

August 2020 | Final Program Environmental Impact Report  
State Clearinghouse No. 2017101033

# SAN BERNARDINO COUNTYWIDE PLAN

for County of San Bernardino

*Prepared for:*

**County of San Bernardino**

Jerry L. Blum, Countywide Plan Coordinator  
385 N. Arrowhead Avenue, 1st Floor  
San Bernardino, California 92415  
909.387.4422  
jerry.blum@lus.sbcounty.gov

*Prepared by:*

**PlaceWorks**

JoAnn Hadfield, Principal, Environmental Services  
3 MacArthur Place, Suite 1100  
Santa Ana, California 92707  
714.966.9220  
info@placeworks.com  
www.placeworks.com





Table of Contents

Section	Page
<b>1. INTRODUCTION.....</b>	<b>1-1</b>
1.1 INTRODUCTION.....	1-1
1.2 FORMAT OF THE FEIR.....	1-1
1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES.....	1-2
<b>2. RESPONSE TO COMMENTS.....</b>	<b>2-1</b>
<b>3. REVISIONS TO THE DRAFT PEIR.....</b>	<b>3-1</b>
3.1 INTRODUCTION.....	3-1
3.2 UPDATES AND CORRECTIONS TO DRAFT PEIR.....	3-1
3.3 DRAFT PEIR REVISIONS IN RESPONSE TO WRITTEN COMMENTS.....	3-31

**APPENDICES**

- Appendix A. Assessing Regional Criteria Pollutant Emissions Impacts Under CEQA In Light of the Friant Ranch Ruling
- Appendix B. Amicus Briefs – Sierra Clube, Reviving the San Joaquin & League of Women Voters of Fresno V. County of Fresno and Friant Ranch, LLP
  - San Joaquin UAPCD
  - South Coast Air Quality Management District
- Appendix C. Health Risk Assessment San Bernardino Countywide Plan
- Appendix D. Environmental Justice and Legacy Communities Background Report
- Appendix E. Coalition of Community Groups, Businesses, Organizations and Individuals in the High Desert of San Bernardino County – Full Letter
- Appendix F. Dr. and Mrs. Brent Moelleken – Full Letter

## Table of Contents

### LIST OF FIGURES

<b>Figures</b>	<b>Page</b>
<b>2. Response to Comments</b>	
Figure 1	Increase in Diesel Particulate Matter Concentrations due to CWP Implementation – Bloomington Community.....2-43
Figure 2	Increase in Diesel Particulate Matter Concentrations due to CWP Implementation – Muscoy Community .....2-45
<b>3. Revisions to the Draft PEIR</b>	
Figure 5.3-2	Environmental Justice Focus Areas.....3-49

# 1. Introduction

---

## 1.1 INTRODUCTION

This Final Environmental Impact Report (FEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code §§ 21000 et seq.) and CEQA Guidelines (California Code of Regulations §§ 15000 et seq.).

According to the CEQA Guidelines, Section 15132, the FEIR shall consist of:

- (a) The Draft Program Environmental Impact Report (PEIR) or a revision of the Draft;
- (b) Comments and recommendations received on the Draft PEIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies comments on the Draft PEIR;
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by the Lead Agency.

This document contains responses to comments received on the Draft PEIR for the San Bernardino Countywide Plan during the public review period, which began June 17, 2019, and closed August 15, 2019. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the lead agency. This document and the circulated Draft PEIR compose the FEIR, in accordance with CEQA Guidelines, Section 15132.

## 1.2 FORMAT OF THE FEIR

***Section 1, Introduction.*** This section describes CEQA requirements and content of this FEIR.

***Section 2, Response to Comments.*** This section provides a list of agencies and interested persons commenting on the Draft PEIR, and copies of comment letters received during the public review period. To facilitate review of the responses, each comment letter has been reproduced and assigned a letter and number—A1 through A7 for letters received from public agencies, O1 through O8 for letters received from organizations, and I1 through I9 for letters received from individuals. Individual comments have been numbered for each letter, and the letter is followed by responses with references to the corresponding comment numbers.

***Section 3. Revisions to the Draft PEIR.*** This section documents revisions to the Draft PEIR text and figures as a result of the comments received from agencies and interested persons, as described in Section 2, and/or errors and omissions discovered subsequent to release of the Draft PEIR for public review.

## 1. Introduction

The responses to comments contain material and revisions that will be added to the text of the FEIR. County of San Bernardino staff has reviewed this material and determined that none of it constitutes the type of significant new information that requires recirculation of the Draft PEIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the Draft PEIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

This section also describes changes that were made to the Policy Plan maps based on annexations and corrections to land use categories reflective of updated zoning data. The updates affect several maps, but do not change the substantive analysis, conclusions, or findings of the Draft PEIR.

### 1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(a) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review and comment of Draft PEIRs should be:

. . . on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. . . . CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

CEQA Guidelines Section 15204(c) further advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.” Section 15204(d) states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204(e) states, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be forwarded to those agencies at least 10 days prior to certifying the environmental impact report. The responses will be forwarded with copies of this FEIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on Draft PEIRs.

## 2. Response to Comments

---

Section 15088 of the CEQA Guidelines requires the Lead Agency (County of San Bernardino) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the Draft PEIR and prepare written responses.

This section provides all written responses received on the Draft PEIR and the County of San Bernardino's responses to each comment.

Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the Draft PEIR are excerpted in this document, the sections are shown indented. Changes to the Draft PEIR text are shown in underlined text for additions and ~~strikeout~~ for deletions.

The following is a list of agencies and persons that submitted comments on the Draft PEIR during the public review period. They are categorized into agencies, organizations, and residents/individuals and listed in chronological order within each category by the date of the comment.

Number Reference	Commenting Person/Agency	Date of Comment	Page No.
<b>Agencies</b>			
A1	Mojave Desert Air Quality Control Board	June 24, 2019	2-3
A2	Soboba Band Luiseno Indians	August 6, 2019	2-7
A3	State of California Attorney General	August 15,2019	2-13
A4	California Highway Patrol – Inland Division	August 15,2019	2-53
A5	South Coast Air Quality Management District	August 15,2019	2-57
A6	Ontario-Montclair School District	August 15,2019	2-69
A7	Ahamakav Cultural Society Fort Mojave Indian Tribe	August 16,2019	2-75
<b>Organizations</b>			
O1	Coalition of Community Groups, Businesses, Organizations and Individuals in the High Desert of San Bernardino County	August 14,2019	2-81
O2	Lucerne Valley Economic Development Association (Part 1)	August 14,2019	2-141
O3	Lucerne Valley Economic Development Association (Part 2)	August 14,2019	2-151
O4	Defender of Wildlife and Sierra Club	August 15,2019	2-165
O5	Center for Biological Diversity	August 15,2019	2-191
O6	Morongo Basin Conservation Association	August 15,2019	2-215

## 2. Response to Comments

<b>Number Reference</b>	<b>Commenting Person/Agency</b>	<b>Date of Comment</b>	<b>Page No.</b>
O7	Wildlands	August 15,2019	2-231
O8	California Desert Coalition	August 15,2019	2-235
<b>Residents - Individuals</b>			
I1	Betty Munson	August 8, 2019	2-251
I2	Paula Deel	August 12,2019	2-255
I3	Jean McLaughlin	August 14,2019	2-259
I4	Colin Walcker on behalf of Dr. and Mrs. Brent Moelleken	August 15,2019	2-265
I5	Sarah Kennington	August 15,2019	2-271
I6	Sarah Kennington and Steve Bardwell	August 15,2019	2-287
I7	Bryan Baker	August 15,2019	2-299
I8	Susan V. Walker	August 15,2019	2-303
I9	Jane Hunt-Ruble	Not Dated	2-307