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Local Agency Formation Commission
San Bernardino, California
January 26, 2007

Kathleen Rollings-McDonald and Members of the Commission

Thank you for asking for my comments on LAFCO 3066. Residents in the area also contributed their concerns, within this letter. These comments are on the EIR as it affects Bloomington in many more ways than just an area annexation. We would like to start our comments with an excerpt from the LAFCO handbook. 56001

“The Legislature recognizes that the logical formation and determination of local agency boundaries is an important factor in promoting orderly development and in balancing that development with sometimes competing state interests of discouraging urban sprawl, **preserving open-space and prime agricultural lands**, and efficiently extending government services.”

This project will remove unique agricultural lands which the state has designated. It will also destroy green space and migratory bird habitats at El Rivino County Club which the community of Bloomington previously had public access.

Recently, residents of Bloomington addressed many issues with the Rancho El Rivino Specific Planned annexation of unincorporated areas of Bloomington to Rialto. These concerns fell on deaf ears, as the saying goes. The plan and EIR showed significant impacts to the residents of these areas. Not to mention the annexations themselves would create an island of homes that will be at risk for confusion of public services. It is our understanding by LAFCOs own rulings' annexations not be allowed if creation of an island would result, without the island areas being included.

If the areas are allowed to be annexed and create an island of homes, this would make way for a island annexation without voter approval. The residents of the adjacent properties have expressed their non-willingness for annexation to Rialto in preference to incorporation into the future city of Bloomington. This annexation would preclude them the ability to do so and would have look of a conspiracy to deprive landowners of their legal right to vote, by manipulating LAFCO rules.

Also noted is the creation of a district that has the nessecesity to be taxed by the city to be in the red. Per EIR study and Young Homes the homes to be built are dependent on a voter imposed utility tax. With 24 percent of Rialtos fiscal budget reliant on the utility tax, there is no guarentee that the services to the area will surface in a timely manner, which could in turn impact other areas of Bloomington. Per previously annexed residents, a similar Fire Station (annexation enticement. same spot most likely) was to be built over 15 years ago, the sign has since fallen

down.

On the other hand, this area developed per the current community plan and general plan, kept in the Bloomington jurisdiction could be a positive asset not a negative cash drain. Thus requiring far less services and demands upon an already overburdened city such as Rialto. Per the Rancho El Rivino EIR, there are only two alternatives that will not significantly impact the area. One is to do nothing. The other to develop out as the current General Plan specifies. Thereby mildly impacting the air, water, traffic, unique and valuable soils, historic elements and migratory birds and wildlife which inhabit the area. Not requiring the need to annex to Rialto for services already provided by the County or future City of Bloomington.

The EIR did point out unhealthy additions this development would make for the new homeowners, and existing residents. With in such close proximity to a Cement Plant and a high level of existing air pollution. It did not bring out the traffic impact that a housing tract this size would cause at the I-10 Cedar interchange. Nor did it address the traffic problems it would cause for the community of Bloomington in general. In fact, the reader (appendix draft EIR) was led to believe that fewer than 50 trips a day will be made on Cedar Ave to the I-10 from a development this size. How irresponsible can Rialto be to expect the reader to believe Cedar Ave and the I-10 interchange would not be impacted. The school study also was left with an adverse impact to current and future students. The study only required that developers will pay impact fees. These fees will not build a new school for the 600 plus students to attend. It takes time to build schools, the home buyers will be subjected to busing and over crowded classrooms as all areas schools are beyond capacity. Rialto was asked to address both these issues and address the adverse affects.

In conclusion, Bloomington is currently pursuing Incorporation thru LAFCO loss of these lands and homes adjacent would effect the proposed city. The community of Bloomington in conjunction with the County of San Bernardino has worked hard to establish a Community Plan, one which involved looking at the concerns of the citizens, land uses, air quality, traffic etc. The areas in question have been designated for uses in this plan. The Rancho El Rivino Specific Plan on the other hand has a feeling of a land grab by the city of Rialto under the pretence of affordable housing. Housing that would subject their new residents to air emissions from the near by cement plant and fumes from the future sewer plant enhancements. This area is intended for large parcels and rural living, not 4000 square foot lots, for obvious reasons. This annexation proposal should be put off until the incorporation effort is complete. At that time if there is still need, revised studies of air, traffic and schools should be conducted as well as putting this annexation before the voters prior to moving forward. There may be a good reason the Cement plant provides area residents with soap for their cars and has disclaimers on the deeds to their homes.

Enclosed is a copy of the concerns given to Rialto previously. The findings were from a review group who looked over the EIR and solicited input from residents of Bloomington.

Respectfully Yours,

Pam Geil

@Concerned Bloomington Residents

City of Rialto Development Services Department
150 South Palm Ave
Rialto, California 92376

Re: EIR

Rancho El Rivino Specific Plan Amendment and Annexation City of Rialto, San Bernardino County, CA (SCH#200510101117)

Mr. Montag and City of Rialto

This response is in opposition to the annexation to Rialto, proposed zone changes and development of proposed Specific Plan for the area of Bloomington proposed.

The EIR leaves the do nothing option or Option that follows the current General Plan for Bloomington as the only two viable options to this project.

- Impact to the Bloomington Community
- Impact to the Current Bloomington Incorporation effort
- Loss of Air Quality
- Loss of Prime Agricultural Land
- Loss of Environment for endangered and migratory animals
- Loss of Park Space and Community Golf Course
- Additional Traffic in area and at the Cedar Ave overpass (which was excluded in the study)
- Traffic routes discusses in EIR are not practical or left out
- Impact on the area schools (which are already at capacity)
- El Rivino Country Club should be designated a point of Historical Interest (even if it does not qualify for a list on the California Historic Registry)

The County and Community have set the current General Plan and Bloomington Community Plan. The developer purchased property in this area knowing the land to be Prime Agriculture land and Community Open Space. This is a deliberate attempt on the developer and City of Rialto to undermine the State, County and Community plans to conserve these valuable resources.

There was no secret in the zoning of these areas, just because land is purchased and let sit dormant does not mean that the land has lost its purpose, only that the purchasers chooses not to use the land for it's specific purpose. In doing so, he is affecting the community. As in the case of the El Rivion Country Club a sign is posted on the gates closed for Remodeling, to my knowledge the purchaser has never attempted to run the Golf Course as a for profit operation. Many Bloomington and local residents used the course not only for golf but also for family outings to view the migratory birds that land on the water areas.

It is understood that the developer is not in the farming professional, though they did with full knowledge purchase prime agricultural land as designated by the state. Many such lands are developed as designated for a conservation measure. The lands in this study

should be kept to the general plan with a planned overlay to protect the agricultural element.

- **Impact to the community** would be against the general plan and the proposed annexation would make an island of land, which according to LAFCO guidelines would also need to be annexed. Annexing residents of Bloomington who do not want to be part of Rialto as shown by recent area surveys, and community petitions.
- **Impact to Incorporation Effort-** Currently the Bloomington Incorporation Commission is in the process of City-Hood. The residents of Bloomington have asked LAFCO to move forward with the City of Bloomington. This annexation would severely impact not only the incorporation but also the aesthetics' of the future City of Bloomington.
- **Loss of Air Quality-** As per the study only no project or following the general plan would result in less than significant air quality segregation.
- **Loss of Prime Agricultural Land-**development beyond the levels designated by the general plan will completely remove what little agricultural land that is left in Bloomington. As with the buffalo at one time, there was plenty to go around then one day they were almost extinct. This goes for Bloomington, it is at its limit the land should be used as so designated in general plan.
- **Loss of environment for endangered and migratory species-** the developers keep getting the endangered species land moved elsewhere in mitigation I am just wondering how they contact the insect, bird or animal that may live or come there that his new home is a few miles away. Again the developer bought the land knowing what it was zoned for and should respect the fact and develop accordingly. The golf course is home as stated in study to a wide range of creatures and birds, though I believe the Canadian goose was left off it said to use the course as a stopping spot while migrating. I don't think posting a map would be sufficient to offset this loss for our feathered friends. As with Capistrano once the area became built around the Swallows stopped returning in the numbers that once were there. Land such as this should remain environmentally correct and respect should be shown for the forethought to keep land available for migratory animals and endangered species
- **Loss of Park Space and Community Recreation-** The residents of Bloomington have few attractions to frequent the Golf Course is one the Bloomington Garage and Kessler Arena plus the Cemetery is your last on the list that brings tourism to the community. El Rivino Country Club has been a fixture in Bloomington since 1956. The closing of the Golf Course was an injustice to the community. The course was a source of tourism and entertainment in Bloomington as it was frequented not only by residents but also by visitors from other cities who want to play a course with reasonable rates and a level of play even a novice is comfortable with. For over 50 years El Rivino Country Club has been a fixture in the community bringing in revenue to the area plus providing a park setting along with home for resident and the migratory animals.
- **Traffic-** The study deliberately left the Cedar Ave overpass and freeway entry to the I-10 Freeway. This overpass already has major traffic problems and will definitely be impacted by 2000 or more new residents. They also chose 7th Street a residential surface street to be more traveled than Cedar and the overpass. I do not believe the residence will choose a 25 mile an hour zone through a residential area to be a good

planned traffic route. In living in Bloomington for over 30 years I find if I am close to Cedar and want to go West I take Cedar to the I-10, if I am closer to Riverside and I want to go west it is a toss up either Riverside or Cedar. Therefore, I would guess at least 30 percent of the Residents of the planned track would be likely to use the Cedar Ave on ramp to the I-10. A small percentage will travel through the number Streets, which are not always considered safe at night... I would appreciate a return letter on **how the study came up with the decision that Cedar overpass would not be impacted and how that information would be derived.**

- **Schools-** I saw no indication that a study was done on the available classroom space in the area. Currently the schools are at capacity, and 700 more students would definitely impact our school. In addition, the traffic is jammed at the schools during peak hours of operation and that should also be considered in the study as the traffic impacts Santa Ana and Slover to the West.
- **El Rivino Country Club significance-** For the facts brought forth in the study for Historic Registry, and that the property is over 50 years old it will qualify for a Point of Historic Interest for it's placement and architecture and uniqueness to Bloomington. It is a large significance in Bloomington history and open space longevity. The loss of this cultural resource is significant to Bloomington. The Crestmore area of Bloomington has long been discounted by the County of San Bernardino. Most all of Bloomington's historic resources and landmarks have been destroyed without any documentation what so ever. Being that this building is one of the few remaining buildings that shows architecture and cultural history of our area.

In conclusion while the study hit some major issues such as air quality, traffic, historic ignorance, land density, general plan, development plan etc. It left out the impact to Bloomington in its mitigation process. Using Seventh street a residential street for traffic routes and leaving out Cedar Ave over pass. Impact on the local Schools that sit beyond capacity and children are being bused to other areas. Impact on the local historical value of the Country Club along with loss of Open Space and Habitat and the unique value it has to Bloomington.

Most of all it left out the Bloomington does not want to have this area annexed to Rialto, as it will affect their future City of Bloomington.

Respectfully Yours

Pam Geil
@ Concerned Citizens of Bloomington