF AIR POLLUTION ON CHILDREN

Fall 2000

Michael T. Kleinman, Ph.D.
Professor, Department of Community and Environmental Medicine
University of California, Irvine.

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Introduction

Air pollution has many effects on the health of both adults and children. The purpose of this article will be to examine what is known about how air pollution affects health, especially children's.

Over the past several years the incidence of a number of diseases has increased greatly. Asthma is perhaps the most important disease with an increasing incidence, but other diseases, such as allergic reactions, bronchitis and respiratory infections also have been increasing. The cause of these increases may be due at least in part to the effects of air pollution. This review will address the following questions:

1. Why are children more susceptible to the effects of air pollution than adults?
2. Which air pollutants have the greatest impact on the health of children and adults?
3. What can be done to reduce the effects of air pollution on children's health?

Why are Children More Susceptible to Air Pollution Than Adults?

In many health effects research studies, children are considered as if they were small adults. This is not really true. There are many differences between children and adults in the ways that they respond to air pollution. For example, children take in more air per unit body weight at a given level of exertion than do adults. When a child is exercising at maximum levels, such as during a soccer game or other sports event, they may take in 20 percent to 50 percent more air -- and more air pollution -- than would an adult in comparable activity.

Another important difference is that children do not necessarily respond to air pollution in the same way as adults. Adults exposed to low levels of the pollutant ozone will experience symptoms such as coughing, soreness in their chests, sore throats, and sometimes headaches. Children, on the other hand, may not feel the same symptoms, or at least they do not acknowledge them when asked by researchers. It is currently not known if children actually do not feel the symptoms or if they ignore them while preoccupied with play activities.

This probably does not mean that children are less sensitive to air pollution than adults. There are several good studies that show children to have losses in lung functions even when they don't cough or feel discomfort. This is important because symptoms are often warning signals and can be used to trigger protective behavior. Children may not perceive these warning signals and might not reduce their activities on smoggy days.

Children also spend more time outside than adults. The average adult, except for those who work mostly outdoors, spends most of their time indoors -- at home, work, or even at the gym. Children spend more time outside, and are often outdoors during periods when air pollution is at its highest.

The typical adult spends 85 percent to 95 percent of their time indoors, while children may spend less than 80 percent of their time indoors. Children may also exert themselves harder than adults when playing outside.

Perhaps the most important difference between adults and children is that children are growing and developing. Along with their increased body size, children's lungs are growing and changing, too.

The Lung's Important Role in Health
The lung is an extremely complex organ. While most organs in your body are made up of a few different types of cells, the lung contains more than 40 different kinds of cells. Each of these cells is important to health and maintaining the body's fitness.

Air pollution can change the cells in the lung by damaging those that are most susceptible. If the cells that are damaged are important in the development of new functional parts of the lung, then the lung may not achieve its full growth and function as a child matures to adulthood. Although very little research has been conducted to address this extremely important issue, this review will discuss the information that is available.

USC Children's Health Study
Recent results from the Children's Health Study, conducted by investigators at the University of Southern California, suggest that children with asthma are at much greater risk of increased asthma symptoms when they live in communities with higher levels of ozone and particles and participate in three or more competitive sports. Having said all this, the purpose of this review is not to discourage children or adults from normal daily activities and outdoor exercise. Exercise has very important, beneficial outcomes. Appropriate exercise and prudent exposures of children and adults should be encouraged even in an environment that may always contain some amount of air pollution.

Which Air Pollutants Have the Greatest Impact on the Health of Children and Adults?

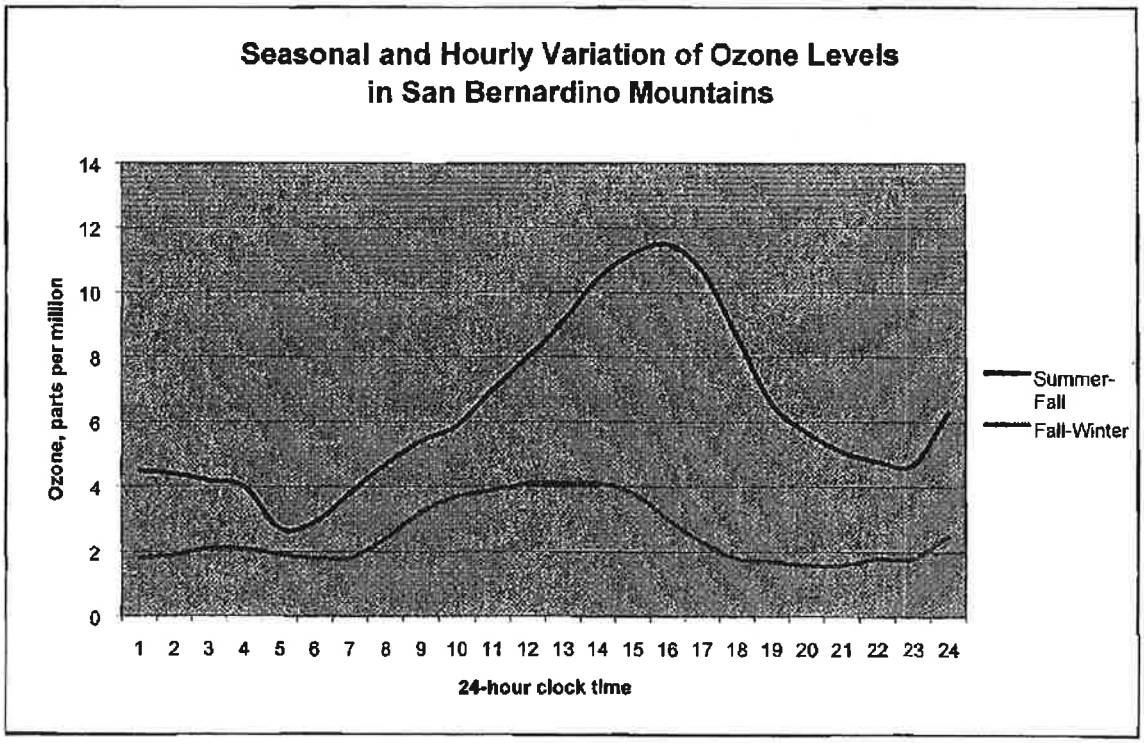
Ozone

Ozone is one of the most important air pollutants affecting human health in regions like Southern California.

Ozone (O_3) is a molecule built of three atoms of oxygen linked together in a very energetic combination. When ozone comes into contact with a surface it rapidly releases this extra force in the form of chemical energy. When this happens in biological systems, such as the respiratory tract, this energy can cause damage to sensitive tissues in the upper and lower airways.

Ozone formation

Because ozone forms as a product of solar energy and photochemical reactions of pollutants, it is not surprising that the highest concentrations of ozone in the atmosphere occur when sunlight is most intense. Thus, ozone generally reaches peak levels during the middle of the day in the summer months. These types of air pollution patterns are called diurnal and seasonal variations. The following graph shows that ozone levels in the San Bernardino Mountains are highest in the summer and fall, and peak in the late afternoon.



Ozone Air Quality Standards

Federal and state agencies have set air quality standards for ozone. An ozone level greater than 0.08 parts per million (ppm) averaged over eight hours is considered unhealthful. This level has been set because both laboratory and community studies have demonstrated measurable effects of ozone at or above that threshold.

The effects of ozone on people include:

- irritation of the nose and throat;
- increased mucus production and tendency to cough;
- eye irritation and headaches for some; and
- during severe episodes, chest pain and difficulty taking a deep breath without coughing.

How Ozone Damages Lungs

What happens when you breathe air that is contaminated with ozone? Like oxygen, ozone is soluble in the fluids that line the respiratory tract. Therefore some ozone can penetrate into the gas-exchange, or alveolar, region of the deep lung.

The following photos show how ozone affects the sensitive tissue in the deep lung. The pictures are from the lungs of rats exposed to ozone in a laboratory under carefully controlled conditions. The human lung is similar --although not identical -- to the rat's lung in terms of the types of cells and the overall structure of the alveolar region.

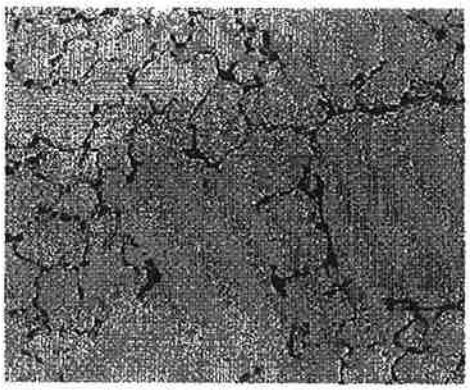


Figure 1

Figure 1 shows a magnified view of the structure of the normal gas-exchange region of the lung. It is called the gas-exchange region because oxygen inhaled from the air is transferred to the hemoglobin in blood in small blood vessels located inside the thin walls separating the alveolar air spaces.

At the same time, carbon dioxide, produced by normal metabolism and dissolved in the blood, is excreted into the air and expired when you breathe out.

The walls of a normal alveolus are very thin. There are only two layers of cells and a thin interstitial matrix separating the air in the alveolar space, or lumen, from the fluid inside the blood vessels. The cells that line the healthy alveoli are mostly very broad and very thin, and are called Type I lung cells or Type I pneumocytes. This provides a very large surface area across which gases can be efficiently transported.

Figure 2 shows the effects of breathing 0.2 ppm ozone for 4 hours. In Southern California air pollution levels can approach 0.2 ppm -- a Stage 1 ozone alert -- during the smoggiest summer days. The photo shows evidence of additional cells, called macrophages, and some material that may be fragments of ozone-injured alveolar wall cells inside the alveolar space.

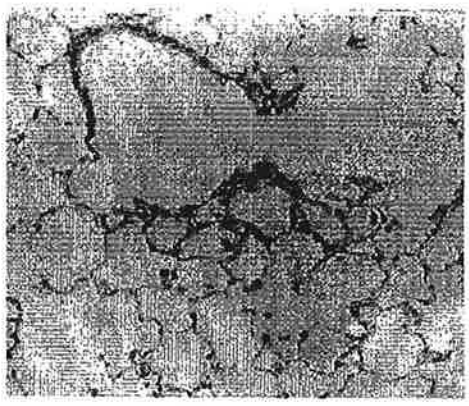


Figure 2

Macrophages are immune system cells that respond to the injury of the delicate cells that line the alveolar lumen. These macrophages play important roles in protecting the lungs from inhaled bacteria,

fungi and viruses, and are also important in helping to repair lung tissue injury caused by inhaled pollutants.

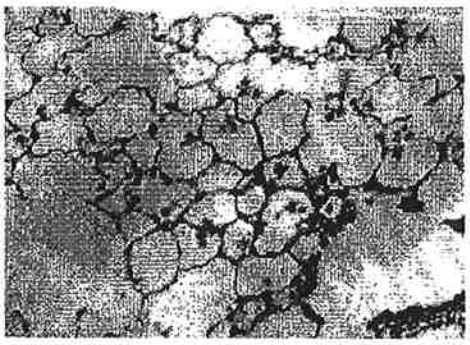


Figure 3

Figure 3 shows more extensive damage following exposure a higher concentration of ozone, 0.6 ppm. The alveolar walls are thicker and there is evidence of cells infiltrating within the walls. There are more macrophages in the alveolar spaces and the thin, Type I cells have been damaged and replaced with thicker Type II, almost cube-shaped cells that are more resistant to the toxic effects of ozone. All of these changes occurred within 48 hours after exposure. If exposure continues for more than three days, the evidence of cell injury seems to be reduced, except for the continuing presence of the Type II cells.

Is Ozone-Related Lung Damage Permanent?
People actually report that the symptoms they feel when first exposed to ozone seem to go away, even though their exposure continues.

Following ozone injury, if the lung is not exposed to ozone for approximately five to seven days, it can for the most part repair itself provided the injury is not too extensive. However, long-term studies with laboratory animals have shown that there may be residual and in some cases permanent damage. This damage might be thought of as accelerated aging of the lung. Thus, frequent exposures to ozone can cause transient damage. The lung's defenses can repair most but probably not all of that damage within a relatively short time in most healthy individuals.

Research and Air Quality Standards
Health scientists probably know more about the effects of ozone on human health than about any other pollutants. This is because ozone is pervasive in the environment. Also there are excellent methods of measuring ozone so the pollutant can be studied using epidemiological methods. The findings of these epidemiological studies can be verified using well-controlled laboratory studies with human volunteers and laboratory animals. Thousands of scientific papers on the health effects of ozone have been published and these have been critically reviewed in documents that provide the scientific basis for National and State Ambient Air Quality Standards. (Ambient refers to outdoor air.)

These so-called Criteria Documents are important because they are extensively reviewed by scientists, public agencies, industry representatives, environmental groups such as the American Lung Association and the Natural Resources Defense Council,

and the public. National and state ambient air quality standards set the goals for healthy air quality in Southern California and across the country.

Based upon the most recent studies, it is now apparent that ozone plays an important role in causing acute health effects, such as heightening asthma symptoms and developing bronchitis symptoms.

The role of ozone in producing long-term or chronic effects is less clear, at least from the available epidemiological studies. However, laboratory animal studies suggest that there can be long-term consequences.

How to Reduce Ozone Exposure
The U.S. Environmental Protection Agency (EPA) has recommended that ozone should not exceed 0.08 ppm averaged over an 8-hr period. When ozone exceeds this level, active children and adults, those with respiratory disease such as asthma, and other people with unusual susceptibility to ozone should limit prolonged outdoor exposure.

Incidentally, personal tobacco smoking during periods of high ozone exposure doubled the risk of asthmatic individuals needing to go to the emergency room for treatment of asthma symptoms.

Carbon Monoxide

Carbon monoxide (CO), a colorless, odorless gas, is a byproduct of combustion.

When inhaled, carbon monoxide reacts very rapidly with hemoglobin in the blood, preventing uptake and transport of oxygen. Because carbon monoxide readily and firmly attaches to hemoglobin, it stays in the blood for a relatively long time. Thus, during an exposure carbon monoxide concentrations in blood can rise in a matter of minutes, then stay high for hours.

Who is Most Sensitive to the Health Effects of Carbon Monoxide?
Most of the health effects directly associated with carbon monoxide are most likely due to decreases in oxygen delivery to vital organs such as the heart and the brain.

People with heart disease may be especially sensitive to the effects of carbon monoxide. In addition, people with lung diseases that limit efficient use of inhaled oxygen, such as asthma and emphysema, may also be susceptible. Even in people without heart or lung diseases, reduced delivery of oxygen to skeletal muscles, especially during exercise, can reduce the ability to perform strenuous work.

At high levels of carbon monoxide exposure, impaired delivery of oxygen to the central nervous system can reduce the ability to respond quickly to external stimuli. After exposures that convert 5 percent to 10 percent of the circulating hemoglobin to carboxyhemoglobin (COHb), people's ability to recognize and react to flashes of light in a test system are reduced. At 10 percent to 30 percent carboxyhemoglobin, nausea,

headaches, unconsciousness, and sometimes death can result. The severity of symptoms increases with the concentration of carboxyhemoglobin.

Air Quality Standards for Carbon Monoxide
Both the EPA and the State of California have set air quality standards for carbon monoxide based on the results of epidemiological and laboratory findings. Ambient levels of carbon monoxide should not exceed 9 ppm, when averaged over an 8-hour interval, and should not exceed 20 ppm in any one-hour period. (The USEPA has a slightly higher 1-hour standard of 35 ppm).

Sources of Carbon Monoxide
The major sources of carbon monoxide pollution are automotive exhaust and emissions from large industrial combustion sources such as electrical power plants. Because these sources produce many contaminants in addition to carbon monoxide -- such as fine particles and nitrogen oxides -- it is often difficult to isolate the health effects of ambient carbon monoxide from those of other pollutants.

In addition to carbon monoxide generated outside, there are also important indoor sources of the pollutant. The most important of these are combustion sources such as gas ovens, gas burners, water heaters, and heating systems. However, in most cases emissions from well-maintained and vented gas appliances are small.

Tobacco smoking is a more significant source of carbon monoxide. Tobacco smoke can contain very high concentrations of carbon monoxide (1,000 ppm to 50,000 ppm). Carbon monoxide levels in the homes of children whose relatives smoke tobacco products can be higher than the carbon monoxide levels outdoors.

Health Effects of Carbon Monoxide
There are hundreds of cases per year of deaths or severe illness due to carbon monoxide poisoning from faulty appliances, indoor emissions of automobile exhaust and industrial exposures. These cases show that carbon monoxide poisoning causes symptoms very similar to those of the flu. In fact, the true number of cases is not really known because many people may have been poisoned slightly and thought that they were just fighting off a cold or the flu. Thus it is very important to make sure that home appliances are well-maintained and that all combustion sources are properly vented to the outdoors.

Epidemiological studies have shown significant association between several health effects and carbon monoxide, although as mentioned earlier it is difficult to completely isolate carbon monoxide's effects from those of other air pollutants.

For example, asthmatic children in Taiwan who were exposed to high levels of traffic-related air pollution -- using carbon monoxide and nitrogen dioxide as marker compounds-- reported more respiratory symptoms than children with lower exposures.

A study of physician office visits in London showed associations between air pollution and doctor visits for asthma and other lower respiratory disease. For children, levels of nitrogen dioxide, carbon monoxide, and sulfur dioxide were associated with increased numbers of medical consultations. However, in adults, the only consistent association was with levels of airborne particles. This suggests that children and adults might respond differently to pollution exposures.

Prenatal Effects of Carbon Monoxide
Carbon monoxide may also have prenatal effects. Pregnant women who were exposed to high levels of ambient carbon monoxide (5 ppm to 6 ppm) were at increased risk of having low birth-weight babies. It has long been known that women who smoke cigarettes during pregnancy have low birth-weight babies, but this is the first study of similar findings in women exposed to environmental carbon monoxide.

Babies exposed to carbon monoxide during the maturation of their organs may suffer permanent changes to those organs. Studies using newborn rats showed that carbon monoxide exposure could cause changes in the heart muscle tissue. This is turn could increase the severity of effects of artery constrictions when they became adults. Other animal studies have shown that long-term carbon monoxide exposure can contribute to a disease called ventricular hypertrophy, in which the cells of the heart's ventricle chambers are enlarged and possibly weakened.

Airborne Particles

Particles, including nitrates, sulfates, carbon[1] and acid aerosols[2] are a complex group of pollutants.

Unlike ozone, which has a specific chemical composition, airborne particles vary in size and composition depending on time and location. Although the components of particles may have common sources, the types and amounts of particles collected at any one time and location may be unique.

To add to the problem, gaseous pollutants including ozone, sulfur dioxide, nitrogen dioxide and carbon monoxide often are present in the atmosphere at the same time as are particles. It is not always possible to clearly differentiate between the health effects of the gases, the particles, and possibly the combination of particles and gases. This complexity presents a tremendous challenge to the scientific community and to public in trying to understand how inhaled particles affect human health.

The Challenge of Measuring Particle Pollution
Precisely measuring particulate pollution is more difficult and labor intensive than measuring gaseous pollutants such as ozone. For this reason, particle concentrations are not measured on a daily basis in most communities. Frequently, they are measured once every six days.

[1] Both elemental and organic. Elemental carbon is pure carbon from combustion sources, including diesel particulate. Organic carbon is a semi-volatile hydrocarbon from combustion and some evaporative sources.
[2] Aerosol is the scientific term used to describe particles suspended in a fluid, such as air.

Particle samples are collected on filters that are then weighed. Particle concentrations are reported in terms of micrograms of particles per cubic meter ($\mu g/m^3$) of collected air.

Originally, the particle samples were relatively indiscriminate with respect to particle size and often contained very large particles. These large particles contributed a great deal to the weighed particle mass, but might not have been very important with respect to lung health. This is because most of the particles were too large to penetrate through the nasal and head airways to reach the lung. A more health-related sample was needed.

After a great deal of scientific consideration it was decided that particulate matter with aerodynamic diameters[3] less than or equal to 10 microns (µm) should be collected. Ambient air quality standards were developed for this material, which is called PM_{10}.

Sources of Particle Pollution

Researchers noted that the sources of relatively large-size particles (greater than 3 microns in aerodynamic diameter) were quite distinct from the sources of particles less than 1 micron in diameter.

The larger, so-called "coarse" particles are mostly produced by mechanical processes, such as automobile tire wear on the road, industrial cutting, grinding and pulverizing processes and re-suspension of particles from the ground or other surfaces by wind and human activities. The chemical composition of coarse particles may be somewhat similar to the chemical composition of soil in that area, along with industrial compounds from activities such as mining or smelting operations. The coarse fraction of urban aerosols also contains bits of plants, molds, spores and some bacteria. Thus the characteristics of the coarse particles may vary greatly in different communities.

In contrast, the smaller or so-called "fine" particles in the urban aerosol come from combustion sources, such as power plants, automobile, truck, bus and other vehicle exhaust or from the reactions that transform some of the pollutant gases into solid or liquid particles. These distinctions may be important because the current air pollution health effects literature suggests, although not with certainty, that for some key health effects the fine particles are more important than the coarse particles. These findings have led EPA to propose a new nationwide $PM_{2.5}$ standard that would reduce exposure to particles that are 2.5 microns or less in diameter.

Historic Air Pollution Disasters

Epidemiological studies have consistently associated adverse health effects with exposures to particulate air pollution. Early studies implicated particulate and sulfur dioxide pollution in the acute illnesses and premature deaths associated with extremely

[3] Aerodynamic diameter is used to define particles' size. Particle deposition on a surface, or in the lung, depends on the particle's aerodynamic and diffusion characteristics. A particle's aerodynamic characteristics depend on its density, shape, actual size, and velocity while its diffusion characteristics are functions of its size and the density of the air in which it is suspended.

severe pollution episodes in Donora, Penn., London, and New York in the 1940s, 1950s, and 1960s. The particle levels in a four-week pollution disaster in London in 1955 were more than 50 times higher than the California standard.[4] Twenty percent of that aerosol was composed of acid sulfates -- probably sulfuric acid. The number of people hospitalized for lung or heart-related diseases was extraordinarily high, but more importantly there were more than 4,000 premature, or "excess," deaths in the London population.

Fortunately, major efforts by government agencies, the public, and industries have made it very unlikely there will ever be a similar episode in modern urban communities. However, the lessons learned from these disasters are still relevant. Despite the fact that our levels of airborne particles are much lower than those that occurred during the disasters, EPA estimates that there are still more than 6,000 excess deaths in the United States that could be associated with inhaled particles.

Health Effects of Particulate Pollution

Current ambient levels of PM_{10} -- 30 to 150 micrograms per cubic meter -- are associated with increases in the numbers of people that die daily from heart or lung failure. Most of these deaths are among the elderly. However there is a strong body of evidence that some children are also adversely affected by particulate matter.

The American Thoracic Society's Environmental and Occupational Health Assembly reviewed current health effects literature. They report that daily fluctuations in PM_{10} levels have been related to:

- acute respiratory hospital admissions in children;
- school and kindergarten absences;
- decreases in peak lung air flow rates in normal children; and
- increased medication use in children and adults with asthma.

The USC Children's Health Study suggests that children with asthma living in a community with high particle concentrations may have suppressed lung growth. After children moved into cleaner cities their lung growth returned to the normal rate, but they did not recover the lost potential growth, according to John Peters, the study's principle investigator.

It is difficult to positively assign a quantitative risk associated with particulate matter because nearly all studies of its health effects find other pollutants present that may account for some of the effects.

Part of the problem is due to the nature of the data being collected. The levels of particulate matter vary during the course of the day and peak values can be quite high. Few studies have evaluated the effect of these short-term "spikes." However, at least one epidemiological study of children with asthma suggested that changes in symptoms

[4] The California standard for particulate matter (PM_{10}) is 50 micrograms per cubic meter averaged over 24 hours

and lung function correlate more strongly with 1-hour peaks than with 24-hour average concentrations.

Other studies, primarily with laboratory animals, suggest that the chemical composition[5] and surface areas of the particles may be more important than particle mass. Scientists are continuing to study the health effects of particles and are developing better methods for measuring the important constituents. It may be possible in the near future to more accurately assess the effects of inhaled particles on human health.

Nitrogen Oxides

Nitrogen oxides are produced during most combustion processes. Mobile sources and power plants are the major contributors in Southern California.

About 80 percent of the immediately released nitrogen oxide is in the form nitric oxide (NO). Small amounts of nitrous oxide (N_2O) are also produced. Nitrous oxide is a "greenhouse" gas that is suspected of playing an important role in global warming.

Nitric oxide reacts with oxygen in the air to produce nitrogen dioxide (NO_2). Further oxidation during the day causes the nitrogen dioxide to form nitric acid and nitrate particles. In the dark, nitrogen dioxide can react with ozone and form a very reactive free radical. The free radical then can react with organic compounds in the air to form nitrogenated organic compounds, some of which have been shown to be mutagenic and carcinogenic.

Health Effects of Nitrogen Dioxide

Nitrogen dioxide is the most important nitrogen oxide compound with respect to acute adverse health effects. Under most chemical conditions it is an oxidant, as is ozone. However, it takes about 10 times more nitrogen dioxide than ozone to cause significant lung irritation and inflammation.

Nitrogen dioxide differs from ozone in that it suppresses the immune system to a much greater degree. As discussed below, some epidemiological studies have shown that children exposed to high levels of ambient nitrogen dioxide may be at increased risk of respiratory infections. Studies with laboratory animals have indeed shown that if mice are exposed first to nitrogen dioxide and later to bacteria at a level that would not infect a healthy control animal, their normal lung defense mechanisms are suppressed and the bacteria are able to infect the host.

[5] The idea that all particles are equally toxic is not scientifically justified. There are many good examples that can be taken from studies of particles in the workplace. For example, certain types of particles that contain quartz --a natural mineral composed of silicon dioxide but with a specific crystal structure -- are very potent lung irritants. Repeated exposures to this material can lead to a serious, permanent lung disease called lung fibrosis. Other mineral particles that are fibrous, such as specific forms of asbestos, can cause lung cancer. Other particles such as titanium dioxide do not seem to cause occupational diseases.

Average levels of nitrogen dioxide in the United States range from 0.02 to 0.04 ppm. Levels in major urban areas in Southern California may be higher, but the region has not exceeded the federal standard[6] for nitrogen dioxide since 1991.

During the 1970s, one of the first studies relating respiratory illnesses and changes in lung function to ambient nitrogen dioxide concentrations reported that children living in areas with high nitrogen dioxide concentrations had greater incidences of lung-related illness than children living in areas with lower concentrations. Since then, other epidemiological studies have suggested that children with asthma are more likely than children without asthma to have reduced lung function and symptoms of respiratory irritation, such as cough and sore throat, when outdoor average nitrogen dioxide concentrations exceed about 0.02 ppm.

Some studies also have suggested that children younger than five years old may be more severely affected by nitrogen dioxide than older children. Several epidemiological studies have suggested that for children, the most important effect of ambient exposure to nitrogen dioxide might be increased susceptibility to respiratory infections and increased severity of responses to inhaled allergens.

Although many epidemiological studies show significant associations between outdoor nitrogen dioxide concentrations and adverse health outcomes, some studies do not corroborate these effects. In part, this is because it is often difficult to fully account for the influences of indoor sources of nitrogen dioxide.

Improvements in Nitrogen Dioxide Measurements

More recent studies have used special devices, called passive dosimeters, that can be worn by children to collect nitrogen dioxide for later analysis. These measurements give epidemiologists the ability to better assess a child's total nitrogen dioxide exposure over the course of the day. These studies show that there can be a great deal of individual variation in exposures, even for children living in the same communities. Thus, it is not surprising that epidemiological studies that do not estimate a nitrogen dioxide dose may reach different conclusions.

However, laboratory studies involving controlled exposures of human volunteers and laboratory animals have demonstrated plausible effects of nitrogen dioxide on human health. For example, if one exposes rats or other animals to nitrogen dioxide, and then examines their respiratory tract tissues, it is very evident that the pollutant can cause short-term injury similar to that seen after ozone exposure.

Long-term exposures to high concentrations of nitrogen dioxide can produce chronic damage to respiratory tract tissue that resembles the lung disease emphysema.

The pollutant's suppression of immune system functions reduces the ability of the host to fight off bacterial and viral infections. Human volunteers who inhaled weakened

[6] 0.053 ppm as an annual average

influenza virus after being exposed to nitrogen dioxide in laboratories were more susceptible to the infection than a control group that did not inhale nitrogen dioxide.

Other studies show that nitrogen dioxide decreases the body's ability to generate antibodies when challenged by pathogens, and may reduce the ability of the respiratory system to remove foreign particles such as bacteria and viruses from the lung.

Lead

People can be exposed to lead (Pb) through air, food and water. Lead is a toxic heavy metal that causes nerve damage and impairs the body's ability to make hemoglobin, leading to a form of anemia.

Sources of Lead Pollution

Large amounts of lead were emitted to the atmosphere when it was used as a gasoline additive.[7] The emitted lead could be inhaled. In addition, lead fallout from the air caused widespread contamination of soil, plants, food products, and water.

Lead is often measured in children's blood as an index of environmental exposure. Even low levels[8] of lead in the blood of children aged 6 to 7 are linked to measurable changes in intelligence quotient and certain perceptual-motor skills. Higher levels of lead exposure can also result in kidney damage and may be related to high blood pressure in adults.

Sulfur Oxides

Most manmade emissions of the gas sulfur dioxide (SO_2) come primarily from the combustion of fossil fuels such as coal, oil, and diesel fuel.

Most of the sulfur in fossil fuel is converted sulfur dioxide, but a small amount is also converted to sulfuric acid. In the atmosphere, gaseous sulfur dioxide can also be converted to sulfuric acid and sulfate-containing particles. Thus, atmospheric concentrations of sulfur dioxide are often highly associated with acidic particles, sulfuric acid particles and sulfate particle concentrations.

The current National Ambient Air Quality Standards for sulfur dioxide are 18 micrograms per cubic meter averaged annually, and 365 micrograms per cubic meter averaged over 24 hours. Southern California does not exceed the national air quality standard because its industries primarily burn low-sulfur fuels such as natural gas. Much of the sulfur oxide air pollution in Southern California is likely to be associated with diesel emissions.

[7] Lead in the form of tetraethyl lead was added to gasoline in the United States in large amounts from the 1950s until it was banned in the mid-1970s.

[8] 10 to 30 micrograms per 100 milliliters

Sulfur dioxide is a very water-soluble gas and therefore most of the sulfur dioxide that is inhaled is absorbed in the upper respiratory tract and does not reach the lung's airways. However, the small amount of sulfur dioxide that does penetrate into the airways can provoke important health effects, primarily in individuals with asthma.

For those with asthma, even relatively short-term, low-level exposures to sulfur dioxide can result in airway constriction leading to difficulty in breathing and possibly contribute to the severity of an asthmatic attack.

A number of epidemiological studies have shown associations between ambient sulfur dioxide and rates of mortality (death) and morbidity (illness). However, because sulfur dioxide is often strongly correlated with fine particles and especially sulfate-containing particles, it is difficult to separate the effects of sulfur dioxide from those of the particle compounds.

A study in France found an increase of 2.9 visits to the emergency room for every 20 micrograms per cubic meter increase in atmospheric sulfur dioxide. The results pertained to days when the average sulfur dioxide levels were above 68 micrograms per cubic meter but below the U.S. health standard.

In London, asthma and other lower respiratory diseases in children were most significantly associated with exposures to nitrogen dioxide, carbon monoxide, and sulfur dioxide. In adults the only consistent association was with particulate matter.

Hospital admissions for children with asthma may increase by 20 percent following acute exposure to ozone peaks and possibly with sulfur dioxide. Chronic exposure to increased levels of fine particles, sulfur dioxide, and nitrogen dioxide may be associated with up to threefold increase in nonspecific respiratory symptoms. Thus, recent literature suggests that sulfur dioxide affects adults and children differently and that chronic and acute effects may also be different.

Diesel Emissions

Diesel fuel is burned to power buses, trucks, road-building equipment, trains, boats and ships and electricity-generating equipment. When diesel fuel is burned, the exhaust includes both particles and gases. Diesel emissions are important constituents of ambient air pollution.

What's in Diesel?

Diesel particles consist mainly of elemental carbon and other carbon-containing compounds. Hundreds of compounds have been identified as constituents of diesel particles. These include polycyclic aromatic hydrocarbons (PAHs) and other compounds that have been associated with tumor formation and cancer. In 1998, the California Air Resources Board designated diesel particulate a cancer-causing toxic air contaminant.

Diesel particles are microscopic. More than 90 percent of them are less than 1 micron in diameter. Due to their minute size, diesel particles can penetrate deeply into the lung. There is evidence that once in the lung, diesel particles may stay there for a long time.

In addition to particles, diesel exhaust contains several gaseous compounds including carbon monoxide, nitrogen oxides, sulfur dioxide and organic vapors, for example formaldehyde and 1,3-butadiene. Formaldehyde and 1,3-butadiene have been classified as toxic and hazardous air pollutants. Both have been shown to cause tumors in animal studies and there is evidence that exposure to high levels of 1,3-butadiene can cause cancer in humans.

AQMD's recent landmark research project, the Multiple Air Toxics Exposure Study II, found that diesel particulate is responsible for about 70 percent of the total cancer risk from all toxic air pollution in the greater Los Angeles metropolitan area.

Diesel emissions may also be a problem for asthmatics. Some studies suggest that children with asthma who live near roadways with high amounts of diesel truck traffic have more asthma attacks and use more asthma medication.

Some human volunteers, exposed to diesel exhaust in carefully controlled laboratory studies, reported symptoms such as eye and throat irritation, coughing, phlegm production, difficulty breathing, headache, lightheadedness, nausea and perception of unpleasant odors. Another laboratory study, in which volunteers were exposed to relatively high levels of diesel particles for about an hour, showed that such exposures could cause lung inflammation.

Thus current epidemiological and laboratory evidence suggests that at typical urban concentrations, diesel exhaust may contribute significantly to the health effects of air pollution.

What Can Be Done to Reduce the Effects of Air Pollution on Children's Health?

After reviewing the literature on how children's exposures differ from those of adults, it is evident that:

- children are outdoors more hours per day than most adults;
- they exert themselves to a greater degree while they are outside than most adults; and
- they participate in more organized activities than adults.

There are definite health benefits to having children participate in outdoor activities. However, scientific evidence also suggests that air pollution exposures can injure children's lungs and other organs.

Air quality information in the form of health reports and air quality advisories are now a regular part of life in California. One logical step is to reduce strenuous activities during pollution episodes and try to take advantage of those hours when airborne pollutant levels are lower.

At the public level there is a long-standing commitment to improve air quality. When you look at the air pollution levels in California today you can see that a great deal of progress has been made. There has been a cost for this progress. For instance, some products are more expensive. In return, the lower levels of pollutant exposure compared to 20 years ago should decrease the adverse effect of air pollution on the long-term health of our developing children.

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EDMUND G. BROWN JR.
Attorney General

State of California
DEPARTMENT OF JUSTICE

The California Environmental Quality Act
Addressing Global Warming Impacts at the Local Agency Level

Under the California Environmental Quality Act (CEQA), local agencies have a very important role to play in California's fight against global warming – one of the most serious environmental effects facing the State today. Where local agencies undertake projects directly, they can and should design sustainable projects from the start, incorporating global warming related considerations into their projects at the earliest feasible time. Further, local agencies can encourage well-designed, sustainable private projects by analyzing and disclosing to the public the environmental benefits of such projects in any required environmental documents. And where projects as proposed will have significant global warming related effects, local agencies can require feasible changes or alternatives, and impose enforceable, verifiable, feasible mitigation measures to substantially lessen those effects. By the sum of their decisions, local agencies will help to move the State away from "business as usual" and toward a low-carbon future.

This document provides information that may be helpful to local agencies in carrying out their duties under CEQA as they relate to global warming. Included in this document are various measures that may reduce the global warming related impacts of a project. As appropriate, the measures can be included as design features of a project, required as changes to the project, or imposed as mitigation (whether undertaken directly by the project proponent or funded by mitigation fees). The measures set forth in this package are examples; <u>the list is not intended to be exhaustive</u>. Moreover, the measures cited may not be appropriate for every project. The decision of whether to approve a project – as proposed or with required changes or mitigation – is for the local agency, exercising its informed judgment in compliance with the law and balancing a variety of public objectives.

The first section of this document lists examples of measures that could be applied to a diverse range of projects where the lead agency determines that the project under consideration will have significant global warming related effects. In general, a given measure should not be considered in isolation, but as part of a larger set of measures that, working together, will reduce greenhouse gas emissions and the effects of global warming.

The second section of this document lists examples of potential greenhouse gas reduction measures in the general plan context. This section is included both to suggest how the measures set forth in the first section could be incorporated into a general plan, as well as to identify measures that are general plan specific. The measures in the second section may also be appropriate for inclusion in larger scale plans, including regional plans (*e.g.*, blueprint plans) and in specific plans. Including these types of measures at the larger planning level, as appropriate, will help to ensure more sustainable project-specific development.

The third section provides links to sources of information on global warming impacts and emission reduction measures. The list is not complete, but may be a helpful start for local agencies seeking more information to carry out their CEQA obligations as they relate to global warming.

The endnotes set forth just some of the many examples of exemplary emission reduction measures already being implemented by local governments and agencies, utilities, private industry, and others. As these examples evidence, California at every level of government is taking up the challenge, devising new and innovative solutions, and leading the charge in the fight against global warming.

(1) Generally Applicable Measures

Energy Efficiency[1]

- Design buildings to be energy efficient. Site buildings to take advantage of shade, prevailing winds, landscaping and sun screens to reduce energy use.[2]
- Install efficient lighting and lighting control systems. Use daylight as an integral part of lighting systems in buildings.
- Install light colored "cool" roofs, cool pavements, and strategically placed shade trees.[3]
- Provide information on energy management services for large energy users.[4]
- Install energy efficient heating and cooling systems, appliances and equipment, and control systems.[5]
- Install light emitting diodes (LEDs) for traffic, street and other outdoor lighting.[6]
- Limit the hours of operation of outdoor lighting.
- Use solar heating, automatic covers, and efficient pumps and motors for pools and spas.[7]
- Provide education on energy efficiency.[8]

Renewable Energy

- Install solar and wind power systems, solar and tankless hot water heaters, and energy-efficient heating ventilation and air conditioning. Educate consumers about existing incentives.[9]
- Install solar panels on carports and over parking areas.[10]
- Use combined heat and power in appropriate applications.[11]

Water Conservation and Efficiency[12]

- Create water-efficient landscapes.[13]
- Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls.
- Use reclaimed water for landscape irrigation in new developments and on public property. Install the infrastructure to deliver and use reclaimed water.
- Design buildings to be water-efficient. Install water-efficient fixtures and appliances.
- Use graywater. (Graywater is untreated household waste water from bathtubs, showers, bathroom wash basins, and water from clothes washing machines.) For example, install dual plumbing in all new development allowing graywater to be used for landscape irrigation.[14]
- Restrict watering methods (*e.g.*, prohibit systems that apply water to non-vegetated surfaces) and control runoff.
- Restrict the use of water for cleaning outdoor surfaces and vehicles.
- Implement low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment. (Retaining storm water runoff on-

site can drastically reduce the need for energy-intensive imported water at the site.)[15]

- Devise a comprehensive water conservation strategy appropriate for the project and location. The strategy may include many of the specific items listed above, plus other innovative measures that are appropriate to the specific project.
- Provide education about water conservation and available programs and incentives.[16]

Solid Waste Measures

- Reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard).
- Provide interior and exterior storage areas for recyclables and green waste and adequate recycling containers located in public areas.
- Recover by-product methane to generate electricity.[17]
- Provide education and publicity about reducing waste and available recycling services.[18]

Land Use Measures

- Include mixed-use, infill, and higher density in development projects to support the reduction of vehicle trips, promote alternatives to individual vehicle travel, and promote efficient delivery of services and goods.[19]
- Educate the public about the benefits of well-designed, higher density development.[20]
- Incorporate public transit into project design.
- Preserve and create open space and parks. Preserve existing trees, and plant replacement trees at a set ratio.
- Develop "brownfields" and other underused or defunct properties near existing public transportation and jobs.
- Include pedestrian and bicycle-only streets and plazas within developments. Create travel routes that ensure that destinations may be reached conveniently by public transportation, bicycling or walking.[21]

Transportation and Motor Vehicles

- Limit idling time for commercial vehicles, including delivery and construction vehicles.
- Use low or zero-emission vehicles, including construction vehicles.
- Promote ride sharing programs *e.g.*, by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading and waiting areas for ride sharing vehicles, and providing a web site or message board for coordinating rides.
- Create car sharing programs. Accommodations for such programs include providing parking spaces for the car share vehicles at convenient locations accessible by public transportation.[22]
- Create local "light vehicle" networks, such as neighborhood electric vehicle (NEV) systems.[23]
- Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles (*e.g.*, electric vehicle charging facilities and conveniently located alternative fueling

stations).

- Increase the cost of driving and parking private vehicles by, *e.g.*, imposing tolls and parking fees.
- Build or fund a transportation center where various public transportation modes intersect.
- Provide shuttle service to public transit.
- Provide public transit incentives such as free or low-cost monthly transit passes.
- Promote "least polluting" ways to connect people and goods to their destinations.[24]
- Incorporate bicycle lanes and routes into street systems, new subdivisions, and large developments.
- Incorporate bicycle-friendly intersections into street design.
- For commercial projects, provide adequate bicycle parking near building entrances to promote cyclist safety, security, and convenience. For large employers, provide facilities that encourage bicycle commuting, including, *e.g.*, locked bicycle storage or covered or indoor bicycle parking.
- Create bicycle lanes and walking paths directed to the location of schools, parks and other destination points.[25]
- Work with the school district to restore or expand school bus services.
- Institute a telecommute work program. Provide information, training, and incentives to encourage participation. Provide incentives for equipment purchases to allow high-quality teleconferences.
- Provide information on all options for individuals and businesses to reduce transportation-related emissions. Provide education and information about public transportation.

Off-Site Mitigation

If, after analyzing and requiring all reasonable and feasible on-site mitigation measures for avoiding or reducing greenhouse gas-related impacts, the lead agency determines that additional mitigation is required, the agency may consider additional off-site mitigation. The project proponent could, for example, fund off-site mitigation projects (*e.g.*, alternative energy projects, or energy or water audits for existing projects) that will reduce carbon emissions, conduct an audit of its other existing operations and agree to retrofit, or purchase carbon "credits" from another entity that will undertake mitigation.

The topic of offsets can be complicated, and a full discussion is outside the scope of this summary document. Issues that the lead agency should consider include:

- The location of the off-site mitigation. (If the off-site mitigation is far from the project, any additional, non-climate related benefits of the mitigation will be lost to the local community.)
- Whether the emissions reductions from off-site mitigation can be quantified and verified.
- Whether the mitigation ratio should be greater than 1:1 to reflect any uncertainty about the effectiveness of the offset.

(2) General Plan Measures[26]

Global warming measures may be reflected in a general plan as goals, policies, or programs; in land use designations; or as additional mitigation measures identified during the CEQA review process. Many of the measures listed above may be appropriate for inclusion in a general plan. In addition, a non-exhaustive list of measures specific to the general plan context follows. The examples are listed under required general plan elements. A given example may, however, be appropriate for inclusion in more than one element, or in a different element than listed. Global warming measures may, alternatively, be included in an optional Climate Change or Energy element.

Conservation Element[27]

- Climate Action Plan or Policy: Include a comprehensive climate change action plan that requires a baseline inventory of greenhouse gas emissions from all sources by a date certain; greenhouse gas emissions reduction targets and deadlines; and enforceable greenhouse gas emissions reduction measures.[28] (Note: If the Climate Action Plan complies with the requirements of Section 15064(h)(3) of the CEQA Guidelines, it may allow for the streamlining of individual projects that comply with the plan's requirements.)
- Climate Action Plan Implementation Program: Include mechanisms to ensure regular review of progress toward the emission reduction targets established by the Climate Action Plan, report progress to the public and responsible officials, and revise the plan as appropriate, using principles of adaptive management. Allocate funding to implement the plan. Fund staff to oversee implementation of the plan.
- Strengthen local building codes for new construction and renovation to require a higher level of energy efficiency.[29]
- Require that all new government buildings, and all major renovations and additions, meet identified green building standards.[30]
- Adopt a "Green Building Program" to require or encourage green building practices and materials.[31] The program could be implemented through, *e.g.*, a set of green building ordinances.
- Require orientation of buildings to maximize passive solar heating during cool seasons, avoid solar heat gain during hot periods, enhance natural ventilation, and promote effective use of daylight. Orientation should optimize opportunities for on-site solar generation.
- Provide permitting-related and other incentives for energy efficient building projects, *e.g.*, by giving green projects priority in plan review, processing and field inspection services.[32]
- Conduct energy efficiency audits of existing buildings by checking, repairing, and readjusting heating, ventilation, air conditioning, lighting, water heating equipment, insulation and weatherization.[33] Offer financial incentives for adoption of identified efficiency measures.[34]
- Partner with community services agencies to fund energy efficiency projects, including heating, ventilation, air conditioning, lighting, water heating equipment, insulation and weatherization, for low income residents.
- Target local funds, including redevelopment and Community Development Block Grant resources, to assist affordable housing developers in incorporating energy efficient designs and features.

- Provide innovative, low-interest financing for energy efficiency and alternative energy projects. For example, allow property owners to pay for energy efficiency improvements and solar system installation through long-term assessments on individual property tax bills.[35]
- Fund incentives to encourage the use of energy efficient vehicles, equipment and lighting.[36] Provide financial incentives for adoption of identified efficiency measures.
- Require environmentally responsible government purchasing.[37] Require or give preference to products that reduce or eliminate indirect greenhouse gas emissions, *e.g.*, by giving preference to recycled products over those made from virgin materials.[38]
- Require that government contractors take action to minimize greenhouse gas emissions, *e.g.*, by using low or zero-emission vehicles and equipment.
- Adopt a "heat island" mitigation plan that requires cool roofs, cool pavements, and strategically placed shade trees.[39] (Darker colored roofs, pavement, and lack of trees may cause temperatures in urban environments to increase by as much as 6-8 degrees Fahrenheit as compared to surrounding areas.[40]) Adopt a program of building permit enforcement for re-roofing to ensure compliance with existing state building requirements for cool roofs on non-residential buildings.
- Adopt a comprehensive water conservation strategy. The strategy may include, but not be limited to, imposing restrictions on the time of watering, requiring water-efficient irrigation equipment, and requiring new construction to offset demand so that there is no net increase in water use.[41]
- Adopt water conservation pricing, *e.g.*, tiered rate structures, to encourage efficient water use.[42]
- Adopt water-efficient landscape ordinances.[43]
- Strengthen local building codes for new construction and implement a program to renovate existing buildings to require a higher level of water efficiency.
- Adopt energy and water efficiency retrofit ordinances that require upgrades as a condition of issuing permits for renovations or additions, and on the sale of residences and buildings.[44]
- Provide individualized water audits to identify conservation opportunities.[45] Provide financial incentives for adopting identified efficiency measures.
- Provide water audits for large landscape accounts. Provide financial incentives for efficient irrigation controls and other efficiency measures.
- Require water efficiency training and certification for irrigation designers and installers, and property managers.[46]
- Implement or expand city or county-wide recycling and composting programs for residents and businesses. Require commercial and industrial recycling.
- Extend the types of recycling services offered (*e.g.*, to include food and green waste recycling).
- Establish methane recovery in local landfills and wastewater treatment plants to generate electricity.[47]
- Implement Community Choice Aggregation (CCA) for renewable electricity generation. (CCA allows cities and counties, or groups of them, to aggregate the electric loads of customers within

their jurisdictions for purposes of procuring electrical services. CCA allows the community to choose what resources will serve their loads and can significantly increase renewable energy.)[48]

- Preserve existing conservation areas (*e.g.*, forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) that provide carbon sequestration benefits.
- Establish a mitigation program for development of conservation areas. Impose mitigation fees on development of such lands and use funds generated to protect existing, or create replacement, conservation areas.
- Provide public education and information about options for reducing greenhouse gas emissions through responsible purchasing, conservation, and recycling.

Land Use Element[49]

- Adopt land use designations to carry out policies designed to reduce greenhouse gas emissions, *e.g.*, policies to minimize or reduce vehicle miles traveled, encourage development near existing public transportation corridors, encourage alternative modes of transportation, and promote infill, mixed use, and higher density development.
- Identify and facilitate the development of land uses not already present in local districts – such as supermarkets, parks and recreation fields, and schools in neighborhoods; or residential uses in business districts – to reduce vehicle miles traveled and allow bicycling and walking to these destinations.
- Create neighborhood commercial districts.
- Require bike lanes and bicycle/pedestrian paths.
- Prohibit projects that impede bicycle and walking access, *e.g.*, large parking areas that cannot be crossed by non-motorized vehicles, and new residential communities that block through access on existing or potential bicycle and pedestrian routes.
- Site schools to increase the potential for students to walk and bike to school.
- Enact policies to limit or discourage low density development that segregates employment, services, and residential areas.[50]
- Where there are growth boundaries, adopt policies providing certainty for infill development.[51]
- Require best management practices in agriculture and animal operations to reduce emissions, conserve energy and water, and utilize alternative energy sources, including biogas, wind and solar.

Circulation Element[52]

- In conjunction with measures that encourage public transit, ride sharing, bicycling and walking, implement circulation improvements that reduce vehicle idling. For example, coordinate controlled intersections so that traffic passes more efficiently through congested areas.[53]
- Create an interconnected transportation system that allows a shift in travel from private passenger vehicles to alternative modes, including public transit, ride sharing, car sharing, bicycling and walking. Before funding transportation improvements that increase vehicle miles

traveled, consider alternatives such as increasing public transit or improving bicycle or pedestrian travel routes.

- Give funding preference to investment in public transit over investment in infrastructure for private automobile traffic.[54]
- Include safe and convenient bicycle and pedestrian access in all transportation improvement projects. Ensure that non-motorized transportation systems are connected and not interrupted by impassable barriers, such as freeways[55] and include amenities such as secure bicycle parking.
- Provide adequate and affordable public transportation choices including expanded bus routes and service and other transit choices such as shuttles, light rail, and rail where feasible.
- Assess transportation impact fees on new development in order to maintain and increase public transit service.[56]
- Provide public transit incentives, including free and reduced fare areas.[57]
- Adopt a comprehensive parking policy that discourages private vehicle use and encourages the use of alternative transportation.[58] For example, reduce parking for private vehicles while increasing options for alternative transportation; eliminate minimum parking requirements for new buildings; "unbundle" parking (require that parking is paid for separately and is not included in rent for residential or commercial space); and set appropriate pricing for parking.
- Develop school transit plans to substantially reduce automobile trips to, and congestion surrounding, schools. (According to some estimates, parents driving their children to school account for 20-25% of the morning commute.) Plans may address, *e.g.*, necessary infrastructure improvements and potential funding sources; replacing older diesel buses with low or zero-emission vehicles; mitigation fees to expand school bus service; and Safe Routes to School programs[59] and other formal efforts to increase walking and biking by students.
- Create financing programs for the purchase or lease of vehicles used in employer ride sharing programs.
- Enter into partnerships to create and expand polluting vehicle buy-back programs to include vehicles with high greenhouse gas emissions.
- Provide public education and information about options for reducing motor vehicle-related greenhouse gas emissions. Include information on trip reduction; trip linking; public transit; biking and walking; vehicle performance and efficiency (*e.g.*, keeping tires inflated); low or zero-emission vehicles; and car and ride sharing.

Housing Element[60]

- Improve the jobs-housing balance and promote a range of affordable housing choices near jobs, services and transit.
- Concentrate mixed use, and medium to higher density residential development in areas near jobs, transit routes, schools, shopping areas and recreation.
- Increase density in single family residential areas located near transit routes or commercial areas. For example, promote duplexes in residential areas and increased height limits of multi-unit buildings on main arterial streets, under specified conditions.

- Encourage transit-oriented developments.[61]
- Impose minimum residential densities in areas designated for transit-oriented, mixed use development to ensure higher density in these areas.
- Designate mixed use areas where housing is one of the required uses.
- In areas designated for mixed use, adopt incentives for the concurrent development of different land uses (*e.g.*, retail with residential).
- Promote infill, mixed use, and higher density development by, for example, reducing developer fees;[62] providing fast-track permit processing; reducing processing fees; funding infrastructure loans; and giving preference for infrastructure improvements in these areas.

Open Space Element[63]

- Preserve forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, groundwater recharge areas and other open space that provide carbon sequestration benefits.
- Establish a mitigation program for development of those types of open space that provide carbon sequestration benefits. Require like-kind replacement for, or impose mitigation fees on development of such lands. Use funds generated to protect existing, or create replacement, open space.
- Allow alternative energy projects in areas zoned for open space where consistent with other uses and values.
- Protect existing trees and encourage the planting of new trees. Adopt a tree protection and replacement ordinance, *e.g.*, requiring that trees larger than a specified diameter that are removed to accommodate development must be replaced at a set ratio.
- Connect parks and publicly accessible open space through shared pedestrian/bike paths and trails to encourage walking and bicycling.

Safety Element[64]

- Address expected effects of climate change that may impact public safety, including increased risk of wildfires, flooding and sea level rise, salt water intrusion; and health effects of increased heat and ozone, through appropriate policies and programs.
- Adopt programs for the purchase, transfer or extinguishment of development rights in high risk areas.
- Monitor the impacts of climate change. Use adaptive management to develop new strategies, and modify existing strategies, to respond to the impacts of climate change.

Energy Element

Many of the goals, policies, or programs set forth above may be contained in an optional energy element. The resources set forth below may be useful to local agencies in developing an energy element or an energy conservation plan.

- The Local Government Commission produced a detailed report in 2002 entitled General Plan Policy Options for Energy Efficiency in New and Existing Development. The document sets forth energy saving policies suitable for inclusion in general plans. Policies range from

exceeding State minimum building efficiency standards, to retrofitting buildings to reduce energy consumption, to implementing energy conservation strategies for roofs, pavement and landscaping. The report also contains suggested general plan language. The report is available here: http://www.redwoodenergy.org/uploads/Energy_Element_Report.pdf.

- The California Energy Commission summarizes the energy-related efforts of Humboldt County, City of Pleasanton, City of Pasadena, City and County of San Francisco, the Los Angeles area, City of Chula Vista, the San Diego region, City of San Diego, City and County of San Luis Obispo, and City of Santa Monica, in the 2006 Integrated Energy Policy Report at pp. 82-87, available here: http://www.energy.ca.gov/2006publications/CEC-100-2006-001/CEC-100-2006-001-CMF.PDF.
- In 2006, the Association of Monterey Bay Area Governments published a regional energy plan, available here: http://www.ambag.org/EnergyWatch/regional_plan.html. Part 1 describes the plan's goals and course of action. Part 2 describes actions that local agencies already have taken and identifies the most cost-effective measures in each sector. The appendices list existing energy programs that may provide support and funding for energy efficiency projects, suggest language for energy-related provisions to be included in general plans, and list and give brief explanations of more than one hundred energy-saving measures.
- The California Local Energy Efficiency Program (CALeep) has available on its website, http://www.caleep.com/default.htm, various resources and documents, including an energy "Workbook." The Workbook lays out a process for instituting local energy efficiency programs based in part on information developed in six California pilot projects (Inland Empire Utilities Agency, City of Oakland, San Joaquin Valley, Sonoma County, South Bay Cities Council of Governments, and Ventura County Regional Energy Alliance). The Workbook is designed to be used by local officials to initiate, plan, organize, implement, and assess energy efficiency activities at the local and regional level.

(3) Resources About Global Warming and Local Action

The following web sites and organizations provide general information about mitigating global warming impacts at the local level. These sites represent only a small fraction of the available resources. Local agencies are encouraged to conduct their own research in order to obtain the most current and relevant materials.

- The U.S. Conference of Mayors' Climate Protection Agreement contains valuable information for the many local agencies that are joining the fight against global warming. The Agreement is available here: http://www.coolcities.us/resources/bestPracticeGuides/USM_ClimateActionHB.pdf. Over one hundred and twenty California cities have joined the "Cool Cities" campaign, which means they have signed the U.S. Mayor's Climate Protection Agreement and are taking concrete steps toward addressing global warming. These steps include preparing a city-wide greenhouse gas emissions inventory and creating and implementing a local Climate Action Plan. Additional resources, including various cities' Climate Action Plans, are located at the Cool Cities website: http://www.coolcities.us/resources.php.
- In July 2007, Alameda County became one of twelve charter members of the "Cool Counties" initiative. Participating counties sign a Climate Stabilization Declaration, which is available at the website for King County (Washington State): http://www.metrokc.gov/exec/news/2007/0716dec.aspx. Participating counties agree to work

with local, state, and federal governments and other leaders to reduce county geographical greenhouse gas emissions to 80% below current levels by 2050 by developing a greenhouse gas emissions inventory and regional reduction plan. Current member counties are recruiting new members and are committed to sharing information. Cool Counties contact information is available at: http://www.kingcounty.gov/exec/coolcounties/Joinus.aspx.

- Local Governments for Sustainability, a program of International Cities for Local Environmental Initiatives (ICLEI), has initiated a campaign called Cities for Climate Protection (CCP). The membership program is designed to empower local governments worldwide to take action on climate change. Many California cities have joined ICLEI. More information is available at the organization's website: http://www.iclei.org/.

- The Institute for Local Government (ILG), an affiliate of the California State Association of Counties and the League of California Cities, has instituted a program called the California Climate Action Network (CaliforniaCAN!). The program provides information about the latest climate action resources and case studies. More information is available at the CaliforniaCAN! website: http://www.cacities.org/index.jsp?displaytype=&section=climate&zone=ilsg.

  ILG's detailed list of climate change "best practices" for local agencies is available at http://www.cacities.org/index.jsp?displaytype=&section=climate&zone=ilsg&sub_sec=climate_local.

  ILG maintains a list of local agencies that have Climate Action Plans. The list is available here: http://www.cacities.org/index.jsp?zone=ilsg&previewStory=27035. According to ILG, the list includes Marin County and the cities of Arcata, Berkeley, Los Angeles, Palo Alto, San Diego, and San Francisco. Many additional local governments are in the process of conducting greenhouse gas inventories.

- The non-profit group Natural Capitalism Solutions (NCS) has developed an on-line Climate Protection Manual for Cities. NCS states that its mission is "to educate senior decision-makers in business, government and civil society about the principles of sustainability." The manual is available at http://www.climatemanual.org/Cities/index.htm.

- The Local Government Commission provides many planning-related resources for local agencies at its website: http://www.lgc.org/.

  In cooperation with U.S. EPA, LGC has produced a booklet discussing the benefits of density and providing case studies of well-designed, higher density projects throughout the nation. Creating Great Neighborhoods: Density in Your Community (2003) is available here: http://www.lgc.org/freepub/PDF/Land_Use/reports/density_manual.pdf.

- The Pew Center on Global Climate Change was established in 1998 as a non-profit, non-partisan and independent organization. The Center's mission is to provide credible information, straight answers, and innovative solutions in the effort to address global climate change. See http://www.pewclimate.org. The Pew Center has published a series of reports called Climate Change 101. These reports provide a reliable and understandable introduction to climate change. They cover climate science and impacts, technological solutions, business solutions, international action, recent action in the U.S. states, and action taken by local governments. The Climate Change 101 reports are available at http://www.pewclimate.org/global-warming-basics/climate_change_101.

- The Climate Group, www.theclimategroup.org, is a non-profit organization founded by a group of companies, governments and activists to "accelerate international action on global warming with a new, strong focus on practical solutions." Its website contains a searchable database of about fifty case studies of actions that private companies, local and state governments, and the United Kingdom, have taken to reduce GHG emissions. Case studies include examples from California. The database, which can be searched by topic, is available at http://theclimategroup.org/index.php/reducing_emissions/case_studies.

- U.S. EPA maintains a list of examples of codes that support "smart growth" development, available here: http://www.epa.gov/piedpage/codeexamples.htm. Examples include transit-oriented development in Pleasant Hill and Palo Alto, rowhouse design guidelines from Mountain View, and street design standards from San Diego.

- In November 2007, U.S. EPA issued a report entitled "Measuring the Air Quality and Transportation Impacts of Infill Development." This report summarizes three regional infill development scenarios in Denver, Colorado; Boston, Massachusetts; and Charlotte, North Carolina. The analysis shows how standard transportation forecasting models currently used by metropolitan planning organizations can be modified to capture at least some of the transportation and air quality benefits of brownfield and infill development. In all scenarios, more compact and transit oriented development was projected to substantially reduce vehicle miles traveled. As the agency found, "The results of this analysis suggest that strong support for infill development can be one of the most effective transportation and emission-reduction investments a region can pursue." The report is available at http://www.epa.gov/smartgrowth/impacts_infill.htm.

- The Urban Land Institute (ULI) is a nonprofit research and education organization providing leadership in responsible land use and sustainability. In 2007, ULI produced a report entitled, "Growing Cooler: The Evidence on Urban Development and Climate Change," which reviews existing research on the relationship between urban development, travel, and greenhouse gases emitted by motor vehicles. It further discusses the emissions reductions that can be expected from compact development and how to make compact development happen. "Growing Cooler" is available at http://www.uli.org/growingcooler.

- The California Department of Housing and Community Development, http://www.hcd.ca.gov/, has many useful resources on its website related to housing policy and housing elements and specific recommendations for creating higher density and affordable communities. See http://www.hcd.ca.gov/hpd/hrc/plan/he/.

- The California Transportation Commission (CTC) recently made recommendations for changes to regional transportation guidelines to address climate change issues. Among other things, the CTC recommends various policies, strategies and performance standards that a regional transportation agency should consider including in a greenhouse reduction plan. These or analogous measures could be included in other types of planning documents or local climate action plans. The recommendation document, and Attachment A, entitled Smart Growth/Land Use Regional Transportation Plan Guidelines Amendments, are located at http://www.dot.ca.gov/hq/transprog/ctcbooks/2008/0108/12_4.4.pdf.

- The California Energy Commission's Public Interest Energy Research (PIER) Program supports energy research, development and demonstration projects designed to bring environmentally

safe, affordable and reliable energy services and products to the marketplace. On its website, http://www.energy.ca.gov/pier/, PIER makes available a number of reports and papers related to energy efficiency, alternative energy, and climate change.

- The Governor's Office of Planning and Research (OPR) provides valuable resources for lead agencies related to CEQA and global warming at http://opr.ca.gov/index.php?a=ceqa/index.html. Among the materials available are a list of environmental documents addressing climate change and greenhouse gas emissions and a list of local plans and policies addressing climate change. In addition, OPRs' The California Planners' Book of Lists 2008, which includes the results of surveys of local agencies on matters related to global warming, is available at http://www.opr.ca.gov/index.php?a=planning/publications.html#pubs-C.
- The California Air Pollution Control Officers Association has prepared a white paper entitled "CEQA and Climate Change" (January 2008). The document includes a list of mitigation measures and information about their relative efficacy and cost. The document is available at http://www.capcoa.org/ceqa/?docID=ceqa.
- The Attorney General's global warming website includes a section on CEQA. See http://ag.ca.gov/globalwarming/ceqa.php. The site includes all of the Attorney General's public comment letters that address CEQA and global warming.

(4) Endnotes

1. Energy efficiency leads the mitigation list because it promises significant greenhouse gas reductions through measures that are cost-effective for the individual residential and commercial energy consumer.

2. Leadership in Energy and Environmental Design (LEED) administers a Green Building Ratings program that provides benchmarks for the design, construction, and operation of high-performance green buildings. More information about the LEED ratings system is available at http://www.usgbc.org/DisplayPage.aspx?CategoryID=19. Build it Green is a non-profit, membership organization that promotes green building practices in California. The organization offers a point-based, green building rating system for various types of projects. See http://www.builditgreen.org/guidelines-rating-systems. Lawrence Berkeley National Laboratories' Building Technologies Department is working to develop coherent and innovative building construction and design techniques. Information and publications on energy efficient buildings are available at the Department's website at http://btech.lbl.gov. The California Department of Housing and Community Development has created an extensive Green Building & Sustainability Resources handbook with links to green building resources, available at http://www.hcd.ca.gov/hpd/green_build.pdf.

3. For more information, see Lawrence Berkeley National Laboratories, Heat Island Group at http://eetd.lbl.gov/HeatIsland/.

4. See California Energy Commission, "How to Hire an Energy Services Company" (2000) at http://www.energy.ca.gov/reports/efficiency_handbooks/400-00-001D.PDF.

5. Energy Star is a joint program of the U.S. Environmental Protection Agency and the U.S. Department of Energy that certifies energy efficient products and provides guidelines for energy efficient practices for homes and businesses. More information about Energy Star-certified products is available at http://www.energystar.gov/. The Electronic Product Environmental Assessment Tool (EPEAT) is a system that ranks computer products based on their conformance to a set of environmental criteria, including energy efficiency. More information about EPEAT is available at http://www.epeat.net/AboutEPEAT.aspx.

6. LED lighting is substantially more energy efficient than conventional lighting and can save money. See http://www.energy.ca.gov/efficiency/partnership/case_studies/TechAsstCity.pdf (noting that installing LED traffic signals saved the City of Westlake about $34,000 per year). As of 2005, only about a quarter of California's cities and counties were using 100% LEDs in traffic signals. See California Energy Commission (CEC), Light Emitting Diode Traffic Signal Survey (2005) at p. 15, available at http://www.energy.ca.gov/2005publications/CEC-400-2005-003/CEC-400-2005-003.PDF. The CEC's Energy Partnership Program can help local governments take advantage of energy saving technology, including, but not limited to, LED traffic signals. See http://www.energy.ca.gov/efficiency/partnership/.

7. See Palm Desert Energy Partnership at http://www.sce.com/rebatesandsavings/palmdesert. The City, in partnership with Southern California Edison, provides incentives and rebates for efficient equipment. See Southern California Edison, Pool Pump and Motor Replacement Rebate Program at http://www.sce.com/RebatesandSavings/Residential/_Pool/PoolPumpandMotor/.

8. Many cities and counties provide energy efficiency education. See, for example, the City of Stockton's Energy Efficiency website at http://www.stocktongov.com/energysaving/index.cfm. See also "Green County San Bernardino," http://www.greencountysb.com/ at pp. 4-6. Private projects may also provide education. For example, a homeowners' association could provide information and energy audits to its members on a regular basis.

9. See http://www.gosolarcalifornia.ca.gov/documents/CEC-300-2007-008-CMF.PDF. At the direction of Governor Schwarzenegger, the California Public Utilities Commission (CPUC) approved the California Solar Initiative on January 12, 2006. The initiative creates a $3.3 billion, ten-year program to install solar panels on one million roofs in the State. See http://www.gosolarcalifornia.ca.gov/nshp/index.html.

10. For example, Alameda County has installed two solar tracking carports, each generating 250 kilowatts. By 2005, the County had installed eight photovoltaic systems totaling over 2.3 megawatts. The County is able to meet 6 percent of its electricity needs through solar power. See http://www.acgov.org/gsa/Alameda%20County%20-%20Solar%20Case%20Study.pdf.

11. Many commercial, industrial, and campus-type facilities (such as hospitals, universities and prisons) use fuel to produce steam and heat for their own operations and processes. Unless captured, much of this heat is wasted. Combined heat and power (CHP) captures waste heat and re-uses it, *e.g.*, for residential or commercial space heating or to generate electricity. See U.S. EPA, Catalog of CHP Technologies at http://www.epa.gov/chp/documents/catalog_of_%20chp_tech_entire.pdf. The average efficiency of fossil-fueled power plants in the United States is 33 percent. By using waste heat recovery technology, CHP systems typically achieve total system efficiencies of 60 to 80 percent. CHP can also substantially reduce emissions of carbon dioxide. http://www.epa.gov/chp/basic/efficiency.html. Currently, CHP in California has a capacity of over 9 million kilowatts. See list of California CHP facilities at http://www.eea-inc.com/chpdata/States/CA.html.

12. The California Energy Commission has found that the State's water-related energy use – which includes the conveyance, storage, treatment, distribution, wastewater collection, treatment, and discharge – consumes about 19 percent of the State's electricity, 30 percent of its natural gas, and 88 billion gallons of diesel fuel every year. See http://www.energy.ca.gov/2007publications/CEC-999-2007-008/CEC-999-2007-008.PDF. Accordingly, reducing water use and improving water efficiency can help reduce energy use and associated greenhouse gas emissions.

13. The Water Conservation in Landscaping Act of 2006 (AB 1881) requires the Department of Water Resources (DWR), not later than January 1, 2009, to update the Model Water Efficient Landscape Ordinance. The draft of the entire updated Model Water Efficient Landscape Ordinance will be made available to the public. See http://www.owue.water.ca.gov/landscape/ord/updatedOrd.cfm.

14. See Graywater Guide, Department of Water Resources, Office of Water Use Efficiency and Transfers at http://www.owue.water.ca.gov/docs/graywater_guide_book.pdf. See also The Ahwahnee Water Principles, Principle 6, at http://www.lgc.org/ahwahnee/h2o_principles.html. The Ahwahnee Water Principles have been adopted by City of Willits, Town of Windsor, Menlo Park, Morgan Hill, Palo Alto, Petaluma, Port Hueneme, Richmond, Rohnert Park, Rolling Hills Estates, San Luis Obispo, Santa Paula, Santa Rosa, City of Sunnyvale, City of Ukiah, Ventura, Marin County, Marin Municipal Water District, and Ventura County.

15. See Office of Environmental Health Hazard Assessment and the California Water and Land Use Partnership, Low Impact Development, at http://www.coastal.ca.gov/nps/lid-factsheet.pdf.

16. See, for example, the City of Santa Cruz, Water Conservation Office at http://www.ci.santa-cruz.ca.us/wt/wtcon/index.html; Santa Clara Valley Water District, Water Conservation at http://www.valleywater.org/conservation/index.shtm; and Metropolitan Water District and the Family of Southern California Water Agencies, Be Water Wise at http://www.bewaterwise.com. Private projects may provide or fund similar education.

17. See Public Interest Energy Research Program, Dairy Power Production Program, Dairy Methane Digester System, 90-Day Evaluation Report, Eden Vale Dairy (Dec. 2006) at http://www.energy.ca.gov/2006publications/CEC-500-2006-083/CEC-500-2006-083.PDF. See also discussion in the general plan section, below, relating to wastewater treatment plants and landfills.

18. Many cities and counties provide information on waste reduction and recycling. See, for example, the Butte County Guide to Recycling at http://www.recyclebutte.net. The California Integrated Waste Management Board's website contains numerous publications on recycling and waste reduction that may be helpful in devising an education project. See http://www.ciwmb.ca.gov/Publications/default.asp?cat=13. Private projects may also provide education directly, or fund education.

19. See U.S. EPA, Our Built and Natural Environments, A Technical Review of the Interactions between Land Use, Transportation, and Environmental Quality (Jan. 2001) at pp. 46-48 http://www.epa.gov/dced/pdf/built.pdf.

20. See California Department of Housing and Community Development, Myths and Facts About Affordable and High Density Housing (2002), available at http://www.hcd.ca.gov/hpd/mythsnfacts.pdf.

21. Palo Alto's Green Ribbon Task Force Report on Climate Protection recommends pedestrian and bicycle-only streets under its proposed actions. See http://www.city.palo-alto.ca.us/civica/filebank/blobdload.asp?BlobID=7478.

22. There are a number of car sharing programs operating in California, including City CarShare http://www.citycarshare.org/, Zip Car http://www.zipcar.com/ and Flexcar http://www.flexcar.com/.

23. The City of Lincoln has a NEV program. See http://www.lincolnev.com/index.html.

24. Promoting "least polluting" methods of moving people and goods is part of a larger, integrated "sustainable streets" strategy now being explored at U.C. Davis's Sustainable Transportation Center. Resources and links are available at the Center's website. See http://stc.ucdavis.edu/outreach/ssp.php.

25. See, for example, Marin County's Safe Routes to Schools program at http://www.saferoutestoschools.org/.

26. For information on the general plan process, see Governor's Office of Planning and Research, General Plan Guidelines (1998), available at http://ceres.ca.gov/planning/genplan/gpg.pdf.

27. The Conservation Element addresses the conservation, development, and use of natural resources including water, forests, soils, rivers, and mineral deposits. Measures proposed for the Conservation Element may alternatively be appropriate for other elements. In practice, there may be substantial overlap in the global warming mitigation measures appropriate for the Conservation and Open Space Elements.

28. See the Attorney General's settlement agreement with the County of San Bernardino, available at http://ag.ca.gov/cms_pdfs/press/2007-08-21_San_Bernardino_settlement_agreement.pdf. See also Marin County Greenhouse Gas Reduction Plan (Oct. 2006) at http://www.co.marin.ca.us/depts/CD/main/pdf/final_ghg_red_plan.pdf; Marin Countywide Plan (Nov. 6, 2007) at http://www.co.marin.ca.us/depts/CD/main/fm/cwpdocs/CWP_CD2.pdf; Draft Conservation Element, General Plan, City of San Diego at http://www.sandiego.gov/planning/genplan/pdf/generalplan/ce070918.pdf.

29. Public Resources Code Section 25402.1(h)2 and Section 10-106 of the Building Energy Efficiency Standards establish a process that allows local adoption of energy standards that are more stringent than the statewide Standards. More information is available at the California Energy Commission's website. See http://www.energy.ca.gov/title24/2005standards/ordinances_exceeding_2005_building_standards.html.

30. See, *e.g.*, LEED at http://www.usgbc.org/DisplayPage.aspx?CategoryID=19; see also Build it Green at http://www.builditgreen.org/guidelines-rating-systems.

31. The City of Santa Monica, for example, has instituted a Green Building Program. See http://www.greenbuildings.santa-monica.org/. The City of Pasadena also has a green building ordinance that applies to public and private buildings. See http://www.ci.pasadena.ca.us/permitcenter/greencity/building/gbprogram.asp and http://ordlink.com/codes/pasadena/index.htm?Search_Code=Begin+Searching+Municipal+Code at Title 14. The City of San Francisco is considering adopting green building performance requirements that would apply to public and private buildings. See http://www.sfenvironment.org/downloads/library/gbtfrrreleasev1.3.pdf.

32. See, *e.g.*, "Green County San Bernardino," http://www.greencountysb.com/. As part of its program, the County is waiving permit fees for alternative energy systems and efficient heating and air conditioning systems. See http://www.greencountysb.com/ at p. 3. For a representative list of incentives for green building offered in California and throughout the nation, see U.S. Green Building Council, Summary of Government LEED Incentives (updated quarterly) at https://www.usgbc.org/ShowFile.aspx?DocumentID=2021.

33. For example, Riverside Public Utilities offers free comprehensive energy audits to its business customers. See http://www.riversideca.gov/utilities/busi-technicalassistance.asp.

34. Under Southern California Gas Company's Energy Efficiency Program for Commercial/Industrial Large Business Customers, participants are eligible to receive an incentive based on 50% of the equipment cost, or $0.50 per therm saved, whichever is lower, up to a maximum amount of $1,000,000 per customer, per year. Eligible projects require an energy savings of at least 200,000 therms per year. See http://www.socalgas.com/business/efficiency/grants/.

35. The City of Berkeley is in the process of instituting a "Sustainable Energy Financing District." According to the City, "The financing mechanism is loosely based on existing 'underground utility districts' where the City serves as the financing agent for a neighborhood when they move utility poles and wires underground. In this case, individual property owners would contract directly with qualified private solar installers and contractors for energy efficiency and solar projects on their building. The City provides the funding for the project from a bond or loan fund that it repays through assessments on participating property owners' tax bills for 20 years." See http://www.cityofberkeley.info/Mayor/PR/pressrelease2007-1023.htm.

The California Energy Commission's Public Interest Energy Research Program estimates that the technical potential for rooftop applications of photovoltaic systems in the State is about 40 gigawatts in 2006, rising to 68 gigawatts in 2016. See Public Interest Energy Research Program, California Rooftop Photovoltaic (PV) Resource Assessment and Growth Potential by County (2007), available at http://www.energy.ca.gov/publications/displayOneReport.php?pubNum=CEC-500-2007-048.

36. As described in its Climate Action Plan, the City of San Francisco uses a combination of incentives and technical assistance to reduce lighting energy use in small businesses such as grocery stores, small retail outlets, and restaurants. The program offers free energy audits and coordinated lighting retrofit installation. In addition, the City offers residents the opportunity to turn in their incandescent lamps for coupons to buy fluorescent units. See San Francisco's Climate Action Plan, available at http://www.sfenvironment.org/downloads/library/climateactionplan.pdf.

37. Among other strategies for reducing its greenhouse gas emissions, Yolo County has adopted purchasing policies for computers and electrical equipment. http://www.yolocounty.org/docs/press/GreenhouseGas.htm.

38. See, for example, Los Angeles County Green Purchasing Policy, June 2007 at http://www.responsiblepurchasing.org/UserFiles/File/General/Los%20Angeles%20County,%20Green%20Purchasing%20Policy,%20June%202007.pdf. The policy requires County agencies to purchase products that minimize environmental impacts, including greenhouse gas emissions.

39. Some local agencies have implemented a cool surfaces programs in conjunction with measures to address storm water runoff and water quality. See, for example, The City of Irvine's Sustainable Travelways/Green Streets program at http://www.cityofirvine.org/depts/redevelopment/sustainable_travelways.asp; The City of Los Angeles's Green Streets LA program at http://water.lgc.org/water-workshops/la-workshop/Green_Streets_Daniels.pdf/view; see also The Chicago Green Alley Handbook at http://egov.cityofchicago.org/webportal/COCWebPortal/COC_EDITORIAL/GreenAlleyHandbook_Jan.pdf.

40. See the website for Lawrence Berkeley National Laboratory's Urban Heat Island Group at http://eetd.lbl.gov/HeatIsland/LEARN/ and U.S. EPA's Heat Island website at www.epa.gov/heatisland/. To learn about the effectiveness of various heat island mitigation strategies, see the Mitigation Impact Screening Tool, available at http://www.epa.gov/heatisld/resources/tools.html.

41. For example, the City of Lompoc has a policy to "require new development to offset new water demand with savings from existing water users, as long as savings are available." See http://www.ci.lompoc.ca.us/departments/comdev/pdf07/RESRCMGMT.pdf.

42. The Irvine Ranch Water District in Southern California, for example, uses a five-tiered rate structure that rewards conservation. The water district has a baseline charge for necessary water use. Water use that exceeds the baseline amount costs incrementally more money. While "low volume" water use costs $.082 per hundred cubic feet (ccf), "wasteful" water use costs $7.84 per ccf. See http://www.irwd.com/AboutIRWD/rates_residential.php. Marin County has included tiered billing rates as part of its general plan program to conserve water. See Marin County Countywide Plan, page 3-204, PFS-2.q, available at http://www.co.marin.ca.us/depts/CD/main/fm/cwpdocs/CWP_CD2.pdf.

43. See the City of Fresno's Watering Regulations and Ordinances at http://www.fresno.gov/Government/DepartmentDirectory/PublicUtilities/Watermanagement/Conservation/WaterRegulation/WateringRegulationsandRestrictions.htm.

44. See, *e.g.*, the City of San Diego's plumbing retrofit ordinance at http://www.sandiego.gov/water/conservation/selling.shtml.

45. The City of Roseville offers free water conservation audits through house calls and on-line surveys. See http://www.roseville.ca.us/eu/water_utility/water_conservation/for_home/programs_n_rebates.asp.

46. See Landscape Performance Certification Program, Municipal Water District of Orange County at http://waterprograms.com/wb/30_Landscapers/LC_01.htm.

47. For example, San Diego's Metropolitan Wastewater Department (SDMWD) installed eight digesters at one of its wastewater treatment plants. Digesters use heat and bacteria to break down the organic solids removed from the wastewater to create methane, which can be captured and used for energy. The methane generated by SDMWD's digesters runs two engines that supply enough energy for all of the plant's needs, and the plant sells the extra energy to the local grid. See http://www.sandiego.gov/mwwd/facilities/ptloma.shtml. In addition, the California Air Resources Board approved the Landfill Methane Capture Strategy as an early action measure. http://www.arb.ca.gov/cc/ccea/landfills/landfills.htm. Numerous landfills in California, such as the Puenta Hills Landfill in Los Angeles County (http://www.lacsd.org/about/solid_waste_facilities/puente_hills/clean_fuels_program.asp), the Scholl Canyon Landfill in the City of Glendale (http://www.glendalewaterandpower.com/Renewable%20Energy%20Development.asp), and theYolo Landfill in Yolo County, are using captured methane to generate power and reduce the need for other more carbon-intensive energy sources.

48. On April 30, 2007, the Public Utilities Commission authorized a CCA application by the Kings River Conservation District on behalf of San Joaquin Valley Power Authority (SJVPA). SJVPA's Implementation Plan and general CCA program information are available at www.communitychoice.info. See also http://www.co.marin.ca.us/depts/CD/main/comdev/advance/Sustainability/Energy/cca/CCA.cfm. (County of Marin); and http://sfwater.org/mto_main.cfm/MC_ID/12/MSC_ID/138/MTO_ID/237 (San Francisco Public Utilities Commission). See also Public Interest Energy Research, Community Choice

Aggregation (fact sheet) (2007), available at http://www.energy.ca.gov/publications/displayOneReport.php?pubNum=CEC-500-2006-082.

49. The Land Use Element designates the type, intensity, and general distribution of uses of land for housing, business, industry, open-space, education, public buildings and grounds, waste disposal facilities, and other categories of public and private uses.

50. Samples of local legislation to reduce sprawl are set forth in the U.S. Conference of Mayors' Climate Action Handbook. See http://www.iclei.org/documents/USA/documents/CCP/Climate_Action_Handbook-0906.pdf.

51. For a list and maps related to urban growth boundaries in California, see Urban Growth Boundaries and Urban Line Limits, Association of Bay Area Governments (2006) at http://www.abag.ca.gov/jointpolicy/Urban%20Growth%20Boundaries%20and%20Urban%20Limit%20Lines.pdf.

52. The Circulation Element works with the Land Use element and identifies the general location and extent of existing and proposed major thoroughfares, transportation routes, terminals, and other local public utilities and facilities.

53. See Orange County Transportation Authority, Signal Synchronization at http://www.octa.net/signals.aspx. Measures such as signal synchronization that improve traffic flow must be paired with other measures that encourage public transit, bicycling and walking so that improved flow does not merely encourage additional use of private vehicles.

54. San Francisco's "Transit First" Policy is listed in its Climate Action Plan, available at http://www.sfenvironment.org/downloads/library/climateactionplan.pdf. The City's policy gives priority to public transit investments and provides public transit street capacity and discourages increases in automobile traffic. This policy has resulted in increased transit service to meet the needs generated by new development.

55. The City of La Mesa has a Sidewalk Master Plan and an associated map that the City uses to prioritize funding. As the City states, "The most important concept for sidewalks is connectivity. For people to want to use a sidewalk, it must conveniently connect them to their intended destination." See http://www.ci.la-mesa.ca.us/index.asp?NID=699.

56. San Francisco assesses a Downtown Transportation Impact Fee on new office construction and commercial office space renovation within a designated district. The fee is discussed in the City's Climate Action plan, available at http://www.sfenvironment.org/downloads/library/climateactionplan.pdf.

57. For example, Seattle, Washington maintains a public transportation "ride free" zone in its downtown from 6:00 a.m. to 7:00 p.m. daily. See http://transit.metrokc.gov/tops/accessible/paccessible_map.html#fare.

58. See, *e.g.*, Reforming Parking Policies to Support Smart Growth, Metropolitan Transportation Commission (June 2007) at

http://www.mtc.ca.gov/planning/smart_growth/parking_seminar/Toolbox-Handbook.pdf; see also the City of Ventura's Downtown Parking and Mobility Plan, available at http://www.cityofventura.net/depts/comm_dev/resources/mobility_parking_plan.pdf, and its Downtown Parking Management Program, available at http://www.cityofventura.net/depts/comm_dev/downtownplan/chapters/5_programs_implementation.pdf.

59. See Safe Routes to School Toolkit, National Highway Traffic Safety Administration (2002) at www.nhtsa.dot.gov/people/injury/pedbimot/bike/Safe-Routes-2002; see also www.saferoutestoschools.org (Marin County).

60. The Housing Element assesses current and projected housing needs. In addition, it sets policies for providing adequate housing and includes action programs for that purpose.

61. The U.S. Conference of Mayors cites Sacramento's Transit Village Redevelopment as a model of transit-oriented development. More information about this project is available at http://www.cityofsacramento.org/planning/projects/65th-street-village/. The Metropolitan Transportation Commission (MTC) has developed policies and funding programs to foster transit-oriented development. More information is available at MTC's website: http://www.mtc.ca.gov/planning/smart_growth/#tod. The California Department of Transportation maintains a searchable database of 21 transit-oriented developments at http://transitorienteddevelopment.dot.ca.gov/miscellaneous/NewHome.jsp.

62. The City of Berkeley has endorsed the strategy of reducing developer fees or granting property tax credits for mixed-use developments in its Resource Conservation and Global Warming Abatement Plan. City of Berkeley's Resource Conservation and Global Warming Abatement Plan p. 25 at http://www.baaqmd.gov/pln/GlobalWarming/BerkeleyClimateActionPlan.pdf.

63. The Open Space Element details plans and measures for preserving open space for natural resources, the managed production of resources, outdoor recreation, public health and safety, and the identification of agricultural land. As discussed previously in these Endnotes, there may be substantial overlap in the measures appropriate for the Conservation and Open Space Elements.

64. The Safety Element establishes policies and programs to protect the community from risks associated with seismic, geologic, flood, and wildfire hazards.

CHAPTER 7 – HEAVY DUTY TRUCK MODEL

INTRODUCTION

The SCAG Year 2003 Regional Model incorporates a computerized truck model, which estimates trip generation, distribution, and traffic assignment for Heavy-Duty Trucks (HDT). According to the California Air Resources Board (CARB), a heavy-duty truck is defined as a truck with a gross vehicle weight of 8,500 pounds or more. The HDT Model is fully integrated with the SCAG Regional Transportation Model. It employs truck trip generation rates, and uses a network of regional highway facilities for truck traffic assignment. The truck traffic assignment process is integrated with the assignment process for light-and-medium duty vehicles in the Regional Model, so that the effects of congestion on truck route choice are represented. The integration of the trip assignment process for both models is necessary so that the effects of truck activity on light-and-medium duty vehicles in the traffic stream are also represented.

A primary objective is to improve the current internal trip generation model by re-estimating the truck trip production and attraction rates for certain land use/employment sectors. The re-estimation of trip productions and attractions will be at the new zone system (4109 internal TAZs).

The HDT Model is extensively documented in a separate report recently prepared for SCAG. The contents of this Chapter is limited to a brief overview of the Model, and a discussion of how the HDT Model was used to generate and distribute heavy-duty truck trips for the Year 2003 Model Validation Run. The assignment and Vehicle Miles Traveled (VMT) results for the HDT traffic component of the Model are presented in Chapter 8.

DESCRIPTION OF HEAVY DUTY TRUCK MODEL

The HDT Model is designed to develop forecasts of heavy-duty trucks in the following three Gross Vehicle Weight (GVW) categories:

- Light-Heavy Trucks: 8,500 to 14,000 pounds GVW
- Medium-Heavy Trucks: 14,000 to 33,000 pounds GVW
- Heavy-Heavy Trucks: over 33,000 pounds GVW

The Model is specifically designed to forecast truck movements in the Region for air quality conformity determinations. As such, it produces VMT estimates for the three truck weight classifications identified above. The HDT Model employs socioeconomic data by Traffic Analysis Zone (TAZ), with employment data broken down into further detail by North American Industry Classification System (NAICS) code to better estimate commodity flow demand that correspond to truck travel demand.

External truck trips, trips with a trip end outside of the SCAG Region were developed from estimated incoming and outgoing commodity flows. The internal ending points of those trips are allocated to TAZs within the SCAG Region. Truck trips "internal" to the Region are estimated from shipping and receiving daily truck trip generation rates corresponding to the number of employees in various employment sectors in each zone, and in certain cases, with the number of households in each zone. Special truck activity trip tables were developed for special truck trip generators, such as ports and airports. Truck specific time period factors, derived from California Weigh In Motion (WIM) truck data, were applied to allocate daily truck activity into the four model time periods (A.M. peak, Midday, P.M. peak, and Night). Trucks are converted into passenger car equivalents during the assignment phase. The trip assignment process simultaneously loads both heavy-duty trucks and light-and-medium duty autos/trucks so that all vehicle types are accounted for in the traffic stream.

Internal Truck Trip Generation Rates

As indicated in the previous section, the current model trip rates are retained for all the sectors. The internal model trip rates used in the interim version of the model are shown in Table 7-1.

Table 7-1

DAILY TRIP RATES FOR INTERNAL TRUCK TRIP GENERATION

EMPOLYMENT CATEGORY	LIGHT HDV	MEDIUM HDV	HEAVY HDV
Households	0.0390	0.0087	0.0023
Agriculture/Mining/Construction	0.0513	0.0836	0.0569
Retail	0.0605	0.0962	0.0359
Government	0.0080	0.0022	0.0430
Manufacturing	0.0353	0.0575	0.0391
Transportation/Utility	0.2043	0.0457	0.1578
Wholesale	0.0393	0.0650	0.0633
Other	0.0091	0.0141	0.0030

Notes: Rates are per household or per employee in each category.

Truck Trip Generation and Distribution

The internal truck trip generation model uses a cross classification methodology using 1-digit employment categories by truck weight class. The internal truck trip generation summary is provided in Table 7-2.

The external truck trips are generated and distributed using a combination of commodity flow data at the county level and 2-digit employment data for allocating county data to

TAZs. External to external truck trips were developed based on observed traffic counts at the external stations and the commodity flow data.

Port related truck trips were developed by using Port of Long Beach's quick trip models for trip generation and the new gate surveys that provided the distribution information of these trips. Air cargo trip tables for Year 2003 were developed by another consultant with the proprietary RADAM model.

The average internal truck trip length in miles for all is 5.92 for Light, 13.06 for Medium, and 24.11 for Heavy.

Table 7-2

YEAR 2003 HEAVY-DUTY VEHICLE INTERNAL TRIP GENERATION BY COUNTY AND BY SECTOR

COUNTY	Light HDV	Medium HDV	Heavy HDV	TOTAL
Imperial	3,789	2,743	3,326	9,859
Los Angeles	247,792	161,873	198,060	607,724
Orange	77,059	59,087	68,905	205,051
Riverside*	39,890	28,049	24,796	92,735
San Bernardino*	43,858	27,401	31,772	103,032
Ventura	19,215	14,547	14,406	48,169
ALL COUNTIES	431,604	293,700	341,265	1,066,569

SECTOR	Light HDV	Medium HDV	Heavy HDV	TOTAL
Households	216,441	48,283	12,764	277,488
Ag/Mining/Const	24,667	40,199	27,360	92,226
Retail	48,273	76,757	28,644	153,674
Governments	1,861	512	10,004	12,377
Manufacturing	30,509	49,697	33,794	114,000
Transportation/Utility	69,363	15,516	53,575	138,454
Wholesale	0	0	161,775	161,775
Other	40,490	62,737	13,348	116,575
ALL SECTORS	431,604	293,701	341,264	1,066,569

Truck Trip Assignment

Truck specific time period factors, derived from California Weigh In Motion (WIM) truck data, were applied to allocate daily truck activity into the four model time periods (A.M. peak, Midday, P.M. peak, and Night). Trucks are converted into passenger car equivalents during the assignment phase.

The trip assignment process simultaneously loads both heavy-duty trucks and light-and-medium duty autos/trucks so that all vehicle types are accounted for in the traffic stream.

Truck PCE is estimated for each link by the product of a grade factor and a congestion factor. The grade factors range from 1.2 to 3.6 for Light, 1.5 to 4.5 for Medium, and 2.0 to 6.0 for Heavy HDV. The congestion factors range between 1.0 and 1.3.

The HDT model (developed using 1994 data) was carefully validated against a number of specific parameters including:

- The model estimated Year 2003 truck movements across 23 regional screenlines to within 5.8 percent of the corresponding truck traffic counts (all screenlines combined).
- All differences on individual screenlines were well within allowable tolerances established for regional modeling processes.
- Finally, Year 2003 daily truck VMT was estimated by the HDT Model. The estimate was compared to truck VMT estimates from other statistical sources as part of the model validation process. See Table 8-3.

The truck traffic assignment results are documented in the SCAG regional screenline summaries and in the assignment VMT summaries tabulated and presented in Chapter 8.

POST MODEL ADJUSTMENT OF THE SPEED OF THE HEAVY DUTY TRUCKS

The Year 2003 Model assumes shared lanes for both passenger cars and heavy-duty trucks (HDTs) except for HOV lanes, truck only lanes, and where trucks are prohibited such as the section of Pasadena Freeway north of downtown LA. Both passenger car and trucks are loaded on the same segment of the roadway irregardless of which lanes the HDTs can travel. Therefore, both HDTs and passenger cars would have the same model speed on the same roadway segment. In order to reflect slower speeds that most trucks are traveling, a post model adjustment of the speeds for the trucks was made using the available Freeway Performance Measurement System (PeMS) data. The hypothesis is that heavy-duty trucks travel slower than the passenger cars due to the following:

1. Heavy-duty trucks can only travel on the outside lanes. HDT's choice of travel is relatively limited.
2. The speeds on outside lanes are interfered and thus slowed by incoming and

outgoing vehicles.

3. The acceleration and deceleration of the HDT are much slower than the passenger vehicle.

A linear regression was developed through the analysis of the PeMS database to build the relationship between the speeds of vehicles traveling on the outer freeway lanes and the speeds of vehicles traveling on the inner freeway lanes. This analysis resulted in the following equation:

HDT speed = 0.31 + 0.9657* average freeway speed

The regression R-Square value of the equation is 0.98 and the t statistics for the independent variable is 417.95.

There is no reliable data to derive the speeds of HDT's on arterials. For Year 2003 model, a similar equation is applied to adjust HDT speeds on arterials.

Mira Loma 12/1/2010

My name is Charles Lanathoua and I live in Mira Loma Village since 1974. I'm opposed to any more construction of warehouses in our neighborhood. We already have health problems caused by exhaust fumes from trucks and cars.

Kids in this area are known to have underdeveloped lungs, asthma, heart desease etc ..

The air we breathing in were analyzed the worst in the nation. Beside people getting sick and dying our trees in the backyards are dying to; we did not have that problem before this pollution we have from the traffic.

Patio furniture and cement floors have to be washed every other day at the houses adjacent to Etiwanda Ave, cloth lines are covered from the residue of diesel fumes; you can see it over the plants, bird feeders etc..

Please do not allow any more warehouses around our village.

Thank you.

Charles Lanathoua

Charles Lanathoua

Hinojosa, Christian

From: Betty Anderson [bettysjam@earthlink.net]
Sent: Sunday, November 28, 2010 11:04 PM
To: Hinojosa, Christian
Cc: district2@rcbos.org
Subject: Agenda Item 4.5

Mr. Hinojosa,

Please add my objections to this proposed warehouse development. I will not be able to attend the Planning Commission meeting and want my objections entered into the record.

I believe Mira Loma has too many mega warehouses already, and many are currently vacant. Why does anyone think we need more? The Planning Commission members as well as the Board of Supervisors have heard my objections to the numerous mega warehouses many times already. Why do the residents of Mira Loma have to continue to suffer from the air quality and traffic issues caused by this type of development? The people of Mira Loma Village deserve better, as do the people of the Homestead Development and the Country Village Senior Apartment complex.

There is nothing that the developer of this project can say to justify this plan. This plan as it now stands should not go forward because of the additional harm it will cause Mira Loma.

Betty A. Anderson
Mira Loma

Reply 1 to
Christian Hinojosa
Response, October 14,2010

Reply to Hinojosa Response #1

Since 1990, (you say): I can understand an oversight but not to do anything about it now, seems unresponsive.

Your own "Staff Report" shows that you are erred if you are contending that all of the buildings have been modified as described. One **warehouse** is reported as having 51 loading docks.

Please allow me to remind you that the "Staff Report" states that this project will require a statement of overriding findings for "...impacts to Air Quality, Noise and Transportation and Traffic" from the Riverside Planning Director to go forward.

My comment #1 remains as written.
Thank you, Stephen Anderson

Response to
Stephen Anderson
Comment letter dated: October 1, 2010

Anderson Comment #1

This proposal abuts three special Mira Loma neighborhoods; Mira Loma Village, Homestead and Country Village. The first two are diverse ethnic residential communities, while the latter is a Senior Living Community. The last thing these communities need is more warehouses pollution, warehouse noise and traffic congestion stemming from warehouse trucking. The last thing Mira Loma needs is greater problems resulting from more Riverside County warehouse development.

Mira Loma already has a particulate air pollution problem that is the worst in the United States. These three special neighborhoods are already inundated and surrounded with Riverside County warehouse development.

What is the point of this proposal? Is Riverside County seeking to enforce its will at the expense of the health of the inhabitants of these residential communities?

If this proposal should go forward it should be relocated to Riverside, below the office window of Director Luna, where she will be able to monitor the pollution daily.

Response to Anderson Comment #1

The six plot plans which make up the proposed project are all located within the Mira Loma Commerce Center, an existing industrial park. The Mira Loma Commerce Center is comprised of approximately 288 acres of industrial park with warehouse, distribution, and manufacturing

uses. The Mira Loma Commerce Center (MLCC) was originally formed in 1990, when the County approved the manufacturing and industrial uses for the area. (Draft EIR, p. 3.0-1)

The proposed plot plans which abut the Mira Loma Village development have been modified whereby single industrial warehouses with large numbers of loading bays have been replaced with smaller individual buildings averaging 11,271 square feet in size. Additionally, the smaller buildings are not intended to be warehouses, and the exterior dock-high loading areas have been eliminated and replaced with interior ground-level loading areas. By redesigning some of the larger buildings into numerous smaller buildings the overall square footage decreased which in turn reduces the amount of traffic associated with the project. Smaller building size also discourages larger regional distribution facilities from operating provides a more suitable facility for smaller business park uses that are less truck-intensive. (Final EIR, p. 2.0-88)

A reduction in traffic also lends to decreased air quality emissions of criteria pollutants, diesel particulate matter, and greenhouse gases. Impacts related to air quality, noise, and traffic was thoroughly discussed in Draft EIR sections 4.3, 4.11, and 4.15, respectively. Impacts related to land use compatibility were also addressed in Draft EIR section 4.9.

Response to
Natural Resources Defense Council
Comment letter dated: October 4, 2010

NRDC Comment #1

On behalf of the the Natural Resources Defense Council, we write to provide additional comments on the Re-circulated Environmental Impact Report for the Mira Loma Commerce Center ("EIR"). At the outset, we note that this environmental review document is insufficient to form the basis for informed decision under the California Environmental Quality Act. These comments supplement the comments we made in our letter to you dated, June 11, 2010. We again request that these comments and the attachments be included in the record for this project.

We continue to maintain that, after further careful review, the EIR fails in many respects to comply with the requirements of the California Environmental Quality Act ("CEQA"). In addition to the issues we raised in our June letter, which is hereby incorporated by reference, the inadequacy of the EIR due to failure to carry out CEQA's mandates extends to the following issues: trip lengths used in the EIR calculations; mitigation measures; and the project's projected greenhouse gas impacts.

Response to NRDC Comment #1

Comment noted. These comments are included in the record for this Project as were the comments submitted June 11, 2010. Responses to the remaining comments in this letter describe how the EIR complies with CEQA.

Moreover, the commenter's conclusory statements above regarding the EIR are not supported by any evidence, much less substantial evidence. No explanation is provided regarding why the commenter believes that these conclusions are correct. In fact, the EIR includes a thorough, complete, and careful analysis of all potentially significant impacts resulting from the Project, and the EIR includes mitigation measures that would mitigate to the fullest extent feasible all of those potentially significant impacts. Additionally, the EIR includes a complete analysis of the Project's mobile source impacts and projected greenhouse gas impacts and provides conclusions based on those impacts. (See Draft EIR § & 4.3 and 6.0.) These commenter's conclusory statements do not require any further response. (See *Browning-Ferris Industries of California v. City of San Jose* (1986) 181 Cal.App.3d 852 [Where a general comment is made, a general response is sufficient.].)

I. The Asserted Trip Lengths in the EIR are not supported by substantial evidence.

The EIR offers no substantive authority for the average trips lengths used in the URBEMIS calculations for emissions. Under §15151 of the CEQA Guidelines, "[A]n EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences." Here, the EIR states that "because the project's trips will primarily be localized, short-distance trips associated with business matters or warehouse trips to Ontario Airport – and not regional, long-distance trips associated with Port warehouse activities – the average trip lengths . . . are accurate."[1] However, the EIR also states "there are no building occupants identified."[2] If no occupants have been identified, then the specific type of business that will be conducted from the warehouses remains unknown. Only when the type of business is known can there be a specific understanding of whether the particular operation will require deliveries from Ontario Airport or the ports of Long Beach and/or Los Angeles. Without the actual trip starting points, the EIR cannot give sound emissions estimates that constitute true "environmental consequences." The EIR contains no accurate basis for assertions about trip length.

The EIR states that warehouses in the Mira Loma area of similar size tend to be occupied by businesses that use the Ontario Airport rather than the ports.[3] However, the EIR contains no substantial evidence to support the assertion, such as market research or statistical analysis based on locally registered businesses. Under § 15384 of the CEQA Guidelines, "'Substantial evidence' as used in these guidelines means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion." Section 15384 continues, "[s]ubstantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." In support of the given average trip lengths, the EIR states, "typically, the larger warehouses over 250,000 square feet accommodate goods that may come from the ports. Only one plot plan of this project is over 250,000 square feet."[4] Without evidence with respect to what warehouses "typically" support, this is simply a conclusory statement unsupported by facts such as, again, market research or statistical analysis of local businesses that use warehouses. "The EIR must contain facts and analysis, not just the bare conclusions of a public agency."[5] The EIR also fails to disclose that obtaining this market analysis would have been prohibitive. Moreover, the EIR fails to articulate how the one warehouse that it admits could support freight coming from the Ports was factored into the trip length used for the environmental review.

With projected emissions values generated from the URBEMIS regional average trip length values, the EIR has not been prepared with a "sufficient degree of analysis," with respect to projected emissions of potentially health-endangering compounds. As the URBEMIS user's manual says: "Trip lengths are one of the most important data elements used in calculating project emissions. Air districts or other agencies responsible environmental review should ensure that default trip length values used in their area have a sound basis."[6] The EIR articulates no "sound basis" for the trip length value, it simply concludes that they are "accurate," as quoted above. Under §15151 of the CEQA Guidelines, "the courts have favored specificity and the use of detail in EIRs."[7] In *Kings County Farm Bureau v. City of Hanford*, the court stated, "A legally adequate EIR . . . must contain sufficient detail to help ensure the integrity of the process of decisionmaking by precluding stubborn problems or serious criticism from being swept under the rug . . . . It must reflect the analytic route the agency traveled from evidence to action."[8] Without substantial evidence and a sufficient degree of analysis, an "EIR does not comply with CEQA."[9]

Response to NRDC Comment #2

As stated in the attachment to the Director's Hearing Staff Report from October 4. 2010, Response to SCAQMD Comment # 2, provided below and in Final EIR p. 2.0-65), provides an explanation of why the analysis used the default urban trips lengths for Riverside County and why they are appropriate for this Project:

> The comment correctly states the trip lengths utilized in the Air Quality Impact Analysis for this project. The values used are the default urban trip lengths listed in URBEMIS 2007 for Riverside County. As the western Riverside County is an urban environment, the urban setting was selected. The URBEMIS 2007 computer model, approved by both California Air Resources Board (CARB) and SCAQMD[1], was last updated in February 2008 and did not contain any updates to the average trip length assumptions used in the model demonstrating that they were still accurate. According to staff at SCAQMD[2], there are no published documents that describe how to adjust trip lengths for development projects. This is particularly the case when there are no building occupants identified. Suggested document to review for potential trip length information included the 2003 Fontana *Truck Trip Generation Study*, the *Mira Loma PM_{10} Monitoring* report prepared by SCAQMD in 2001. Upon further review, these studies did not include information on trip lengths. Additional research was also conducted by the County, including review of documents from CARB, the Californian Department of Transportation (Caltrans), and regional metropolitan planning organizations, to determine reasonable assumptions for altering the default trip length.[3] No methodology was found that could provide a more accurate trip length for speculative buildings. Regarding sources of trip lengths, URBEMIS 2007 *Software User's Guide*, prepared for the SCAQMD, "More detailed breakdowns may be available from the Regional Transportation Planning Agency in your

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[1] http://www.arb.ca.gov/planning/urbemis/urbemis2007/urbemis2007.htm; http://www.aqmd.gov/ceqa/models.html

[2] Personal communication with James Koizumi on 8/27/09.

[3] These documents included, as examples, the CARB's *Goods Movement Action Plan*, SCAG's *Goods Movement Truck Count Study*, SCAG's 2008 *Regional Transportation Plan*, Federal Highway Administration's *Heavy-Duty Truck Activity Data*, Caltrans' Traffic Data Branch, *Annual Average Daily Truck Traffic*, Maricopa Association of Governments' *MAG Internal Truck Travel Survey and Truck Model Development Study*, and document posted on both the websites for the Ports of Los Angeles and Long Beach at http://www.portoflosangeles.org/environment/studies_reports.asp and http://www.polb.com/environment/air/emissions.asp; http://www.arb.ca.gov/gmp/gmp.htm

area." (User's Guide Appendix C, p. C-6.) The Southern California Association of Governments (SCAG), the regional transportation agency for the South Coast Air Basin does not have any published data for altering trip lengths. The default trip length in URBEMIS was relied upon in the absence of published documentation.

While it is understandable that other warehouse projects in the region have chosen to use a 40-mile one-way trip length, it is not as applicable to the proposed project as described herein. The project consists of six separate plot plans, two of which are business/industrial park uses rather than warehouses. Businesses draw local, short-distance trips in comparison to warehouses and because the project includes businesses, the average trip lengths generated will be shorter than if the project was entirely warehousing. The remaining four plot plans are smaller scale warehouse uses ranging from 104,210 square feet to 426,212 square feet in size. Typically, the larger warehouses over 250,000 square feet accommodate goods that may come from the ports. Only one plot plan of this project is over 250,000 square feet and there are no plot plans with very large regional-type warehouses over one million square feet in size. The smaller size of the majority of the project's plot plans makes them more suitable for local distribution facilities. It is also reasonable to assume that goods may be traveling to the project site from the Ontario Airport only five miles west of the project site.

Additionally, the *Subregional Freight Movement Truck Access Study* prepared by SCAG and the San Bernardino Association of Governments in 2004[4] reported that heavy-duty truck trips to/ from the Ports and Western Riverside County were a total of approximately eight trips during three peak hours periods (AM, Midday, and PM) in 1999 and will decrease by 2030 to four trips during three peak hours periods. Peak hour traffic is a fraction of total daily traffic. The total daily Port traffic will increase by a proportional amount when compared to the peak hour estimates, regardless of the area analyzed. Therefore, the peak hour estimates can be used as an indicator of the percentages of Port-related truck traffic traveling to different areas within the region. The western Riverside County area receives the least amount of truck trips related to the Ports, second only to the Coachella Valley/Idyllwild which receives no truck trips. This is also the only area to decrease heavy-duty truck trips in 2030. This further justifies that the project area is not frequently served by the Ports.

Because the project's trips will primarily be localized, short-distance trips associated with business matters or warehouse trips to Ontario Airport – and not regional, long-distance trips associated with Port warehouse activities – the <u>average</u> trip lengths used in the air quality analysis (which are URBEMIS default trip lengths) are accurate.

For these reasons, the mobile sources emissions were not recalculated as the trip lengths used in the Draft EIR are deemed appropriate.

Further, as stated in the letter submitted by SCAQMD on October 1, 2010, "The air quality analysis included consideration of AQMD staff written comments on the Draft EIR, and subsequent verbal comments. While the final air quality analysis may differ from AQMD recommended methodologies in some respects, the basic conclusions of the Final EIR would likely not change with further refinement to the air quality calculations. The lead agency

[4] http://www.scag.ca.gov/goodsmove/pdf/SFM_Truck_Access_Study_0704.pdf

concludes that air quality impacts and health risks remain significant and unavoidable during construction and operation."

No new environmental issues have been raised by this comment and no modification of the Draft EIR is required.

NRDC Comment #3

> **II. Proposed Mitigation Measures inadequately address projected environmental impacts**
>
> As detailed in the letter of June 11, 2010, a continuing omission in the mitigation measures is the failure to adopt all feasible mitigation measures as required by CEQA. For example, for both construction and for operations, all trucks should comply with the most recent EPA standards. Instead, the County proposes only to require that "the developer/successor-in-interest shall *provide occupants and businesses with information* related to state programs to require 2007 or 2010 EPA compliant trucks." (emphasis added)[10] Just as the ports of LA and Long Beach mandate such vehicles, so, too, can the county.[11]
>
> Furthermore, in the response to AQMD comment ten, the county states that the suggested mitigation measures – construction and implementation of a park & ride program and the provision of incentives to tenants to encourage the use of low sulphur fuel and particulate traps – are infeasible under § 21061.1.[12] Under that section, feasible means "capable of being accomplished in a successful manner within a reasonable period of time."[13] The refusal to enact the suggested mitigation measures results from the claim that because the future tenants are unknown, and thus so too the future businesses, there is no way to know the proper scale of a prospective park & ride facility; for the same reason, there is also no way to provide incentives because there's no way to calculate the cost.[14] The county's response begs the question of what constitutes a "successful manner" and a "reasonable period of time." The county cites no authority for either notion, so it appears that the county has decided arbitrarily. The decision based on its arbitrary declaration of infeasibility has resulted in an effective dismissal AQMD's recommendations, an outcome that disregards the health and safety concerns of the surrounding community as represented by AQMD, a state agency whose core competency and mission is to take "all necessary steps to protect public health from air pollution."[15]

Response to NRDC Comment #3

The Director's Hearing Staff Report contained a thorough evaluation of all the mitigation measures recommended by NRDC. All feasible mitigation measures were incorporated in the Final EIR. Three existing mitigation measures were modified in response to recommendations by the NRDC (**MM Air 3a**, **MM Air 3d**, and **MM Air 5**) and one additional feasible mitigation measure was identified and incorporated (**MM Air 3f**).

Additionally, six new project conditions of approval were incorporated based on subsequent recommendations from SCAQMD. The SCAQMD also recommended evaluating the feasibility of the project requiring only 2010 emissions-compliant trucks serve the project site. The feasibility of these proposed measures were previously addressed in SCAQMD Response to Comment #13, which explained why these measures were incapable of being accomplished in a

successful manner and within a reasonable period of time. Specifically, SCAQMD Response to Comment #13 states:

> Proposed Condition 29 and 30: These two measures require the developer to require only 2010 emissions-compliant trucks serve the project and that site enforcement staff shall be trained/certified in accordance with California Air Resources Board (CARB) guidelines to ensure compliance. The future building occupants are unknown at this time and a condition such as this makes the buildings less competitive in the market because potential tenants will search out other buildings (vacant or new) without this requirement to reduce costs. This is because very few tenants have truck fleets comprised of 100% brand new trucks or a truck fleet that has been 100% retrofitted to meet 2010-standards. According to an article posted by the Gerson Lehrman Group in August 2009 (Appendix C of the Final EIR), the price increases for 2010 compliant diesel trucks would be between $8,000 and $9,600. This does not include the price of a new engine or a new diesel truck (tractor). Accordingly, assuming that the number of daily trucks serving the project site is only 500 (a conservative estimate assuming some trucks make multiple trips per day since the Traffic Study estimated 736 trucks per day), the cost increase for 2010-compliant trucks would still range between $4,000,000 and $4,800,000 not including the cost of hiring CARB trained enforcement staff. This is assuming it would cost between $8,000 and $9,600 to repower existing truck engines within a tenant's fleet and does not account for the replacement of an entire engine to comply nor does it account for any replacement of an entire tractor (which can cost $100,000). Given that the total construction costs for the project will be approximately, $56,350,000[5] (see Draft EIR Appendix L), the cost of 2010-compliant trucks represents no less than approximately 7 to 8.5 percent of the project's total construction cost. The recession and slow economic recovery also further hinder such cost prohibitive measures and make the project less competitive in the current market. Requiring that a project developer/owner or future tenant incur such costs to accommodate a single mitigation measure – particularly given that the percentage is actually likely to be higher once the costs of hiring CARB trained/verified enforcement staff is included – is infeasible.

Moreover, and as previously stated in response to the NRDC June 11, 2010 letter in response to the request for clean truck fleets:

> This type of program is not feasible or applicable for this type of project where the building occupants are unknown and the various developers and/or County have no control over the truck fleets that may frequent the sites. If such a requirement were imposed, it would severely limit the number of potential building occupants which would significantly affect the economic viability of the Project. A tenant of a particular building may not even have control over the trucks used to transport goods to and from the facility. Specifically, in a competitive market like that which exists today, imposing measures that prohibit any tenant with even a single older truck from operating at the Project will likely result in the Project standing vacant. According to a 2004 study by the Bay Area Economic Forum, "Vacant buildings, along with their large parking lots, can attract litter, graffiti, and vandalism, as well as loiterers and homeless populations. A decaying building both worsens its own prospects for refurbishment and weakens the

[5] As shown in Appendix L, the total one-time major fees of $3,103,929 (Table 3-3) were added to the total estimated construction costs for the project are $53,254,344 (Table 5-1) for a total of $56,358,273.

vitality of the buildings around it."[6] Because the imposition of the measures proposed by the commenter would make the Project unmarketable and, thus, likely to remain vacant, the implementation of those measures would introduce other potentially significant impacts associated with aesthetics, hazards, and other environmental effects. Accordingly, they are rejected as infeasible for environmental reasons as well. Further, CARB has already adopted a regulation (referred to as the Truck and Bus Regulation) to reduce emissions from on-road diesel trucks which starts phasing in requirements for most fleets in January 2011[7]. However, and as required by mitigation measures **MM Air 8** and **MM Air 12**, the Project is required to do what is feasible by providing information to tenants about incentive programs and other technologies that support "clean" truck fleets so that the Project's future tenants can take advantage of those programs to reduce overall emissions. Ultimately, and as another example of the EIR's conservatism, the EIR concluded that this measure, even when combined with other feasible mitigation measures, would not reduce the health risks impacts associated with the production of diesel particulate matter to a less than significant level. (Draft EIR p. 4.3-72) Accordingly, the revisions suggested by the CCAEJ/NRDC are infeasible, and the existing analysis provided in the EIR is adequate.

For still further discussion of the infeasibility of requiring all trucks to be 2010-compliant, please see the written responses to the South Coast Air Quality Management District's comment letter dated October 1, 2010.

Finally, and as stated in Response to SCAQMD Comment #10, "...an existing park and ride lot is located at the SR-60 westbound off-ramp for Country Village Road which is one-half to one mile east of the project site." Additionally, Response to SCAQMD Comment #10 explains that the project proponents are also providing information to tenants regarding park-and-ride program via Mitigation Measure Air 11 and undertaking other measures to reduce air quality emissions. Ultimately, however, "the project proponents do not know whether the number of employees using [project] buildings will be sufficient to allow for the orchestration of an independent, project-specific, park-and-ride program. Because of these considerations, the direct implementation of an independent, project-specific park-and-ride program is not a mitigation measures that is 'capable of being accomplished in a successful manner within a reasonable period of time'" and thus is infeasible. (Response to SCAQMD Comment #10.)

NRDC Comment #4

III. The Revised EIR Improperly Concludes that the Project's GHG Emissions Impact is not Cumulatively Considerable.

[6] http://www.bayeconfor.org/pdf/PPRSCscreen11.2.pdf
[7] http://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm

In addition to our assertion in our prior letter that the "deficiencies with the air quality analysis also taint the greenhouse gas analysis," and that the "curtailed trip analysis dramatically underestimated the emissions of greenhouse gasses associated with this project," we note that the Southern California Association of Governments states that the Mira Loma project is "regionally significant per CEQA."[16] Under CEQA, "projects with a regionally significant impact should consider the regional context."[17] However, the EIR analysis regarding GHGs cites only statewide statistics with regard to its conclusion that "impacts on global climate change are not considered to be cumulatively considerable."[18] Under the CEQA Guidelines, in regards to such determinations, "[t]he lead agency shall identify facts and analysis supporting its conclusion that the contribution will be rendered less than cumulatively considerable." By citing only to statewide figures in its "facts and analysis supporting its conclusion," the EIR fails to properly analyze the GHG emissions of the project.

Response to NRDC Comment #4

No regional GHG inventory exists for comparison. Under SB 375, the Southern California Association of Governments (SCAG) is in the process of creating a "Sustainable Communities Strategy" (SCS) that will meet the region's target for reducing GHG emissions from cars and lights trucks in accordance (Draft EIR, p. 4.3-31). SCAG will develop the SCS through integrated land use and transportation planning and demonstrate an ability to attain the proposed GHG reduction targets by 2020 and 2035[8]. Further, the County of Riverside is in the process of developing a County-wide GHG inventory and climate action plan[9].

Finally, the quotation from the Final EIR that impacts on global climate change are not considered to be cumulatively considerable relates to construction-related emissions (Draft EIR, p. 4.3-53). With respect to long-term operational GHG emissions, the Draft EIR found that "the proposed project's resulting impacts on global climate change are considered to be cumulatively considerable when considered in combination with other statewide, national and international emissions, and the proposed project will have a potentially significant cumulative impact related to greenhouse gases." (Draft EIR, p. 4.3-57)

No new environmental issues have been raised by this comment and no modification of the Draft EIR is required.

NRDC Comment #5

[8] http://www.scag.ca.gov/sb375/index.htm
[9] http://www.rctlma.org/planning/content/temp/rc_genplan_2008.html

IV. A Revised Draft EIR Must Be Prepared and Re-circulated.

As in our letter of June 11, we reiterate that because of the inadequacies discussed above, the County's EIR cannot form the basis of a lawful EIR. CEQA requires preparation and recirculation of a supplemental draft "[w]hen significant new information is added to an environmental impact report" after public review and comment on the earlier draft EIR.[19] The opportunity for meaningful public review of significant new information is essential "to test, assess, and evaluate the data and make an informed judgment as to the validity of the conclusions to be drawn therefrom."[20] An agency cannot simply release a draft report "that hedges on important environmental issues while deferring a more detailed analysis to the final [EIR] that is insulated from public review."[21]

In order to cure the panoply of EIR defects identified in this letter, the County must obtain substantial new information to adequately assess the proposed Project's environmental impacts, and to identify effective mitigation and alternatives capable of alleviating the Project's significant impacts. This new information will clearly necessitate recirculation. CEQA requires that the public have a meaningful opportunity to review and comment upon this significant new information in the form of a recirculated draft supplemental EIR.

Response to NRDC Comment #5

This comment is identical to the comment received in the June 11, 2010 letter. As discussed in the previous response to the June 11, 2010 letter:

> The Draft EIR does not require recirculation. CEQA requires that an EIR be recirculated only in the limited circumstances where significant new information of substantial importance, such as a new potentially significant impact comes to light after an EIR is circulated but prior to its certification. (State CEQA Guidelines, § 15088.5.) Here, significant new information was not presented after public review of the Draft EIR. Indeed, the significance conclusions in the EIR remain accurate. Although additional mitigation measures were imposed through the responses to comments process, those mitigation measures further mitigate impacts but do not change the ultimate significance conclusions from the EIR. Further, the Draft EIR did not defer more detailed analyses to the Final EIR. Instead, additional explanation of some issues was provided in response to the comments received on the EIR, but that information merely "clarifies or amplifies" the discussion already presented in the Draft EIR for public review. Accordingly, recirculation is not required. (See *ibid.*) The impacts from the proposed Project remain the same as those identified in the Draft EIR and no recirculation is needed.

The comment letter submitted by NRDC on October 4, 2010 did not raise any new significant information of substantial importance. Therefore, no additional response is necessary.

NATURAL RESOURCES DEFENSE COUNCIL

October 4, 2010

Mr. Jeffrey Childers, Project Planner
County of Riverside
4080 Lemon Street, 9th Floor
P.O. Box 1409
Riverside, CA 92502-1409
Email: jchilder@rctlma.org

RE: RIVERSIDE COUNTY RESPONSE TO COMMENTS ON RECIRCULATED ENVIRONMENTAL IMPACT REPORT FOR MIRA LOMA COMMERCE CENTER (SCH# 2002121128)

Dear Mr. Childers:

On behalf of the the Natural Resources Defense Council, we write to provide additional comments on the Re-circulated Environmental Impact Report for the Mira Loma Commerce Center ("EIR"). At the outset, we note that this environmental review document is insufficient to form the basis for informed decision under the California Environmental Quality Act. These comments supplement the comments we made in our letter to you dated, June 11, 2010. We again request that these comments and the attachments be included in the record for this project.

We continue to maintain that, after further careful review, the EIR fails in many respects to comply with the requirements of the California Environmental Quality Act ("CEQA"). In addition to the issues we raised in our June letter, which is hereby incorporated by reference, the inadequacy of the EIR due to failure to carry out CEQA's mandates extends to the following issues: trip lengths used in the EIR calculations; mitigation measures; and the project's projected greenhouse gas impacts.

I. The Asserted Trip Lengths in the EIR are not supported by substantial evidence.

The EIR offers no substantive authority for the average trips lengths used in the URBEMIS calculations for emissions. Under §15151 of the CEQA Guidelines, "[A]n EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences." Here, the EIR states that "because the project's trips will primarily be localized, short-distance trips associated with business matters or warehouse trips to Ontario Airport – and not regional, long-distance trips associated with Port warehouse activities – the average trip lengths . . . are accurate."[1] However, the EIR also states "there are no building occupants identified."[2] If no occupants have

[1] EIR, p. 2.0-65.
[2] *Id.*

been identified, then the specific type of business that will be conducted from the warehouses remains unknown. Only when the type of business is known can there be a specific understanding of whether the particular operation will require deliveries from Ontario Airport or the ports of Long Beach and/or Los Angeles. Without the actual trip starting points, the EIR cannot give sound emissions estimates that constitute true "environmental consequences." The EIR contains no accurate basis for assertions about trip length.

The EIR states that warehouses in the Mira Loma area of similar size tend to be occupied by businesses that use the Ontario Airport rather than the ports.[3] However, the EIR contains no substantial evidence to support the assertion, such as market research or statistical analysis based on locally registered businesses. Under § 15384 of the CEQA Guidelines, "'Substantial evidence' as used in these guidelines means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion." Section 15384 continues, "[s]ubstantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." In support of the given average trip lengths, the EIR states, "typically, the larger warehouses over 250,000 square feet accommodate goods that may come from the ports. Only one plot plan of this project is over 250,000 square feet."[4] Without evidence with respect to what warehouses "typically" support, this is simply a conclusory statement unsupported by facts such as, again, market research or statistical analysis of local businesses that use warehouses. "The EIR must contain facts and analysis, not just the bare conclusions of a public agency."[5] The EIR also fails to disclose that obtaining this market analysis would have been prohibitive. Moreover, the EIR fails to articulate how the one warehouse that it admits could support freight coming from the Ports was factored into the trip length used for the environmental review.

With projected emissions values generated from the URBEMIS regional average trip length values, the EIR has not been prepared with a "sufficient degree of analysis," with respect to projected emissions of potentially health-endangering compounds. As the URBEMIS user's manual says: "Trip lengths are one of the most important data elements used in calculating project emissions. Air districts or other agencies responsible environmental review should ensure that default trip length values used in their area have a sound basis."[6] The EIR articulates no "sound basis" for the trip length value, it simply concludes that they are "accurate," as quoted above. Under §15151 of the CEQA Guidelines, "the courts have favored specificity and the use of detail in EIRs."[7] In *Kings County Farm Bureau v. City of Hanford*, the court stated, "A legally adequate EIR . . . must contain sufficient detail to help ensure the integrity of the process of decisionmaking by precluding stubborn problems or serious criticism from

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[3] *Id.*
[4] *Id.*
[5] *Santiago Water District v. County of Orange*, 118 Cal. App. 3d 818, 831 (4th Dist. 1981).
[6] URBEMIS2007 for Windows Users' Guide, Version 9.2, November 2007, P. C-6, available at http://www.urbemis.com/software/download.html.
[7] *Whitman v. Board of Supervisors,* 88 Cal. App. 3d 397, 411 (2d Dist. 1979).

being swept under the rug . . . . It must reflect the analytic route the agency traveled from evidence to action."[8] Without substantial evidence and a sufficient degree of analysis, an "EIR does not comply with CEQA."[9]

II. Proposed Mitigation Measures inadequately address projected environmental impacts

As detailed in the letter of June 11, 2010, a continuing omission in the mitigation measures is the failure to adopt all feasible mitigation measures as required by CEQA. For example, for both construction and for operations, all trucks should comply with the most recent EPA standards. Instead, the County proposes only to require that "the developer/successor-in-interest shall *provide occupants and businesses with information* related to state programs to require 2007 or 2010 EPA compliant trucks." (emphasis added)[10] Just as the ports of LA and Long Beach mandate such vehicles, so, too, can the county.[11]

Furthermore, in the response to AQMD comment ten, the county states that the suggested mitigation measures – construction and implementation of a park & ride program and the provision of incentives to tenants to encourage the use of low sulphur fuel and particulate traps – are infeasible under § 21061.1.[12] Under that section, feasible means "capable of being accomplished in a successful manner within a reasonable period of time."[13] The refusal to enact the suggested mitigation measures results from the claim that because the future tenants are unknown, and thus so too the future businesses, there is no way to know the proper scale of a prospective park & ride facility; for the same reason, there is also no way to provide incentives because there's no way to calculate the cost.[14] The county's response begs the question of what constitutes a "successful manner" and a "reasonable period of time." The county cites no authority for either notion, so it appears that the county has decided arbitrarily. The decision based on its arbitrary declaration of infeasibility has resulted in an effective dismissal AQMD's recommendations, an outcome that disregards the health and safety concerns of the surrounding community as represented by AQMD, a state agency whose core competency and mission is to take "all necessary steps to protect public health from air pollution."[15]

III. The Revised EIR Improperly Concludes that the Project's GHG Emissions Impact is not Cumulatively Considerable.

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[8] *Kings County Farm Bureau v. City of Hanford,* 221 Cal. App. 3d 692, 733 (Cal. Ct. App. 1990).
[9] *Cadiz Land Co., Inc. v. Rail Cycle, L.P.,* 83 Cal. App. 4th 74, 87, 99 (Cal. Ct. App. 2000).
[10] EIR, p. 2.0-86.
[11] Information available at http://www.polb.com/environment/cleantrucks/trucksfaq.asp#581
[12] EIR, p. 2.0-87.
[13] *Id.*
[14] *Id.*
[15] Available at http://www.aqmd.gov/aqmd/index.html

In addition to our assertion in our prior letter that the "deficiencies with the air quality analysis also taint the greenhouse gas analysis," and that the "curtailed trip analysis dramatically underestimated the emissions of greenhouse gasses associated with this project," we note that the Southern California Association of Governments states that the Mira Loma project is "regionally significant per CEQA."[16] Under CEQA, "projects with a regionally significant impact should consider the regional context."[17] However, the EIR analysis regarding GHGs cites only statewide statistics with regard to its conclusion that "impacts on global climate change are not considered to be cumulatively considerable."[18] Under the CEQA Guidelines, in regards to such determinations, "[t]he lead agency shall identify facts and analysis supporting its conclusion that the contribution will be rendered less than cumulatively considerable." By citing only to statewide figures in its "facts and analysis supporting its conclusion," the EIR fails to properly analyze the GHG emissions of the project.

IV. A Revised Draft EIR Must Be Prepared and Re-circulated.

As in our letter of June 11, we reiterate that because of the inadequacies discussed above, the County's EIR cannot form the basis of a lawful EIR. CEQA requires preparation and recirculation of a supplemental draft "[w]hen significant new information is added to an environmental impact report" after public review and comment on the earlier draft EIR.[19] The opportunity for meaningful public review of significant new information is essential "to test, assess, and evaluate the data and make an informed judgment as to the validity of the conclusions to be drawn therefrom."[20] An agency cannot simply release a draft report "that hedges on important environmental issues while deferring a more detailed analysis to the final [EIR] that is insulated from public review."[21]

In order to cure the panoply of EIR defects identified in this letter, the County must obtain substantial new information to adequately assess the proposed Project's environmental impacts, and to identify effective mitigation and alternatives capable of alleviating the Project's significant impacts. This new information will clearly necessitate recirculation. CEQA requires that the public have a meaningful opportunity to review and comment upon this significant new information in the form of a recirculated draft supplemental EIR.

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[16] EIR, p. 2.0-47.
[17] 14 CCR § 15126.6.
[18] EIR, p. 2.0-81
[19] Pub. Resources Code § 21092.1.
[20] *Sutter Sensible Planning, Inc. v. Sutter County Board of Supervisors*, 122 Cal. App. 3d 813, 822 (1981); *City of San Jose v. Great Oaks Water Co.*, 192 Cal. App. 3d 1005, 1017 (1987).
[21] *Mountain Lion Coalition v. California Fish and Game Comm'n*, 214 Cal.App.3d 1043, 1052 (1989).

We appreciate your consideration of our comments. Please feel free to contact us if you have any questions.

Sincerely,

Adriano L. Martinez

Adriano L. Martinez
Project Attorney
Natural Resources Defense Council

Response to
South Coast Air Quality Management District
Comment letter dated: October 1, 2010

SCAQMD Comment #1

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance, and should be considered by the lead agency prior to certifying the Final EIR.

Response to SCAQMD Comment #1

Comment noted. The County, as lead agency, has considered the comments submitted by SCAQMD prior to certifying the Final EIR s detailed in the following responses.

SCAQMD Comment #2

AQMD staff appreciates that the lead agency analyzed and quantified air quality impacts from the proposed project. The air quality analysis included consideration of AQMD staff written comments on the Draft EIR, and subsequent verbal comments. While the final air quality analysis may differ from AQMD recommended methodologies in some respects, the basic conclusions of the Final EIR would likely not change with further refinement to the air quality calculations. The lead agency concludes that air quality impacts and health risks remain significant and unavoidable during construction and operation. AQMD staff is concerned that the proposed project lacks feasible mitigation measures that could reduce these significant risks.

Response to SCAQMD Comment #2

The comment correctly notes that the County considered both the written and verbal comments received from SCAQMD staff. Several new mitigation measures were incorporated into the Final EIR to mitigate air quality impacts in response to recommendations from SCAQMD and other agencies/interested parties. In total, the project incorporated 21 air quality mitigation measures. Additionally, six new project conditions of approval were incorporated based on recommendations from SCAQMD.

No new environmental issues have been raised by this comment and no modification of the Draft EIR is required.

SCAQMD Comment #3

Specifically, the lead agency states in response to SCAQMD comment #13 that providing an entire 2010-compliant truck fleet is economically infeasible, hence no incentives or schedule to phase in a clean truck fleet is provided to clean up the fleet serving the project. This "all or nothing" approach to mitigation does not appear to be supported by the explanation provided in the response to comments. While a cost of 4 to 4.8 million dollars was found to be economically infeasible, it is not clear what is economically feasible. For example, the lead agency has not considered other alternatives such as whether only a portion of the fleet could be retrofitted or repowered, or whether retrofits could be phased in over a specified time period. These alternatives could substantially reduce the air quality health risks, and may be economically feasible. As the majority of operational emissions are from diesel trucks, AQMD staff recommends that the lead agency provide a more robust feasibility analysis of providing a cleaner fleet to service this project prior to certifying the Final EIR.

Response to SCAQMD Comment #3

The County evaluated SCAQMD's proposed mitigation measures and conditions of approval based on the examples provided by SCAQMD for a Project in the City of Banning. Those examples included a condition to require 100 percent of the truck fleet to be 2010 emissions-compliant. The other alternatives provided above in the comment were not included in previous written or verbal comments. Accordingly, the County's prior responses were good faith and complete responses to the "all or nothing" measure that was proposed by SCAQMD. However, below, the County has considered and provided a further response to the "phase in" measure recently proposed by the SCAQMD.

It should be noted that the comment letter received from SCAQMD, also received after the close of the Draft EIR public review period (July 21, 2009), did not recommend a requirement for the Project to only be served by a clean truck fleet. As stated in SCAQMD Comment #10 of the Final EIR (Final EIR, p. 2.0-86):

9. In the event that the lead agency's revised Health Risk Assessment requested in Comment #2 demonstrates the operation of the project would generate substantially greater cancer risk impacts or significant non-cancer health risks. The SCAQMD staff recommends that the lead agency consider revising the following mitigation measures to further reduce cancer risk impacts from the operation phase of the project, if feasible:

MM Air 8: In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall provide building occupants and businesses with information related to SCAQMD's Carl Moyer Program, or other ~~such~~ state programs that ~~promote truck retrofits or~~ restrict the operation to "clean" trucks, such as 2007 or newer model year or 2010 compliant vehicles.

As requested by the SCAQMD, mitigation measure **MM Air 8** was amended to read as indicated above even though there are no new significant adverse impacts not previously discussed in the Draft EIR and none of the impacts described in the Draft EIR have been made substantially greater as a result of the revised air quality modeling. (Final EIR, p. 2.0-86)

As stated in SCAQMD Response to Comment #13, below, the County provided an evaluation of the feasibility of implementing the SCAQMD recommendation.

> Proposed Condition 29 and 30: These two measures require the developer to require only 2010 emissions-compliant trucks serve the project and that site enforcement staff shall be trained/certified in accordance with California Air Resources Board (CARB) guidelines to ensure compliance. The future building occupants are unknown at this time and a condition such as this makes the buildings less competitive in the market because potential tenants will search out other buildings (vacant or new) without this requirement to reduce costs. This is because very few tenants have truck fleets comprised of 100% brand new trucks or a truck fleet that has been 100% retrofitted to meet 2010-standards. According to an article posted by the Gerson Lehrman Group in August 2009 (Appendix C of the Final EIR), the price increases for 2010 compliant diesel trucks would be between $8,000 and $9,600. This does not include the price of a new engine or a new diesel truck (tractor). Accordingly, assuming that the number of daily trucks serving the project site is only 500 (a conservative estimate assuming some trucks make multiple trips per day since the Traffic Study estimated 736 trucks per day), the cost increase for 2010-compliant trucks would still range between $4,000,000 and $4,800,000 not including the cost of hiring CARB trained enforcement staff. This is assuming it would cost between $8,000 and $9,600 to repower existing truck engines within a tenant's fleet and does not account for the replacement of an entire engine to comply nor does it account for any replacement of an entire tractor (which can cost $100,000). Given that the total construction costs for the project will be approximately, $56,350,000[1] (see Draft EIR Appendix L), the cost of 2010-compliant trucks represents no less than approximately 7 to 8.5 percent of the project's total construction cost. The recession and slow economic recovery also further hinder such cost prohibitive measures and make the project less competitive in the current market. Requiring that a project developer/owner or future tenant incur such costs to accommodate a single mitigation measure – particularly given that the percentage is actually likely to be higher once the costs of hiring CARB trained/verified enforcement staff is included – is infeasible.

As previously stated in response to the NRDC June 11, 2010 letter in response to the request for clean truck fleets:

> This type of program is not feasible or applicable for this type of project where the building occupants are unknown and the various developers and/or County have no control over the truck fleets that may frequent the sites. If such a requirement were imposed, it would severely limit the number of potential building occupants which would significantly affect the economic viability of the Project. A tenant of a particular building may not even have control over the trucks used to transport goods to and from the facility. Specifically, in a competitive market like that which exists today, imposing measures that prohibit any tenant with even a single older truck from operating at the Project will likely result in the Project standing vacant. According to a 2004 study by the Bay Area Economic Forum, "Vacant buildings, along with their large parking lots, can attract litter, graffiti, and vandalism, as well as loiterers and homeless populations. A decaying building both worsens its own prospects for refurbishment and weakens the

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[1] As shown in Appendix L, the total one-time major fees of $3,103,929 (Table 3-3) were added to the total estimated construction costs for the project are $53,254,344 (Table 5-1) for a total of $56,358,273.

vitality of the buildings around it."[2] Because the imposition of the measures proposed by the commenter would make the Project unmarketable and, thus, likely to remain vacant, the implementation of those measures would introduce other potentially significant impacts associated with aesthetics, hazards, and other environmental effects. Accordingly, they are rejected as infeasible for environmental reasons as well. Further, CARB has already adopted a regulation (referred to as the Truck and Bus Regulation) to reduce emissions from on-road diesel trucks which starts phasing in requirements for most fleets in January 2011[3]. However, and as required by mitigation measures **MM Air 8** and **MM Air 12**, the Project is required to do what is feasible by providing information to tenants about incentive programs and other technologies that support "clean" truck fleets so that the Project's future tenants can take advantage of those programs to reduce overall emissions. Ultimately, and as another example of the EIR's conservatism, the EIR concluded that this measure, even when combined with other feasible mitigation measures, would not reduce the health risks impacts associated with the production of diesel particulate matter to a less than significant level. (Draft EIR p. 4.3-72) Accordingly, the revisions suggested by the CCAEJ/NRDC are infeasible, and the existing analysis provided in the EIR is adequate.

Thus, even a partial implementation of a 2010-compliant fleet requirement (for example a 20% requirement for a 2010-compliant fleet) is infeasible because even that 20% requirement would impose a cost of nearly $1 million dollars on future, unknown tenants. This cost would be in addition to the cost of the more than 20 other mitigation measures and conditions that are already being imposed on the Project. Moreover, imposing a nearly $1 million cost directly on future tenants would destroy the marketability of the project, which is designed to serve smaller businesses that will not be able to incur an up front cost of that magnitude and will choose to take their business elsewhere.

Moreover, a phased-in 2010-compliant fleet requirement is already being implemented by the California Air Resources Control Board. Specifically, The CARB Truck and Bus Regulation applies to fleets with more than three on-road heavy duty diesel vehicles[4]. The regulation requires affected trucks to meet performance requirements between 2011 and 2023. By January 1, 2023, all vehicles must have a 2010 model year engine or equivalent. The regulation requires owners to reduce emissions in their fleet by upgrading existing vehicles one of three ways. The first option is to install PM retrofits and replace vehicles (or engines) according to a prescribed schedule based on the existing engine model year. The second option is to retrofit a minimum number of engines each year with a high level PM exhaust retrofit and to replace a minimum number of older engines with newer engines meeting the 2010 new engine standards. The third option is to meet a fleet average. With this option, a fleet operator can use PM and NO_X emission factors established by the regulation to calculate the average emissions of the fleet. Then, by the applicable compliance date each year, the owner can demonstrate that the fleet average emissions for PM and NO_X do not exceed the PM and NO_X fleet average emission rate targets set by the regulation. Generally, this regulation requires that 50 percent of an owner's fleet be 2010 compliant by 2014. Accordingly, 50 percent of fleets operating in the state will be 2010 compliant in little more than three years. In sum, then, a requirement that the project's fleet be 100% compliant with 2010-standards is infeasible; and a requirement that a portion of the project's fleet by 2010-compliant is both infeasible (in the short-term) and unnecessary (in the

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[2] http://www.bayeconfor.org/pdf/PPRSCscreen11.2.pdf
[3] http://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm
[4] *Ibid.*

long-term) due to economic considerations and the existing phase-in program being administered and enforced by CARB.

Nevertheless, and in the interests of imposing all feasible measures that might reduce air quality impacts, the County has incorporated the following condition of approval to require future tenants to apply for funding for the immediate replacement or retrofit of project-related trucks as shown below. These programs provide grant funding for certain eligible projects to replace or retrofit their truck fleets in order to help to reduce air quality emissions. Ultimately, however, and even with the implementation of this additional condition, the significant and unavoidable impacts to air quality will remain as analyzed and disclosed in the EIR.

> The developer shall require future tenants to request funding for replacement or retrofit of trucks through programs such as the Carl Moyer, Prop 1B, VIP, HVIP, and SOON funding programs, as identified on SCAQMD's website (http://www.aqmd.gov).

In response to an additional request by SCAQMD to set aside monies at project start-up to provide tenants matching funds, it is infeasible for the property developer to do this because the amount of money that would be required for matching at the time of application, if grant funding is available and the tenant/owner fleets qualify, cannot be determined at this time. As this relates to future tenants and fleet owners matching funds may be inherently included in the existing grant programs. Hence, the above added condition would already provide for matching funds, as required by the individual programs.

In response to an additional request by SCAQMD for the developer to provide other incentives to tenants SCAQMD did not provide information on what other incentives could include (i.e examples). As outlined above the project incorporated 21 air quality mitigation measures and six new project conditions of approval based on other specific recommendations from SCAQMD.

No new environmental issues have been raised by this comment and no modification of the Draft EIR is required.

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-Mailed: October 1, 2010
cluna@rctlma.org

October 1, 2010

Ms. Carolyn Syms Luna
County of Riverside
Planning Department
4080 Lemon Street, 9th Floor, P.O. Box 1409
Riverside, CA 92502-1409

Review of the Final Environmental Impact Report (Final EIR) for the Proposed Mira Loma Commerce Center Project

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance, and should be considered by the lead agency prior to certifying the Final EIR.

AQMD staff appreciates that the lead agency analyzed and quantified air quality impacts from the proposed project. The air quality analysis included consideration of AQMD staff written comments on the Draft EIR, and subsequent verbal comments. While the final air quality analysis may differ from AQMD recommended methodologies in some respects, the basic conclusions of the Final EIR would likely not change with further refinement to the air quality calculations. The lead agency concludes that air quality impacts and health risks remain significant and unavoidable during construction and operation. AQMD staff is concerned that the proposed project lacks feasible mitigation measures that could reduce these significant risks.

Specifically, the lead agency states in response to SCAQMD comment #13 that providing an entire 2010-compliant truck fleet is economically infeasible, hence no incentives or schedule to phase in a clean truck fleet is provided to clean up the fleet serving the project. This "all or nothing" approach to mitigation does not appear to be supported by the explanation provided in the response to comments. While a cost of 4 to 4.8 million dollars was found to be economically infeasible, it is not clear what is economically feasible. For example, the lead agency has not considered other alternatives such as whether only a portion of the fleet could be retrofitted or repowered, or whether retrofits could be phased in over a specified time period. These alternatives could substantially reduce the air quality health risks, and may be economically feasible. As the majority of operational emissions are from diesel trucks, AQMD staff recommends that the lead

agency provide a more robust feasibility analysis of providing a cleaner fleet to service this project prior to certifying the Final EIR.

AQMD staff is available to work with the lead agency to address these issues and any other air quality questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:DG

RVC100922-01
Control Number

Response to

Jurupa Area Recreation and Park District

Comment letter dated: October 4, 2010

JARPD Comment #1

The following is to inform the reader of the Jurupa Area Recreation and Park District (JARPD), comments and concerns regarding EIR Report No. 00450. In general, the Park District is recommending that formal dialogue take place with the Developer, Riverside County Planning Department and with JARPD to discuss the following:

Open Space - The project has an identified Lot which may be deemed as Open Space/ Park Land with a concept to consider the development of a Funding and Management Mechanism for the Maintenance of the area. Funding and maintenance may be provided through the formation or annexation of a Community Facilities District, 'CFD'. The Jurupa Area Recreation and Park District currently maintains and operates CFD's throughout the Jurupa Valley.

It is known that there exists a Green Belted Linear Park along the western border to the proposed project. It is understood that the area is currently maintained through the Jurupa Community Services District and paid for through, what has been described by homeowners within the area, as a 'Mellow-Roos' funded project. We do not have verification of that.

It is our understanding that the western border of the project may be dedicating approximately 10 feet wide of land to be added to the already existing parkway. The Park District is willing to accept this land as dedicated land pending the formation or annexation of a CFD with the developer.

Response to JARPD Comment #1

The following condition of approval was added to PP18877 per the Jurupa Area Recreation and Park District letter, dated October 4, 2010.

Prior to the issuance of a building permit, the applicant/permittee or any successor-in-interest shall submit written proof to the Riverside County Planning Department that the Jurupa Area Recreation and Park District, or equivalent agency as provided by law has approved and signed an agreement relating to Community Facilities District "CFD" fees and maintenance on the dedication of approximately 1.18 acres of land to be added to the existing green belted linear park located along the western border of PP18877. See letter from Jurupa Area Recreation and Park District, dated October 4, 2010 for reference.

Jurupa Area Recreation and Park District

4810 Pedley Road ❖ Riverside, CA 92509 ❖ (951) 361-2090 ❖ Fax (951) 361-2095

www.jarpd.org

October 4, 2010

Christian Hinojosa, Planner
Riverside County Planning Department
9th Floor, CAC - P.O. Box 1409
Riverside, CA 92502-1409

RE: ENVIRONMENTAL IMPACT REPORT NO. 00450
PP NO. 18877 - SECOND SUPERVISORIAL DISTRICT

The following is to inform the reader of the Jurupa Area Recreation and Park District (JARPD), comments and concerns regarding EIR Report No. 00450. In general, the Park District is recommending that formal dialogue take place with the Developer, Riverside County Planning Department and with JARPD to discuss the following:

Open Space - The project has an identified Lot which may be deemed as Open Space/ Park Land with a concept to consider the development of a Funding and Management Mechanism for the Maintenance of the area. Funding and maintenance may be provided through the formation or annexation of a Community Facilities District, 'CFD'. The Jurupa Area Recreation and Park District currently maintains and operates CFD's throughout the Jurupa Valley.

It is known that there exists a Green Belted Linear Park along the western border to the proposed project. It is understood that the area is currently maintained through the Jurupa Community Services District and paid for through, what has been described by homeowners within the area, as a 'Mellow-Roos' funded project. We do not have verification of that.

It is our understanding that the western border of the project may be dedicating approximately 10 feet wide of land to be added to the already existing parkway. The Park District is willing to accept this land as dedicated land pending the formation or annexation of a CFD with the developer.

If you have any questions or comments regarding this subject, please contact my office at 951-361-2090.

DAN RODRIGUEZ, General Manager
Jurupa Area Recreation and Park District

XC: Board of Directors
Brenda Reynolds, Administrative Assistant - JARPD

U:\drodriguez\Dan Rodriguez\MyFiles\2010 Plannng Development Projects\October 4, 2010 Letter EIR 450 or Parcel Map 18877 Business Park Planning east of Etiwanda.wpd

Oct 4, 2010.

A quien Corresponda:-

Yo Flor Merino de la Windsor pl. no estoy de acuerdo que se construllan mas bodegas en nuestra area. El motivo, es que hay demaciado esmok para todos los niños y para uno mismo como Adulto. demaciado trafico que se forma por tantos trailes. Esperando tomen encuenta estas palabras por el bien de todos los niños que radican aqui

Atentamente

From: Stephen Anderson [sca1baa@earthlink.net]
Sent: Friday, October 01, 2010 9:47 AM
To: Hinojosa, Christian
Subject: Opposed To October 4, 2010, Director Board Item 4.3, EIR No. 450, Plot Plan Nos. 16979, 17788, 18875, 18876, 18877, and 18879.

To: Carolyn Syms Luna
Director

Thru: Christian Hinojosa
Project Planner

Dear Ms. Luna,
I am writing to oppose the continued consideration of your October 4, 2010, Director Board Item 4.3, EIR No. 450, Plot Plan Nos. 16979,17788,18875, 18876, 18877, and 18879.

This proposal abuts three special Mira Loma neighborhoods; Mira Loma Village, Homestead and Country Village. The first two are diverse ethnic residential communities, while the latter is a Senior Living Community. The last thing these communities need is more warehouses pollution, warehouse noise and traffic congestion stemming from warehouse trucking. The last thing Mira Loma needs is greater problems resulting from more Riverside County warehouse development.

Mira Loma already has a particulate air pollution problem that is the worst in the United States. These three special neighborhoods are already inundated and surrounded with Riverside County warehouse development.

What is the point of this proposal? Is Riverside County seeking to enforce its will at the expense of the health of the inhabitants of these residential communities?

If this proposal should go forward it should be relocated to Riverside, below the office window of Director Luna, where she will be able to monitor the pollution daily.

Thank you for your time,
Stephen Anderson
11378 Pena Way
Mira Loma, CA 91752-1620
951-360-8723

Center for Community Action and Environmental Justice
Centro de Acción Comunitaria y Justicia Ambiental

Charles

e the community/ies ask that you:

- Not build more warehouses
- Utilize existing empty warehouses
- Not build on every vacant lot
- Create buffer areas with trees and foliage to mitigate the impacts caused by existing air pollution sources
- A commercial center so we don't have to drive 5-7 miles for basic household needs
- Build sound walls to help lessen the noise from traffic
- Ideally it should be like a Saturday or Sunday every day with less noise and traffic
- Enforce statewide truck idling regulations as per the Clean Air Act to reduce emissions
- Enforce parking and traffic laws
- Prioritize the public's safety
- No longer target our communities for more warehouses

Please support our families by signing our petition for a healthy community for all of us.

	Name	Address	Phone
1.	Charles Zamarripa	10940 IBERIA M.L.	9516850865
2.	Dora Zamarripa	2525 Lime St Riverside 92501	951 727 6034
3.	Abelardo Rodriguez	2525 Lime ST Riverside 92501	(951) 212-5599
4.	Alexis Rodriguez	13162 Egola Dr. Moreno Valley 92555	(951) 352-1836
5.	Desiree Rodriguez	2525 Lime St.	(951) 295-1855
6.	Daniel Rodriguez	13162 Egola Dr. Moreno Valley 92555	(951) 867-2096
7.	Laura Borrayo - 3581 - urbana av. M.L		(951) 681-1791
8.	Ramona Zamarripa	10940 IBERIA M.L.	951 6850865
9.	Melanie Guerrero	10940 Iberia M.L.	(951) 742-1286
10.	Antonio Guerrero	10940 Iberia ST ML	951-833-1793
11.	Pamela Solis	10924 Iberia St	(951) 685-9603
12.	Juana Solis	10924 Iberia St	(951) 685-9603
13.	Jorge Solis	10924 Iberia st	(951) 685-9603
14.	Yesenia Solis	10924 Iberia st	(951) 685-9603.
15.	Jorge Solis	10924 Iberia st	(951) 685-9603

Center for Community Action and Environmental Justice
Centro de Acción Comunitaria y Justicia Ambiental

¡osotros las comunidades les solicitamos que:

- No construyan mas bodegas
- Utilicen las bodegas vacías
- No necesitan construir en todos los lotes vacíos
- Crear una distancia de protección con arboles y otras plantas para mitigar actuales fuentes de contaminación
- Un centro comercial para no tener que manejar 5 o 7 millas para necesidades básicas
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- Idealmente debe ser como un sábado o domingo todos los días con menos ruido y trafico
- Forzar regulaciones del estado de camiones parados con la marcha andando por el Acto de Aire Limpio para reducir emisiones
- Forzar las leyes de tráfico y estacionamiento
- La Seguridad del público tomar como prioridad
- No ser objeto para mas bodegas

Favor de apoyar nuestras familias y firmen nuestra petición para una comunidad saludable para todos.

	Nombre	Domicilio	Teléfono
1.	Norma Bahena	10991 Iberia st.	(951) 847-5571
2.	Jennifer Cortina	10991 Iberia st.	(951)847-5571
3.	Cesar Delfin	10917 Iberia st	(909)921-2932
4.	Martha Terrones		(909)921-2932
5.	JESUS RAUL DELFIN	10917 IBERIA ST	909 912 9835
6.	Sandra Vazquez	10917 Iberia st	(909)767-8090
7.	Blanca Tang	10917 Iberia St.	(951) 685-5895
8.	Eduardo Cossio	10929 IBERIA St.	(951) 360-5644
9.	Otilio Rojas	10953 Iberia St.	" " "
10.	Angel I. Sánchez	10981 Iberia St	(951) 681-09-38
11.	MARIA HERRERA	"	" " " "
12.	Luis Barajas	10916 Iberia St	(909)645-6556
13.	SALVADOR OCHOA	10941 IBERIA St	951- 220-9905
14.	SARAH OCHOA	10941 IBERIA St.	(951) 220-4304

Center for Community Action and Environmental Justice
Centro de Acción Comunitaria y Justicia Ambiental

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- Prioritize the public's safety
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Please support our families by signing our petition for a healthy community for all of us.

Name Anthony Quezada **Address** 10930 Iberia St **Phone** 6811737

1. Carmen Vaquerano 10909 Iberia St 360-6537
2. Maria Amelia Garcia 10909 Iberia St. (951) 3606537
3. Antonio Sanchez
4. Franklin Vasquerano
5. Luis Barajas 10916 Tberia St (909) 645-6556
6. Maria Angela Sanchez 10925 Iberia st miraloma ca. 91752
7. Francisco Sanchez 10925 Iberia st mira loma ca.
8. Nayeli Sanchez 10925 Iberia st Miraloma CA
9. Mayra sanchez 10925 Iberia st Mira Loma CA
10. Jasmin Sanchez 10925 Iberia st mira loma ca.
11. Lorena Sandoval 10962 Iberia St. Miraloma Ca. 91752
12. Osvaldo Tinajero
13. Filomeno Borrayo C. 3581 Urbana (951) 681-1791 ave Mira Loma
14. Javier Tinajero 10962 IBERIA St. mira Loma Ca. 91752

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Gene

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Country Village

	Name	Address	Phone
1.	Charles Staples	3570 Eve Circle	
2.	Tom Hirsch	3601 Eve Circle #E	
.	Linda Johnson	3661 - Eve Circle - Cal	
4.	[illegible]	3581 EVE CIRCLE C	Cal
5.	[illegible]	3611 Eve Circle Apt K	
6.	Norma Juarez	10357 N Lynn Cir, Apt E	
7.	[illegible]	10451 N. Lynn Cir, Apt C	
8.	M Flick	3580 Eve Cir "K"	
9.	DAVID E GRAY	10440 N. Lynn Cir	
10.	[illegible]	40E	
11.	[illegible]	56A EMMA St	
12.	Dennis Benson	17470 N. LYNN CIR	
13.	[illegible]	3797 EVE CIR. APT L	
1.	[illegible]	1327 W. Mahrona St.	
15.	Eudoxia C Manzano	3761 EVE CIR Apt D	

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Country Village

	Nombre	Domicilio	Teléfono
1.	[illegible] S. Zapata	3761 Eve Circle # E	951-321-3036
	[illegible]	3771 EVE CIR APT G	
3.	Joyce Wolfree	3770 EVE Cir Apt. C	951-685-6029
4.	Sharon Brean	3680 EVE Circle Apt M	951-685-3145
5.	Paul [illegible]	1033 JACARANDA ST ONTARIO	909 [illegible] 2459
6.	Rachel Hoeseberg	3229 Ashgate Pl ONTARIO	909-638-3579
7.	Patricia J. Heath	3680 Eve Circle Mesa Loma	
8.	Mary L. Ward	3671 Eve Circle #D	
9.	Linda Carrington	3770 #C EVE Cr.	
10.	Kimberly Barber	8694 Duida Rv. CA. 92504	
11.	[illegible]	3780 EVE Cir CA 92[illegible]52	
12.	Ray [illegible]	7421 3rd ST Riverside	
	[illegible]	3786 Eve Circle Riverside	
14.	Diane Foster	5020 Trail St Norco	

Center for Community Action and Environmental Justice
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Stella

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Name Stella D. Bordillo Address 10928 Lansford st. Phone 951-685-1208

1. Lila M. Latham 10916 Lansford St. Mira Loma, Ca. 91752
2. Daniel A. Portillo 10928 Lansford St Mira Loma CA. 91752
3. Norma A. Pineda 10935 Lansford St CA 91752
4. Yolanda Ortega 10942 Kenmore st Mira Loma Ca, 91752
5. Martin Marquez
6. Cynthia McDonald 10906 Lansford St Mira Loma 91752
7. Sabino Garcia 10899 Lansford St MiraLoma Ca 91752
8. Marcy Gomez 10899 Lansford St. MiraLoma Ca, 91752
9. Roberto Hernandez 10899 Lansford st Miraloma Ca 91752
10. Marvin Zambrano 10899 Lansford st Mira Loma CA. 91752.
11. PAZ ORTIZ 10896 LANSFORD st mira Loma CA 91752
12. Maria A. Carrillo 10891 Lansford st. Mira Loma CA 91752
13. Kelly Murray 10873 LANSFORD St Mira loma 91752
14. Graciela Garcia 10868 Windsor Pl miraloma
15. Jose Garcia 10868 Windsor Pl miraloma

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Name	Address	Phone
1. Guillermo Sanchez	10872 windsor PL	
2. Pedro Villagrana	10899 Windsor Pl	
Monica Garcia	10908 Windsor PL	
4. Paul Hively	10919 windsor pl.	
5. Holly Hively	10919 windsor place Miraloma,ca	
6. CHRIS GALLEGOS	10920 Windsor. pl. Miraloma. CA.	
7. JOSE A. Garcia		
8. Alejandro Perez	10930 windsor pl.	
9. Elder Monge	3750 Urbana Ave	
10. Mirala CA	92752	
11.		
12.		
13.		
15.		

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Name	Address	Phone
1. Richard Gonzalez	10971 Iberia st. Mira loma.	217-9242
2. Jaime .Martinez,	10962 Iberia st, Mira Loma,	909-5619760
3. Daniela zoto.	1062 Iberia st Mira Loma,	909-6443211
4.		
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	Name	Address	Phone
1.	[illegible]	170 E 6th St	(405) 473-7672
2.	[illegible]	170 E 6th St.	(206) 371-4515
3.	Katie Feller	170 E. 6th St.	(914) 844 5049
4.	Julie Juarez	170 E. 6th St	(626) 255-4155
5.	Jaya Spivey	120 E. 6th St	(404)-861-0668
6.	Jonas Kwok	170 E. 6th St.	(949) 350-4306
7.	Thuy Ly	170 E. 6th St.	(619) 735-8177
8.	[illegible]	170 E. 6th St	(510) 847-4098
9.	Chioma Enwereasor	170 E. 6th street	(909) 518-5113
10.	Rachel Ramir	170 E 6th	(773) 428-2725
11.	Doug Farquhar	170 E 6th st	(202) 441-0936
12.	Anna Gibson	170 E 6th St	(414) 801-6465
13.	Joshua Nomkin	170 E 6th st	(602) 881-4998
14.	Pooja Paul	1050 N. Miles Ave	(909) 546 7110
15.			

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	Name	Address	Phone
1.	Gary Lent	170 East 6th street, Claremont CA	
2.	Joanna Ladd	170 East 6th St. Claremont CA	(501) 442-7401
3.	Andee Garay	170 East 6th Street, Claremont, CA	(916) 798-7632
4.		170 East 6th Street, Claremont, Ca	
5.	Kyle Weber	170 E 6th St, Claremont, CA	(925) 451-0832
6.	Cole Craddock	170 E 6th St, Claremont, CA	(909) 709-1996
7.	Joanna Ladd	170 E 6th St, claremont, CA	(301) 461-1306
8.	Mary Munoz	1050 N. Mills Ave, Claremont, CA	909-767-2906
9.	Samuel Greve	1050 N Mills Ave Claremont, CA	909 464 9660
10.	Amy Jasper	1050 N. Mills Ave Claremont CA	9492852467
11.	Meldrie Epstein	1050 N Mills Ave. Claremont CA	(971)9985641
12.	Anne Marie Tse	Box 803 PZ	9094511179
13.	KARIM LAHLOU	Box 971	802-380-9466
14.	Elizabeth Williams	Box 619 Pitzer College	(323) 3502113
15.			

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	Name	Address	Phone
1.	SAM SAREN	~~10408~~ 1050 N. Mills	X
2.	Vincent Giannotti	1050 N Mills Claremont	
3.	Alex Smith	" " " "	
4.	Geral Korzman	" " "	X
5.	Isabel Harbaugh	742 N Amherst Ave	(206) 501-1966
6.	Jessie Coleman	1030 Columbia Ave Claremont	(503) 307-5957
7.	Madeline Sheldon	1030 Columbia Ave, Claremont	(206) 280-4401
8.	Bobb Sanders	3752 Live Oak Dr., Pomona	
9.	Ryan Waldman	340 E Foothill Boulevard	
10.	Kymberli Capone	1465 S. Berendo Ave Gardena, CA. 90247	(310) 413-5419
11.	Addia Tucker	129 Woods Run Rollinsford NH 03857	
12.	ANDREW GRIMES	268 ELIZABETH DR. Pt. Roberts WA 98281	(360) 220 3587
13.	Phoebe Duvall	11042 Fairfax St. Denver, CO 80220	720-300-1317
14.	Zoey Greco	1050 N Mills Ave Claremont, CA 91711 PO BOX 347	860 329 1332
15.	Kellen Wohl	1050 N Mills Ave #650 Claremont, CA 91711	x

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	Name	Address	Phone
	Elisea Mendoza	1460 W Foothill Blv. #181 Upland Ca 91786	909/762 9955
1.	Jixi He	Pomona College Oldenborg 363	9092670695
2.	BRYCE CEFFALO	PITZER College	661-644-6701
3.	Jesse Caro	Pomona College	914-924-8869
4.	Nathan Gardner	170 E. 6th St. Box 574 91711	5712286112
5.	Michelle Kretsch	Pomona College	909-809-7364
6.	Colleen Hane	Pomona College	(480) 316-2545
7.	Marie Beam		(909 625-4355
8.	Nash Witkin	HMC	909 623 4221
9.	Milo Tow	HMC	GPN 906 3103
10.	Sara Krautbauer	Scripps	952-261-6113
11.	Kate Hoffman	SCR	206-335-4404
12.	Rebekka Manzella	PZ	(310)923-5283
13.	AMYAPPA VEMULKAR	HMC	
14.	Ching Tung	CMC	
15.	Jeffrey Hemphill	HMC	626 676 2027

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	Name	Address	Phone
1.	Dawn Bickett	170 E. 6th St. Suite 132 box. 949 Claremont, CA 91711	(510) 552-4984
2.	Lukas Martincik	170 E. 6th St. Suite 132, Box 698 Claremont, CA 91711	408-674-2760
3.	Casey Davis-Van Atta	170 E. 6th St., Suite 132, Box 524 Claremont, CA 91711	(651) 214-7249
4.	Samantha Meyer	170 E. 6th St. Suite 132, Box 715 Claremont, CA 91711	(773) 936-8772
5.	Elizabeth Na	170 E. 6th St. Suite 132, BOX 724 Claremont, CA 91711	(908) 872-9103
6.	Alison Cantor	1147 Oxford Ave Claremont, CA 91711	(206) 409-4589
7.	Halley Everall	1147 Oxford Ave. Claremont CA 91711	720-231-9201
8.	Jawad Rigby	170 E. 6th St Suite 132 Claremont CA 91711	
9.	Michael Navarro	340 E. Foothill Blvd Claremont CA 91711	(915) 471-0134
10.	Nataly Ratan	1050 N MILLS AVE #722 CLAREMONT, CA 91711	(909) 243-3006
11.	Jon Trork	1050 North Mills Ave	650-432-8721
12.	Michael Rosoff	1050 N Mills Ave	(310)-367-0781
13.	Keren Yi	1050 N Mills Ave	909-451-5899
14.	Liza Bashur	1050 N Mills Ave	(314) 541-7979
15.	Chuba Ezeks	1063 1st [illegible] Claremont Ave 91711	202-446-8573

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	Name	Address	Phone
1.	Elena Sevy	170 E. 6th St.	(773) 814-0241
2.	Julie Lee	170 E 6th St	(626) 628-6311
3.	Jereen Kwong	170 E 6th St	(951) 203 5521
4.	[illegible]	" "	909 267 4506
5.	Ian Hubbard	" "	626 - 378-[illegible]
6.	Zach Barnett	" "	781 801 6360
7.	[illegible]	170 E. 6th St. Box #470	(708) 497-0159
8.	Marissa Grau	1030 Columbia Ave #371	(360) 710-4414
9.	Katarina Hicks	170 E 6th St	(310) 994-4296
10.	Brianna Backe	" "	(970) 250-9002
11.	Lida Hernez	170 E 6th St.	909) 454 5441
12.	Erin Finnich	Pomona	971-237-6766
13.	Sydney Miller	CMC	317-506-2820
14.	Cynthia Gama	1050 N. Mills Ave	(805) 453-7040
15.	Nisha Williams	Pitzer College 1050 N Mills Ave. Box 909 Claremont, CA 91711	(562) 991-7861

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	Name	Address	Phone
1.	Samira Nedungadi	170 E. Sixth St, Claremont CA	(503) 267-8257
2.	Laura Carr	170 E. 6th St. Smith Campus Center Suite 118 Mailbox #858	(805) 550-1904
3.	Eli Omernick	170 E. 6th St, Claremont, CA Center Suite 118 Mailbox # 1088	(920) 421-0972
4.	Ge Zhang	170 E. 6th St. Claremont, CA Mailbox #1314	(909) 267-5280
5.	Leon. Aquino	1050 North Mills Ave. Claremont, CA 91711	(909) 342-7025
6.	CINDY DONIS	6126 King Ave	323. 440. 4789
7.	Guillaume Dubois	1050 N. Mills Ave. Claremont	909 374-6879
8.	Alex Ferré	1050 N. Mills Ave, Claremont, CA, 91711	858 531 9378
9.	Claire Berkman	170 N Mills Av, Claremont CA	(617)459-4030
10.	BRIANNA MOFFITT	1050 N Mills Ave, Claremont, CA	(714) 225-7837
11.	Francisco Silva	1050 N Mills Ave, Claremont CA	(505)903-941
12.	Raven JONES	1050 N. Mills Ave, Claremont, CA	9094371108
13.	Jonah Tull	Pitzer	609-947-3888
14.	Jake Harder	1050 N. Mills Av.	541-914-7137
15.	Samuel Jones	1050 N. Mills Ave.	618-201-4205

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	Name	Address	Phone
1.	Miriam Shiffman	170 E 6th St.	412-977-8091
2.	Naama Schweitzer	170 E. 6th St	971-404-8250
3.	Mike Darevko	170 E 6th St #885	773 297 5034
4.	Jake Rollins	2114 Hawk St.	805-915-8090
5.	Aaron Altman	170 E 6th St.	203-671-5167
6.	Juliette Walker	170 E. 6th St.	608-669-7703
7.	Rose Ingerware	170 E 6th St.	832-794-5082
8.	Teresa Foster	170 E. 6th St.	608-444-0706
9.	Kristen Lenelbergh	170 E. 6th St	206-434-1067
10.	Shannon Washington	170 E. 6th St.	(708) 752-1804
11.	Alejandra Vega	170 E. 6th St	(832) 293-5635
12.	Natalie Orenstein	170 E. 6th St.	(510) 219-5513
13.	Charles Vallejo-Anderson	170 E. 6th St.	503-475-8940
14.	Courtney Christenson	170 E. 6th St.	(952)-405-7933
15.	Hannah Yang	170 E. 6th St.	734 883 6241

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	Name	Address	Phone
1.	Sam Jo Yeo	Pomona College	909 575 7118
2.	Jenessa Irvine	Pomona College	818 618-3805
3.	Frances Hundley	Pomona College, Claremont	505-412-8653
4.	Eldridge Green	Pomona College, Claremont	901-270-8571
5.	Allison Miller	Pomona College, Claremont	571 451 3961
6.	Cati Crawford	Pomona College	630-740-5603
7.	Marco Lobba	Pomona College	865-701-8572
8.	Amy Li	PC	(312) 714-5629
9.	Anne-Marie Giuca	Pomona College	(608) 449-0267
10.	Vivian Chou	Pomona College	[illegible] (510) 529-1214
11.	Ben De Winkle	Pomona College	616-745-3779
12.	Mahda Aman	Pomona College	703-300-4248
13.	Caitlyn Casimo	"	360 [illegible]
14.	Melinda Liu	Pomona College	(949) 701-6777
15.	Kevin Wang	Pomona College	626 660 6205

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	Name	Address	Phone
1.	CJ Verbeck	170 E 6th St Claremont, CA 91711	206-234-6217
2.	Alvin Sangsuwan	170 E. 6th St. #84 Claremont, CA 91711	317-225-6634
3.	Kimberly Aldinger	170 E 6th St Claremont, CA 91711	906-871-6132
4.	Cuyapi Stott	1030 COLUMBIA AVE, CLAREMONT, CA 91711	224 6025087 5
5.	Chrysanthe Oltmann	170 E 6th Street Claremont, CA 91711	(908) 370-9113
6.	Joe DeBlasio	340 E. Foothill Blvd. Claremont, CA 91711	(503) 319-5999
7.	Kate Pluth	1030 Columbia Ave Claremont, CA 91711	(253) 227-9514
8.	Yu Kyung Kim	250 N College Park Drive Apt P35 Upland, CA 91786	(949) 701-0353
9.	Katie Lyman	1050 No. Mills Ave Claremont, CA 91711	(914) 707-2871
10.	[illegible]	1649 [illegible] Claremont CA 91711	909-451-3696
11.	[illegible]	[illegible]	909.607-137[illegible]
12.	Jenny McCarthey	170 E 6th St Claremont, CA 91711	214-649-8863
13.	Morgan Chalmiers	170 East 6th st Claremont, CA	978-855-4727
14.	Bridgette Depay	170 E 6th St Box 1309 Claremont CA 91711	917-214-1746
15.	Sameera Hokkarale	170 E Sixth St Box 1522 Claremont CA 91711	

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Name	Address	Phone
1. Emelia P. Arvizu	170 E. 6th St., Suite 132, Box 2, Claremont, CA	
2. Lindsey Cole	1030 N Columbia Ave #239 Claremont, CA 91711	(925) 989-0727
3. Caitlin Cotta	742 N. Amherst Ave #777 Claremont, CA 91711	
4. Julie M. Pa	P.O. Box 1375 Davidson, NC 28036	—
5. Ryan Bull	1050 Pitzer College Claremont, CA 91711	(973) 699-5886
6. Giselly Rodriguez	170 E 6th St #1570, Claremont, CA	
7.	1113 N. Almansor St. Alhambra, CA	
8. Arielle Brown	170 E. 6th st. suite 132 box 42 claremont, Ca 91711	(678) 524-3409
9. Theresa Shaw	244 Greentree, Rd Upland CA 91786	
10. Rebecca Aaronson	1030 Columbia Ave #165	—
11. Marshall Anderson	1050 N. Mills Claremont, CA 91711	—
12. Rebecca Haulesty	#678 1050 N Mills Ave Claremont, CA 91711	415-595-9610
13. Tom Slade	1001 NW Lovejoy Portland, OR	503-704-1098
14. theory of practice	170 E. 6th st., Claremont, CA	(718) 213-3953
15. Steven Chau	170 E 6th St. Claremont, CA #170	(909) 981-3952

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	Name	Address	Phone
1.	Hwang, In Ha	170 E 6th st. Claremont, CA	909-921-9370.
2.	Dylan Farrell	1050 N Mills Ave	207 251 3430
3.	H. Ricardo Tcaung	1896 Cooland Ave, Upland	909-607-2239
4.	J. DuBose	120 E. Bonita Ave. Claremont	909-621-8652
5.	Dymke Benson	170 E 6th St, #216 Claremont	909-510-6205
6.	Brennan Byrne	"	(256)-54-0041
7.	[illegible]	170 E. 6th St. #1551	6468758267
8.	Jessie Stern	170 E. 6th St. #1619	(805) 798-0690
9.	Claire Roberman	170 E 6th St #1127	617-512-7965
10.	Evyn Espiritu	170 E 6th st #907	760-994-3427
11.	Lucas Wrench	170 E 6th St #1222	425-953-9746
12.	Josh Rosenberg	170 E. 6th St #1125	(908) 723-0560
13.	Charlotte Dohrn	170 E 6th St #897	706 949 8845
14.	Audrey Dunne	170 E. 6th St. #903	401 258 4615
15.	Will Hummel	170 E. 6th St #1405	224 623 3867

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	Name	Address	Phone
1.	Sasan Kinicki	170 East Sixth St.	978-201-2005
2.	Kelly Park	170 E. Sixth St	714-329-1387
3.	Nicholas Gerber	170 E. Sixth St	512-590-9249
4.	Joel Fishbein	170 E. 6th St	610 662 9165
5.	Shahriyar Zarabian	170 E 6th St	916-992-8031
6.	Emery Donovan	170E. 6th St.	303.807.4251
7.	Mitch Berman	170 E 6th St #836	217-840-5995
8.	Justin Ellis	170 E 6th St. 905	605-840-0758
9.	Adam Chung	170 East Sixth St. #870	248-835-2015
10.	Zoe Carlberg	" " #1263	970 578 4870
11.	Rachel Ekaireb	" #1320	917-734-1819
12.	Toby Hills	170 East Sixth St. #970	510-655-5235
13.	Evan Fields	170 E 6th St 916	404 916 2201
14.	Cody Moore	170 E. 6th St.	909-896-6103
15.	Anatolia Evanston-Kaku	170 E. 6th St. #908	858 775 66676

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	Name	Address	Phone
1.	Zipporah Smith	170 E. Street	909-200-5833
2.	Claire Mueller	170 E. Sixth St.	402-499-8505
3.	Hunter Dukes	170 E. Sixth st	508-525-3086
4.	Mindy Hagan	"	626-253-7547
5.	Joe Maher	"	914-380-2144
6.	John Russell	170 E. Sixth St	602-672-2990
7.	Trevor Flynn	170 E. Sixth St	925-989-7845
8.	Evan Feenstra	204 S. Dartmouth St.	530-400-4919
9.	Keun Wang	170 E. Sixth St.	626-660-6805
10.	Dominique Exumé	170 E Sixth St	619-417-3197
11.	James Heo	170 E Sixth St.	760 533-7267
12.	Jaw Hosang	170 E Sixth St	306-934-0895
13.	Sarah Appelbaum	170 E. 6th St.	541.913.9867
14.	Rachel Lee	"	425-999-1579
15.	Anne-Claire Saint Georges	170 E 6th St	808-428-3793

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	Name	Address	Phone
1.	Frank Sanchez	170 E. 6th St.	(512) 461-0534
2.	Stella Deny	170 E 6th St.	(860) 389-1961
3.	[illegible]	170 E. 6th St.	413 253 7[illegible]
4.	Valentine Sergon	170 E 6th St.	(240) 528 0089
5.	Louis D'Silva	170 E 6th St	(917) 584 0212
6.	[illegible]	170 E 6th St	(203) 814-7987
7.	[illegible]	170 E 6th ST	(847) 254-6293
8.	Alice Hilton	" "	(706) 614-2971
9.	Sophia Segan	170 E 6th ST	(508) 642-7630
10.	Eeeely Bristman	" "	949 922 0673
11.	Tracy Zhao	" "	248 563 0812
12.	Morgan Chalmiers	" "	978 855 4727
13.	Claire Yuan	" "	(415) 595-3426
14.	Andrea Ray	" "	(903) 436-5418
15.	Zach Schulson	" "	(858) 337-6830
16.	Leila Zahedi	" "	(520) -910-3920
17.	Meryl A Seward	" "	(661) 331-4512

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	Name	Address	Phone
1.	Michael Lu	Pitzer	909-450 1887
2.	Deonté Baker	CMC	(323)229-0833
3.	Adam Hamburg-Brun	Pitzer	(203) 921-6144
4.	Melissa Muñoz	Scripps	(510) 875-9596
5.	Rachel Gregory	Pitzer	(206) 999-6416
6.	Dialica Sall	Pomona	347-420-9482
7.	Danielle Antone	Pitzer	415 320 9223
8.	Angie Tyler	CMC	2067692782
9.	Tiffany Wu	Pitzer	626-695-0109
10.	Zach Milder	PZ	9493517603
11.	Clinton Haway	PZ	208 818 4171
12.	[illegible]	CMC	310 882-0526
13.	Annie Jalota	CMC	714-707-8557
14.	Kendall Kritzik	CMC	480-239-1119
15.	Ian St. Lawrence	PZ	650 678 6899

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	Name	Address	Phone
1.	[illegible]	Pomona College	808 937 9377
2.	[illegible]	Pomona college	805-403-3216
3.	[illegible]	Pomona	520-756-3078
4.	[illegible]	Pomona College	408-309-7082
5.	[illegible]	Pomona [illegible]	701.626.2197
6.	[illegible]	Scripps	858 335 8012
7.	[illegible]	Scripps	6262159635
8.	[illegible]	Pitzer	323.972.5219
9.	[illegible]	Scripps	510-384-8772
10.	Sydney Losco	Pitzer	916-266-1075
11.	Claire Constable	Harvey Mudd	858 699-5695
12.	Fumi Fujikawa	Pitzer	909 4367372
13.	Ying Zeng	POM	404-396-9661
14.	[illegible]	Pitzer	206 617 3205
15.	Adriana Holler	Pitzer	706 970 8319

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	Name	Address	Phone
1.	Libby Kokernoor	170 E 6th St #1443	715-828-3759
2.	[illegible]	170 E 6th St	909-621-8000
3.	[illegible]	170 E 6th St	425-802-4704
4.	Carolyn Bacon	170 E. 6th St. #1228	503-866-0568
5.	Louis Gallardo	170 E. 6th St.	(210) 482-9927
6.	Karen Parfitt	2555 King Way, Claremont	909 267 9689
7.	Tommy Li	170 E. Sixth St Suite 118 Box 1471	413 262 6617
8.	Elizabeth Brown	170 East 6th St	
9.	Zach barnett		781 801 0360
10.	Hannah Snyder	170 East 6th St, Claremont	503-473-2616
11.	Lianna Schechter	177 Princeton Ave, Claremont	401 477-3513
12.	Daniel [illegible]	[illegible]	814-730-9718
13.	Philip [illegible]	105 D N Mills Ave	918-289-8162
14.	Joseph McCann	12 Stonebrook Lane, Cos Cob, CT	(203)-536-5518
15.	Mike Ernest	5020 Wind Point	262-672-5017

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	Name	Address	Phone
1.	Justine Dodgen	742 N. Amherst Ave Claremont CA 91711	
2.	Daniel Law	170 E. 6th St. Ste 132, Box 211 Claremont, CA 91711	
3.	Evelyn Duarte	1030 Columbia Ave #428 Claremont, CA 91711	
4.	Jen Byrne	1030 Columbia Ave #0246 " " "	
5.	Kate Craddock	1030 Columbia Ave #291 Claremont, CA 91711	
6.	Miles Litson	742 N. Amherst Ave Claremont CA 91711	
7.	Anna Fiasko	1030 Columbia Ave #309 Claremont, CA 91711	
8.	Orissa Stewart-Rose	1030 Columbia Ave #920 Claremont, CA 91711	
9.	Jackie Salena	1030 Columbia ave #892 Claremont, CA 91711	
10.	Amalia Nelson	505 Evelyn Ave, Albany, CA 94706	
11.	Isabel Cohen	1030 Columbia ave. CA 91711	
12.	Donielle Kaufman	1030 Columbia Ave, #20 Box 273 Claremont, CA 91711	
13.	Alana MacWhorter	1030 Columbia #693 Claremont, Ca 91711	
14.			
15.			

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	Name	Address	Phone
1.	Benjamin Murphy	Pomona College	
2.	Christina Bejjani	↓	
3.	Neina Rahim	↓	
4.	Joel Detweiler	↓	
5.	Alison Blume	↓	
6.	Ian Gallogly	↓	
7.	Jonathan Wang	↑	
8.	[signature]	↓	
9.	Mala Karnani	Pitzer College Box 492	760-524-8986
10.			
11.			
12.			
13.			
14.			
15.			

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	Name	Address	Phone
1.	Puja patel	Pitzer college	(626)827-6418
2.	Mitchell	PZ College	(559) 917 1025
3.	Adam Mandel-Scaft	PZ college	(310) 860-2500
4.			
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	Name	Address	Phone
1.	Eden Maloney	250 De Neve Drive Room 602 Los Angeles CA 90024	(917)-837-0548
2.	Gabe Romero	170 E 6th Street, Claremont, CA 91711	626-922-8136
3.	Laura Berman	170 E 6th Street Claremont, CA 91711	(602)319-9247
4.	John Hasse	170 East Sixth Street, Claremont, CA 91711	(510) 866-4243
5.	Alex Nakao	170 E 6th St Claremont, CA 91711	408-927-6099
6.	Jinlin Ye	170 E 6th St Claremont CA	~~7096359~~
7.	Ian Chua	170 E 6th St Claremont CA 91711	909 477-7498
8.	Lauren Zielske	170 E 6th St Claremont CA 91711	615 4987004
9.	Alex Goldman	170 E 6th St. Claremont CA 91711	9095447407
10.	Carol Chu	SCRIPPS	(626)3980648
11.	Jacob Heller	CMC	301-204-5997
12.	Adam Bradsky	PZ	617-312-9759
13.	Stefan Valleeillo	Pz Claremont, CA 91711	530-902-7067
14.	Olivia Graham	CMC	(505)301-7781
15.	Emma Fisher	Pitzer	818-914-4155

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	Name	Address	Phone
1.	Amaru Tejeda	170 E 6th Street	(323)893-2549
2.	Kendra Francis	170 E. 6th St.	(425)802-0325
3.	Quani Dexter	170 E. 6th St.	(540)598-0881
4.		170 E 6th St	512 228 - 9004
5.	Brendan Bartanen	170 E. 6th St.	253 651 0376
6.	Eli Kaplan	170 E. 6th St.	847 722 5910
7.	House Vogt	170 E 6th St	502 303 8507
8.	Jessica Hsu	170 E. 6th St	702 250 - 4298
9.	Xin Wang	170 E. 6th St	646 - 749 - 9776
10.	Kyle K. Redford	170E. 6th St. Box 1111	702-244-0406
11.	Becky Loeb	170 E. 6th St #1037	206-683-4369
12.	Nathaniel Ampman	170 E 6th St #924	(847) 254-6283
13.	John-Paul Nako	170 E. 6th St.	808 371 2824
14.	Hsuanwei Fan	" #1326	951 750 3681
15.			

Center for Community Action and Environmental Justice
Centro de Acción Comunitaria y Justicia Ambiental

We the community/ies ask that you:

- Not build more warehouses
- Utilize existing empty warehouses-
- Not build on every vacant lot, instead use them as buffer areas with trees and other foliage to mitigate the impacts caused by existing air pollution sources
- Build a park for our kids
- A local market so we don't have to drive 5-7 miles to get there
- Build sound walls to help lessen the noise from traffic
- Ideally it should be like a Saturday or Sunday every day with less noise and traffic
- Enforce the Clean Air Act – reduce emissions
- Enforce statewide truck idling regulations
- No longer target our community for more warehouses

Please support our families by signing our petition for a healthy community for all of us.

	Name	Address	Phone
1.	Ben Peloquin	#742 1050 N. Mills Ave	(415) 994-6204
2.	Ben Rubin	1050 N Mills Ave	201-779-5090
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4.			
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	Name	Address	Phone
1.	KatieBonneau	10153 Piedmont Ct HR, CO	303-472-3705
2.	Katharine Grasburg	Pitzer College Box 243; 1050 N. Mills Ave Claremont, CA 91711	617-967-3191
3.	Kathryn Leonnig	742 N. Amherst Dr. Claremont, CA 91711	(214) 755-2437
4.	Kate Davidson	Box 210 1050 N. Mills Ave, Claremont, 91711	617-777-2150
5.	Michael Gray	Pitzer College	408 204-4343
6.	Kristen Bair	Scripps. #0145	303 570 3252
7.	Caitlin Hanavan	Scripps College	510-501-8141
8.	Mhavianne Strong	Pitzer 1029	909 964 1420
9.	Eduardo Fernandez	1050 N. Mills Ave, Claremont, 91711	707-299-9125
10.	Violet Luxton	4003 N. Garey Claremont 91711	909-973-2017
11.	Kathy	Pitzer 310.	626-321-5407
12.	Chelsea Kumabe	1050 N. Mills Ave Box 452 Claremont, CA 91711	(562)221-9435
13.	Shana Gould	Pitzer College	909-242-0054
14.	Wesley Gibbs	1050 N Mills Ave Box 247	415 488-7153
15.			

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	Name	Address		Phone
1.	Shruti Purkayastha	1050 Columbia ave.		217-721-3254
2.	Amanda Banducci	650 29th Ave	San Mateo CA 94403	650 678 1903
3.	Priya Saxena	608 Blossom Ct.	Pleasanton CA 94566	925-989-9659
4.	Elizabeth Ward	742 N Amherst Ave,	Claremont CA 91711	619-395-2298
5.	Jeff Macdonald	"		626-827-6172
6.	David Davila	3389 Cambria Ct	Riverside Ca 92501	(951) 880-9671
7.	Jemima Barrios	27 Barrett Ct	Lynn MA 01905	617-461-5938
8.	Xiaohan (Meimei) Xu	1050 N. Mills ave	Claremont, CA	503-860-9818
9.	Mick Rosenthal			
10.	Savannah Ross	1050 N. Mills ave	Claremont, CA	602-614-6336
11.	Laurent Gaudet	3L0 E Foothill	Claremont, CA	—
12.				
13.				
14.				
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	Name	Address	Phone
1.	Amanda Clemm	Scripps College	978 287 0143
2.	Lindon Pronto	Pitzer College Box 695	530-401-4263
3.	Miranda Holeton	Pitzer College Box 322	650-740-2311
4.	Jaclyn Mena	Pitzer College Box 572	206 375 6841
5.	NICK MORRIS	PITZER WILLEGE BOX 600	202 641 0994
6.	Scott Hunter	pitzer college 368	N/A
7.	Robbie Aeelen	Pitzer College #5	513 606 1222
8.	Michael Landsman	Pitzer College Box 456	n/a
9.	Liza Baskir	Pitzer College	N/A
10.	Ben Keller	HMC	909 607 1458
11.	Jose Barriga	Pitzer College Box 50	323) 406 3540
12.	Patrick miller	pitzer college	N/A
13.	michele Kaufman	Pitzer college	[illegible]
14.	Danielle Alon	Pitzer College Box 2	(650) 823-1824
15.			