Incorporating the Unincorporated:
Environmental Violence and Resistance in the Warehouses of the Inland Empire

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ABSTRACT

Centering a warehousing project approved for development in San Bernardino County, California, I have compared environmental violence in incorporated and unincorporated communities, a perspective that is rarely used in environmental justice literature. In a case study of warehouse development in Bloomington, an unincorporated community, and the City of Rialto, I analyzed government records and reports, news articles, city and county data, and interviews with organizers, residents, and warehouse workers, seeking to understand whether the growth of the logistics industry in the Inland Empire has affected unincorporated communities and cities in different ways. This thesis makes three claims, based on my initial findings. First, comparing land use procedures and transformations in Bloomington and Rialto, I argue that development in cities tends to maintain existing residential areas despite increasing warehouse development, while the County aids violent forms of dispossession in favor of new warehousing in unincorporated communities. Second, I analyzed warehousing practices and found that unincorporated areas, due to their lack of developed infrastructure, face more intense environmental harms caused by warehousing, such as increased pollution burden and diminished community safety. Third, I found more resistance and protests against new warehouse construction in unincorporated areas. However, organizers face unique hurdles to promoting resistance in unincorporated areas, such as inaccessible County meetings, making struggles against warehouse development more difficult than parallel struggles within city boundaries. Ultimately, I argue that a community's status as "unincorporated" largely determines the means through which dispossession and other forms of environmental injustice, subsequent resistance, and development narratives manifest on local scales, expanding the literature in place-based political ecology and bringing forward the specific experiences of people living in unincorporated communities.

KEYWORDS

Keywords: Environmental Justice, Land Use, Logistics Industry, Unincorporated Communities, Political Ecology

"The right to the city is not merely a right of access to what already exists, but a right to change it after our heart's desire."

- David Harvey, "The Right to the City," 2003, page 939

INTRODUCTION

Rancho Cucamonga, where I have lived for my whole life, is part of the Inland Empire in California, a region known for its parking lots, strip malls, cookie-cutter houses, and dense clusters of warehouses. Traveling back and forth between Rancho Cucamonga and University of California Berkeley, I have noticed new development projects every time I return home. Each construction site represents the death of what could have been. A fast-growing metropolitan area roughly sixty miles east of Los Angeles and Orange counties, the Inland Empire sits as a major logistics hub in the western portions of San Bernardino and Riverside counties (Davis 1990).

The region has not always been known as the Inland Empire. As railroads and other infrastructure was being constructed rapidly around the nation due to the success of the Works Progress Administration in the 1930s, the authors of the Federal Writers Project, when discussing the region in their guide to California, emphasized its agrarian features, such as citrus groves, vineyards, and small livestock farms. Rancho Cucamonga, Fontana, and Rialto are just some of the communities described as sparsely populated areas of approximately 2,000, 6,000, and 1,600 people respectively (Federal Writers Project 2013).

Driving through today, one would see few remnants of the agricultural community that once was. Paved over with concrete, decorated with suburbs and warehouses, and woven into a complex network of roads, highways, and railroads, these three cities combined are now home to nearly 500,000 people, growing more than 5,000% in under a century (City of Rancho Cucamonga 2022, City of Fontana n.d., City of Rialto n.d.a). In fact, the Inland Empire is one of the fastest growing populations in the United States and is expected to grow twice as fast as the rest of Southern California over the next 25 years (Lansner 2022, Yarbrough 2023). This growth is one reflection of the expansion that has occurred across the entire Inland Empire. In this thesis, I examine the environmental injustices that have arisen within the region in the course of the most recent developments.

The scale of demand for access to warehousing can be illustrated by the fact that the ports of Los Angeles and Long Beach are the largest ports in the country by container volume, processing forty percent of containerized imports and thirty percent of exports in the United States (California Legislative Analyst's Office 2022). The Inland Empire faces some of the worst air quality in the United States, primarily due to diesel emission caused by deliveries to and from over 4,000 warehouses and roughly 600,000 daily truck trips across the region (Newton 2023). San Bernardino and Riverside rank as the counties with the highest ozone pollution in the United States and the seventh and eighth highest year-round particulate matter pollution respectively. Additionally, the two counties are among only eleven counties in the nation to receive failing grades for all three pollution indicators measured by the American Lung Association (American Lung Association 2023). Alongside historical economic transformations in the region came spatially different environmental harms and endless emissions related to the functioning of the growing logistics industry (Patterson 2015). The region, when compared to other counties across Southern California, has the highest rate of commuters driving alone to work, an average commute time of over thirty minutes, and declining rates of carpooling (San Bernardino County 2021a). These trends have continued the downward spiral of the region's air quality.

However, the environmental harms present in these communities are not equally distributed. Communities living in close proximity to warehouses and highways are subjected to lower air quality and face negative health impacts, such as increasing risks of asthma, lung cancer, cardiovascular disease, and low birth weight among other illnesses, creating an urgent need for action to combat damage to public health and quality of life (Stroik and Finseth 2021, American Lung Association 2023). The unequal distribution of environmental harms is causing noticeable impacts on the communities in the Inland Empire, especially those that are low-income, Spanish-speaking, and non-white (Torres et al. 2021). These communities, which are also subjected to heat inequities, are estimated to face millions of dollars in health costs due to declining air quality and long-term exposure (Dialesandro et al. 2021, Bluffstone and Ouderkirk 2007).

Furthermore, those working within these warehouses are increasingly exposed to unsafe practices and environmental harms (Alimahomed-Wilson and Reese 2020). In addition to extremely common repetitive motion injuries, they also face frequent exposure to diesel emissions, dust and debris brought in by trucks, heat levels that are intensifying with climate

change, and accidental contact with chemicals being transported (Delp et al. 2021). Many political ecologists have highlighted the mechanisms through which perpetual states environmental violence have been produced and reproduced, paralleling what can be seen in the Inland Empire (Peluso and Watts 2001). Environmental injustices have been caused by structural power imbalance governing land use, environmental quality, and working conditions, at times manifesting conditions of environmental violence, through which people are displaced and their health deteriorated. The endless appropriation of land for warehousing, the degradation of one's body caused by the air that must be breathed, and the exploitation of marginalized communities as sources of cheap labor, have all become normalized by state policy and development practices within the logics of capitalism.

In 2022, San Bernardino County approved the Bloomington Business Park Specific Plan. This plan, spanning 213 acres, is set to demolish the homes of over 200 residents and an elementary school in the community of Bloomington in order to make way for the construction of over 2 million square feet of warehouses. This project will be in close proximity to homes and the majority of Bloomington schools. Despite enormous resistance from the residents of Bloomington, a community that values their rural and agrarian lifestyle, San Bernardino County and Howard Industrial Partners, the developer behind this plan, have continued to push the project forward (Hagen 2021, Torres et al. 2021, Whitehead 2022, Yarbrough 2022). While warehouse development is a common occurrence across the Inland Empire, dispossession of this intensity is not. So why is this happening in Bloomington? Bloomington is an unincorporated community, meaning that their most local governmental representation is San Bernardino County, as opposed to the governance that exists within cities. Although it seems obvious to ask if this has been permitted because of Bloomington's status as unincorporated, it is a question that has had surprisingly little inquiry. Even in broader place-based research and environmental justice literature, it has not been meaningfully investigated how unincorporated communities are differentially impacted by environmental injustices, despite the fact that, in 2010, nearly 40% of people in the United States were living in unincorporated areas, and, in 2018, almost 15% of San Bernardino County residents were as well (Gomez-Vidal and Gomez 2021, Southern California Association of Governments 2019).

Evidence and Methods

In order to tactfully approach the most prominent environmental injustices in the Inland Empire, it should be understood how environmental harms manifest across different local communities. Given the County's complete dismissal of the opposition to this violent development project, I asked if and how the growth of the logistics industry in San Bernardino County is differentially impacting incorporated communities and unincorporated communities. Throughout this thesis, I reference multiple interviews I conducted. In order to ensure the safety of everyone who contributed to this study, names have been removed, other than three warehouse workers who have been renamed for the purpose of distinction.

First, I compiled city and county development procedures and reports, secondary data on regional warehouse growth from researchers at the Robert Redford Conservancy and Radical Research LLC, interviews with community organizers from the Concerned Neighbors of Bloomington and the Center for Community Action and Environmental Justice, and local news reporting. Analyzing these combined forms of evidence, I determine whether incorporated and unincorporated communities are experiencing the development of new warehouses in different ways.

Next, I gathered publicly available workplace citations by the California Division of Occupational Safety and Health (Cal/OSHA), applicable environmental and labor legal standards, reports from the City of Rialto and the CalEnviroScreen 4.0 on local traffic and environmental health, and interviews with three warehouse workers and representatives from Teamsters Local 1932 and the the Warehouse Worker Resource Center I investigated whether and how warehouses located within unincorporated areas have affected the health and safety of workers and surrounding communities differently than warehouses located in incorporated areas.

Lastly, I recorded observations at a Rialto City Council meeting, which I watched live online, and San Bernardino County Board of Supervisors meeting, which I watched a recording of, as well as my previously mentioned interviews with community and worker organizations. I asked if the prospects of organizing resistance against warehouse development and related environmental harms have differed between incorporated and unincorporated communities. Ultimately, I argue that a community's zoned positionality (in this case, as incorporated or unincorporated) is central in determining how dominant narratives, environmental injustice, and subsequent resistance manifest on local scales, expanding upon existing place-based research in

political ecology and shedding much-needed light on the unique experiences of unincorporated communities.

Study Sites

I make this argument primarily through a case study of two communities, Bloomington and Rialto. As previously mentioned, Bloomington is an unincorporated community in San Bernardino County. Conversely, Rialto is a city within the same county. It is worth noting that Bloomington, an unincorporated community is 83.5% Latine, has a higher poverty rate than 80.9% of California, and is more linguistically isolated than 76.9% of California, largely because a significant percentage of Bloomington residents are only fluent in Spanish. On the other hand, the City of Rialto is 74.5% Latine, has a higher poverty rate than 64% of California, and is more linguistically isolated than 49.3% of California (California Office of Environmental Health Hazard Assessment 2021). While Rialto reflects a typical suburban lifestyle associated with Southern California, Bloomington stands out as a more rural area in the Inland Empire, a lifestyle that is a point of pride and enjoyment for many residents. However, Bloomington is still the "largest and most developed unincorporated community in San Bernardino County" (San Bernardino County 2020). Lastly, Bloomington lies within Rialto's sphere of influence. While the County is still responsible for the governance of Bloomington, the sphere of influence maintains the understanding that Bloomington is ultimately intended to be annexed by Rialto, encouraging the City to make development plans with annexation as a long-term priority (City of Rialto 2010). While both communities have experienced warehouse development, as has the entire Inland Empire, it is necessary to understand how the region became a warehousing hotspot and how its history is embedded within the construction of infrastructure.

A Brief History of the Inland Empire

The Inland Empire's Birth Through Agriculture

The story of the Inland Empire is one of land speculation and the shifting trends of a capitalist society, even from its initial formation. Following the Mexican-American War,

Mexican and Spanish land grants were contested and Californian land was seized by the United States in 1850. As the U.S. Dollar imposed new values on the region and new settlers from the east coast and Texas were inspired by a belief in manifest destiny, a civilization centered around large-scale trade, profit-maximization, and private property rights was forced upon the land and the people who lived on it (Patterson 2015). In 1887, the Santa Fe Railroad, alongside other regional developments, began the construction of a new stretch of tracks, which would connect the southwest coast to the rest of the nation's economy. With the funding of private investors and having acquired cheap, empty land, the company built train stations across what is now the Inland Empire with the prospect of communities eventually developing there. Only a handful of families settled around these stations until new investors arrived in the early twentieth century (Anicic Jr. 2005). Buying land across the region, developers planted saplings as windbreakers and constructed irrigation systems and power lines, with the goal of building a community centered around profitable agricultural production. With key infrastructure established, townsites like Rialto and Fontana began to grow much more rapidly, fueled by the investments of L.A. bankers who believed in the vision for a capitalist agricultural utopia in a once dry and barren region of the Inland Valley. While the larger farms were generating profits through the production of grapes, walnuts, citrus, pork, and other agricultural products, daytrippers and aspiring entrepreneurs from the coastal counties were able to take the Pacific Electric Railroad to the region seeking to purchase smaller plots of land. While the small farmers of Fontana often utilized their own labor, larger producers came to rely on the labor of hundreds of Mexican and Japanese immigrants. Thriving off of investments and immigration from L.A., the Inland Empire became the agricultural community that early developers had envisioned (Davis 1990).

The Expansion of Infrastructure and Industry

As World War II broke out and the American economy entered a period of wartime production, highways and military bases were popping up around the Inland Empire to aid the logistical efficiency of the region's growing economy, many of which were the product of President Franklin D. Roosevelt's broad infrastructure investments of the New Deal, such as the Interstate 10 and the March Air Force Base in Riverside (The Living New Deal n.d.). There became a need for the production of steel on the west coast to supply shipyards and airframe

manufacturers in L.A. and Orange counties. In 1942, Henry Kaiser, with support from the U.S. government, constructed the Kaiser Steel Mill in Fontana, which became the one of the only steel manufacturing plants west of the Mississippi River. (Patterson 2015). Kaiser's steel plant did not select the site entirely by choice. The U.S. Department of State, alongside lobbyists of the steel industry, which was concentrated in the east, forced unfavorable conditions of Kaiser's plan. With fear of a targeted attack following Pearl Harbor and a desire to economically suffocate the plant in the postwar economy, Kaiser's mill was forced inland and away from the ports of L.A. and Long Beach, destined to be reliant on distant shipments via railroad. Under these constraints, Kaiser was attracted to Fontana because of both the lack of local government, due to the fact that Fontana was still an unincorporated community, and the previous infrastructural accomplishments regarding access to electricity, irrigation, and railyards (Davis 1990). Roughly one year after regional steel production began in 1942, acidic industrial fumes killed a significant quantity of the region's delicate and profitable citrus trees. The age of industrialization reached the Inland Empire and devalued the once thriving farmlands. As thousands of military personnel and steelworkers flocked to the region, so did investors and land speculators who were once again looking to profit through shifting developments. Additionally, the onset of the internment of Japanese Americans caused labor shortages for farms and required them to seek cheap bracero labor through federal programs. Facing a housing shortage caused by the rapid influx of laborers, farm owners were pressured to sell their land, stripping away the agrarian capitalist society that had been meticulously planned and ushering in the air quality issues that would come to plague the Inland Empire (Patterson 2015).

As the world transitioned from the violent conflicts of World War II to those of the Cold War, wartime production continued. Following the federal government's decentralization of the airframe industry, production facilities trickled out of southern California's coastal counties and into the Inland Empire. With this, the Inland Empire accelerated its march toward becoming an industrial suburb, with strip malls and highways forming where farmlands once were. The growing economy required labor and, thus, additional housing. Suburban neighborhoods were built across the region. Since homes were nearly identical in style and price, neighborhoods were largely separated by income and, thus, race. Additionally, discriminatory housing practices forced people of color into specific communities (Davis 1990, Patterson 2015). As the region industrialized and institutional structures formed, the same narratives that produced the formerly

agrarian society, such as those related to economic efficiency and finance capital, framed the new economy and brought in new forms of spatial organization.

Deindustrialization and the Dominance of Warehousing

While international production was increasing in foreign countries during the Cold War, manufacturers in the Inland Empire struggled to maintain their profitability and competitiveness. Meanwhile, workers from L.A. and Orange counties found relatively affordable homes in the Inland Empire. Their long commutes via freeways, as well as those of an increasing number of trains and diesel trucks, worsened the region's air quality. The collapse of local manufacturing, such as the Kaiser steel plant's closure in 1983, and the downsizing of military bases devastated the economy. Unionized workers became unemployed, small businesses were forced to cease operations and were replaced by big-box retailers and fast food restaurants, and inflation skyrocketed. Furthermore, the passage of Proposition 13 in 1978 transformed California property taxes into a scheme that bankrupted local governments and was designed for the benefit of large corporations and joint-stock companies. The decline in industrial capital and a massive labor surplus, alongside increasing imports from Asian countries to the L.A. and Long Beach ports, paved the way for a new form of infrastructure: warehouses (Davis 1990, Patterson 2015, De Lara 2018). The increasing trade deficit of the United States required large high-tech warehouses in order to meet the supply, which necessitated land that could not be acquired in the dense coastal counties. This caused developers to set their targets on inland cities. Local officials welcomed these developments, in addition to the development of malls, big-box retailers, and fast food restaurants, as they searched for new revenue to make up for property tax revenue lost after Prop 13 (Patterson 2015). Today, Amazon and other warehousing profiteers continue to pollute and suffocate Inland Empire communities. Their histories emphasize the fact that these environmental injustices did not develop overnight. They are the result of a century of finance capitalism that has been dependent on shifting markets and related narratives dominating local debates. With each major shift, prior infrastructure made way for new infrastructure, workers became more disempowered, and wealth more concentrated in the hands of few. Critically understanding the Inland Empire's history provides a framework through which environmental justice can be envisioned and one day, hopefully, achieved.

New Frontiers of Environmental Resistance

As the environmental disparities of the Inland Empire have become more publicly acknowledged, resistance has formed across the region attempting to address these harms with focuses ranging from warehouse working conditions to environmental health. A region bonded in its suffering, the present harms have produced a coalition politics (De Lara 2018), through which organizations have united against unjust development schemes, such as how over sixty organizations have signed onto a letter calling on the State to implement a regional warehouse moratorium (Center for Community Action and Environmental Justice 2023). Worker organizations, such as the Warehouse Worker Resource Center and Teamsters Local 1932, have highlighted the labor intensive tasks endured by warehouse workers, while also acknowledging the impacts of the logistics industry on the environmental quality of local communities. These organizations are one key focus of this study due to the strategic positioning of workers to halt production and the flow of profits, as many social theorists have pointed out (Berberoglu 2007). Other organizations, such as the Concerned Neighbors of Bloomington and the Center for Community Action and Environmental Justice, have emphasized the need for environmental justice and local autonomy over development projects that will impact communities. However, even as these organizations have become more common across the Inland Empire and the region's demographics have become more favorable toward progressive politics due to the influx of a diverse workforce, concerns have been largely ignored by lawmakers and developers, allowing environmental disparities to continue intensifying (Esquivel 2019). By critically understanding the history of the Inland Empire, investigating warehouse-related disparities in incorporated and unincorporated communities, and analyzing the narratives dominating sites of contention, I develop an analysis of how environmental violence and resistance has manifested across communities of varying statuses.

FROM COMMUNITY TO CORPORATIONS AND THE ERASURE OF BLOOMINGTON

While the entirety of the Inland Empire has experienced the rapid expansion of warehousing, the violent development happening under the Bloomington Business Park Specific Plan feels somewhat unusual. In my conversations with organizers, warehouse workers, and researchers, this was somewhat of a universally felt sentiment. The historical developments of the city of Rialto and unincorporated Bloomington demonstrate that developers are setting their sights on unincorporated communities as the path of least resistance, especially with the diminishing quantities of available land within cities. Ultimately, institutional structures governing land use in Bloomington have paved the way for developers to pursue more violent and less democratic land transformations.

The Warehouse Cumulative Impact Tool for Community (Warehouse CITY), an interactive online mapping tool produced through collaboration between the Robert Redford Conservancy at Pitzer College and Radical Research LLC, demonstrates a dramatic difference in the warehouses of Rialto and Bloomington (Figure 1). In fact, Rialto has far more warehouses than Bloomington. When these data are graphed by their cumulative quantity over time, it reaffirms that warehouse growth has primarily been inside of city boundaries (Figure 2). Even when comparing a broader view of the Inland Empire to unincorporated warehouse growth, using data from the cities of Rialto, Fontana, Rancho Cucamonga, San Bernardino, and Ontario, it is apparent that the rate of warehouse growth in incorporated areas has significantly outpaced that of unincorporated counterparts (Figure 3). Just as authors on the history of the region have pointed out, much of this growth began accelerating in the late 1970s, during a period of deindustrialization and after the passage of Prop 13, which later received another boost through the expansion of online retailing and the rise of Amazon (Davis 1990, Patterson 2015). For many decades, cities could use warehouse development as a source of revenue to recover from the damages of Prop 13, but this has led to the creation of a new dilemma for developers seeking to grow within the tighter city boundaries; as parcels were accumulated by profiteers and fields became warehouses, cities became the origin of land scarcity in a region that was once seemingly vast, leaving two option for continued growth: annex unincorporated land into the cities or construct warehouses beyond city borders.

Figure 1. Map of warehouses in Rialto and Bloomington. Map was sourced from the online interactive mapping tool, Warehouse CITY, representing results in "Rialto" and "Unincorporated San Bernardino" up to May 2023 (Robert Redford Conservancy and Radical Research LLC 2023).

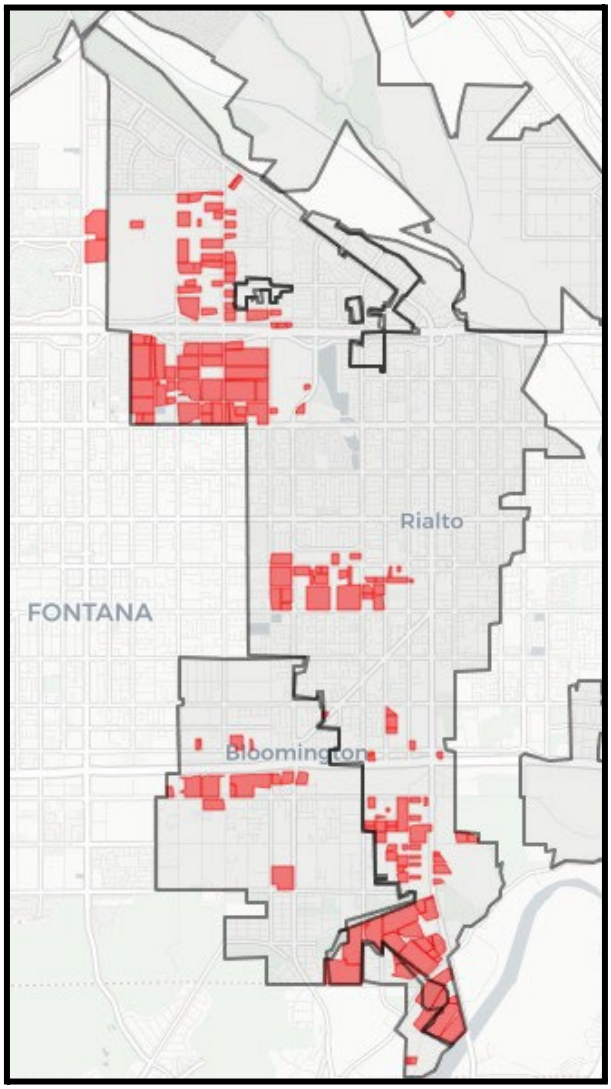


Figure 2. Graph of cumulative warehouse growth in Rialto and Bloomington between 1910 and 2021. Data was sourced from the Warehouse CITY tool, using the same results as Figure 1 (Robert Redford Conservancy and Radical Research LLC 2023).

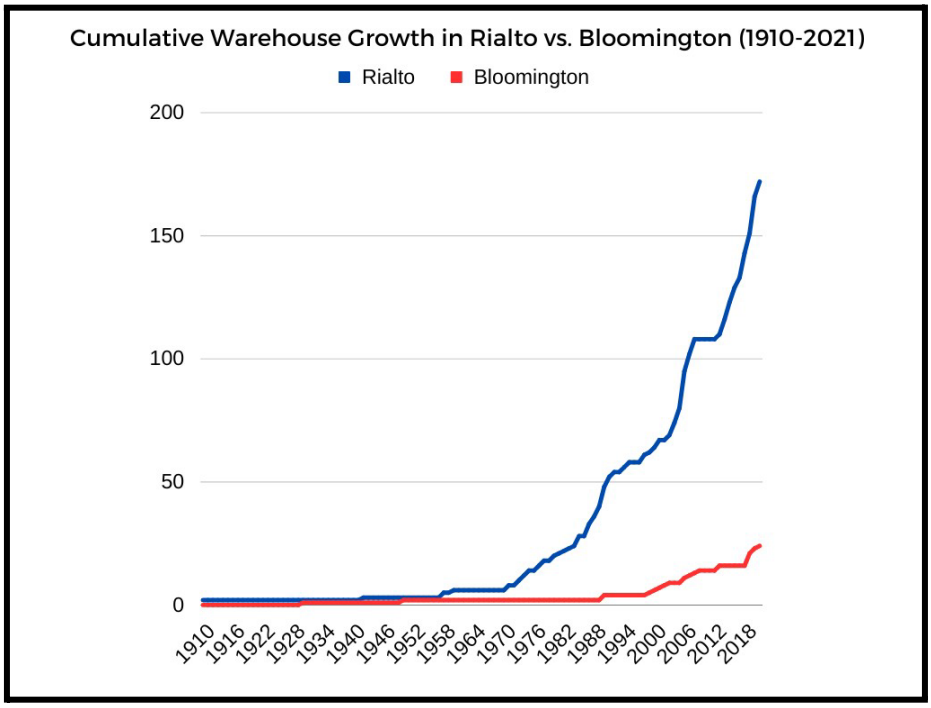
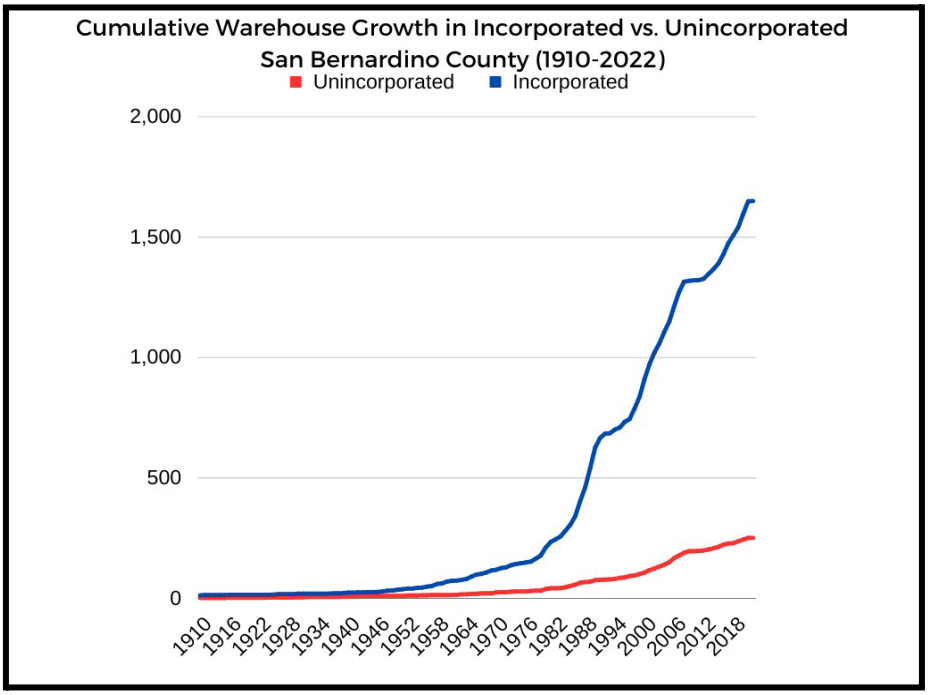


Figure 3. Graph of cumulative warehouse growth in Incorporated and Unincorporated San Bernardino County between 1910 and 2023. Data was sourced from the Warehouse CITY tool, representing results in "Rialto," "Fontana," "Rancho Cucamonga," "San Bernardino," "Ontario," and "Unincorporated San Bernardino" (Robert Redford Conservancy and Radical Research LLC 2023).



Despite city and county documentation of land use transformations being quite difficult to access, most of Rialto's warehousing developments have occurred in designated "specific plans." As opposed to "general plans," which set a framework for land use over an entire city or county, specific plans establish guidelines and development priorities for smaller plots of land (City of Rialto n.d.b). I compared the Bloomington Business Park Specific Plan, which was approved by the San Bernardino County Board of Supervisors, to four Rialto specific plans, demonstrating that city planning avoids displacing and harming residents in a way that the County does not. First, the Agua Mansa Industrial Corridor Specific Plan, approved in 1986, encompassed a total 4,285 acres of land from the cities of Colton and Rialto, as well as unincorporated land in the counties of San Bernardino and Riverside, including parts of Bloomington. While over 85% of the incorporated land within the plan site was already zoned industrial or commercial and under 3% zoned residential, the opposite was true for Bloomington. Of the roughly 100 acres in Bloomington that the plan covered, almost half was residential and only 6% was industrial (Willdan Associates and Williams-Kuebelbeck & Associates 1986). Furthermore, this plan established a zone in southern Rialto, which tucked warehousing away

from Rialto residents and right along the border of the Bloomington community.

Second, the Rialto Airport Specific Plan, which was adopted in 1997, included 3,131 acres of land in northern Rialto. This land was roughly 50% vacant land, with most of the remaining land being industrial, commercial, and land occupied by the Rialto Airport. While over 100 acres were zoned residential, containing over 400 homes, the plan explicitly stated its priority of preserving and growing these neighborhoods and included a buffer zone, distancing the homes from industrial uses (Robert Bein, William Frost & Associates 1997).

Third, almost ten years later in 2005, the Rialto City Council dispersed the operations of the Rialto Airport to other facilities, leaving much of the Rialto Airport Specific Plan obsolete. In 2010, the Renaissance Specific Plan was approved by the City Council, allowing new industrial and commercial developments, while also designating new land as community and residential spaces. Even through various amendments to the plan, the residential neighborhoods and buffer zone that were initially mentioned in the Rialto Airport Specific Plan were still preserved (City of Rialto 2018). The Renaissance Specific Plan was unique due to its transformation of previously industrial and commercial lands into sites of community for Rialto residents.

Finally, the Pepper Avenue Specific Plan, which was approved by the City Council in 2017, rezoned 101.7 acres of primarily vacant land to commercial with opportunities for residential development. However, the plan site was notably located in proximity to both a fault line and a floodplain (KTYG Group 2017). In a 2023 City Council meeting that I was able to attend virtually, the plan was amended to be zoned industrial following years of no development within the site due to the unfavorable geographic conditions (Rialto Network 2023). Despite each of these four specific plans leading to the development of warehousing in Rialto, the city has generally done well at preserving residential areas and investing in community spaces.

Conversely, the Bloomington Business Park Specific Plan, which was approved by the County Board of Supervisors in 2022, transformed 213 acres of almost entirely residential land into an industrial zone for multiple large warehouses (EPD Solutions 2021). Not only will the homes of over 200 residents be demolished for this project, but so will Walter Zimmerman Elementary School (Hagen 2021, Yarbrough 2022). The Colton Joint Unified School District sold the nearly 70 year-old public school to the developer, just so it can be torn down and rebuilt across the street (Whitehead 2022). In my interview with a leading organizer of the Concerned Neighbors of Bloomington, she highlighted the local importance of Zimmerman Elementary School to the residents of the unincorporated community. Generations of Bloomington families

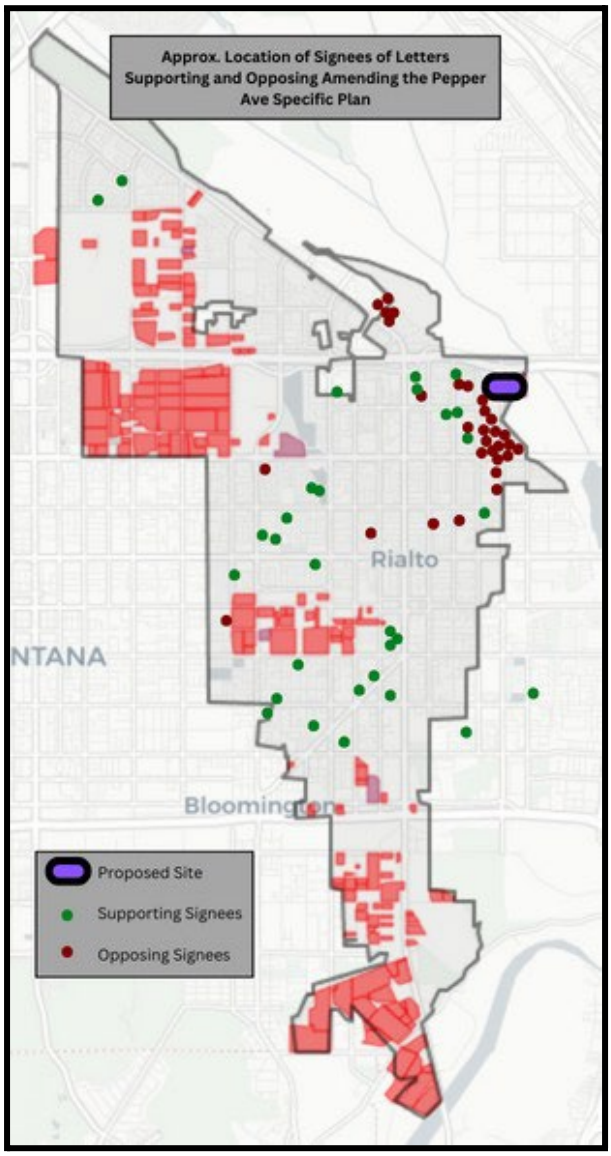
have attended the school, and many have expressed that they feel betrayed by the school district for paving the way for this development project by selling the property (Concerned Neighbors of Bloomington and People's Collective for Environmental Justice 2022). This specific plan stands out as a particularly violent and traumatic project in rural Bloomington, diverging from those in Rialto that avoid displacing residents and destroying schools. In multiple of my interviews, this theme became common. Organizers that I interviewed, who were both Bloomington residents, from both the Concerned Neighbors of Bloomington and the Center for Community Action and Environmental Justice, made the claim that this type of reckless development does not occur within the cities. Sarah, a warehouse worker whose name has been changed so her identity can remain anonymous, has worked in multiple warehouses across the Inland Empire and has seen warehouses be constructed around her home in the city of Fontana since around the time of her high school graduation in 2009. In her experience within the city, she, too, has felt that warehouses tend to replace only vacant plots of land.

One explanation for the varied nature of development in Bloomington and Rialto is their respective structures of governing land use and the relationship of the community to those structures. San Bernardino County and Rialto both have their own Planning Commission, with members appointed by the Board of Supervisors and City Council respectively (City of Rialto n.b.c., San Bernardino County n.d.a.). These commissions make land use and development decisions on behalf of and recommendations to the democratically elected body that appointed them. While both communities technically have democratic processes in place to elect their local government representatives, the Board of Supervisors is drastically more distanced from the residents of Bloomington. As the largest county in the contiguous United States, Bloomington represents only a fraction of the constituents of a single supervisor, of which there are five total (San Bernardino County 2021b). In order to provide increased representation to Bloomington, a Municipal Advisory Council is appointed by the County, with the intention of being advocates for Bloomington and a bridge between the County and community (Fuller 1977). Unlike Bloomington, which has all of their local elected representation consolidated into one supervisor, Rialto has a mayor and four council members, all of whom are elected by the entirety of Rialto (City of Rialto n.d.d.). Though not the only reason, I expect that the "distance" between Bloomington and their representation is undeniably one reason that development has been able to proceed in such a violent manner.

Beyond the structures governing land use in Rialto and Bloomington, it has also become clear that developers seeking approval for their warehousing projects are using ethically questionable tactics to achieve success. However, these tactics become far more coercive and dishonest in Bloomington because of the need to acquire residential properties. Recall the amendment to the Pepper Avenue Specific Plan in Rialto, an approval by the City Council that I watched live. The same developer behind the Bloomington Business Park Specific Plan, Howard Industrial Partners, was once again behind this project.

Letters of both protest and support were submitted to the city. With 167 letters of protest and 936 of support, the developer clearly did far better at obtaining written support than those organizing an opposition. Interestingly, Tim Howard, a partner at Howard Industrial Partners, admitted at the City Council meeting that an outside firm was hired to collect these letters of support (Rialto Network 2023). Despite Howard seeking approval for a zoning change and the construction of a warehouse, these letters make not one mention of a new warehouse and instead refer to the project as a "Business Park" that will bring new jobs, retailers, and funding to the city (see Appendix A). Additionally, every letter of support is identical, with residents simply filling out the necessary information on them. Compare that to the letters of protest, which are not all identical and include written paragraphs about why another warehouse is undesirable, with arguments ranging from air quality and noise pollution to the safety of their children (see Appendix B). Furthermore, I randomly selected thirty of both types of letters and, using the addresses available on them, placed the rough location of each signee on a map of Rialto. The results show that those opposing the project live much closer to it and have much more genuine stakes in its approval, while those supporting the project are scattered across and even outside of the City (Figure 4). Beyond these letters, Tim Howard, in order to garner support, even claimed to be running a small business, a claim that was contested in the meeting due to his promises to donate millions of dollars (Rialto Network 2023). While all of this points to the dishonest tactics used by developers, Bloomington faces much more real consequences as projects threaten to displace people.

Figure 4. Map of the approximate residencies of signees of letters of support and protest regarding the amendment to the Pepper Avenue Specific Plan. Using the addresses listed on thirty randomly selected letters of support and protest, I mapped their approximate locations onto a map of Rialto from the Warehouse CITY tool (Appendix A, Appendix B).



At the County Board of Supervisors meeting was being held to discuss the Bloomington Business Park Specific Plan, a meeting I was able to watch a recording of, residents and organizers provided evidence of the tactics used by Howard Industrial Partners (San Bernardino County 2022). For example, several organizers accused the developer of lying to residents. According to them, developers would knock on the doors of Bloomington residents asking to buy their home. Some residents reportedly regret agreeing to sell their homes, hoping that the

project would ultimately be rejected by the County, but agreed only because of years of harassment by developers, even at times being falsely told that their neighbors have already sold. Other residents were told that if they chose not to sell their homes, large concrete walls and warehouses would surround them, which is clearly a coercive and manipulative tactic to force people out of their homes with the threat of a poor quality of life. Even if one chose not to sell their home, they would be left in an area rezoned to industrial. With Bloomington being a rural, agricultural area, the future of their farm would remain uncertain as they would be left in land only permitting industrial uses.

One final tactic that developers use to gain approval is what essentially amounts to bribes. Promising to use union labor for construction has caused unions, like the Laborers' International Union of North America and the Southwest Regional Council of Carpenters to back developers, despite the understanding that union labor will not occupy these warehouses. In both the Bloomington Business Park Specific Plan and the Pepper Avenue Specific Plan, Howard Industrial Partners proposed voluntary community benefits agreements, dangling millions of dollars of funding over elected officials and residents, claiming that they will invest in infrastructure and make large donations that will uplift the communities (Rialto Network 2023, San Bernardino County 2022, EPD Solutions 2021). However, in Bloomington, these investments related almost entirely to improving infrastructure, which the County has neglected to maintain, causing many residents to view the project as a development that will solve their problems. Although developers practice dishonest tactics in both Rialto and Bloomington, it has become apparent that those tactics used in Bloomington are much more questionable and manipulative in nature.

While warehouse development within Rialto and other cities has largely taken place on vacant parcels of land, development in unincorporated Bloomington represents a modernized form of violent dispossession. Of course, the long-term transformations of land across the region still descend from a violent history of primitive accumulation, which oversaw the removal of indigenous communities from communal lands in order to replace them with state-sanctioned enclosures by Mexico and the United States (Patterson 2015). However, following the creation of new settlements and claims over land across the Inland Empire, recent warehouse developments in Rialto have not seen a recurrence of violent enclosures, as they have primarily targeted vacant or already industrial and commercial land. As land scarcity has emerged in the cities and access

to infrastructure has remained essential for new warehousing projects, land has been seized from the working class, rural communities of unincorporated Bloomington, reflecting a mode of capitalist accumulation referred to by geographer David Harvey as accumulation by dispossession (Harvey 2004). Bloomington residents are not being forced off their land through physical violence, as Marx described in his theorization of primitive accumulation (Marx 1867). Rather, they are being dispossessed of their land, their assets, and their unique community values through legitimized tactics by developers and local governments. Through the abandonment of public infrastructure by the County, the reorientation of land as necessitating occupation by economic productivity, and the redistribution of land facilitated by the County, the environmental violence impacting the residents of unincorporated Bloomington is being both normalized, encouraged, and accelerated.

BUILT FOR SILENT VIOLENCE

The endless expansion of warehousing in the Inland Empire has undoubtedly caused harm across the entire region; however, unincorporated communities experience this harm in different ways. Through a discussion of relevant labor and environmental laws, Cal/OSHA citation records, interviews with warehouse workers and a representative from Teamsters Local 1932, and government studies, I highlight both the universal harm caused by the logistics industry across the region and the subtle, yet impactful, harms afflicting unincorporated Bloomington. Once again, a theme emerges suggesting that the neglect of unincorporated areas by the County has allowed silent environmental violence to manifest to a greater intensity than that of Rialto.

Initially, it was my intention to investigate differences in local laws regulating environmental quality and workplace standards, comparing those of Rialto and San Bernardino County. After looking through local government ordinances and speaking with experts on the impacts of warehousing, I found that those differences do not exist. In my conversation with the Communications Coordinator at Teamsters Local 1932 and the Director of UCLA's Labor Occupational Safety and Health Program, they affirmed that environmental and labor regulations fall almost entirely on California state agencies, including Cal/OSHA, the California Environmental Protection Agency, CalEPA's Air Resources Board, and the South Coast Air

Quality Management District. These agencies are largely tasked with the enforcement of the California Environmental Quality Act and Title 8 of that State's Code of Regulations, which establishes workplace standards. While it is difficult to determine if enforcement of rules and regulations on warehouses differs between incorporated and unincorporated communities, some resources point to subtle differences in environmental health impacts.

Analyzing publicly available data on federal and state workplace violations, it can be seen that differences between working conditions do not differ significantly between incorporated and unincorporated communities of the Inland Empire. Rather, there is a universal lack of support for warehouse workers being impacted by environmental harms. Using OSHA's online establishment search tool, I compiled information from every inspection that was conducted in the warehouses of Rialto and Bloomington since the start of the 21st century, defining warehousing as facilities under the North American Industry Classification System (NAICS) code 493, which indicates warehousing and storage (U.S. Bureau of Labor Statistics n.d.). This NAICS code takes a slightly more encompassing approach than was used in a paper co-authored by Dr. Riley, which used the more specific code, 493110 (Delp et al. 2021). This decision was made because of my smaller study sites of Bloomington and Rialto, as opposed to broader Southern California. However, it should be noted that some facilities within the logistics industry may fall under NAICS codes that are not represented here. What I ultimately determined is that there is no meaningful difference between violations being cited in Bloomington and Rialto (see Appendix C). Across the two communities, citations cover a wide range of standards, such as failure to take adequate safety precautions, improper storage of compressed gas, injuries caused by onsite vehicles, etc. One trend that did emerge, however, is the substantial amount of time it takes for these violations to be addressed, a claim that I first was pointed to in my interview with the Teamster representative, who stated it often takes well over a year for issues to be resolved. The data from OSHA confirmed this. Of the fifteen total cases in which violations were found, eight of them took at least a year to be resolved, with some taking as long as three years. Additionally, it is near impossible for workers to address environmental harms in their workplaces. There are no protections from the long-term impacts of exposure to diesel emissions or from intense heat in indoor facilities. Although warehouses represent violent work environments, where the bodies of workers experience trauma from intense labor,

repetitive motion injuries, and exposure to environmental harms, there is a broad lack of protections that are not specific to unincorporated communities.

This understanding was reaffirmed through various interviews that I conducted. In addition to my conversation with representatives from UCLA's Labor Occupational Safety and Health Program and Teamsters Local 1932, I also spoke with a Research and Policy Coordinator for the Warehouse Worker Resource Center, as well as three warehouse workers, each who has been renamed in order to remain anonymous. Each representative of all three worker-related organizations highlighted the universally poor working conditions of warehouses across the Inland Empire, explaining that repetitive motion injuries are especially common. With workers being pressured to work as quickly and efficiently as possible, their health and safety hardly becomes a priority.

My conversations with warehouse workers provided more concrete examples of these harsh conditions. Melody, a twenty-three year-old woman who worked for three months in a medical supplies warehouse in unincorporated Riverside County, described to me the stark similarities of injuries across her workplace. Elaborating on one particular duty, which required walking around a large warehouse to collect items from boxes on shelves of various heights, Melody explained to me how common back pain was among her coworkers. She explained that she, and many others, would often sacrifice safety procedures if it meant that they could finish their jobs faster, especially considering that they were timed and had to meet quotas. She also emphasized that her workplace was dirty, and objects would fall from high places and throw dust into her face, making her grateful to be wearing a mask due to Covid-19 requirements. Teresa, a twenty-three year-old woman who worked for over a year in a different facility owned by the same company as Melody, outlined her experience packing equipment that was requested by healthcare facilities. Similar to Melody's experience, she explained that wrist pain was common among her coworkers, due to the constant opening and sealing of boxes. Teresa also mentioned that they were pressured to work overtime, being reminded that, if they refused to, medical patients would not receive the supplies. Additionally, both Melody and Teresa expressed concerns about their working conditions, but explained that they were largely normalized, especially among their older, Spanish-speaking coworkers, of which there were many. Sarah, a thirty-one year-old woman who I previously mentioned, has worked in various warehouses in the cities of Colton, Jurupa Valley, and Moreno Valley for roughly a decade. Similarly, she pointed

out the poor working conditions across all of her workplaces, comparing them to sweatshops. Having heard about several accidents during her decade of experience, she stated that management claims to resolve safety issues, but they rarely take any action until an injury occurs. Although no obvious differences have emerged between the working conditions of warehouses in incorporated and unincorporated areas, it is clear that worker health and safety has failed to be a priority of warehouses seeking to extract as much value from the labor of workers as possible.

While working conditions are universally abysmal in the warehouses of the Inland Empire, differential impacts of warehousing practices on unincorporated communities emerge when analyzing how communities are affected. In Rialto's 2022 Citywide Truck Route Study, sites along streets across the City, including some sites in and near Bloomington, were observed to collect information on daily diesel truck trips. What can be seen is that the streets and warehouses within the Agua Mansa Industrial Corridor Specific Plan, the warehousing zone tucked right on the border of Bloomington, are being much more frequented by trucks (Advantec Consulting Engineers 2022). In our conversation, an organizer with the Concerned Neighbors of Bloomington brought up these warehouses on the Bloomington-Rialto border, pointing out that their trucks are known to use Bloomington streets and drive through residential neighborhoods, despite the fact that their tax revenue goes to Rialto. This concern over trucks using residential streets was a common concern among those who attended the Board of Supervisors meeting where the Bloomington Business Park Specific Plan was approved. The study also shows that the streets of Bloomington have a higher proportion of truck traffic than Rialto. This is largely because the County has not meaningfully invested in the development or maintenance of infrastructure in Bloomington, a fact that is generally true of most unincorporated areas (Gomez-Vidal and Gomez 2021). Many streets are not built to last under heavy industrial traffic. Additionally, many streets lack safety precautions, like sidewalks. As the rural, equestrian community is having warehouses forced along their borders and, now, within them, many residents are becoming concerned about the community's safety, especially considering that many residents ride their horses around the area and many children walk home from school on sidewalk-less streets. Furthermore, with these increased impacts of trucks come more intense pollution. As the CalEnviroScreen 4.0 report demonstrates, Bloomington has a higher pollution burden than Rialto and over 75% of the State, especially related to particulate matter, increasing

impacts on public health in a community that is more predominantly working class and Latine than their city counterpart (California Office of Environmental Health Hazard Assessment 2021). Because of the County's neglect of infrastructure in the unincorporated community, in combination with the new industrial framework being forced upon them, Bloomington is faced with increased environmental violence compared to that which is being experienced in Rialto.

As Harvey states, Marx, through his dialectical analysis of history, understood that "we change ourselves by changing our world and vice versa" (Harvey 2003 pg. 939, Marx 1867). In other words, we shape our cities, our communities, just as they shape us in return. As the Inland Empire becomes shaped by warehouses, so do the lives and experiences of those who live there. This fact is seen clearly through the transformation of Bloomington, which is seeing its own erasure throughout these development projects. With warehouses spreading like parasitic fungal spores, residents of the rural community are being pushed into poor working conditions and forced to breathe poisonous air in high temperatures. With each new warehouse comes the intensified degradation of the bodies of workers and residents, creating a rift between this violent production and the reproduction of the communities that are necessary for production to persist (Foster 1999). As violent development and practices continue, communities are beginning to resist in hopes that they will be able to control the way their communities are shaped and changed.

ENVIRONMENTAL RESISTANCE AND THE FACADE OF AUTONOMY

As organizing against warehouse development and the discussion of environmental injustices have become more frequent across the Inland Empire, many of the more successful acts of resistance have come from the cities. Using news articles, interviews with organizers, and recorded meetings in San Bernardino County and the City of Rialto, I highlight the unique hurdles to resistance afflicting unincorporated communities, which make resistance to warehouse-related environmental injustices and development a much more achievable task within incorporated spaces.

The Fight for Sustainable Workplaces

Resistance in Communities and Narratives of Development

While the harms of warehousing persist across the entire region, small, yet notable, wins have been achieved in cities throughout San Bernardino County. Following a lawsuit by the California Attorney General over the approval of a warehouse next to a high school, which was said to violate the California Environmental Quality Act, the City of Fontana passed an ordinance outlining new restrictions on warehousing development and practices (Briscoe 2022). The cities of Redlands, Colton, Riverside, Pomona, Norco, Jurupa Valley, and Chino have all previously approved temporary moratoriums on warehouse development (Yeung and Saraiva 2022, Putzger 2022, Victoria 2022). Similar proposals made by the counties of San Bernardino and Riverside have fallen short of approval (Lee 2022, Putzger 2022). Beyond moratoriums, in the City of Banning, a city council member resigned after a recall effort against her qualified for the ballot. This effort began after she voted in favor of a zone change to approve a warehousing project, with a lead organizer being elected to replace her, stating that she would oppose all warehouse proposals in residential areas (Heiss 2023). Furthermore, it is much easier to find examples of news articles showcasing cities rejecting warehouse proposals than it is to find counties doing the same (Solis 2023, The Real Deal 2022, McAllister 2022). While these efforts are not holistic solutions to the many problems caused by rapid warehousing growth, they make clear the greater viability resisting warehouse-related harms in cities.

On Tuesday, November 15th, 2022, forty minutes into the San Bernardino County Board of Supervisors meeting, which began at 10:00 a.m., public hearing was opened to allow testimony on whether or not the Bloomington Business Park Specific Plan should be approved (San Bernardino County 2022). Following the Planning Commission's recommendation for approval, the first speaker approached the podium and introduced himself:

"I live in the area that's gonna be proposed, and I approve of the project"

With a shrug and no further explanation, he stepped away from the podium, setting a grim tone for the many organizers who were prepared to resist the project at the meeting. Next, another individual prepared to speak:

> "I believe this is something that Bloomington needs. Our infrastructure, there's been so many accidents. There's been horses run over. Our sidewalks… We have a problem in Bloomington. This is a solution. We have someone coming in that's gonna bring benefits to our community."

Highlighting the lack of infrastructure in the community and painting the developer, Howard Industrial Partners, as a savior, she neglected to mention her career as a local realtor, making her a possible beneficiary of development and the future or vacated housing that may follow. In fact, a second realtor was there that morning to speak in support. As she stepped away with a large grin, she was followed, once again, by another supporter of the project. One white resident of Bloomington, proceeded to contrast her home to those living in the project area, offering printed photos of houses on Locust Avenue to the Board of Supervisors:

> "Forty-two percent of the houses on Locust look like this. There's no pride of ownership. The ownership there is five cars filled with trash… My house is beautiful because I continually farm it… Bloomington needs to be beautiful and it needs a thoroughfare that should be beautiful, sidewalks for children going to school. It should be a beautiful place for children to live. Bloomington is not a beautiful place. It's a dump."

Throughout the hearing, a number of arguments were made in favor of the project, with most relating to issues that are unique to unincorporated areas. Some argued this would provide the revenue necessary for Bloomington to become a city of its own. Many pointed to the lack of infrastructure built by the County, saying they have seen no progress in Bloomington. Others repeated narratives equating the developer to a generous benefactor who wants to invest in the community. Teresa Escoto and Angela McClain, both members of the County-appointed Municipal Advisory Council that was a space of contention for many Bloomington activists,

came to speak in support, wearing shirts that read "Invest in Bloomington" (San Bernardino County n.d.b.). Six members from two construction workers unions, the Laborers' International Union of North America and the Southwest Regional Council of Carpenters, also spoke in support of the project, highlighting the agreement the developer has to use union labor during construction. A total of twenty-five people spoke in support of the project, with only twelve actually preparing speeches to provide reasoning. It was not until after the fourteenth person spoke in support that the first person was able to speak against the Bloomington Business Park.

A co-founder of the People's Collective for Environmental Justice, approached the podium with many activists by her side holding large prints of rural life in the community and side that read "#BloomingtonIsNotForSale #BloomingtonNoSeVende." After pointing out that the County is perpetuating environmental racism, that no company has agreed to occupy the warehouses after construction, that it has not been explained how new warehouses will not cause additional truck accidents, and that the jobs that will come to Bloomington are not a quality to be proud of, she offered a counterargument to those promoting the project:

> "I would like to see if the County actually has exhausted all of its resources and measures to bring in infrastructure dollars. There is no reason that community members here should be neglected for ten years for their infrastructure issues, and to see a warehouse come in and supposedly deal with it. That's the responsibility of the County itself, not of the warehouse developer."

An organizer with the Concerned Neighbors of Bloomington, after claiming that many residents within the project site have been harassed, lied to, and pressured to sell their homes by Howard Industrial Partners for five years, made a bold statement about those speaking in support of the project:

> "Please do not take the word of a CEO with no connection to Bloomington. Those residents who are here in support of the project are leaving Bloomington and some who are in favor have said themselves that they would want to stay in their homes except that they can't take the annual flooding that occurs because of a

> rundown septic and lack of appropriate drainage in the area. This is something that the County can and must address."

The Concerned Neighbors of Bloomington organizer who I interviewed, highlighted stories of corruption, a concern she also shared during our conversation:

> "Our previous supervisor sold us out. Bloomington did not want this. Our Bloomington [Municipal Advisory Council], we voiced our opposition to them. They've sold us out. They received money from Howard Industrial in donations. Our school district will sell Zimmerman Elementary if this passes because, again, they've received money from Howard Industrial"

A senior field representative for the Office of Assembly Majority Leader Eloise Gómez Reyes, spoke on behalf of the Majority Leader and Senator Connie Leyva, state legislators who represented Bloomington at the time of the meeting:

> "We do not believe that this project's significant negative impacts can be mitigated, nor justified, with an overriding consideration, and further benefits from this project pale in comparison to its numerous environmental, economic, and social impacts. We join with the residents of Bloomington who urge you to vote no on this project. They should not have to sacrifice their air quality for the promise of jobs or public investment."

The organizer from the Center for Community Action and Environmental Justice who I interviewed, used his speaking time as an opportunity to point out the inaccessibility of important County meetings:

> "Obviously you do not care about the people of Bloomington. Having a meeting at 10 a.m. when people are a working class community that work from 9 to 5. Who can make it to a 10 a.m. meeting? And you might not see a lot of us here today, but it's because we're working today. We're working. But the people who

> are here today, we're representing thousands of people in Bloomington that are trying to fight for our community."

This argument, which he further elaborated on in our conversation, is critical to understanding the hurdles to resistance that resist in unincorporated communities in San Bernardino County. Recall that Bloomington is a more predominantly working class community with a higher Spanish-speaking population than Rialto. Despite this, the Board of Supervisors meets on weekdays at 10 a.m. and the County Planning Commission meets on weekdays at 9 a.m. In contrast, Rialto City Council meetings open to the public on weekdays at 6:30 p.m. and City Planning Commission meetings meet on weekdays at 6 p.m. Furthermore, Rialto residents only need to travel to their city hall, which is roughly at the city center and hardly more than three miles from anyone in the Rialto, while Bloomington residents must travel almost 10 miles to the city of San Bernardino for County meetings. Given that Bloomington is more predominantly working class and Spanish-speaking, County meetings are disproportionately inaccessible to Bloomington residents, especially those of low-income backgrounds who cannot meaningfully attend meetings that take place in English.

Throughout the Board of Supervisors meeting, all sixteen people who spoke in opposition to the project gave prepared speeches, two of which were in Spanish and required a translator, in contrast to the twelve out of twenty-five supporters who did. Citing concerns over lack of representation by the Municipal Advisory Council and the County, frustration with outside unions coming to advocate for development, and the County's neglect of Bloomington's infrastructure, every person resisting the specific plan used their allotted time to explain their reasoning. Much of their testimony, similar to those in support of the project, revolved around narratives of lack of infrastructure and County investment.

As the public hearing came to a close, only one Supervisor had a question during deliberation. Joe Baca Jr., who represents Bloomington and many other communities in the largest county in the lower forty-eight states, asked if it could be confirmed that all of the properties in the project site have agreed to sell to the developer. As Tim Howard of Howard Industrial Partners responded at the podium that they have all of the contracts, shouts could be heard from the audience calling him a liar. With no further questions, the Board voted

unanimously to approve the violent development project. Breaking through the applause from supportive participants, more shouts could be heard from the audience:

> "Shame on you, Joe Baca! Shame on you! Where were you when we needed you!"

Frustrated with the opposition posed by residents fighting for their community, Chairman Curt Hagman put an end to the protesting shouts:

> "I'm gonna have you escorted out, both of you guys. You're not respectful."

In contrast, at the Rialto City Council meeting I was able to attend virtually, starkly different arguments were made, with a much different turnout (Rialto Network 2023). Recall that Howard Industrial Partners was also the developer seeking a zoning change in this case. Despite only seeking to change the zoning from commercial to industrial on a vacant plot of land, making the stakes far lower than those of the Bloomington project, nineteen residents and activists turned out to the 6:30 p.m. meeting in opposition to the project, which would place warehousing near homes in northern Rialto. Of the nine who spoke in support, three were representing the same construction worker unions, one was from a Latina small business group that Howard Industrial promised to donate to should the project be approved, one was with an adjacent property owner that would benefit from the zoning change, and one was from the firm that was contracted by Howard Industrial to collect letters of support. Only three speakers seemingly had any ties to the community.

Interestingly, the narratives that were so prominent in Bloomington were nonexistent in Rialto. Rather than the majority of speakers highlighting infrastructure deficiencies, they emphasized more typical development narratives. Supporters focused on new jobs and tax revenues and the donations the developer claimed that would be made. One even argued that the warehouse would improve environmental quality. The opposition cited environmental and ecological concerns, public health and safety issues, the need to build more parks and community centers, and fears of large developers pricing small businesses out of access to land. As the meeting transitioned from public comments to questions by the Council, every Council Member

had multiple questions to ask for the Planning Commission and the developer, on topics ranging from who will occupy the warehouse and if commercial companies have sought the land to the quality of jobs and life in Rialto. Ultimately, the Council approved the project by a margin of three to two due to the land being near a fault line, on a floodplain, and undesired by retailers and residential developers, with Mayor Deborah Robertson and Council Member Joe Baca, the father of Supervisor Joe Baca Jr., voting against it.

While both the Bloomington and Rialto project were approved, the hurdles to resistance in the unincorporated community have become far more prominent. With distant County meetings being held in English and at times that are inaccessible to the working class, Spanish-speaking community of Bloomington, the spaces that are supposedly in place to allow community engagement are structured in a way that disproportionately restricts access from low-income Latine residents. Furthermore, an organizer from the Concerned Neighbors of Bloomington expressed to me in our conversation that Bloomington residents felt that they did everything they could to fight this warehousing project, such as spreading awareness in English and Spanish, showing up to important County meetings, publishing studies and reports, gaining the support of California legislators, and hosting valuable community events and actions, like protests and cabalgatas, through which Bloomington residents paraded through the street on horseback in protest (Scott 2022). Despite these efforts, which exceed those of any parallel fight against warehousing in the Inland Empire, the project was unanimously approved by the County. In our conversation, an organizer with the Center for Community Action and Environmental Justice told me that he felt that similar fights against warehouse development in cities are eight percent successful, yet even if residents in unincorporated areas can get their Supervisor to oppose a project, there still remain four other County Supervisors who will vote to approve it. Resistance of the degree that occurred in Bloomington has not been seen elsewhere around proposed developments in the Inland Empire, let alone projects as violent as the Bloomington Business Park.

While it is clear that Bloomington residents lack the power to self-determine development that occurs within their communities due to their distance from meaningful democratic processes, a key factor that influences the success of new warehousing projects is the narratives that arise out of the community's status as unincorporated. Because it is seemingly universally understood that the County neglects the development and maintenance of

infrastructure in unincorporated communities, like Bloomington, this leads to development narratives that are nonexistent in cities, which typically see more infrastructural investments. Thus, developers become framed as sources of new revenue, generous saviors in a County whose hands are apparently tied, as was seen at the Board of Supervisors meeting. We see that struggles over resources, like land, become struggles over meaning, a concept which many political ecologists have written on. Unincorporated land faces a battle over its meaning, where developers frame it as empty, underutilized, and unproductive, requiring industry to give the region any sort of purpose and to be worthy of valuable infrastructure dollars. In contrast, those who live in the community, who lack the money and institutional resources available to developers, resist by maintaining the value of the land to community, culture, and the environment. Unfortunately, the narratives of developers, working within the lived logics of capitalism, remain far more effective to those with the power to influence key decisions. When improvements to infrastructure may only come through the erasure of community, infrastructure, thus, becomes a way of making claims on the land and transforming it into a new framework that aligns with profitable development. This glorification of the actors forcefully facilitating development and the use of infrastructure as a way of making claims on land are concepts that other political ecologists have pointed to (Yeh 2013). As land for new warehouses becomes increasingly scarce within the cities, it is likely that developers will continue to set their sights on unincorporated communities, like Bloomington, where people are less powerful and claims over land can more easily usher in violent development.

Many have written on the so-called "right to the city," arguing that the benefits of urban spaces should be democratic and accessible to all who reside there, not allowing groups of people to be pushed to the margins and neglected and guaranteeing to every person a right to the city (Lefebvre 1968). Others have expanded on the concept, arguing that this right should not be "merely a right of access to what the property speculators and state planners define, but an active right to make the city different, to shape it more in accord with our heart's desire, and to re-make ourselves thereby in a different image" (Harvey 2003, page 941).

I ask, however, what right is guaranteed to those who have no city, to those who are marginalized to the unincorporated periphery, to those who are virtually powerless to resist the encroachment of developers and lawmakers upon their communities? There, of course, is no single obvious answer to this question. But, for the sake of those in Bloomington and other

unincorporated areas, we must, as others have argued for within cities, see that the struggle for new commons against privatization and other logics of capitalist development is extended to those unincorporated spaces at the city periphery.

CONCLUSION

The approval of the Bloomington Business Park Specific Plan by the San Bernardino County Board of Supervisors represents one of the most violent examples of warehouse development in the Inland Empire. Given Bloomington's status as unincorporated, it became obvious to ask if that played a role in the success of this project. Beyond Bloomington, with a significant percentage of the United States population living in unincorporated areas, it is surprising that few have investigated how these communities are being disproportionately impacted by disparities in environmental health (Gomez-Vidal and Gomez 2021). Pulling information from government records and reports, news articles, secondary data on warehouse development, and interviews with organizers and warehouse workers, I have analyzed if the growth of the logistics industry in the Inland Empire is differently impacting incorporated and unincorporated communities, using Bloomington and the City of Rialto as case studies.

Through a glimpse of the historical development of warehousing in Rialto and Bloomington and their respective processes of transforming land use, it can be concluded that warehouse development is particularly violent and undemocratic in unincorporated communities. Rialto has tended to preserve residential neighborhoods, and, as land has become increasingly scarce in cities, developers have set their sights on unincorporated communities, where the County has unanimously supported the displacement of Bloomington residents. While development within the City targets primarily vacant land, embedded within the prior accumulation of land from indigenous communities by physical state violence, development within Bloomington has reflected a form of accumulation by dispossession, through which people are dispossessed of their land and assets through normalized subtle violence (Patterson 2015, Marx 1867, Harvey 2004). With the logistics industry rapidly expanding across the Inland Empire, it has become clear that warehouse workers are universally subjected to violent work environments. As the industry expands into unincorporated communities, the harms become amplified due to a lack of infrastructure capable of withstanding warehousing practices, causing

greater impacts to safety and environmental health in communities like Bloomington. These harms highlight the contradictions of capitalist growth, of which the bodies of necessary workers and exploited communities are increasingly degraded as the industry intensifies (Foster 1999).

Efforts to resist violent development in unincorporated areas are often skewed in favor of the developer. While they are uphill battles across the Inland Empire, communities like Bloomington, which is overwhelmingly working class and predominantly Spanish-speaking, face unique hurdles to their struggles. Facing a disconnect with the labor movement and a separation from the "democratic" processes which are supposed to represent them, unincorporated areas have been left largely powerless to determine their own development. Additionally, the ways through which warehouse development has manifested environmental harms in unincorporated Bloomington has determined which narratives become common in spaces of contention, like the Board of Supervisors meeting. These narratives commonly revolve around lack of infrastructure, with policymakers and advocates of new warehousing often framing developers as saviors who will generously solve the issues that the County has neglected. Thus, when infrastructure is tied solely to private developers and displacement, it becomes a means of making claims upon the land, erasing the values and histories of the community that once lived there.

Warehouses, through their land transformations, practices, and economic power, represent major sources of environmental violence in the Inland Empire, disproportionately afflicting unincorporated communities. Despite these challenges, groups like the Concerned Neighbors of Bloomington have formed coalition to defend their homes, their community, and their way of life, building power and relationships in a community that the County would prefer to quickly steamroll without confrontation. As warehouses continue to degrade the lives of the Inland Empire and resistance continues to develop, we must ensure that unincorporated communities are not neglected in conversations of autonomy and self-determination. Rather, they must be held central to this struggle, never to be excluded or pushed to the margins, as we hope to guarantee all people the right to shape their communities and their lives, city or not.

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REFERENCES

Advantec Consulting Engineers. 2022. 2022 Citywide Truck Route Study. City of Rialto. https://www.yourrialto.com/DocumentCenter/View/3577/Attachment-B --- 2022-Citywide-Truck-Route-Study

Alimahomed-Wilson, J. and E. Reese. 2020. The Cost of Free Shipping: Amazon in the Global Economy. Pluto Press, London.

American Lung Association. 2023. State of the Air. https://www.lung.org/research/sota

Anicic Jr., J. C. 2005. Images of America: Fontana. Arcadia Publishing.

Atchison, Topeka, and Santa Fe Railway System. 1921. M.B. Brown Printing and Binding Company, New York. http://cartweb.geography.ua.edu/lizardtech/iserv/calcrgn?cat=Special%20Topics&item=Railroads/Railroad1921a.sid&wid=500&hei=400&props=item(Name,Description),cat(Name,Description)&style=default/view.xsl&plugin=true

Berberoglu, B. 2007. The Centrality of Class in Contemporary Capitalist Society. International Review of Modern Sociology:33.

Bluffstone, R. A., and B. Ouderkirk. 2007. Warehouses, Trucks, And PM 2.5: Human Health And Logistics Industry Growth In The Eastern Inland Empire. Contemporary Economic Policy:25.

Briscoe, T. 2022. Fontana Settles with California AG over Alleged Environmental Violations.

Los Angeles Times. https://www.latimes.com/california/story/2022-04-19/fontana-settles-with-state-over-environmental-violations

California Legislative Analyst's Office. 2022. Overview of California's Ports. Budget and Policy Post. https://lao.ca.gov/Publications/Report/4618#:~:text=These%20ports%20process%20about%2040,as%20measured%20by%20container%20volume.

California Office of Environmental Health Hazard Assessment. 2021. CalEnviroScreen 4.0. https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40

Center for Community Action and Environmental Justice. 2023. Region in Crisis: The Rationale for a Public Health State of Emergency in the Inland Empire. https://www.ccaej.org/projects-3

City of Fontana. n.d. About the City of Fontana. https://www.fontana.org/31/About-Us

City of Rancho Cucamonga. 2022. Rancho Cucamonga at a Glance. https://www.cityofrc.us/sites/default/files/2022-09/Rancho%20Cucamonga%20at%20A%20Glance_0.pdf

City of Rialto. 2010. Rialto General Plan. https://www.yourrialto.com/DocumentCenter/View/1494/2010-General-Plan

City of Rialto. 2018. Renaissance Specific Plan Amendment. https://www.yourrialto.com/DocumentCenter/View/1896/Renaissance-Specific-Plan

City of Rialto. n.d.a. History of Rialto. https://www.yourrialto.com/488/History-of-Rialto

City of Rialto. n.d.b. Specific Plans. https://www.yourrialto.com/DocumentCenter/View/535/Specific-Plans-PDF

City of Rialto. n.d.c. Planning Commission. https://www.yourrialto.com/570/Planning-Commission

City of Rialto. n.d.d. City Council & Elected Officials. https://www.yourrialto.com/285/City-Council-Elected-Officials

Concerned Neighbors of Bloomington and People's Collective for Environmental Justice. 2022. Health and Environmental Impacts Report. https://drive.google.com/file/d/1ugZm_dotv_l4hDSbW7LE0t_VJv1Geg4b/view?fbclid=IwAR0_eURSWSSDp4Vc01NEGH4oMXqarSqLXmEM_HuN7ucSdLS17NYTo2colv0

DataUSA. 2021. Fontana, CA. https://datausa.io/profile/geo/fontana-ca

Davis, M. 1990. City of Quartz. Verso Books, New York.

De Lara, J. D. 2018. Inland Shift: Race, Space, and Capital in Southern California. University of California Press, Oakland, California.

Delp, L., B. Cole, G. Lozano, and K. Riley. 2021. Worker Injuries in Southern California's Warehousing Industry: How to Better Protect Workers in This Burgeoning Industry? New Solutions: A Journal of Environmental and Occupational Health Policy 31:178-192

Dialesandro, J., N. Brazil, S. Wheeler, and Y. Abunnasr. 2021. Dimensions of Thermal Inequity: Neighborhood Social Demographics and Urban Heat in the Southwestern U.S. International Journal of Environmental Research and Public Health:18.

Downey, D. 2021. Massive Moreno Valley Warehouse Project Still Alive. Press-Enterprise. https://www.pressenterprise.com/2021/12/08/massive-moreno-valley-warehouse-project-still-alive/

EPD Solutions. 2021. Bloomington Business Park Specific Plan: Public Review Draft. San Bernardino County. http://www.sbcounty.gov/uploads/LUS/Environmental/Bloomington_Business_Park_Specific_Plan/Draft%20Bloomington%20Specific%20Plan.pdf

Esquivel, P. 2019. When Your House is Surrounded by Massive Warehouses. Los Angeles Times. https://www.latimes.com/california/story/2019-10-27/fontana-california- warehouses-inland-empire-pollution

Federal Writers Project. 2013. California in the 1930s: The WPA Guide to the Golden State. University of California Press, California.

Fontana Herald News. 2022. Fontana City Council Votes in Favor of More Stringent Air Quality Standards. https://www.fontanaheraldnews.com/news/fontana-city-council-votes-in-favor-of-more-stringent-air-quality-standards/article_116fb8d4-8574-11ec-be48-4be8e9b0ba26.html

Foster, J. B. 1999. Marx's Theory of Metabolic Rift: Classical Foundations for Environmental Sociology. American Journal of Sociology 105:366-405. https://doi.org/10.1086/210315

Fuller, J. 1977. Municipal Advisory Councils: An Experiment in Community Participation. California State Library. https://sgf.senate.ca.gov/sites/sgf.senate.ca.gov/files/MunicipalAdvisoryCouncils.pdf

Gomez-Vidal, C. and A. M. Gomez. 2021. Invisible and Unequal: Unincorporated Community Status as a Structural Determinant of Health. Social Science & Medicine:285. https://doi.org/10.1016/j.socscimed.2021.114292

Good Jobs First. 2021. Mapping Amazon 2.0. https://storymaps.arcgis.com/stories/144d21045a794cf8b7834b0c49fdd0c0

Hagen, R. 2021. Bloomington Warehouse Project Would Displace Residents, Opponents Say. San Bernardino Sun. https://www.sbsun.com/2021/02/11/bloomington-warehouse-project-would-displace-residents-opponents-say/

Harvey, D. 2003. The Right to the City. International Journal of Urban and Regional Research:27.

Harvey, D. 2004. The 'New' Imperialism: Accumulation by Dispossession. Socialist Register 40.

Heiss, D. J. 2023. Sheri Flynn Sworn in to Banning's City Council. Record Gazette. https://www.recordgazette.net/news/sheri-flynn-sworn-in-to-banning-s-city-council/article_a73c8622-92ce-11ed-9218-77d824f6146a.html

Kleinheisterkamp-González, N. 2023. The Case for an Environmental Labor Geography: The Role of Organized Labor in the Climate Crisis. Progress in Human Geography 47:317-332.

Kotkin, J. 2013. America's Fastest-Growing Cities Since the Recession. NewGeography.com. https://www.newgeography.com/content/003779-americas-fastest-growing-cities-since-the-recession

KTYG Group. 2017. Pepper Avenue Specific Plan. City of Rialto. https://www.yourrialto.com/DocumentCenter/View/565/Pepper-Avenue-Specific-Plan

Lansner, J. 2022. Inland Empire Population Growth 5th Largest in the US. Press-Enterprise. https://www.pressenterprise.com/2022/03/28/inland-empire-population-growth-5th-largest-in-the-us/

Lee, K. 2022. As Warehouses Multiply, Some Cities Say: Enough. New York Times. https://www.nytimes.com/2022/10/10/business/economy/warehouses-moratorium-california.html

Lefebvre, H. 1968. The Right to the City.

Marx, K. 1867. Capital: A Critique of Political Economy. Volume 1.

McAllister, T. 2022. Beaumont Says No to Massive Industrial Complex Off 1-10. Patch. https://patch.com/california/banning-beaumont/beaumont-says-no-massive-industrial-complex-i-10

Moore, T., Payne-Foster, P., Oliver, J. S., Spears, E. G., and C. H. Spencer. 2022. Community Perspectives and Environmental Justice Issues in an Unincorporated Black Township. International Journal of Environmental Research and Public Health:19. DOI:10.3390/ijerph19127490

Newton, J. 2023. California Warehouse Boom Comes with Health, Environmental Costs for Inland Empire Residents. CalMatters. https://calmatters.org/commentary/2023/01/inland-empire-california-warehouse-development/

Patricia Gutierrez - Realtor. n.d. Facebook. https://www.facebook.com/patriciagutierrezrealtor/

Patterson, T. C. 2015. From Acorns to Warehouses: Historical Political Economy of Southern California's Inland Empire. Routledge, New York.

Putzger, I. 2022. City Opposition to Boom in Warehousing Developments on the Rise. The Loadstar. https://theloadstar.com/city-opposition-to-boom-in-warehousing-developments-on-the-rise/

Rialto Network. 2023. Rialto City Council Meeting 4-25-23. YouTube. https://www.youtube .com/watch?v=YL3xpIr1wA4&ab_channel=RialtoNetwork

Robert Bein, William Frost & Associates. 1997. Rialto Airport Specific Plan. City of Rialto. https://www.yourrialto.com/DocumentCenter/View/1888/Rialto-Airport-Specific-Plan

Robert Redford Conservancy and Radical Research LLC. 2023. Warehouse Cumulative Impact Tool for Community. https://radicalresearch.shinyapps.io/WarehouseCITY/

San Bernardino County. 2020. Bloomington Community Plan. https://countywideplan.com/ wp-content/uploads/sites/68/2020/07/Bloomington_CAG_2020.pdf

San Bernardino County. 2021a. Community Indicators: Mobility. https://indicators.sbcounty.gov/ transportation/mobility/

San Bernardino County. 2021b. San Bernardino County Adopted Supervisor Districts. https://sbcounty.maps.arcgis.com/apps/View/index.html?appid=97eabb32b34c485188edd 2009a7d980f

San Bernardino County. 2022. Board of Supervisors Regular Meeting on 2022-11-15 10:00 AM: Video and Fair Statement. Board of Supervisors. https://sanbernardino.granicus.com/ player/clip/5989?view_id=13&redirect=true&h=6bdbf0e1958e505081e5c95ecefd6355

San Bernardino County. n.d.a. Land Use Services: Planning Commission. https://lus.sbcounty. gov/planning-home/planning-commission/

San Bernardino County. n.d.b. Bloomington Municipal Advisory Council. https://www.sbcounty. gov/bosd5/meetings/bloomington

Scott, S. 2022. In the Midst of Changing Landscape, Bloomington Residents Plan to Fight Back. The Frontline Observer. https://www.frontline-observer.com/in-the-midst-of-changing-landscape-concerned-neighbors-of-bloomington-plan-to-fight-back/

Schwartz, A. n.d. LinkedIn. https://www.linkedin.com/in/almaschwartz/

Sedgwick, J. 2021. How the Santa Fe Railroad Changed America Forever. Smithsonian Magazine. https://www.smithsonianmag.com/history/santa-fe-railroad-changed-america-forever-180977952/

Solis, M. 2023. Massive 1.2 Million-Square-Foot Warehouse Rejected in Moreno Valley. The Press-Enterprise. https://www.pressenterprise.com/2023/04/19/massive-warehouse-rejected-in-moreno-valley/

Southern California Association of Governments. 2019. Profile of Unincorporated San

Bernardino County. https://scag.ca.gov/sites/main/files/file-attachments/unincareasan bernardinocounty_0.pdf?1606013790#:~:text=the%20total%20population%20of%20 unincorporated,increased%20by%2018%2C802%20to%20311%2C659.

Stroik, P., and R. Finseth. 2021. Second Draft Socioeconomic Impact Assessment for Proposed Rule 2305. South Coast Air Quality Management District. http://www.aqmd.gov/docs/default-source/planning/fbmsm-docs/pr-2305_sia_2nd-draft_ 4-7-21.pdf?sfvrsn=8

The Living New Deal. n.d. https://livingnewdeal.org/

The Real Deal. 2022. Inland Empire City Rejects 1.3M sf Distribution Warehouse Proposal. The Real Deal. https://therealdeal.com/la/2022/03/21/inland-empire-city-rejects-1-3m-sf-distribution-warehouse-proposal/

Torres, I., Victoria, A., and D. Klooster. 2021. Warehouses, Pollution, and Social Disparities. People's Collective for Environmental Justice. https://earthjustice.org/wp-content/ uploads/warehouse_research_report_4.15.2021.pdf

U.S. Bureau of Labor Statistics. n.d. Warehousing and Storage: NAICS 493. Industry at a Glance. https://www.bls.gov/iag/tgs/iag493.htm

Victoria, A. 2022. Can Banning New Warehouses Improve Air Quality in the Inland Empire? KCET. https://www.kcet.org/news-community/can-banning-new-warehouses-improve-air-quality-in-the-inland-empire

Willdan Associates and Williams-Kuebelbeck & Associates. 1986. Agua Mansa Industrial Corridor Specific Plan. San Bernardino County. http://www.sbcounty.gov/Uploads/lus/ SpecificPlans/AMSP.pdf

Whitehead, B. 2022. Colton School District Swaps Elementary School Land in $45 Million Deal with Warehouse Developer. San Bernardino Sun. https://www.sbsun.com/2022/07/08/ colton-school-district-swaps-elementary-school-land-in-45-million-deal-with-warehouse-developer/

Yarbrough, B. 2022. San Bernardino County Supervisors Approve 213-Acre Bloomington Industrial Park. San Bernardino Sun. https://www.sbsun.com/2022/11/15/san-bernardino-county-supervisors-approve-213-acre-bloomington-industrial-park/

Yarbrough, B. 2023. Inland Empire to Grow Twice as Fast as Rest of Southern California in Next 25 Years. San Bernardino Sun. https://www.sbsun.com/2023/02/20/inland-empire-to-grow-twice-as-fast-as-rest-of-southern-california-in-next-25-years/#:~:text=SCAG%20expects%20the%20Inland%20Empire,other%20parts%20of%20the%20region.

Yeh, E. 2013. Taming Tibet: Landscape Transformation and the Gift of Chinese Development. Cornell University Press.

Yeung, N. and A. Saraiva. 2022. Los Angeles Warehousing Mecca Halts Expansion Just as Needs Soar. Bloomberg. https://www.bloomberg.com/news/articles/2022-08-15/los-angeles-warehousing-mecca-halts-expansion-just-as-needs-soar

APPENDIX A: Letter of Support

I SUPPORT
PEPPER AVENUE SPECIFIC PLAN

YES

TO THE PEPPER AVE SPECIFIC PLAN

- ☑ SIGNIFICANT TRAFFIC REDUCTION ON PEPPER AVE
  - Business Park use located adjacent to freeway to avoid impacts to city streets
  - Proposed development will reduce total traffic by 58% on Pepper Ave vs 2017 approved Pepper Ave Specific Plan
  - Trucks servicing development will not be permitted to travel south on Pepper Ave into residential area
  - New Traffic Signal on Pepper Ave which will prevent delays caused by project traffic
- ☑ RETAIL DEVELOPMENT
  - 15 acres planned for new restaurants, shops, convenience & gas station(s)
- ☑ NEW LOCAL JOBS
  - 849 new local jobs (700 full time direct employees & 149 indirect employees; *source DTA Economic Impact Report 2022)
  - Job fair for Rialto residents
- ☑ NEW COMMUNITY BENEFITS
  - Funding for police & code enforcement
  - Upgraded sewer & lift station
  - Enhanced landscape beautification with 30 acres of habitat preserve to remain as open space

Contact Information

[redacted] First Name

[redacted] Last Name

[redacted] Address

[redacted] Email

[redacted] Phone

[redacted] Signature

[redacted] Date

CONTACT
Email
info@pepperavenuespecificplan.com

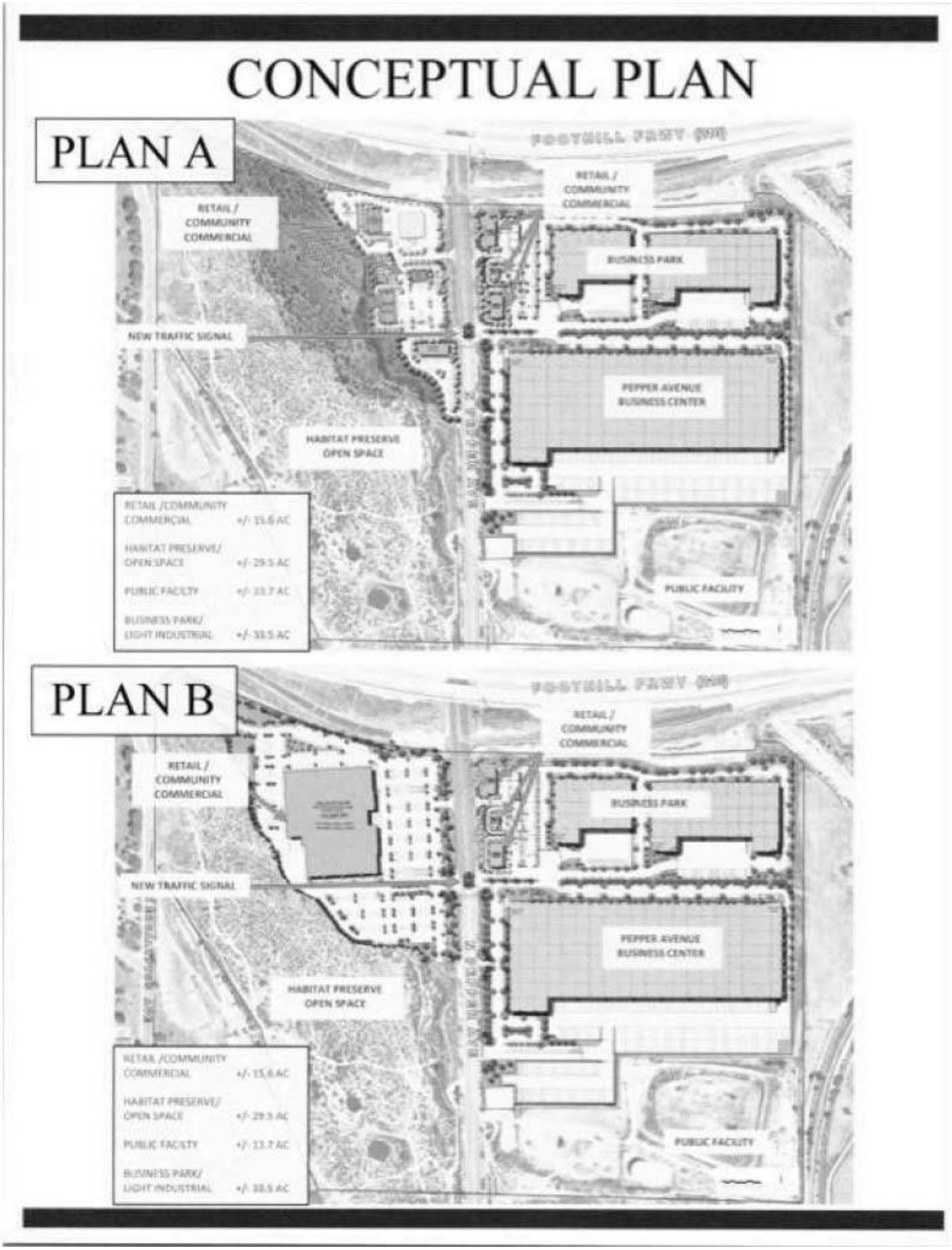

Figure A1. Example letter of support for the Pepper Avenue Specific Plan Amendment. Letters were received by the Rialto City Council in April 2023 (https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:fdb19b12-0d3a-3499-b54d-2dacf465be36).

APPENDIX B: Letter of Protest

NO Warehouse

on Pepper Ave.

Facts: In 2017 the Rialto City Council approved a Pepper Ave. Specific Plan which designated the land on Pepper Ave. just south of the 210 freeway for retail, commercial and housing use. **The Plan specifically prohibits industrial development (warehouses).**

Plan: Current owners of the property want to **change the zoning** of this land **to industrial** use so they can build a 485,000 square foot warehouse, with plans for future industrial development, up to 785,000 square feet.

Action: **Fill out a comment card and let your voice be heard in opposition to this zoning change and warehouse development.**

This Pepper Ave. area is one of the last corridors for Rialto to attract business and tax dollars through retail or housing and to improve the image of the city. A warehouse definitely will NOT do this.

Comment Card

Pepper Avenue Specific Plan Amendment and Industrial Development Project

I oppose warehouses being built near our home. This is a residential area and just that. It should not be fair to our families being next to commercial use. We fear that adding warehouses here will grow truck traffic in our neighborhoods which will increase the spread of dangerous pollutants in our air. This is coming from a mother whose eight-year old child has Asthma already so we definitely oppose that idea, and will be devastated if it actually goes through with this project.

Name: [redacted] Address: [redacted]

More information on reverse

Figure A2. Example letter of protest for the Pepper Avenue Specific Plan Amendment. Letters were received by the Rialto City Council in April 2022 (https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:5c5a707e-313e-3b14-9663-349fb25283ea).

APPENDIX C: Cal/OSHA Citation Data

Zip Code	Community	Inspection	Opened	Closed	Standard Cited	Standard Type
92316	Bloomington	Planned	Jan-22	Open	4353(G)	Equipment Precautions
92316	Bloomington	Planned	Jan-22	Open	5185(M)	Equipment Precautions
92316	Bloomington	Planned	Jan-22	Open	5185(N)	Worker Safety
92316	Bloomington	Planned	Nov-21	Aug-22	3210(A)	Worker Safety
92316	Bloomington	Planned	Nov-21	Aug-22	3216(C)	Worker Safety
92316	Bloomington	Planned	Nov-21	Aug-22	5043	Inspections/Assessment
92316	Bloomington	Planned	Nov-21	Aug-22	5185(B)	Equipment Precautions
92316	Bloomington	Accident	Jun-19	Oct-19	3650(T)(12)	Vehicle Safety
92316	Bloomington	Accident	Aug-15	Jan-17	3272(C)	Worker Safety
92316	Bloomington	Accident	Aug-15	Jan-17	3380(F)(1)	Inspections/Assessment
92316	Bloomington	Accident	Aug-15	Jan-17	3203(A)(7)(C)	Inspections/Assessment
92316	Bloomington	Accident	Aug-15	Jan-17	3385(A)	Worker Safety
92316	Bloomington	Accident	Apr-13	Sep-13	3385(A)	Worker Safety
92377	Rialto	Accident	Mar-23	Open	N/A	N/A
92377	Rialto	Planned	Mar-21	Open	4650(E)	Hazard Storage/Handling
92377	Rialto	Planned	Mar-21	Open	3577(E)	Equipment Precautions
92377	Rialto	Planned	Mar-21	Open	3578(G)	Equipment Precautions
92377	Rialto	Accident	Feb-20	May-20	3385(A)	Worker Safety
92377	Rialto	Complaint	Nov-18	Apr-19	N/A	N/A
92377	Rialto	Complaint	Jun-17	Mar-18	3664(A)	Vehicle Safety
92377	Rialto	Complaint	Jun-17	Mar-18	3272(C)	Worker Safety
92377	Rialto	Complaint	Jun-17	Mar-18	3380(F)	Inspections/Assessment
92377	Rialto	Complaint	Jun-17	Mar-18	3668(F)	Vehicle Safety
92377	Rialto	Complaint	Jun-17	Mar-18	3385(A)	Worker Safety
92376	Rialto	Accident	Oct-22	Mar-23	N/A	N/A
92376	Rialto	Complaint	Feb-22	Open	6151(E)(2)	Inspections/Assessment
92376	Rialto	Complaint	Apr-21	Jun-21	N/A	N/A
92376	Rialto	Accident	Dec-20	Dec-21	342(A)	Accountability
92376	Rialto	Complaint	Oct-20	Mar-21	N/A	N/A
92376	Rialto	Planned	Apr-20	Aug-20	3650(J)	Vehicle Safety
92376	Rialto	Planned	Apr-20	Aug-20	3663(C)	Vehicle Safety
92376	Rialto	Accident	Oct-19	Jan-23	3650(T)(12)	Vehicle Safety
92376	Rialto	Complaint	Sep-19	Oct-19	N/A	N/A
92376	Rialto	Accident	May-19	Mar-20	342(A)	Accountability
92376	Rialto	Accident	Oct-15	Jan-17	3380(F)	Inspections/Assessment
92376	Rialto	Accident	Oct-15	Jan-17	3650(T)(5)	Vehicle Safety
92376	Rialto	Accident	Oct-15	Jan-17	3385(A)	Worker Safety
92376	Rialto	Accident	Jun-13	Mar-14	3999 B	Equipment Precautions

Figure A3. Data retrieved from Cal/OSHA citation records. This table shows the respective community that each warehouse was in. Colors change on the table as they move to different inspections. For example, the first three rows of data were three citations found during a single inspection.