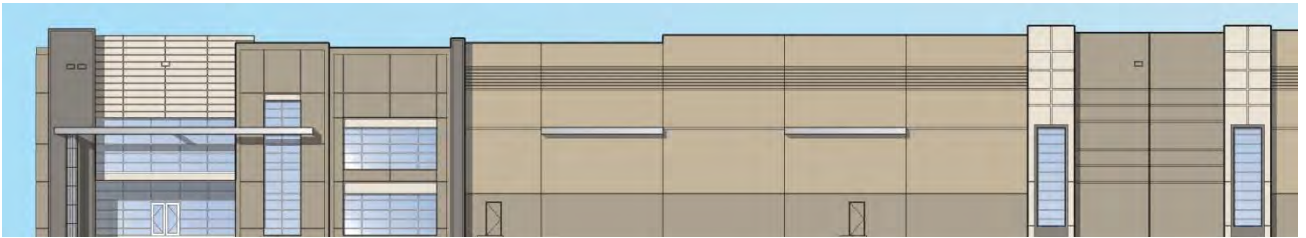


Final Environmental Impact Report No. 546
SCH No. 2015081081

Knox Business Park Buildings D and E

Riverside County, California



Lead Agency
Riverside County
Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92501

Final EIR: March 2, 2018

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General Plan Amendment Nos. 1151 and 1152
Change of Zone Nos. 7872 and 7873
Tentative Parcel Map Nos. 36950 and 36962
Plot Plan Nos. 25837 and 25838

Final EIR: March 2, 2018



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ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASUREMENT

| <u>Acronym</u> | <u>Definition</u> |
|-----------------------------------|--|
| § | Section |
| < | less than |
| > | greater than |
| ≥ | greater than or equal to |
| A.D. | Anno Domini |
| a.m. | Ante Meridiem (between the hours of midnight and noon) |
| AB | Assembly Bill |
| ABOP | Antifreeze, batteries, oil and paint |
| ACM | Asbestos-containing Material |
| ACOE | Army Corps of Engineers |
| ADP | Area Drainage Plan |
| ADT | Average Daily Traffic |
| AFY | acre feet a year |
| ALUC | Airport Land Use Commission |
| ALUCP | Airport Land Use Compatibility Plan |
| AMSL | Above Mean Sea Level |
| APS | Alternative Planning Strategy |
| APN | Assessor Parcel Number |
| AQMP | Air Quality Management Plan |
| ARB/IRP | March Air Reserve Base/Inland Port Airport |
| Av. | Avenue |
| BAAQMD | Bay Area Air Quality Management District |
| BAU | Business-As-Usual |
| Bl. | Boulevard |
| BLM | Bureau of Land Management |
| BMPs | Best Management Practices |
| C&D | Construction and Demolition |
| C ₂ F ₆ | Hexaflouroethane |
| C ₂ H ₆ | Ethane |
| CF ₄ | Tetraflouromethane |
| CF ₃ CH ₂ F | Tetrafluoroethane |
| CH ₄ | Methane |
| CH ₃ CHF ₂ | Difluorethane |
| CHF ₃ | Trifluormethane |
| CO | Carbon Monoxide |
| CO ₂ | Carbon Dioxide |
| CO ₂ e | Carbon Dioxide Equivalent |
| COHb | carboxyhemoglobin |
| CA | California |
| CAA | Clean Air Act |



| <u>Acronym</u> | <u>Definition</u> |
|-----------------------|---|
| CAAQS | California Ambient Air Quality Standards |
| CAFÉ | Corporate Average Fuel Economy |
| CalEEMod™ | California Emissions Estimator Model™ |
| CalEPA | California Environmental Protection Agency |
| CalFire | California Department of Forestry and Fire Protection |
| CALGreen | California Green Building Standards Code |
| Caltech | California Institute of Technology |
| Caltrans | California Department of Transportation |
| Calveno | California Vehicle Noise |
| CAP | Climate Action Plan |
| CAPCOA | California Air Pollution Control Officers Association |
| CAPSSA | Criteria Area Plant Species Survey Area |
| CARB | California Air Resources Board |
| CASSA | Criteria Area Species Survey Area |
| CAT | Climate Action Team |
| CBSC | California Building Standards Code |
| CCR | California Code of Regulations |
| CDC | California Department of Conservation |
| CDFW | California Department of Fish and Wildlife |
| CEC | California Energy Commission |
| CEQA | California Environmental Quality Act |
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act |
| CES | Criteria Area Species |
| CESA | California Endangered Species Act |
| CETAP | Community Environmental Transportation Acceptability Process |
| CFCs | Chlorofluorocarbons |
| CFR | Code of Federal Regulations |
| CGC | California Government Code |
| CGS | California Geologic Survey |
| cfs | cubic feet per second |
| CHE | Cargo Handling Equipment |
| CIWMB | California Integrated Waste Management Board |
| CIWMP | Countywide Integrated Waste Management Plan |
| CWHR | California Wildlife Habitat Relationship |
| CLCA | California Land Conservation Act |
| CMP | Congestion Management Plan |
| CNEL | Community Noise Equivalent Level |
| CNPS | California Native Plant Society |
| CPHI | California Points of Historic Interest |
| CPUC | California Public Utilities Commission |
| CNEL | Community Noise Equivalent Level |
| COG | Council of Governments |
| CORPS | United States Army Corps of Engineers |
| CPHI | California Points of Historic Interest |
| CPUC | California Public Utilities Commission |



| <u>Acronym</u> | <u>Definition</u> |
|----------------|---|
| CREC | Controlled Recognized Environmental Condition |
| CRHL | California Registered Historic Landmarks |
| CRPR | California Rare Plant Rank |
| CSA | County Service Area |
| CSC | California species of Concern |
| CTP | Clean Truck Program |
| c.u. | cubic yards |
| CUPA | Certified Unified Program Agency |
| CWA | Clean Water Act |
| CZ | Change of Zone |
| | |
| Db | Decibel |
| dBA | A-weighted Decibels |
| DBESP | Determination of Biologically Superior Preservation |
| DEH | Department of Environmental Health |
| DIF | Development Impact Fee |
| DoD | Department of Defense |
| DOE | Department of Energy |
| DOI | Department of Interior |
| DOT | Department of Transportation |
| DPM | Diesel Particulate Matter |
| DPR | Department of Parks and Recreation |
| DTSC | Department of Toxic Substances Control |
| du/ac | dwelling units per acre |
| DWR | Department of Water Resources |
| | |
| EDR | Environmental Data Review |
| EIC | Eastern Information Center |
| EIR | Environmental Impact Report |
| EIS | Environmental Impact Statement |
| EMFAC | Emissions Factor Model |
| EMWD | Eastern Municipal Water District |
| EO | Executive Office |
| EPA | Environmental Protection Agency |
| EPD | Environmental Programs Department |
| ESA | Environmental Site Assessment |
| ESFR | Early Suppression Fast Response |
| et seq. | <i>et sequentia</i> , meaning "and the following" |
| | |
| F | Fahrenheit |
| Ft. | Feet |
| FAA | Federal Aviation Administration |
| FAR | Floor Area Ratio |
| FEIR | Final Environmental Impact Report |
| FEMA | Federal Emergency Management Agency |



| <u>Acronym</u> | <u>Definition</u> |
|-----------------------|---|
| FESA | Federal Endangered Species Act |
| FHWA | Federal Highway Administration |
| FIRM | Flood Insurance Rate Map |
| FMMP | Farmland Mapping and Monitoring Program |
| FRA | Federal Responsibility Area |
| FTA | Federal Transit Administration |
| FUDS | formerly Used Defense Sites |
| FY | Fiscal Year |
| | |
| GCC | Global Climate Change |
| GCCC | Global Climate Change Center |
| Gg | gigagrams |
| GgCO _{2e} | Gigagrams of carbon dioxide equivalent |
| GHGs | Greenhouse Gases |
| GIS | Geographic Information System |
| GPA | General Plan Amendment |
| GPD | gallons per day |
| GVWR | Gross Vehicle Weight Rating |
| GWP | Global Warming Potential |
| | |
| H ₂ O | Water Vapor |
| HCM | Highway Capacity Manual |
| HCP | Habitat Conservation Plan |
| HFCs | Hydrofluorocarbons |
| HHD | Heavy-Duty Trucks |
| HHW | Household Hazardous Waste |
| HI | Hazard Index |
| HMBEP | Hazardous Materials Business Emergency Plan |
| hp | horsepower |
| HREC | Historical Recognized Environmental Condition |
| HRS | Hazard Ranking System |
| HSAA | Hazardous Substance Account Act |
| HVWAP | Harvest Valley/Winchester Area Plan |
| HVAC | Heating, Ventilation, and Air Conditioning |
| HWCL | Hazardous Waste Control Law |
| | |
| I-10 | Interstate 10 |
| I-15 | Interstate 15 |
| I-215 | Interstate 215 |
| I-405 | Interstate 405 |
| I-710 | Interstate 710 |
| i.e. | that is |
| in. | inches |
| IA | Implementing Agreement |
| IBC | International Building Code |



| <u>Acronym</u> | <u>Definition</u> |
|--------------------|--|
| IEPR | Integrated Energy Policy Report |
| IPCC | Intergovernmental Panel on Climate Change |
| IRWMP | Integrated Regional Water Management Plan |
| ISTEA | Intermodal Surface Transportation Efficiency Act |
| ITE | Institute of Transportation Engineers |
| JD | Jurisdictional Delineation |
| JPA | Joint Powers Authority |
| kBTU/yr | kilo-British Thermal Units per year |
| kWh/yr | kilowatt-hours of electricity per year |
| LAFCO | Local Agency Formation Commission |
| LBP | Lead-based Paint |
| LCA | Life-cycle analysis |
| LDA | Light-Duty-Auto Vehicles |
| LDMF | Local Development Mitigation Fee |
| Leq | equivalent continuous sound level |
| LHD | Light-Heavy-Duty-Trucks |
| LID | Low Impact Development |
| LLA | Lot Line Adjustment |
| LNAP | Lakeview/Nuevo Area Plan |
| LOS | Level of Service |
| LRA | Local Responsibility Area |
| LST | Localized Significance Threshold |
| LUST | Leaking Underground Storage Tank |
| M ³ | Cubic Meter |
| MARB | March Air Reserve Base |
| March ARB/IPA | March Air Reserve Base/Inland Port Airport |
| MATES | Multiple Air Toxics Exposure Study |
| MAWA | Maximum Applied Water Allowance |
| MBTA | Migratory Bird Treaty Act |
| MCL | Maximum Contaminant Level |
| MDP | Master Drainage Plan |
| MEIR | maximally exposed individual receptor |
| MEISC | maximally exposed individual school child |
| MEIW | maximally exposed individual worker |
| MHD | Medium-Heavy-Duty Trucks |
| MICR | Maximum Individual Cancer Risk |
| MLD | Most Likely Descendant |
| MM | Mitigation Measure |
| MMRP | Mitigation Monitoring and Reporting Program |
| MMTs | million metric tons |
| MTCO _{2e} | Metric Tons of Carbon Dioxide Equivalent |



| <u>Acronym</u> | <u>Definition</u> |
|----------------------|--|
| MMTCO ₂ e | million metric tons of carbon dioxide equivalent |
| Mph | Miles per hour |
| MPO | Metropolitan Planning Organization |
| MPG | Miles per gallon |
| MSHCP | Multiple Species Habitat Conservation Plan |
| MT | metric ton |
| MUTCD | Manual on Uniform Traffic Control Devices |
| MVAP | Mead Valley Area Plan |
| MWD | Metropolitan Water District |
| N ₂ | Nitrogen |
| No. | Number |
| NO | Nitric Oxide |
| NO ₂ | Nitrogen Dioxide |
| NO _x | Nitrogen Oxides |
| N ₂ | Nitrogen |
| N ₂ O | Nitrous Oxide |
| n.d. | no date |
| n/o | North of |
| n.p. | no page |
| NAHC | Native American Heritage Commission |
| NAAQS | National Ambient Air Quality Standards |
| NB | Northbound |
| NEPS | narrow Endemic Plant Species |
| NEPSSA | Narrow Endemic Plant Species Survey Area |
| NF | Notable Findings |
| NHRP | National Register of Historic Places |
| NOP | Notice of Preparation |
| NPDES | National Pollutant Discharge Elimination System |
| NRCS | Natural Resources Conservation Service |
| NPL | National Priorities List |
| O ₂ | Oxygen |
| O ₃ | Ozone |
| OHWM | Ordinary High Water Mark |
| OPR | Office of Planning and Research |
| Ord. | Ordinance |
| OWOW | One Water One Watershed |
| Pb | Lead |
| PCBs | polychlorinated biphenyls |
| PCE | Passenger Car Equivalent |
| PFCs | Perfluorocarbons |
| p.m. | Post Meridiem (between the hours of noon and midnight) |
| PM | Parcel Map |
| PM | Particulate Matter |



| <u>Acronym</u> | <u>Definition</u> |
|-----------------------|--|
| PM _{2.5} | Fine Particulate Matter (2.5 microns or smaller) |
| PM ₁₀ | Fine Particulate Matter (10 microns or smaller) |
| PP | Plot Plan |
| ppb | parts per billion |
| ppm | parts per million |
| pp. | pages |
| ppt | parts per trillion |
| POLA | Port of Los Angeles |
| POLB | Port of Long Beach |
| PRIMP | Paleontological Resource Impact Mitigation Program |
| PPV | Peak Particle Velocity |
| PRC | Public Resources Code |
| PUC | Public Utilities Commission |
| PVRWRF | Perris Valley Regional Water Reclamation Facility |
| RCALUC | Riverside County Airport Land Use Commission |
| RCDEH | Riverside County Department of Environmental Health |
| RCFCWCD | Riverside County Flood Control and Water Conservation District |
| RCFD | Riverside County Fire Department |
| RCHL | Riverside County Historical Landmarks |
| RCIT | Riverside County Information Technology |
| RCRA | Resource Conservation and Recovery Act |
| RCNM | Roadway Construction Noise Model |
| RCRMC | Riverside County Regional Medical Center |
| RCTC | Riverside County Transportation Commission |
| RCSD | Riverside County Sheriff's Department |
| RCWMD | Riverside County Waste Management Department |
| Rd. | Road |
| REC | Recognized Environmental Condition |
| RECLAIM | Regional Clean Air Incentives Market |
| Regs | Regulations |
| REL | Reference Exposure Level |
| REMEL | Reference Mean Emission Level |
| RHNA | Regional Housing Needs Assessment |
| RHSA | Regional System of Highways and Arterials |
| RivTAM | Riverside County Transportation Analysis Model |
| RMS | Root-Mean-Square |
| ROD | Record of Decision |
| ROGs | Reactive Organic Gasses |
| ROW | Right-of-Way |
| RTA | Riverside Transit Authority |
| RTP | Regional Transportation Plan |
| RTPA | Regional Transportation Planning Agency |
| RTP/SCS | Regional Transportation Plan/Sustainable Communities Strategy |
| RUWMP | Regional Urban Water Management Plan |



| <u>Acronym</u> | <u>Definition</u> |
|-----------------------|--|
| RWQCB | Regional Water Quality Control Board |
| SO ₂ | Sulfur Dioxide |
| SO ₄ | Sulfates |
| SO _x | Sulfur Oxides |
| s/o | south of |
| s.f. | square feet |
| SARA | Superfund Act and Reauthorization Act |
| SAWPA | Santa Ana Watershed Project Authority |
| SB | Southbound |
| SB | Senate Bill |
| SCAB | South Coast Air Basin |
| SCAG | Southern California Association of Governments |
| SCAQMD | South Coast Air Quality Management District |
| SCE | Southern California Edison |
| SCH | State Clearinghouse |
| SCS | Sustainable Communities Strategy |
| SDWA | Safe Drinking Water Act |
| Sec. | Seconds |
| SFS | Sustainable Freight Strategy |
| SKR | Stephens' Kangaroo Rat |
| SLF | Sacred Lands File |
| SOI | Sphere-of-Influence |
| Sp. | Species |
| SR-60 | State Route 60 |
| SR-62 | State Route 62 |
| SR-74 | State Route 74 |
| SR-91 | State Route 91 |
| SR-243 | State Route 243 |
| SRA | Source Receptor Area |
| SRRE | source Reduction and Recycling Element |
| St. | Street |
| STP | Shovel Test Pit |
| SWP | State Water Project |
| SWPPP | Stormwater Pollution Prevention Plan |
| SWRCB | State Water Regional Control Board |
| TAC | Toxic Air Contaminants |
| TEA | Transportation Equity Act |
| TMDL | Total Maximum Daily Load |
| TLMA | Transportation and Land Management Agency |
| TPM | Tentative Parcel Map |
| TRT | Total Response Time |
| TS | Traffic Signal |
| TSF | Thousand Square Feet |



| <u>Acronym</u> | <u>Definition</u> |
|-----------------------|---|
| TUMF | Transportation Uniform Mitigation Fee |
| µg | microgram |
| UCR | University of California Riverside |
| UNFCCC | United Nations Framework Convention on Climate Change |
| U.S. | United States |
| USACE | United States Army Corps of Engineers |
| USCB | United States Census Bureau |
| USDA | U.S. Department of Agriculture |
| USEPA | United States Environmental Protection Agency |
| USFWS | United States Fish and Wildlife Service |
| USGS | United States Geological Society |
| UST | Underground Storage Tank |
| UTR | Utility Tractor |
| UWMP | Urban Water Management Plan |
| | |
| VVUSD | Val Verde Unified School District |
| VdB | Vibration Decibels |
| VMT | Vehicle Miles Traveled |
| VOCs | Volatile Organic Compounds |
| | |
| w/o | West of |
| WQMP | Water Quality Management Plan |
| WRCOG | Western Riverside Council of Governments |
| WRP | Waste Recycling Plan |
| WSA | Water Supply Assessment |
| WSAP | Water Supply Allocation Plan |
| WSDMP | Water Surplus and Drought Management Plan |
| WSCP | Water Shortage Contingency Plan |
| Wy. | Way |
| | |
| YBP | Years before Present |



F.0 FINAL ENVIRONMENTAL IMPACT REPORT

F.1 INTRODUCTION

This Final Environmental Impact Report (FEIR) was prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code §21000 *et seq.*) and CEQA Guidelines (Title 14, California Code of Regulations, §15000 *et seq.*).

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

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

In accordance with the above listed requirements, this FEIR for the proposed Knox Business Park Building D project and Building E project (hereafter, the “Project”) and associated discretionary and administrative actions consists of the following:

1. Comment letters and responses to public comment; and
2. The circulated Knox Business Park Buildings D and E Draft EIR (DEIR) and Technical Appendices, SCH No. 2015081081 with additions shown as underline text and deletions shown as ~~stricken~~ text. Table F-2, *Errata Table of Additions, Corrections, and Revisions*, provides a page number index indicating where the revisions to the DEIR can be found in the FEIR.

This FEIR document was prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the CEQA Lead Agency (County of Riverside).

F.2 RESPONSES TO COMMENTS

F.2.1 CEQA REQUIREMENTS

CEQA Guidelines §15204(a) outlines parameters for submitting comments, and notes that the focus of review and comment of DEIRs should be:



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

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

Pursuant to CEQA Guidelines §15088(b), copies of the written responses shall be provided to commenting public agencies at least ten (10) days prior to certifying the FEIR. The responses shall be provided along with an electronic copy of this FEIR, as permitted by CEQA, and shall conform to the legal standards established for response to comments on DEIRs.

F.2.2 RESPONSES TO DEIR COMMENTS

CEQA Guidelines §15088 requires the Lead Agency to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the DEIR and to provide written responses to any substantive comments received. This Section F.0, *Final Environmental Impact Report*, provides all comments received on the DEIR, the County’s response to each comment, and an index of the pages of the DEIR that have been revised as part of the FEIR in response to the various comment letters and to correct any errors.

Comment letters were received during the DEIR public review period which began on May 19, 2017 and closed on July 6, 2017. Twenty (20) comment letters were received by the County of Riverside regarding the DEIR for the proposed Project. A list of agencies, organizations, and persons that submitted comments regarding the DEIR is presented in Table F-1, *Organizations, Persons, & Public Agencies that Commented on the DEIR*. A copy of each comment letter and a response to each



environmental issue raised in those letters is provided on the following pages. No comments submitted to the County of Riverside on the DEIR have produced substantial new information requiring recirculation or additional environmental review under State CEQA Guidelines §15088.5.

Table F-1 Organizations, Persons, & Public Agencies that Commented on the DEIR

| COMMENT LETTER | COMMENTING ORGANIZATION, PERSON, OR PUBLIC AGENCY | DATE |
|-----------------------|---|----------------------|
| A | State of California Governor’s Office of Planning and Research, and: Native American Heritage Commission | 07-05-17 05-30-17 |
| B | Golden State Environmental and Social Justice Alliance | 06-18-17 |
| C | Johnson, Smith & Foy | 06-28-17 |
| D | Lozeau Drury LLP | 07-05-17 |
| E | Rural Association of Mead Valley (Debbie Walsh) | 07-05-17 |
| F | Anzaldi, Anjanette | 07-06-17 |
| G | Blum Collins LLP | 07-06-17 |
| H | Chaney, Robin | 07-06-17 |
| I | Gonzalez, Erika | 07-06-17 |
| J | Lindou, Margaret | 07-06-17 |
| K | Miller, C. Ray and Peggy | 07-05-17 |
| L | Pechanga Tribal Historic Preservation Office | 07-06-17 |
| M | Robinson, Lindsay | 07-06-17 |
| N | Rowe, Dr. Krystle | 07-06-17 |
| O | Skog, Charlene | 07-06-17 |
| P | Soboba Band of Luiseño Indians | 07-06-17 |
| Q | South Coast Air Quality Management District | 07-06-17 |
| R | Tenney, Doug and Chris | 07-06-17 |
| S | Tithof, Mary | 07-06-17 |
| T | Rincon Band of Luiseño Indians | 07-14-17 |



COMMENT LETTER A



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

July 5, 2017

Russell Brady
Riverside County
4080 Lemon Street, 12th Floor
P.O. Box 1409
Riverside, CA 92501

Subject: Knox Business Park Buildings D and E
SCH#: 2015081081

Dear Russell Brady:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on July 3, 2017, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

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COMMENT LETTER A

Document Details Report
State Clearinghouse Data Base

SCH# 2015081081
Project Title Knox Business Park Buildings D and E
Lead Agency Riverside County

Type EIR Draft EIR

Description The project applicant proposes to develop two business park warehouse buildings, building D and building E, on approx 58.6 gross acres in the Mead Valley area of unincorporated Riverside County.

Lead Agency Contact

Name Russeli Brady
Agency Riverside County
Phone 951 955 3025 **Fax**
email
Address 4080 Lemon Street, 12th Floor
P.O. Box 1409
City Riverside **State** CA **Zip** 92501

Project Location

County Riverside
City Perris
Region
Lat / Long 33° 51' 26" N / 117° 16' 17" W
Cross Streets South of Oleander Ave., north of Redwood Dr., east of Day St., west of Harvill Ave
Parcel No.
Township 4S **Range** 4W **Section** 2 **Base** SBR&M

Proximity to:

Highways I-215
Airports March Air Reserve Base
Railways BNSF
Waterways
Schools Tomas Rivera MS
Land Use Community Development: Business Park and Light Industrial and Rural Community: Very Low Density Residential

Project Issues Air Quality; Archaeologic-Historic; Biological Resources; Recreation/Parks; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects; Other Issues; Aesthetic/Visual; Agricultural Land; Economics/Jobs; Wetland/Riparian

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 6; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 8; Native American Heritage Commission; Public Utilities Commission; Regional Water Quality Control Board, Region 8

Date Received 05/19/2017 **Start of Review** 05/19/2017 **End of Review** 07/03/2017

A-1
(cont.)

Note: Blanks in data fields result from insufficient information provided by the applicant.



COMMENT LETTER A

STATE OF CALIFORNIA
NATIVE AMERICAN HERITAGE COMMISSION
Environmental and Cultural Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95601
Phone (916) 373-3710

Edmund G. Brown Jr., Governor



May 30, 2017

Russell Brady
Riverside County
4080 Lemon Street, 12th Floor
Riverside, CA 92501

sent via e-mail: rbrady@rivco.org

Re: SCH# 2015081081, Knox Business Park Buildings D and E Project, Community of Mead Valley; Riverside County, California

Dear Mr. Brady:

The Native American Heritage Commission (NAHC) has reviewed the Draft Environmental Impact Report prepared for the project referenced above. The review included the Introduction and Project Description, the Executive Summary, the Environmental Setting sections 2.5.5 Cultural Resource Setting and section 2.5.14 Rare and Unique Resources sections, the Environmental Analysis, and Technical Appendices D1 and D2, prepared by Brian F. Smith & Associates for Riverside County. We have the following concerns:

1. There is no documentation of **government-to-government consultation by the lead agency** under AB-52 with Native American tribes traditionally and culturally affiliated to the project area as required by statute, or that mitigation measures were developed in consultation with the tribes. Discussions under AB-52 may include the type of document prepared and proposed mitigation. Contact by consultants during the Cultural Resources Assessments is not formal consultation.
2. There are no mitigation measures specifically addressing Tribal Cultural Resources separately. Mitigation measures must take Tribal Cultural Resources into consideration as required under AB-52, **with or without consultation** occurring. Mitigation language for archaeological resources is not always appropriate for or similar to measures specifically for handling Tribal Cultural Resources.

The California Environmental Quality Act (CEQA)¹, specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.² If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared.³ In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended in 2014 by Assembly Bill 52. (AB 52).⁴ **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** AB 52 created a separate category for "tribal cultural resources"⁵, that now includes "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment."⁶ Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.⁷ Your project may also be subject to **Senate Bill 18 (SB 18)** (Burton, Chapter 905, Statutes of 2004), Government Code 65352.3, if it also involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space. **Both SB 18 and AB 52 have tribal consultation requirements.** Additionally, if your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966⁸ may also apply.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

¹ Pub. Resources Code § 21000 et seq.

² Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15084.5 (b); CEQA Guidelines Section 15064.5 (b)

³ Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15084 subd.(a)(1); CEQA Guidelines § 15064 (a)(1)

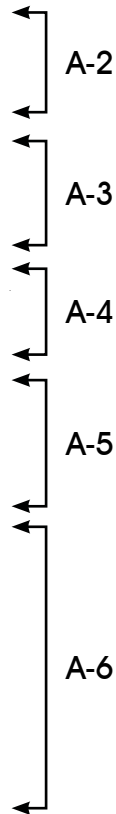
⁴ Government Code 65352.3

⁵ Pub. Resources Code § 21074

⁶ Pub. Resources Code § 21084.2

⁷ Pub. Resources Code § 21084.3 (a)

⁸ 154 U.S.C. 300101, 36 C.F.R. § 800 et seq.





COMMENT LETTER A

Pertinent Statutory Information:

Under AB 52:

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice.

A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project,⁹ and **prior to the release of a negative declaration, mitigated negative declaration or environmental impact report.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18)."¹⁰

The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects.¹¹
1. The following topics are discretionary topics of consultation:
- a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.

If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency.¹²

With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process **shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10.** Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.¹³

If a project may have a significant impact on a tribal cultural resource, **the lead agency's environmental document shall discuss** both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource.¹⁴

Consultation with a tribe shall be considered concluded when either of the following occurs:

- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.¹⁵

Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 **shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program,** if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable.¹⁶

If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, **the lead agency shall consider feasible mitigation** pursuant to Public Resources Code section 21084.3 (b).¹⁷

An environmental impact report **may not be certified,** nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

⁹ Pub. Resources Code § 21080.3.1, subds. (d) and (e)

¹⁰ Pub. Resources Code § 21080.3.1 (b)

¹¹ Pub. Resources Code § 21080.3.2 (a)

¹² Pub. Resources Code § 21080.3.2 (a)

¹³ Pub. Resources Code § 21082.3 (c)(1)

¹⁴ Pub. Resources Code § 21082.3 (b)

¹⁵ Pub. Resources Code § 21080.3.2 (b)

¹⁶ Pub. Resources Code § 21082.3 (a)

¹⁷ Pub. Resources Code § 21082.3 (e)

A-9
(cont.)



COMMENT LETTER A

- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days.¹⁸
This process should be documented in the Tribal Cultural Resources section of your environmental document.

Under SB 18:

Government Code § 65352.3 (a) (1) requires consultation with Native Americans on general plan proposals for the purposes of "preserving or mitigating impacts to places, features, and objects described § 5097.9 and § 5091.993 of the Public Resources Code that are located within the city or county's jurisdiction. Government Code § 65560 (a), (b), and (c) provides for consultation with Native American tribes on the open-space element of a county or city general plan for the purposes of protecting places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code.

- SB 18 applies to **local governments** and requires them to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf
- **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.**¹⁹
- **There is no Statutory Time Limit on Tribal Consultation under the law.**
- **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research,²⁰ the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction.²¹
- **Conclusion Tribal Consultation:** Consultation should be concluded at the point in which:
 - The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation.²²

NAHC Recommendations for Cultural Resources Assessments:

- Contact the NAHC for:
 - A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - A Native American Tribal Contact List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
 - The request form can be found at <http://nahc.ca.gov/resources/forms/>.
- Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - If part or the entire APE has been previously surveyed for cultural resources.
 - If any known cultural resources have been already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

A-9
(cont.)

¹⁸ Pub. Resources Code § 21082.3 (d)

¹⁹ (Gov. Code § 65352.3 (a)(2)).

²⁰ pursuant to Gov. Code section 65040.2,

²¹ (Gov. Code § 65352.3 (b)).

²² (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18)



COMMENT LETTER A

Examples of Mitigation Measures That May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- o Avoidance and preservation of the resources in place, including, but not limited to:
 - Planning and construction to avoid the resources and protect the cultural and natural context.
 - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- o Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource.
 - Protecting the traditional use of the resource.
 - Protecting the confidentiality of the resource.
- o Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- o Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed.²³
- o Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated.²⁴

The lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

- o Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources.²⁵ in areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- o Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- o Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subs. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

A-9
(cont.)

²³ (Civ. Code § 815.3 (c)).

²⁴ (Pub. Resources Code § 5097.991).

²⁵ per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)).



COMMENT LETTER B



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June 18, 2017

VIA EMAIL

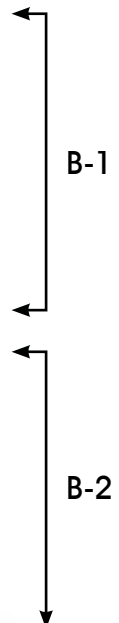
Russell Brady, Project Planner
Riverside County Planning Department
4080 Lemon St., 12th Floor
Riverside, CA 92501
(951) 955-3025
rbrady@rivco.org

SUBJECT: COMMENTS ON KNOX BUSINESS PARK BUILDINGS D AND E EIR

To whom it may concern:

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed Knox Business Park Buildings D and E. Please accept and consider these comments on behalf of Golden State Environmental and Social Justice Alliance, a California Social Purpose Corporation, Entity #C4017878. Also, Golden State Environmental and Social Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental and Social Justice Alliance 160 W. Foothill Parkway Ste. 105-92 Corona, CA 92882.

As we understand it, the proposed project consists the construction and operation of two business park warehouse buildings (Buildings D and E) with a combined maximum floor space of 1,113,627 square feet on the existing approximately 58.6 gross-acre project site. The Building D Site will contain one business park warehouse building with a maximum of 702,645 square feet of building area. The Building E Site will contain one business park warehouse building with a maximum of 410,982 square feet of building area. Associated improvements to the Building D and E Sites would include, but are not limited to, surface parking areas, vehicle drive aisles,



160 W. Foothill Parkway Ste. 105-92 Corona, CA 92882



COMMENT LETTER B

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truck courts, utility infrastructure, landscaping, exterior lighting, signage, walls and fencing, a guard shack, and water quality/detention basins. Both the Building D Project and the Building E Project also would construct frontage improvements to Ellsworth Street and Oleander Avenue. The project as proposed requires two General Plan Amendments and Zone Change to permit the proposed high cube warehousing/distribution land use.

Buildings D and E would be operational 24 hours per day, seven (7) days per week, with traffic movement, parking, and the loading and unloading of tractor trailers at the loading bays. During long-term operational conditions, Building D is calculated to generate 1,853 passenger car equivalent (PCE) trips, while Building E is calculated to generate 1,038 PCE trips. In total, the Project would generate up to 3,319 PCE vehicle trips per day.

4.0 Environmental Analysis

Table 4.0-1: Cumulative Development

The table presents a list of projects utilized for cumulative analysis in the EIR. The table gives the project number to identify to the project, which is completely irrelevant to the general public and decision makers as they do not have access to the County's project numbers to identify the projects. A brief, one or two word description and size (square footage) of the projects are given. The location/address of these projects is not given at all. This does not comply with CEQA's requirements for meaningful disclosure. The location, name, and distance from the proposed project site must be disclosed in the EIR.

4.2 Agriculture and Forest Resources

Agriculture Threshold C

The EIR states that "In the *unlikely event* that agricultural activity commences on the properties immediately to the west and south of the Project site that are zoned A-1-1, and continues for at least three years before the Project site is developed, the proposed Project would be required to comply with Riverside County Ordinance No. 625 (Riverside County Right-to-Farm Ordinance) (Riverside County, 1994)." The EIR is misleading as an informational document in stating that agricultural activity is unlikely to occur at the properties zoned A-1-1. Since these properties have a zoning designation which permits agricultural activity, it is possible that such activity could commence at any time. The statement that "In the *unlikely event* that agricultural activity

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COMMENT LETTER B

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commences...” should be revised to accurately reflect the possibility that the properties zoned A-1-1 could be used for agricultural operations in order to be an adequate informational document in compliance with CEQA § 15121.

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**B-4
(cont.)**
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4.3 Air Quality

4.3.2(A): Methodology for Estimating Project Construction Emissions

Table 3-1 Construction Equipment Assumptions indicates a maximum assumed 8 hour construction day. However, Section 9.52.020 of the County’s Noise Regulation ordinance states that noise associated with “any private construction activity located within one-quarter of a mile from an inhabited dwelling is considered exempt between the hours of 6:00 a.m. and 6:00 p.m., during the months of June through September, and 7:00 a.m. and 6:00 p.m., during the months of October through May.” Section 9.52.020 does not restrict construction on weekends or Federal Holidays. Section 3.6: Construction Characteristics states that “the analysis in this EIR represents worst-case analyses...” erroneously as the worst-case construction duration is not analyzed. The air quality modeling does not present a “worst-case scenario” analysis of construction equipment emitting pollutants for the legal 12 hours per day, 7 days a week during the summer and 11 hours per day, 7 days a week during the winter. The air quality modeling must be revised to account for these legally possible longer construction days and increased number of construction days.

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B-5
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Further, the air quality analysis is unduly optimistic in that it places adjacent sensitive receptors on Redwood Drive at the opposite end of their property from where the exposure would take place rather than at their adjacent property lines. The analysis places the sensitive receptors 191 feet from their adjacent property line at residential structures. However, the aerial maps provided clearly indicate that there are residential structures much nearer to the property line than 191 feet; there appears to be residential structures located immediately adjacent to the property lines. The air quality modeling must be revised to conservatively assess the potentially significant impacts to the sensitive receptors given their exposure at their adjacent property lines.

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B-6
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The east elevation (Ellsworth Street) of Building E will feature approximately 52 delivery/dock doors that are oriented towards the homes on Redwood Drive. The air quality analysis does not provide information regarding the potential impacts to air quality that these 52 delivery/dock doors receiving deliveries 24 hours per day, 365 days per year will have on the sensitive receptors.

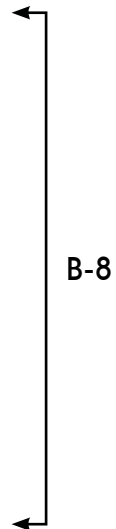
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COMMENT LETTER B

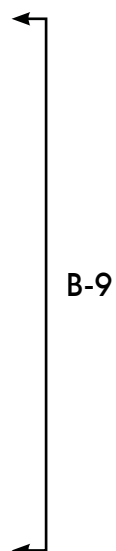
Threshold A

The EIR concludes that because “the proposed Project would provide a similar level of building intensity on the Project site compared to the intensity of building anticipated by the Riverside County General Plan, the Project would be consistent with Consistency Criterion No. 2”. The project proposes two General Plan Amendments to change the site designation from CD-BP to CD-LI, which leads the EIR to conclude “the amount of building and traffic intensity (and thereby, area, energy, and mobile source emissions) would be similar, if not less intense from CD-BP land uses due to a higher traffic generation rate per building square foot for the CD-BP designation compared to the Project’s proposed high cube warehouse buildings under the proposed CD-IP designation”. The EIR does not provide any evidence or analysis to support this conclusion. This language in the EIR is misleading and guides the reader towards speculation while diverting attention from Consistency Criterion No. 2 - the proposed project exceeding assumptions of the AQMP. Since the project proposes two General Plan Amendments to a more intense land use, the most logical and conservative conclusion is that the project has not been included in the AQMP assumptions and has the potential to exceed those assumptions.

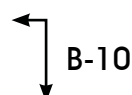


Threshold B

The EIR is misleading in stating that “construction activities would occur at a later date than assumed by the analysis presented in the air quality impact analysis (Technical Appendix B1) and herein, emission quantities associated with construction equipment exhaust would be less than disclosed in Technical Appendix B1 and herein, *due to the application of more restrictive regulatory requirements for construction equipment and on-going replacement of older construction fleet equipment with newer, lower emission equipment by construction contractors.*” The EIR does not require the project to utilize the newest low-emission equipment available or replace existing equipment with the latest low-emission model. Mitigation Measure 4.3-1(b) states that “All Heavy-Heavy Duty Haul Trucks (HHD) accessing the Project site shall use year 2010 or newer engines during all construction activities to the extent such HHD are commercially available”. The project is permitted to utilize equipment from year 2010 throughout the duration of construction and is not required to utilize equipment that complies with the latest regulatory requirements or replace existing equipment with newer, lower emissions equipment at any given point during construction. The statement under Threshold B is misleading and must be removed for the EIR to be an adequate informational document.



Further, MM 4.3-1(b) in addition to MM 4.3-1(a-f) are unenforceable as they are to be included as notes on the project plans. There is no enforcement entity or field verification component of





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these notes specified. MM 4.3-1(a-f) must be revised in order to meaningfully enforceable (CEQA § 21081.6 (b)).

↑ B-10
← (cont.)

Threshold F

The EIR concludes “any odors emitted during construction activities would be temporary, short-term, and intermittent in nature” and thus would not produce “unusual or substantial” odors. NOx emissions will exceed applicable SCAQMD thresholds; NOx emissions are associated with a pungent, acrid odor¹. The EIR does not provide any analysis regarding the potential odor impacts resulting from increased NOx emissions. Also, the EIR does not provide a definition of temporary, short-term, or intermittent odors or a CEQA exemption for such odors. The EIR does not define “a substantial number of people” either and does not provide supporting evidence for this claim such as the population count within the project vicinity, the average length of time the “temporary/intermittent odors” would last, a map for which receptors were used for modeling, or evidence that any odor modeling occurred at all.

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4.4 Biological Resources

4.4.1(b) Existing Conditions - Sensitive Plant Species

The EIR states that Cadre followed up their 2014 site visit with a visit in March 2016. However, the report from the March 2016 visit is not included in the EIR and is not included as an Appendix. CEQA § 15150 (f) states that incorporation by reference is most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of the problem at hand. The March 2016 report contributes directly to the analysis of the problem at hand and should be included for public review.

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The EIR discloses that during the March 2016 visit to the Building D site, it was noted that the site appeared to have been “disced” within the last three months and there was no paniculate tarplant present. The EIR does not provide a definition of “disced”, what that process entails, or how that process could impact the paniculate tarplant. This does not comply with CEQA § 15140 which requires EIRs to be written in plain language. The EIR must be revised to define “disced” and its relevant impacts to paniculate tarplant at the project site.

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¹ “Nitrogen Dioxide”. National Institute for Occupational Safety and Health - Center for Disease Control. Accessed 15 June 2017. <https://www.cdc.gov/niosh/npgd/npgd0454.html>



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4.7 Greenhouse Gas Emissions

Senate Bill 32

The EIR indicates that no analysis is necessary regarding “Executive Order B- 30-15 and SB 32 because the Project’s horizon (buildout) year would occur before 2020.” This viewpoint for analysis is contrary to information provided in the Project Description (3.6 Construction Characteristics). The Project Description states that “actual construction of Building D and Building E would commence in 2018” and last for 23 months. Construction of the project must commence by January 2018 in order to for buildout to occur before 2020. The EIR does not assume the “worst-case scenario” which is the likely event that construction will commence later in 2018. There is no condition or statement that construction will commence in January 2018, so it can be reasonably assumed that construction could commence at some point during February - December 2018. The EIR must be revised to demonstrate compliance with SB 32 since it can be reasonably assumed that the actual construction schedule for the project will result in a horizon year 2020 or later.

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Mitigation Measure 4.7-1 requires the project applicant to include Implementation Measures from Appendix F of Riverside County’s Climate Action Plan (December 2015) to be incorporated into the building permit application and/or plans to achieve the required minimum of 100 points prior to issuance of building permits. Compliance with the CAP following certification of the EIR and public review of the approved mitigation measures represents deferred mitigation in violation of CEQA. This is especially true as the CAP permits measures for off-site energy projects (E6.A.3 Off-site renewable energy project) and for the applicant to establish their own energy reduction programs (T1.A.5 CTR Employer based Commute Trip Reduction (CTR)), (W1.C.3 Storm water Reuse Systems), (E6.A.4 Other Renewable Energy Generation) that should be made available for public review in conjunction with CEQA review as a mitigation measure.

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4.10 Land Use and Planning

Planning Thresholds B and C

The EIR states that the project “would not expose the adjacent rural residential and light agriculture zoned areas to substantial adverse environmental effects during construction or long-term operation,” resulting in compatibility with the adjacent rural residential areas and less than

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B-16
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COMMENT LETTER B

Page 7 of 10

significant impacts from the proposed General Plan Amendments/zone change. This statement is contradictory to information and findings throughout the EIR. The EIR finds that implementation of the proposed project will have significant and unavoidable impacts in the following areas:

4.3 Air Quality Threshold A - Long-Term Operation: Significant and Unavoidable Direct and Cumulatively Considerable Impact

4.3 Air Quality Thresholds B and C - Significant and Unavoidable Direct and Cumulatively Considerable Impact

4.10 Land Use and Planning Threshold A - Significant and Unavoidable Direct and Cumulatively Considerable Impact

4.11 Noise Thresholds A, B, and C - Off-Site Transportation Noise: Significant and Unavoidable under Existing + Project and Opening Year traffic conditions

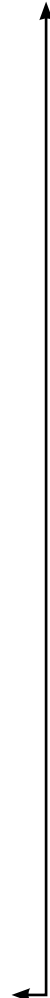
4.15 Transportation and Traffic Thresholds A and B - Significant and Unavoidable Cumulatively Considerable Impact

The EIR does not present any analysis of these significant and unavoidable impacts when considering compatibility with the existing surrounding zoning and land uses. Additionally, Section 5.3 of the EIR directly contradicts findings in this section by stating “the land uses proposed by the Project would differ substantially than the land uses that are permitted on the Project site under existing conditions.” The EIR must be revised to discuss and analyze the significant and unavoidable impacts associated with project implementation in relation to compatibility with the existing surrounding zoning and land uses.

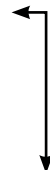
4.11 Noise

Figure 4.11-2

The figure indicates that there was no noise measurement taken at properties that would be adjacent to the east side of Building D which features approximately 52 delivery/dock doors. R6 was again placed 191 feet away from the property line for analysis even though all properties on Redwood Drive are adjacent to the project site. The noise analysis must be revised to model



**B-16
(cont.)**



B-17



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each receptor for exposure at their property line closest to the project site. This is especially true for sensitive receptors on Redwood Drive as *Figure 4.11-3* illustrates they are immediately adjacent to operational noise source locations.

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(cont.)
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Mitigation Measure 4.11-2 is unenforceable as the information will be included as notes on the project plans. There is no enforcement entity or field verification component of these notes specified. MM 4.11-2(a-e) must be revised in order to meaningfully enforceable, such as sending notice to adjacent property owners regarding an enforcement contact for noise complaints or posting signs with such contact information (CEQA § 21081.6 (b)).

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4.15 Transportation

The EIR does not demonstrate the proposed project's compliance with the following General Plan Circulation Element Policies:

Policy C 1.8: Ensure that all development applications comply with the California Complete Streets Act of 2008 as set forth in California Government Code Sections 65040.2 and 65302.

The EIR does not demonstrate or discuss any compliance with the California Complete Streets Act of 2008. The EIR should be revised to discuss this topic and comply with Policy C 1.8.

Policy C 2.1: The following minimum target levels of service have been designated for the review of development proposals in the unincorporated areas of Riverside County with respect to transportation impacts on roadways designated in the Riverside County Circulation Plan (Figure C-1) which are currently County maintained, or are intended to be accepted into the County maintained roadway system:

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LOS C shall apply to all development proposals in any area of the Riverside County not located within the boundaries of an Area Plan, as well those areas located within the following Area Plans: REMAP, Eastern Coachella Valley, Desert Center, Palo Verde Valley, and those non-Community Development areas of the Elsinore, Lake Mathews/Woodcrest, Mead Valley and Temescal Canyon Area Plans.

Policy C 2.4: The direct project related traffic impacts of new development proposals shall be mitigated via conditions of approval requiring the construction of any improvements identified as necessary to meet level of service targets.



COMMENT LETTER B

The EIR determines that the proposed project will have significant and unavoidable cumulative impacts regarding Thresholds A and B after mitigation because there is no certainty that the necessary improvements will be constructed. The EIR should require construction of the proposed improvements as a condition of approval/mitigation measure in compliance with Policy C 2.4 in order to alleviate these significant LOS impacts that violate policy C 2.1.

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5.0 Other CEQA Considerations

5.2 Significant Irreversible Environmental Changes which could be caused by the proposed project should it be implemented

The EIR states that “Although the Project would cause unavoidable impacts to the environment associated with air quality, land use and planning, noise, and traffic as summarized above in Subsection 5.1, these effects would not commit surrounding properties to land uses other than those that are present under existing conditions or planned by the County of Riverside General Plan. For this reason, the Project would not result on a significant, irreversible change to nearby, off-site properties.”

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The project proposes two General Plan Amendments and Zone Change to permit land uses that are not permitted in their current zone and land use designation. The EIR’s basis for finding that there will be no significant, irreversible changes to nearby properties is flawed and must be revised to accurately represent the proposed project. The CD-BP designation does not expressly permit warehousing/distribution land uses which create very different nuisances to adjacent residential than an employee-based office business park. For example, office business parks do not operate on the weekends and have standard business hours during the week. The proposed project would operate 24 hours a day, 365 days a year. This is a stark contrast to the types of land uses permitted under the existing General Plan and Zoning designations. Also, the EIR contradicts itself on this point in Section 5.3 by stating “the land uses proposed by the Project would differ substantially than the land uses that are permitted on the Project site under existing conditions.” The EIR must be revised to accurately represent the proposed project and be an adequate informational document.

Conclusion

For the foregoing reasons, Golden State Environmental and Social Justice Alliance believes the EIR is flawed and an amended EIR must be prepared for the proposed project and circulated for

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B-22
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public review. Golden State Environmental and Social Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental and Social Justice Alliance 160 W. Foothill Parkway Ste. 105-92 Corona, CA 92882.

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Sincerely,

Joe Bourgeois
President
Golden State Environmental and Social Justice Alliance



COMMENT LETTER C

Johnson, Smith & Foy

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June 28, 2017

VIA U.S. MAIL AND EMAIL

Russell Brady
Project Planner
Riverside County Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92501
rbrady@rivco.org

**Re: Opposition to Draft Environmental Impact Report No. 546 (SCH # 2015081081), Knox
Business Park Buildings D and E**

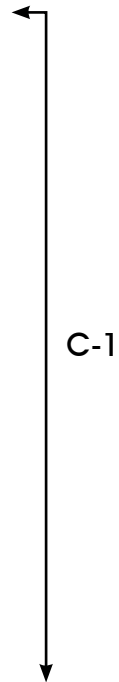
Greetings:

On behalf of concerned area residents and RAMV.org, I hereby submit these comments on the Draft Environmental Impact Report (EIR) No. 546 for the Knox Business Park Project.

The Project proposes the development of two high-cube industrial warehouse buildings on 58.6 gross acres in the Mead Valley area of unincorporated Riverside County. The Project site is located south of Oleander Avenue, north of Redwood Drive, east of Day Street, and west of Harvill Avenue. Ellsworth Street/ Decker Road transects the Project site. The site is located approximately 0.4-miles west of I-215, 5.8 miles south of SR-60, and 2.5 miles southeast of the City of Riverside.

The Project would develop two buildings totaling 1,113,627 square feet: (1) Building D, a 702,645 square foot building to the east of Ellsworth/ Decker on 37.1 acres; and (2) Building E, a 410,982 square foot building to the west of Ellsworth/Decker on 21.5 acres. To implement the Project, the following discretionary approvals are needed:

1. General Plan Amendment (GPA) No. 1151- a GPA for the 37.1 acre "Building D" site to change the General Plan designation from Community Development- Light Industrial (CD-LI) and Community Development Business Park (CD-BP) to entirely CD-LI.
2. GPA No. 1152- a GPA for the 21.5 acre "Building E" site to change the General Plan Designation from CD-BP to CD-LI





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3. Change of Zone No.7872- a Zone Change for the Building D site from Manufacturing – Medium, Industrial Park, and Rural Residential to Industrial Park.
4. Change of Zone No. 7873- a Zone Change for the Building E site from Rural Residential ½- acre lot sizes and Industrial Park to Industrial Park.
5. Tentative Parcel Map (TPM) No. 36950 to consolidate four parcels to one parcel on the Building D site and dedicate 2.6 acres as public right of way.
6. TPM No. 36962 to consolidate three parcels to one parcel on the Building E site and dedicate 2.0 acres as public right-of-way.
7. Plot Plan No. 25838- Plot plan, site plans, architectural plans, and landscape design for the Building D Site.
8. Plot Plan No. 25837- Plot plan, site plans, architectural plans, and landscape design for the Building E Site.

C-1
(cont.)

Parking will be provided at the Project site for 331 trucks and trailers—251 at Building Site D and 80 at Building Site E. The Project will also develop 160 loading docks-- 109 at Building D and 51 at Building E. It is anticipated that this industrial Project would operate 24-hours a day, seven days a week. The nearest residences are located directly adjacent to the site to the south.

I. GENERAL COMMENTS

The California Environmental Quality Act (CEQA) was adopted as a disclosure and transparency document. The theory is that by providing a document that adequately describes the environmental consequences of a project to decision makers and the public, the decision makers will make a rational decision based upon the true environmental consequences of the project and if they do not, the electorate can hold them accountable for their decisions. The core of this statutory structure is the adequacy of the EIR as an informational document.

C-2

Having reviewed the Draft EIR, several major flaws are readily apparent. First, while the EIR states that the two Buildings are being jointly considered in one EIR to prevent impermissible piecemealing under CEQA; the EIR continues to improperly segregate evaluation and impact determinations in many areas. As an example, impacts to biological resources are separately analyzed for each building site in both the EIR and its Appendices. As another example, impacts to cultural resources are likewise separately considered. But, if considered jointly, impacts may be more severe or newly significant. The EIR must be revised and recirculated to correct this improper piecemealing of review.

C-3

Second, the EIR makes unreasonable and baseless assumptions regarding vehicle and truck travel to and from the Project site. The EIR assumes *no vehicles* will travel south from the site on Decker/ Ellsworth to Markham Street to access I-215 or the Cajalco Expressway. This assumption is not based on any physical, legal, or other limitations of the Project or the adjacent roadways; and does not account for substantial existing truck traffic on Harvill Avenue. The EIR

C-4



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also fails to assess impacts to roadways used to avoid congestion on I-215/ SR-60, including Van Buren and Alessandro Boulevards to access SR-91; and Cajalco Expressway to access I-15 or SR-91. These unsupported assumptions significantly skew and render inaccurate the air quality, health risk, noise, traffic, and other analyses' consideration of the effect of the Project's 3,319 daily passenger car equivalent (PCE) trips.

C-4
(cont.)

Third, the EIR regularly understates impacts by assuming a 191-foot separation between the Project and residential uses. In fact, residential uses are adjacent to the Project site. This error pervades the air quality/ health risk, noise, and other impact assessments.

C-5

Fourth, the EIR greatly understates construction impacts at the site where construction is anticipated to occur for almost 2 years (23 months), eight hours a day, five days per week. Substantial blasting (drilling 5,253 holes in the largest area) and subsequent rock crushing operations would be necessary to crush approximately 2,759 tons of rock onsite per day for 65 days. While the effects of blasting and crushing operations are likely *severe*, they were inadequately considered in the EIR terms of impacts to hazards, noise/ vibration, cultural resources, and biological resources.

C-6

Overall, the EIR fails to adequately evaluate and disclose project impacts to/from, but not limited to, aesthetics, agriculture, air quality/health risks, biological resources, cultural resources, GHGs, geological resources/ soils, noise, and traffic, among other things. (Pub. Res. C. § 21002.1(a), (e); State CEQA Guidelines § 15128, 15126, 15123) In addition, the EIR fails to require all feasible mitigation of the Project.

C-7

As detailed herein, the EIR fails in its informational role. Significant modification to, and recirculation of, the EIR is essential before the public and decision-makers can consider approval of this Knox Business Park Project.

C-8

II. THE EIR FAILS TO PROVIDE NEEDED INFORMATION AND MITIGATION MEASURES

A. PROJECT DESCRIPTION

The Project was heard by the ALUC on May 11, 2017 concerning the approval of a height increase to 55 feet. (ALUC May 11, 2017 Agenda Item 3.2, <http://www.rcaluc.org/Portals/0/aluc_agenda_051117.pdf?ver=2017-04-27-140245-500>. ¹) The increase was conditionally approved. Where planned and reasonably foreseeable, development of the Project to a 55-foot height must be disclosed and evaluated in the draft EIR prior to approval, not proposed as a post- approval modification.

C-9

¹ In order to conserve paper citations are provided herein in electronic format as hyperlinks and in PDF format. If for whatever reason there is a problem with the electronic document, please let us know as soon as possible. Please consider these documents as if fully incorporated and attached.



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The EIR is unclear as to how many parking spaces will be provided for passenger vehicles, stating variously that Building D provides 251 stalls or 243 stalls. (*Compare*, p. 3-10 [Project Description}, 3-12 [Parking and Loading]) The Building E site would provide a total 236 automobile stalls, inclusive of 7 handicap stalls.

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C-10

The EIR states construction is expected to operate eight hours per day, five days a week during the construction period. There is no requirement construction be so limited. To the contrary, construction of warehouses like those proposed regularly occurs at night in region because the cooler temperatures are needed for concrete pouring. (*See, e.g.*, “When the Going Gets Hot, Construction Workers Get Nocturnal,” June 29, 2016 <www.npr.org/2016/06/29/483843456/when-the-going-gets-hot-construction-workers-get-nocturnal>) As the Project consists of concrete, tilt-up construction, the EIR must address construction operations occurring at night or include a prohibition for night-time construction, include obtaining exceptions from any applicable County ordinances after approval.

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B. AESTHETICS

According to the EIR, both buildings would be developed up to a height of 40 feet above finished grade, with architectural projections reaching up to 44 feet. (EIR p. 3-14, 3-23)

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The EIR variously states that screen walls, tube steel fencing, and retaining walls would be installed at the site. Clarification is needed as to the location of each of these walls and fences.

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C-13

Photographs are provided of existing views from various areas north of the site, but notably not from the existing residential neighborhoods to the south or west of the site, or from the location of existing trails. While CEQA does not require inquiry into a few private views, effects to public views and damage to scenic resources experienced by a significant number of people among several neighborhoods should be evaluated. The EIR fails in its evaluation of these effects.

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In evaluating aesthetic impacts, the EIR states that land south and west of the site is “developed” under existing conditions. (EIR p. 4.1-12) This fails to consider that significant land surrounding the site to the west, north, and east remains in open space and zoned for very low residential and agricultural uses. (*compare*, EIR p. 4.2-1 [noting undeveloped land and rural residential uses]) Land west of the site includes both developed and undeveloped area.

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Construction lighting impacts must be evaluated and disclosed where construction is likely to occur at night. 24-hour lighting during construction for security should also be evaluated and mitigation adopted ensuring no light trespass off-site.

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C. AGRICULTURE

The Project is located east of land with an agricultural zoning designation and rural residential lots containing ancillary agricultural uses.

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C-17



COMMENT LETTER C

The site and surrounding areas contain “Farmland of Local Importance,” 18.9% of which contain soils with an “excellent” soil rating under the Storie Index. (EIR p. 4.2-4 to -5) These soils occur for the most part on the Building E site. (EIR p. 4.2-6 to -7 [HcC soils deemed “excellent”]) Dismissing the possibility of agricultural impacts, the EIR claims the excellent soils are split by Ellsworth Street, preventing them from being productively farmed. (EIR p. 4.2-9) But the soils map shows just a small portion of HcC soils occur on or east of Ellsworth Street; the majority occur on the center of the Building E site. (EIR p. 4.2-6) The conclusion is not supported by the Soils map or other substantial evidence.

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C-18

The evaluation of impacts to agricultural resources piecemeals consideration of the effects of the two building sites. The environmental effects of the whole Project must be considered.

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C-19

The EIR concludes ancillary agricultural uses on rural residential properties “would be unaffected” by the Project. (EIR p. 4.2-10) This determination is improperly conclusory where no reasoning or substantial evidence is provided in support. While ancillary agricultural uses may not be ceased or prohibited, they may be adversely impacted by, for instance, heavy duty trucks passing proximate to their property; by construction and blasting; or by 24-hour-a-day lighting. Potential impacts must be considered.

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C-20

Likewise, in asking if the Project would cause development of non-agricultural uses within 300 feet of agriculturally zoned property, the EIR deflects proposing a finding of significance despite “[p]roperties immediately to the west, south, and southwest of the Project site [being] zoned A-1-1” for agriculture. The EIR finds the Project has “no potential” to result in off-site impacts to the properties and, in any event, would comply with Ordinance 625 such that impacts would be less than significant. As it is unlikely Ordinance 625 would apply because it requires agricultural operations be in place for 3 years prior to construction to be afforded protection; and construction of this Project is planned to commence in 2018; additional mitigation should be adopted to reduce off-site impacts to agriculturally zoned properties. Mitigation may include according the same protection from a Project-related nuisance claim to future potential agricultural operations to properties surrounding the Project site.

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C-21

The EIR fails to evaluate secondary impacts to agriculture from the Project. Such effects may include urbanization/ growth inducement in this undeveloped area; vehicle hazard impacts from incompatible uses (e.g. farm equipment near industrial uses, semi-trucks near equestrian uses, etc.); and development pressure to convert agricultural land to non-agricultural uses. Absent consideration of indirect/ secondary impacts, the EIR fails in its informational role. Revision is needed.

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C-22

D. AIR QUALITY

1. The Overall Analysis is Flawed

The EIR states the nearest “residential structures” are 191 feet south of the Project site boundary. In fact, the Project backs up to the property line of adjacent residential uses, and

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C-23



COMMENT LETTER C

visuals show structures and residential trailers adjacent to the property line as well. Moreover, there is no reasonable basis for assuming persons will remain inside their residence on their residential property. Adverse air quality impacts should be measured to the property line of these residences.

C-23
(cont.)
C-24

Page 4.4-30, Figure 4.4-1 “Building D Site Biological Resources” in erroneously inserted into the air quality analysis between pages 4.3-43 and 4.3-45.

2. The EIR fails to Adequately Consider Construction Air Quality Impacts

The Air Quality Report located at Appendix B1 evidently calculated air quality PM impacts from blasting and rock crushing activities at the site, but these effects were not discussed in the Report or EIR. (See, e.g. Air Quality Report p. 33, Table 3-3 [Construction Equipment Assumptions]) Other potential emissions do not appear to have been evaluated from these activities; diesel emissions from the rock crusher, for instance.

C-25

In addition, the daily impacts of construction, blasting, and rock crushing activities occurring at the same time/ on the same day are not evaluated. The EIR acknowledged that once blasting activities are complete, grading and other activities will recommence onsite. (EIR p. 4.11-11)

C-26

MM 4.3-1 (a) and (b) and MM 4.3-2 propose uncertain and vague mitigation by incorporating language requiring compliance only is “feasible” and “where commercially available.” The EIR cannot claim construction impacts will be reduced below significance unless its certain these measures will be implemented and successfully reduce such effects.

C-27

3. The EIR fails to Adequately Evaluate Operational Air Quality Impacts

The Health Risk Assessment assumes no vehicle trips, either passenger car or trucks, will travel south on Decker/ Ellsworth. Absent mitigation preventing truck trips south on Decker/ Ellsworth to Markham Ave. to access I-215, this assumption is utterly unsupported. The EIR must assume southbound trips past residential uses, particularly where trucks regularly back up on Harvill Avenue.

C-28

The EIR states health risks were modeled using a receptor grid with 100- meter spacing was placed at residential, worker, and school locations. But only 2 rows of gridding were evaluated and only for residences along Redwood Drive. Effects on homes further south and west should be evaluated through expended receptor grid modeling.

C-29

MM 4.3-8 proposes the roof be constructed to incorporate a 1 KW PV solar array to offset Project operational air quality impacts. It is feasible to design the roof to accommodate a maximally sized solar array and require incorporation of substantially more PV. Given the Project’s estimated electricity demand of 4,381,622 kWh/year, proposed development to accommodate a 1 KW system, which would generate around 1,674 kWh/year, is utterly

C-30



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insignificant. Even a 1 MW system (taking up about 100,000 – 200,000 square feet of rooftop area) would fall far short, generating approximately 1,674,349 kWh/year according to <<http://www.pvwatts.nrel.gov>> (utilizing March AFB weather data), but would at least somewhat off-set the energy demand of this Project.

Additional mitigation is needed where it is feasible to revise MM 4.3-8 to both (1) require the rooftop be developed to accommodate a maximally sized solar array and, (2) require the developer install a 1 MW system prior to Project occupancy. Furthermore, as noted in the EIR, because solar panels absorb light and do not reflect it, the potential for adverse glare impacts from this mitigation would be less than significant. (EIR p. 4.1-11)

C-30
(cont.)

4. Additional Mitigation is Needed

a) *Construction Mitigation*

The following additional mitigation should be adopted to reduce construction air quality emissions:

1. All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 4 emissions standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
2. No diesel powered generators shall be used onsite at any time.
3. Implement activity management techniques including a) development of a comprehensive construction management plan designed to minimize the number of large construction equipment operating during any given time period; b) scheduling of construction truck trips during non-peak hours to reduce peak hour emissions; c) limitation of the length of construction work-day period; and d) phasing of construction activities.*
4. Develop a trip reduction plan to achieve a 1.5 AVR for construction employees
5. Require high pressure injectors on diesel construction equipment.*
6. The developer shall require all contractors to turn off all construction equipment and delivery vehicles when not in use and/or idling in excess of 3 minutes.*
7. Restrict engine size of construction equipment to the minimum practical size.*
8. Use electric construction equipment where technically feasible.*
9. Require use of alternatively fueled construction equipment, using, e.g., compressed natural gas, liquefied natural gas, propane, or biodiesel.*
10. Install catalytic converters on gasoline-powered equipment.*
11. Require the use of Alternative Diesel Fuels on diesel equipment used. Alternative diesel fuels exist that achieve PM10 and NOx reductions.
12. Suspend use of all construction equipment operations during second stage smog alerts.*
13. Demonstrate proper inspection and maintenance of construction equipment.*
14. Employ a construction site manager to verify that engines are properly maintained and keep a maintenance log.*

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COMMENT LETTER C

15. Establish a staging zone for trucks that are waiting to load or unload material at the work zone in a location where diesel emissions from the trucks will have minimum impact on abutters and the general public.
16. Require all diesel trucks used by construction contractors at the site, or for on-road hauling of construction material, to be 2010 compliant vehicles.*
17. Use a Heavy-Duty Off-Road Vehicle Plan to ensure compliance with construction mitigation measures, incorporating the use of hourly meters on equipment; documentation of the serial number, horsepower, manufacturing age, fuel, etc. of all onsite equipment; and daily logging the operating hours of equipment.
18. During Project construction, the applicant will be required to solicit preference construction bids that use BACT, particularly those seeking to deploy zero- and/or near zero emission technologies.*
19. During Project construction, the applicant will be required to use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production to the extent feasible.*

C-31
(cont.)

b) Operational Mitigation

The Project will result in significant air quality impacts during operation by exceeding the regional thresholds for VOC and NOx. Additional mitigation measures requiring cleaner trucks should be implemented in light of these significant NOx emissions. As stated by SCAG:

C-32

“The two air pollutants of greatest concern in Southern California are nitrogen oxides (NOx) and fine particulate matter (PM_{2.5}). The South Coast Air Basin is classified as an extreme non-attainment area per the federal ambient ozone standard, with a required attainment date of 2023. By approximately 2031, a second, more stringent federal ozone standard must be attained. The federal Clean Air Act requires the region to demonstrate timely attainment of these standards or federal sanctions may result, such as interruption or curtailment of funding for transportation projects. To attain the federal ozone standards, the region will need broad deployment of zero- and near-zero-emission transportation technologies in the 2023 to 2035 timeframe.” [emphasis added] (Southern California Association of Governments’ (SCAG’s) 2012- 2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS))

C-33

Moreover, in the Inland Empire, increased distribution warehousing and truck travel to and from the ports of Los Angeles and Long Beach are anticipated to cause “substantial congestion problems due to the increased truck volumes on regional highways.” (*Id.*)

In light of the fact that this Project is anticipated to exacerbate the substantial NOX and PM2.5 problems in the Southern California region, a mitigation measure should be adopted requiring the implementation of zero- or near- zero emission technology for all trucks accessing the site by 2025. If deemed infeasible to implement for all trucks, a Diesel Minimization Plan should be adopted whereby zero-emission trucks are phased in, e.g. 10% of the truck fleets for any industrial uses shall zero emission by 2023, and increase that percentage at least 10% per year until 100% of trucks operating onsite are zero emission vehicles.

C-34



COMMENT LETTER C

The following additional mitigation is also feasible and should be adopted to reduce the Project's operational air quality effects:

1. Diesel yard trucks (hostlers, yard goats, etc.) shall be prohibited from onsite.*
 2. All heavy trucks accessing the site shall conform to 2010 air quality standards or better. Results, including backup data shall be reported to the Planning Department semi-annually.*
 3. All 53-foot or longer box-type trailers shall be equipped with low-rolling resistance tires.
 4. Developer, tenant, or purchaser shall maintain a log including license plates, engine model year, retrofit technology if applicable, and engine family name of all trucks accessing the Project site.
 5. Install catalytic converters on gasoline-powered equipment.*
 6. Utilize electrical equipment for landscape maintenance. Prohibit gas powered equipment for landscape maintenance.*
 7. Prohibit idling of trucks for periods exceeding three minutes.*
 8. Plant shade trees in parking lots to provide minimum 50% cover to reduce evaporative emissions from parked vehicles. (While Sycamores were once preferred, a recent bacterial disease makes us recommend other species of canopy trees)*
 9. Plant at least 50 percent low-ozone forming potential (Low-OFP) trees and shrubs, preferably native, drought-resistant species, to meet city/county landscaping requirements.*
 10. Concrete, instead of asphalt, shall be used for parking areas and internal roadways. Concrete shall have an initial solar reflectance value of at least .30 as determined in accordance with American Society for Testing and Materials (ASTM) Standards E 1980 or E1918.
 11. Provide shuttle service to food service establishments/commercial areas.*
 12. Roof area shall be constructed with materials with an initial installation Solar Reflective Index Value of at least 39 or greater than the values specified and set forth in CalGreen 2013 Table A5.106.11.2.2.
 13. All hot water heaters installed by Developer shall be powered either through solar cells mounted on the roof of the building, solar water heating, or through other on-site renewable power.*
 14. No diesel-powered generator of any type shall be used at any time on the Project site except if required by the fire department for safety purposes.*
- (*Would also reduce GHG emissions)

C-35

c) Mitigation for Health Risk Impacts

Mitigation must be incorporated to reduce the health risk impacts of this Project and cumulative impacts. Mitigation should include, at the least:

1. Adopt measures which bar trucks from using Decker/ Ellsworth to access the site. Such measures should include physical barriers, not just signage. Bulbouts, chicanes, curb cuts, gates, or other designs should be constructed physically prevent local access to Decker/ Ellsworth by trucks.

C-36



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2. Establish truck routes and post signs between the warehouse/distribution center and the freeway/primary access arterial to help eliminate trucks traversing residential areas.
3. Provide food options and/or a convenience store onsite for truck driver use to prevent trips off-site.
4. Install shower facilities sufficient to meet the demands of truck drivers accessing the site and to prevent travel into the surrounding neighborhoods.
5. Require the installation of electric hook-ups to eliminate idling of main and auxiliary engines during loading, unloading, and when trucks are parked.
6. Provide pamphlets to all truck drivers about the health effects of diesel particulates, the benefits of minimizing idling time, CARB regulations, and the importance of not parking in residential areas.
7. Require the posting of signs outside the facility providing a phone number which neighbors may call if there is an air quality issue. Require response to such calls within 24 hours.
8. Require adequate distance and check-in areas within the site to prevent truck stacking off-site.
9. (Once an accurate health risk assessment is prepared) Require the Project install and maintain in-home air filtration systems for each significantly impacted sensitive receptor at a cost of \$1,700 per parcel.

C-36
(cont.)

E. BIOLOGICAL RESOURCES

The effects of blasting on biological resources on- and off- site were not evaluated in the EIR. (“How and why environmental noise impacts animals: an integrative, mechanistic review,” 2011 <<http://onlinelibrary.wiley.com/doi/10.1111/j.1461-0248.2011.01664.x/full>>; “Synthesis of Noise Effects on Wildlife Populations,” 2004, <https://www.fhwa.dot.gov/Environment/noise/noise_effect_on_wildlife/effects/effects.pdf> Such evaluation is particularly important where animals may be sensitive to frequencies associated with blasting to which humans are not.

C-37

The EIR segregates consideration of impacts to biological resources among the two building sites. Impacts should be jointly evaluated for significance.

C-38

Two burrowing owls were observed on the Project site, yet the significance determination was segregated into observations of one owl on each of the building sites. Impacts to burrowing owls before and after mitigation should be reconsidered addressing the entire site and all impacts.

C-39



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Off-site impacts to burrowing owls during construction and operation should also be considered, particularly given the blasting needed for Project construction. A larger off-site survey for burrowing owl may be needed to analyze these effects.

C-40

The EIR relies on Ordinance No. 810 to mitigate for lost burrowing owl habitat. But Ordinance No. 810 was adopted to supplement the acquisition of MSHCP lands, not to off-set impacts to burrowing owl habitat, a non-covered species. Impacts to burrowing owl habitat should be disclosed as significant, and mitigation must be adopted.

C-41

MM 4.4-1 is vague as to how mitigation of burrowing owls will occur and whether/ how it will be effective. The measure states that take of active nests shall be avoided but fails to specify how, e.g. that all construction will cease within 1000 feet of the nest until CDFW biologists determine all owls have fledged and no blasting will occur until it is determined the nest is no longer occupied. There is also no disclosure concerning where actively relocated owls would be moved. The EIR provides no evidence of the efficacy and success of the mitigation techniques proposed, including passive and active relocation.

C-42

The proposed mitigation is also unclear and conflicting as to what action is required and when. For example, MM 4.4-1 states variously that if owls are found during the pre-construction survey, passive relocation shall not be allowed; but also that, if the owl is determined to be present outside the nesting season, relocation is required. A mitigation plan should be drafted and incorporated into any EIR disclosing how impacts to burrowing owl will be successfully reduced below significance.

Mitigation should be adopted to ensure the applicable objectives of the MSHCP are met. Specifically, if the pre-construction survey shows 3 mating pairs onsite, the conservation of the site prescribed by MSHCP Objective 5 must be incorporated. The MSHCP relevantly states:

C-43

Objective 5: Surveys for burrowing owl will be conducted as part of the project review process for public and private projects within the burrowing owl survey area where suitable Habitat is present (see *Burrowing Owl Survey Area Map, Figure 6-4 of this document*). The locations of this species determined as a result of survey efforts shall be conserved in accordance with procedures described within *Section 6.3.2, of this document* and the guidance provided below:

Burrowing owl surveys shall be conducted utilizing accepted protocols as follows. If burrowing owls are detected on the project site then the action(s) taken will be as follows:

“If the site is within the Criteria Area, then at least 90 percent of the area with long-term conservation value will be included in the MSHCP Conservation Area. Otherwise:

“1) If the site contains, or is part of an area supporting less than 35 acres of suitable Habitat or the survey reveals that the site and the surrounding area supports fewer than 3 pairs of burrowing owls, then the on-site burrowing owls will be passively or actively relocated following accepted protocols.



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“2) If the site (including adjacent areas) supports three or more pairs of burrowing owls, supports greater than 35 acres of suitable Habitat and is non-contiguous with MSHCP Conservation Area lands, at least 90 percent of the area with long-term conservation value and burrowing owl pairs will be conserved onsite. The survey and conservation requirements stated in this objective will be eliminated when it is demonstrated that Objectives 1 4 have been met.

“**Objective 6:** Pre-construction presence/absence surveys for burrowing owl within the survey area where suitable Habitat is present will be conducted for all Covered Activities through the life of the permit. Surveys will be conducted within 30 days prior to disturbance. Take of active nests will be avoided. Passive relocation (use of one way doors and collapse of burrows) will occur when owls are present outside the nesting season.

“**Objective 7:** Translocation sites for the burrowing owl will be created in the MSHCP Conservation Area for the establishment of new colonies. Translocation sites will be identified, taking into consideration unoccupied Habitat areas, presence of burrowing mammals to provide suitable burrow sites, existing colonies and effects to other Covered Species. Reserve Managers will consult with the Wildlife Agencies regarding site selection prior to translocation site development.” (MSHCP Volume 1, Appendix E available at <http://rctlma.org/Portals/0/mshcp/volume1/Appendix_E.html>)

The EIR must address how the Project and mitigation proposed comply with these conservation objectives for burrowing owl.

MM 4.4-3 and -4 fail to evidence payment to Riverside Corona Resource Conservation District will be used to mitigate for permanent impacts to the drainage features in the Project site. Is there an established program of the RCRCDC to create or restore drainages or wetlands offsite that this payment will be earmarked for? While in-lieu payments are permitted as mitigation under CEQA, it must be linked to a specific mitigation program or otherwise show actual mitigation will result. (*Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, *California Clean Energy Comm. v. City of Woodland* (2014) 225 Cal.App.4th 173, 197) Absent this connection, impacts to these drainage features should still be considered significant.

The EIR states over 1000 paniculate tarplant, a CNPS California Rare Plant Rank 4 category, were found onsite. Despite this plant not being covered by the MSHCP, the EIR found “loss of individual plants on the site would not threaten the species as a whole.” If in order to find a significant impact a project had to “threaten the species as a whole,” it is likely no significance finding would ever be made. The impact to tarplant should be significant, and mitigation adopted for this substantial loss.

F. CULTURAL RESOURCES

The Project site is located within the vicinity of a Payomkawichum village complex recognized by Native American tribes. The Pechanga Band of Luiseno Indians asserted that the

C-43
(cont.)

C-44

C-45

C-46



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Project site is part of the cultural landscape extending several miles around the site and associated with the village known as Qaxaalku or a smaller, unnamed village.

C-46
(cont.)

The EIR states, “the County does not have the substantial evidence necessary to conclude that the Project site is part of landscape that meets the definition of a tribal cultural resource,” and that the individual resources known to be located on the Project site are not significant. (EIR p. 2-12) The EIR discounts Tribal knowledge and oral tradition as supported by only “limited scientific analysis and ethnographic data.” (EIR p. 4.5-7) But, in fact, some 73 cultural resources have been recorded within a one- mile radius of the Project site, of which at least 62 were Native American resources. (EIR p. 4.5-6) In addition, five archaeological resources occur at the Project site itself, each containing various artifacts. (EIR p. 4.5-7 to 4.5-13) Historical records, prior cultural resources studies, and the studies prepared for this Project thus appear to support the assertion the Project area is part of a tribal cultural landscape.

C-47

The EIR improperly piecemeals consideration of impacts to cultural resources, listing the cultural resources found at each building site separately, and then concluding based on this separate consideration that the resources known to occur onsite do not support a finding of significant impacts or inclusion in a tribal cultural landscape. As with biological resources above, the opinion of experts as to the significance and mitigability of cultural impacts in the Appendices attached and in the EIR’s conclusions may be different if the entire site and all effects were considered. The EIR must be revised to jointly consider and propose an impact determination as to the effect of the whole Project to cultural resources.

C-48

Given the proposed conversion of land to industrial uses, and anticipated blasting and substantial grading work planned to occur at the site prior to development, it is essential any potential impacts be fully considered, disclosed, and mitigated before Project approval. There appears to be ample substantial evidence provided by the Tribe and prior cultural resource surveys to find a significant impact to tribal cultural resources.

C-49

G. GEOLOGICAL RESOURCES/ SOILS

Substantial earthwork is needed for the Project. At the Building D Site, the plan includes grading to site the project approximately 17 feet below ground elevation and to manufacture slopes up to 17 feet in height with an incline of 47.8% and retaining walls from 4- 12 feet along the southern and western boundary. At the Building E Site, the plan includes manufactured slopes ranging from 4-15 feet; retaining walls ranging from 1-7 feet; and a mechanically stabilized earth wall up to 18 feet along the west and south sides of the proposed water quality basin.

C-50

The EIR states there is no potential for landslides to occur on or adjacent to the site as there are no steep or manufactured slopes. (EIR p. 4.6-8, 4.6-13 to -14) Furthermore, the EIR states a less than significant impact would occur from a change of topography or from creating slopes greater than 2:1 or higher than 10 feet. (EIR p. 4.6-15 to -16) Given plans for Project development containing steep slopes with a maximum incline of 47.8% and 2:1 up to 12 and 14 feet tall; and requires building of retaining walls; both findings are unsupported by substantial

C-51



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evidence. Impacts should be found significant based on the thresholds applied and evidence in the record.

C-51
(cont.)

To reduce or avoid this impact, an alternative or mitigation measure should be considered whereby the Project building pads are substantially reduced such that gradual sloping may occur within setback areas.

C-52

H. GREENHOUSE GAS EMISSIONS

The EIR improperly finds impacts from GHG emissions would be less than significant. The Project is estimated to generate 24,617.57 metric tons of CO2 equivalent emissions per year, far in excess of any screening thresholds.

C-53

The EIR relies on compliance with the County’s Climate Action Plan to determine that GHG impacts would be less than significant. But the County’s CAP only addresses impacts and compliance with reduction targets up to 2020. (EIR p. 4.7-26 to -27) There is no evidence that compliance with the CAP would meet longer term emissions targets including those established in Executive Order B-30-15, which seeks to reduce GHG emissions in the state to 40 percent below 1990 levels by 2030; and 80 percent below 1990 levels by 2050.

C-54

As noted in *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 223, “over time consistency with year 2020 goals will become a less definitive guide, especially for long-term projects that will not begin operations for several years. An EIR taking a goal-consistency approach to CEQA significance may in the near future need to consider the project’s effects on meeting longer term emissions reduction targets.” Where Project operation is anticipated to commence in 2020, consistency with the CAP meeting 2020 goals is an utterly inadequate measure to demonstrate compliance with longer term emission reduction targets. (*See also, Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2014) 231 Cal. App. 4th 1056 [finding evaluation of GHGs impacts mandates evaluation of achievement relative to statewide emission targets].)

C-55

For these reasons, the GHG impact of this Project should be found significant, and the EIR must propose mitigation measures which would substantially reduce Project emissions. At a minimum, installation of a meaningful amount of PV at the site to offset electricity demand, and installation of EV charging station for passenger vehicles and trucks, should be adopted to mitigate for Project GHG impacts.

C-56

I. HAZARDS/HAZARDOUS MATERIALS

Regarding airport hazards, the EIR states airspace review is required for object greater than 70 feet tall. In fact, ALUC review was required by the FAA Obstruction Evaluation Service for development to 44 feet, and for a proposed height increase to 55 feet. (ALUC Agenda Item 3.2, May 11, 2017, <http://www.rcaluc.org/Portals/0/aluc_agenda_051117.pdf?ver=2017-04-27-140245-500>, EIR p. 4.8-18) The EIR should disclose why the ALUC was required to consider

C-57



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plans to develop to 55 feet where the height would not exceed the 70 feet stated to mandate review. The EIR should also disclose that the Project proposed would develop up to 55 feet in height, not the 44 feet disclosed and evaluated throughout the EIR.

C-57
(cont.)

In evaluating potential Project impacts, the EIR states at page 4.8-13 that only the Building D site was reviewed by the ALUC; there is no discussion of Building E. In fact, a height increase for both buildings was proposed and considered. (*Id.*) This error should be corrected. Absent consideration of the whole Project, the proposed finding the Project is consistent with the ALUCP and would not create a hazard is not supported by reasoning or evidence.

C-58

The EIR also inadequately considers hazard impacts during construction where the Project would require routine transport of ANFO to the site. First, the EIR concludes no impacts would occur because contractors would have to comply with regulations; but the EIR fails to provide the information needed to reach this conclusion. (EIR p. 4.8-10) What do those regulations require? How will the Project comply? This needed information is omitted.

C-59

Second, the public services section of the EIR acknowledges fire department response times would be inadequate to the Project site. (EIR p. 4.13-7 to -8) The EIR fails to consider potential hazard impacts in the event of accident where these response times could not be met. For each of these reasons, the EIR fails to provide needed information, and construction hazard impacts may be significant.

C-60

J. HYDROLOGY/ WATER QUALITY

The Project would modify drainage onsite through the removal of two ephemeral streams. While the EIR considers potential impacts on site, it fails to consider potential off-site impacts from eradicating these drainages and substantially altering the drainage pattern of the area.

C-61

K. LAND USE

The EIR concludes the Project's conversion from CD-BP to CD-LI is not regarded as a substantial alteration to planned land uses for the Project site. But as noted in the EIR, CD-BP does not allow high-cube warehousing but instead allows for a variety of uses including research and development, technology centers, corporate offices, clean industry, and supporting retail uses. The modification to high-cube warehouse and truck intensive uses should be considered a substantial alteration of the planned land use.

C-62

The EIR also concludes repeatedly that, "Because the Project would not expose the rural residential land uses located south of the Project site to substantial adverse environmental effects during construction or long-term operation, the Project would not be incompatible" with the abutting rural residential and light agriculture zones, or rural residential uses. (EIR p. 4.10-7 to -8) Given the substantial impacts to adjacent land uses, and for the reasons discussed herein, the

C-63



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EIR should be revised to consider incompatibility (individual and cumulative) with adjacent land uses given the substantial adverse impacts of the Project on adjacent uses.

↑ C-63
(cont.)
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Further, non-compliance and incompatibility with General Plan’s Healthy Community Element is given inadequate consideration in the EIR. In particular, the Project is inconsistent with:

- Policy HC 14.2- When feasible, avoid locating new sources of air pollution near homes and other sensitive receptors.
- HC 1.1 – Foster the overall health and well-being of County residents, particularly the most vulnerable populations.
- HC 2.1 (b), 4.1, 10.1, 10.2 concerning access to open space and recreation.

← C-64
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These inconsistencies must be addressed in the EIR. Environmental justice should also be considered within the EIR.

← C-65
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Inconsistency with the WRCOG Good Neighbor Guidelines should also be evaluated in the EIR. (“Good Neighbor Guidelines For Siting New and/or Modified Warehouse/Distribution Facilities,” 2005, <<http://www.wrcog.cog.ca.us/DocumentCenter/View/318>>) The Good Neighbor Guidelines specifically recommend the following strategies not implemented with this Project:

- Create buffer zone of at least 300 meters (roughly 1,000 feet, can be office space, employee parking, greenbelt) between warehouse/distribution center and sensitive receptors (housing, schools, daycare centers, playground, hospitals, youth centers, elderly care facilities, etc.);
- Site design shall allow for trucks to check-in within facility area to prevent queuing of trucks outside of facility;
- Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points;
- Design warehouse/distribution center so that interior vehicular circulation shall be located away from residential uses or any other sensitive receptors.

← C-66
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L. NOISE

Page 1 of the Noise section (4.11) of the EIR is erroneously replaced with page 51. This typographical error should be corrected in the final EIR.

← C-67
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Noise receptor and measurement locations seem arbitrarily chosen and do not include some of the most effected properties along Redwood Drive. Additional receiver locations should be considered.

← C-68
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COMMENT LETTER C

1. Construction Noise is Inadequately Evaluated and Mitigated

The EIR failed to evaluate and disclose significant sources of noise impacts from grading where blasting is required. First, the EIR omitted noise from rock drills where over 5,000 holes are needed in the largest area in order to place charges. (EIR p. 4.11-20 to -21) Rock drills emit noise of over 80 dBA Lmax at 50 feet. (Federal Highway Administration Construction Noise Handbook Chapter 9, Construction Noise <https://www.fhwa.dot.gov/ENVIRONMENT/noise/construction_noise/handbook/handbook09.cfm> [80-83 dBA];, Highlands Ranch SEIR, County of San Diego, <http://www.sandiegocounty.gov/dplu/docs/0219021-Ch3.4.pdf>. P. 3-53 [estimating drill noise at 86 dBA based on 2007 Acoustical Report])

C-69

Second, the EIR fails to evaluate the pre- and post- blast horn signals occurring over a few seconds. (EIR p.4.11-11, 4.11-20 to -21) The noise levels of these horn signals are not disclosed or evaluated in the EIR.

C-70

Third, the noise from rock crushers is likewise not considered in the construction noise impact assessment. (EIR p. 4.11-20 to -21) “Rock crushing operations can generate potential noise levels up to 86.5 decibels at 50 feet.” (Highlands Ranch SEIR, County of San Diego, <http://www.sandiegocounty.gov/dplu/docs/0219021-Ch3.4.pdf>. P. 3-52) The EIR must be revised to include these non-standard pieces of needed construction equipment in its evaluation of Project noise impacts.

C-71

Fourth, with respect to blasting noise, “much of the acoustic energy released by blasting is in the form of very low frequency sound that is inaudible to humans” but creates a pressure change that “can rattle windows and produce a startle effect.” (Noise Analysis, Las Pilitas Rock Quarry, March 15, 2010, http://www.slocounty.ca.gov/Assets/PL/environmental/Oster_Las+Pilitas+Quarry+Conditional+Use+Permit/Studies+Provided+by+Applicant/Noise+Analysis+Revised+Final.pdf. p. 10-12) The EIR failed to account for these impacts. Measuring noise impacts only to an A-weighted metric and with respect to vibration, as was done here, fails to address this sound associated with blasting from this “air- overpressure” or “airblast.” (*Id.* at p. 10-12, See also, Transportation and Construction Vibration Guidance Manual, California Department of Transportation, 2014, http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf. p. 67.)

C-72

The EIR should be revised to account for impact from air-overpressure. The Caltrans guidelines for blast noise are useful in providing measurement guidelines and standards for annoyance associated to address air overpressure to evaluate this potentially significant impact. (Noise Analysis, Las Pilitas Rock Quarry, p. 29, [*citing* Transportation- and Construction- Induced Vibration Guidance Manual, California Department of Transportation, 2004]; Transportation and Construction Vibration Guidance Manual, California Department of Transportation, 2014 http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf. p. 75)

C-73



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Additional mitigation should also be incorporated to address blasting impacts. Such mitigation may include:

1. Identifying potential problem areas surrounding the project site
2. Determining the conditions that exist prior to commencement of construction
3. Informing the public about the project and potential blasting-related consequences
4. Scheduling the work to reduce adverse effects
5. Designing the blast to reduce vibration and air over pressure
6. Using blast signals to notify nearby residents that blasting is imminent.
7. Monitoring and recording the vibration and air overpressure effects of the blast
8. Responding to and investigating complaints

C-74

Vibration impacts are measured pursuant to County standard of 0.01 in/ sec. The EIR cites Riverside County General Plan Policy N 15.3; in fact, this should read N 16.3. (EIR p. 4.11-18) Despite adopting this threshold for vibration impacts for construction noise, the EIR adopts a second threshold of 3.0 in/ second for vibration from blasting. The County's vibration threshold should be applied to all construction impacts, general construction and blasting alike.

C-75

As in the air quality analysis, the EIR measures noise impacts to a distance of 191 feet despite homes and residential uses being located *adjacent* to the site. Noise impacts should be measure to the residential property line.

C-76

Construction noise impacts at night are inadequately considered where it is likely night-time construction will be needed.

C-77

Mitigation Measures proposed to address construction noise are impermissibly vague. For instance, MM4.11-2 (e) only requires preparation of a haul route exhibit but fails to include any alternatives or performance standards to ensure noise impacts associated with haul trips are reduced/ avoided. Mitigation should be incorporated requiring noise be reduced below applicable standards and that no haul trips access the site from the south from Markham along Decker/ Ellsworth.

C-78

2. Operational Noise is Inadequately Evaluated and Mitigated

The EIR evaluation of stationary operational noise impacts seemingly occurs in a vacuum without consideration of existing ambient noise at receptor sites. The EIR merely estimates noise of 67.2 dBA Leq and then estimates noise attenuation by distance from the site. There is no disclosure or analysis of total anticipated noise levels to receptors when the Project noise is added to ambient noise in the area. No evidence supports the findings operational noise impacts will be less than significant or mitigated below significance absent this inquiry.

C-79

Distances for attenuation purposes were also artificially reduced by measuring from loading docks to residences, not from the property line to the property line, or from onsite driveways/roads, parking, etc. (Table 4.11-12 fn.3) As discussed above, there is no basis for assuming residents will remain within their homes and not make use of the remainder of their properties. Hence noise impacts must be measured to the property line of residences.

C-80



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Further, there is no basis for assuming noise will not be generated in any areas onsite other than the loading docks. For example, back-up beepers from trucks produce 97-112 decibels of noise, and would be in operation 24/7. (Wikipedia <https://en.wikipedia.org/wiki/Back-up_beeper>). Vehicle doors opening and closing, people talking, and other activities in parking areas would also generate noise 24/7. Hence noise impacts must be evaluated as occurring adjacent to residential uses, not the conflated 191 feet relied on in the EIR.

C-81

The EIR states, “the Project would also not comply with General Plan Policy N6.3 without installation of the 8-foot high wall, which is a policy that truck delivery hours be limited when adjacent to noise-sensitive uses.” (EIR p.4.11-22) This reasoning (or lack thereof) is flawed. The EIR fails to show that installation of a wall somehow limits truck delivery hours to render the Project in compliance with this policy, which states: “N 6.3 Require commercial or industrial truck delivery hours be limited when adjacent to noise-sensitive land uses unless there is no feasible alternative or there are overriding transportation benefits.” While a wall may reduce noise impacts, the Project would nevertheless be inconsistent with this General Plan Policy. Mitigation should be adopted limiting truck delivery hours adjacent to noise sensitive uses to comply with this General Plan Policy.

C-82

The EIR also states that the 8-foot wall would mitigate impacts from Building D; but no similar conclusion is reached for Building E despite the EIR stating attenuation would be provided by these walls at both sites.

C-83

MM 4.11-3 requires construction of a noise barrier only vaguely along the “southwestern and southeastern corners” of the Building D site. The location and length of this noise barrier along the Project’s property lines must be clarified.

C-84

3. Operational Traffic Noise is Inadequately Evaluated

The pervasive, flawed assumption in the EIR that all truck traffic, and most vehicle traffic, will travel north and east from the Project site, and not south on Decker/Ellsworth, likewise infects the noise analysis. Either design and mitigation measures should be implemented preventing the use of Decker/ Ellsworth south of the site, or this assumption should be discarded.

C-85

The EIR omits evaluation of traffic noise impacts relative to exceedences of General Plan standards. Project traffic noise is shown to exceed 65 dBA Leq and even the 70 dBA CNEL industrial threshold, and should accordingly be found significant.

C-86

Mitigation should be required for on- and off- site traffic impacts. For instance, a measure may be implemented requiring the Project applicant improve on-site and off-site roadways utilizing rubberized asphalt concrete. (See, “Rubberized Asphalt Concrete (RAC) Benefits,<<http://www.calrecycle.ca.gov/tires/rac/Benefits.htm>>[rubberized asphalt results in traffic noise reductions of 40 to 88 percent].)

C-87

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COMMENT LETTER C

M. RECREATION/ RECREATIONAL TRAILS

The EIR finds a less than significant impact would occur with respect to trails based on no substantial evidence, but rather reasoning, “the Project would not preclude the County’s ability to establish a planned community trail along other road segments in the community.” This conclusion fails to evaluate potential impacts to use of these trails where they would now be located adjacent to (on Oleander and Ellsworth) high-truck use warehouse facilities. The EIR should evaluate potential impacts to not only *development* of any trails but whether or not they may be *used*, and used safely. A focus in this rural agricultural area should include whether any trails would safely accommodate resident, bicyclist, and/ or equestrian use in close proximity to heavy duty trucks. The health risks of use of recreational trails adjacent to diesel PM sources should also be considered. These impacts are likely significant and may require mitigation.

C-88
C-89
C-90

Mitigation should be adopted to reduce impacts to recreational trails in the form of off-site replacement of recreational trails, expanding the width of trails, and preventing truck use of Decker/ Ellsworth.

N. TRANSPORTATION/ TRAFFIC

Table 4.15-5, I-215 Southbound traffic from Alessandro Blvd. to Cactus Ave. shows the Project would reduce traffic volumes from 4,985 to 534. This appears to be a modeling error or typo that needs to be corrected.

C-91

As discussed herein, the EIR unreasonably assumes no passenger cars or trucks will use Decker/ Ellsworth to access the Project site. (Figures 4.15-8, 4.15-9) There is certainly nothing preventing such use. In fact, the EIR states it will be required to be improved to its full right of way adjacent to the Project site. (EIR p. 3-25) In any case, the EIR must be revised to assume some use of Decker Road/ Ellsworth Street to Markham Street, or, alternatively, implement measures to prevent such access.

C-92

Moreover, impacts of use of Decker/ Ellsworth south of the Project boundaries should be considered where roadway improvements are not required beyond the Project boundaries and where this roadway is an unimproved dirt road to Markham Street. For instance, dust/air quality impacts, noise from speed bumps and pot holes, water quality, and other related effects must be considered.

C-93

Traffic impacts are artificially limited to evaluation of the immediate Project area, where the Project may impact a greater geographical area. Specifically, the EIR inadequately considers southbound traffic trips to use Cajalco Road (aka Cajalco Expressway) as an east/ west route. Cajalco Road is located just 1.2 miles south of the site and is regularly a faster route to/ from the Ports than northbound on I-215. Furthermore, as noted in the EIR, the County of Riverside does not designate truck routes.

C-94



COMMENT LETTER C

The EIR also inadequately assesses the effect of cut-through traffic to the City of Riverside, including use of Van Buren and Alessandro Boulevards to travel between the I-215 and SR-91. These roadways should be included in any impact evaluation.

C-95

Traffic and hazard impacts are inadequately considered where significant truck stacking on Harvill and other roadways currently occurs. Further, the EIR fails to consider hazard impacts of school drop-off and commutes to Citrus Hills High School.

C-96

O. PALEONTOLOGICAL RESOURCES

The northeastern corner of the Building D site is designated as having high paleontological sensitivity. Yet MM 4.17-1 defers creation of a mitigation program (PRIMP) without adequately incorporating alternative or performance standards to avoid significant effects.

C-97

P. ENERGY CONSUMPTION

The Project would consume a substantial amount of energy annually, that can be at least partially off-set by installation of solar paneling on the rooftop and/or parking areas at the Project site. Despite solar being feasible and able to off-set the cost of electricity to the Project, the EIR states the Project proposes to incorporate just 1 KW of solar, less than needed for the average home. A 1 MW solar installation should be required for the Project to reduce its energy consumption.

C-98

Q. ALTERNATIVES

The No Project/ Existing General Plan Designation Alternative considered development at the site as near in use as the proposed Project despite a multitude of potential uses under existing designations. In fact, the site is predominantly designated CD-BP which, according to the General Plan, allows for “employee-intensive uses, including research and development, technology centers, corporate and support office uses, clean industry supporting retail uses.” Even the portion of the site CD-LI allows “a wide variety of industrial and related uses, including assembly and light manufacturing, repair and other service facilities, warehousing, distribution centers, and supporting retail uses.” The assumption development would occur as similar general warehouse and industrial park is not supported given the variety of permitted uses.

C-99

Furthermore, the BP designation acts as a buffer between Very Low Density Residential uses to the south and west and LI to the east. At a minimum, the EIR should evaluate a No Project/ Existing General Plan Designation alternative that would develop a compatible BP land use within this area. Consideration of a BP use in lieu of high-cube warehousing is likely to reduce operational effects of the Project to land use/ planning, as well as air quality, traffic, and traffic noise due to reduced truck trips and associated NOx and diesel PM emissions.

C-100

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COMMENT LETTER C

R. JOBS

While the EIR need not evaluate jobs, if a job estimate is provided, as here, it should be accurate. The EIR estimates the Project will create 1,081 permanent jobs. Job creation is likely much lower-- closer to 1/3 of prior estimates, or 300 jobs or less—due to warehouse automation. (See, “Moreno Valley Logistics Center Economic and Fiscal Impact Report, June 2016 <<http://morenovalleyca.iqm2.com/Citizens/FileOpen.aspx?Type=4&ID=5034&MeetingID=2387>> p. 22 [estimating 340 new jobs for 1.7 million square feet of warehousing if in warehousing in Moreno Valley, approximately ½ compared to if developed in manufacturing], Appendix D; “Warehouses promised lots of jobs, but robot workforce slows hiring,” December 4, 2016. <<http://www.latimes.com/projects/la-fi-warehouse-robots/>>) Furthermore, warehouse jobs, “typically pay less than a living wage, are often temporary, and do not provide health-care benefits, according to researchers at the University of California, Riverside” (“Studies find warehouse jobs pay poorly, lack health insurance,” July 22, 2015. <<https://phys.org/news/2015-07-warehouse-jobs-poorly-lack-health.html>>) Particularly where the tenants of the proposed Project are unknown, the quality and quantity of likely employment opportunities from Project development should be reasonably estimated based on current trends.

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C-101
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III. CONCLUSION

The EIR must be substantially revised and recirculated to correct the significant errors and omissions referenced herein. Additional mitigation should also be incorporated into any future proposal.

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C-102
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We appreciate the opportunity to offer comments on this Project, and thank you for your consideration of these comments.

←
C-103
←

Sincerely,

Kimberly Foy
JOHNSON, SMITH & FOY



COMMENT LETTER C

Attachments and Electronic Citations

- (1) ALUC May 11, 2017 Agenda Item 3.2.
<http://www.rcaluc.org/Portals/0/aluc_agenda_051117.pdf?ver=2017-04-27-140245-500>.
- (2) “When the Going Gets Hot, Construction Workers Get Nocturnal,” June 29, 2016.
<www.npr.org/2016/06/29/483843456/when-the-going-gets-hot-construction-workers-get-nocturnal>
- (3) “How and why environmental noise impacts animals: an integrative, mechanistic review,” 2011. <<http://onlinelibrary.wiley.com/doi/10.1111/j.1461-0248.2011.01664.x/full>>.
- (4) “Synthesis of Noise Effects on Wildlife Populations,” 2004.
<https://www.fhwa.dot.gov/Environment/noise/noise_effect_on_wildlife/effects/effects.pdf>
- (5) “Federal Highway Administration Construction Noise Handbook Chapter 9, Construction Noise.”
<https://www.fhwa.dot.gov/ENVIRONMENT/noise/construction_noise/handbook/handbook09.cfm>
- (6) “Good Neighbor Guidelines For Siting New and/or Modified Warehouse/Distribution Facilities,” 2005.
<<http://www.wrcog.cog.ca.us/DocumentCenter/View/318>>
- (7) Highlands Ranch SEIR, County of San Diego.
<<http://www.sandiegocounty.gov/dplu/docs/0219021-Ch3.4.pdf>>
- (8) Noise Analysis, Las Pilitas Rock Quarry, March 15, 2010.
<http://www.slocounty.ca.gov/Assets/PL/environmental/Oster_Las+Pilitas+Quarry+Conditional+Use+Permit/Studies+Provided+by+Applicant/Noise+Analysis+Revised+Final.pdf>
- (9) “Transportation and Construction Vibration Guidance Manual,” California Department of Transportation, 2014.
<http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf>
- (10) Wikipedia “Back-Up Beeper.” <https://en.wikipedia.org/wiki/Back-up_beeper>
- (11) “Rubberized Asphalt Concrete (RAC). Benefits,” <<http://www.calrecycle.ca.gov/tires/rac/Benefits.htm>>
- (12) “Moreno Valley Logistics Center Economic and Fiscal Impact Report, June 2016
<<http://morenvalleyca.iqm2.com/Citizens/FileOpen.aspx?Type=4&ID=5034&MeetingID=2387>>
- (13) “Warehouses promised lots of jobs, but robot workforce slows hiring,” December 4, 2016. <<http://www.latimes.com/projects/la-fi-warehouse-robots/>>
- (14) “Studies find warehouse jobs pay poorly, lack health insurance,” July 22, 2015.
<<https://phys.org/news/2015-07-warehouse-jobs-poorly-lack-health.html>>

C-104



COMMENT LETTER D



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Via Email and Overnight Mail

July 5, 2017

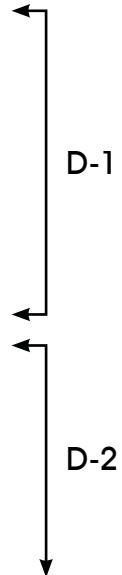
Riverside County Planning Department
Attn: Russell Brady
4080 Lemon Street, 12th Floor
P.O. Box 1409
Riverside, CA 92502-1409
rbrady@rivco.org

Re: Draft EIR for Knox Business Park Buildings D and E, GPA 1151 and 1152, CZ 7872 and 7873, PM 36950 and 36962, PP 25837 and 25838 (SCH2015081081)

Dear Mr Brady:

I am writing on behalf of the Laborers International Union of North America, Local Union 1184 and its members living in Riverside County (“LiUNA”), regarding the Draft Environmental Impact Report (DEIR) prepared for the Project known as **Knox Business Park Buildings D and E**, GPA 1151 and 1152, CZ 7872 and 7873, PM 36950 and 36962, PP 25837 and 25838 (SCH2015081081), including all actions related or referring to the construction of a 702,645 sf and 555,615 sf warehouse/distribution centers and all other necessary and required improvements to the project site and adjacent roadways on approximately 70.70 acres in three phases near the City of Perris near cross streets Oleander Avenue and Decker Road. (“Project”).

We have reviewed the DEIR and conclude that it fails to comply with the California Environmental Quality Act (CEQA) in that it fails to adequately describe the Project, fails to properly describe the environmental setting, fails to adequately describe the environmental impacts of the Project, and fails to analyze all feasible mitigation measures and alternatives to reduce Project impacts. For these reasons, we ask the County to prepare a revised draft environmental impact report (RDEIR) to cure these defects. Thank you for considering our





COMMENT LETTER D

July 5, 2017

CEQA Comment of LiUNA on Knox Business Park Project (SCH2015081081)

Page 2 of 3

comments. Please inform us of any response to comments, any future CEQA documents concerning the Project and any hearings related to the Project. Thank you.

↑ D-2
← (cont.)

Sincerely,

Richard Drury
Lozeau | Drury LLP



COMMENT LETTER E

RAMV.ORG
PO Box 2433
Perris, CA 92572
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July 5, 2017

Russell Brady - Project Planner
Riverside County Planning Department
4080 Lemon Street, 12th Floor
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**Re: Opposition to Draft Environmental Impact Report No. 546 for proposed Knox
Business Park Buildings D and E**

The Rural Association of Mead Valley (RAMV.org) representing over 19,000 residents of the rural community of Mead Valley is adamantly opposed to General Plan Amendment 1151 & General Plan Amendment 1152 and zone changes 7873 & 7872 that proposes to build two logistics high-cube Industrial Warehouses on 58.6 acres of land directly adjacent to rural homes along Redwood Drive in Mead Valley. The project is located south of Oleander Avenue, north of Redwood Drive, east of Day Street, and west of Harvill Avenue. Ellsworth Street / Decker Road transects the Project site.

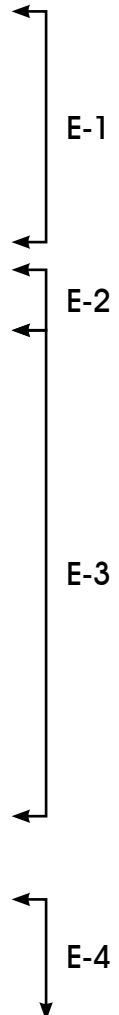
There is another choice. RAMV.org recommends the NO Project Alternative – to leave the area as open space and protect the wildlife corridor. The second choice would be to retain the existing land use of Business Park and Rural Residential. Business Park zoning would allow smaller businesses that create real jobs, sales taxes and operate from 8:00am to 6:00 pm not 24-7. This zoning follows the Riverside County General Plan – Mead Valley Area Plan and vision for the area. Any buildings should allow for a substantial buffer between rural homes and businesses. The Business Park alternative would reduce the operational effects of the project substantially reducing truck trips, air pollution, traffic, noise, truck idling times, diesel particulate PM and NOx emissions.

Business Park zoning acts as a buffer between Very Low Density Residential A-1-1 Zoning to the south and west of the project and Light Industrial along Harvill Ave.

"Business Park (BP) - The Business Park land use designation allows for employee-intensive uses, including research and development, technology centers, corporate and support office uses, clean industry and supporting retail uses. Building intensity ranges from 0.25 to 0.6 FAR" (Riverside County General Plan – Mead Valley Area Plan).

Policies:

The following policies apply to Industrial and Business Park designated properties within the Community Development General Plan Foundation Component, as further depicted on the area plan land use maps.





COMMENT LETTER E

Community Design

LU 30.2 Control heavy truck and vehicular access to minimize potential impacts on adjacent properties.

↑ E-4
(cont.)
←

Most of the project is designated Business Park (BP) Land Use in the Riverside County General Plan.

| | | |
|--------------------|-----------------|--|
| Business Park (BP) | 0.25 - 0.60 FAR | <ul style="list-style-type: none"> Employee intensive uses, including research & development, technology centers, corporate offices, "clean" industry and supporting retail uses. |
|--------------------|-----------------|--|

E-5

Light Industrial (LI) Land Use.

| | | |
|-----------------------|-----------------|--|
| Light Industrial (LI) | 0.25 - 0.60 FAR | <ul style="list-style-type: none"> Industrial and related uses including warehousing/distribution, assembly and light manufacturing, repair facilities, and supporting retail uses. |
|-----------------------|-----------------|--|

PROJECT

The Project proposes to build two high-cube logistics warehouses totaling 1,113,627 square feet. Building "D" is a 702,645 square foot located to the east of Ellsworth Street and south of Oleander on 37.1 acres; and Building "E" is a 410,982 square foot building to the west of Ellsworth and south of Oleander on 21.5 acres.

- General Plan Amendment (GPA) No. 1151 proposes to change the General Plan designation from Community Development- Light Industrial (CD-LI) and Community Development Business Park (CD-BP) to entirely CD-LI.
- Change of Zone No. 7873- a Zone Change for Building E site from (RR) Rural Residential ½- acre lot sizes and (IP) Industrial Park to (IP) Industrial Park.
- GPA No. 1152- seeks to change the General Plan Land Use Designation from CD-BP Community Development Business Park to CD-LI Community Development Light Industrial.
- Change of zone No.7872 for building "D" from (MM) Medium Manufacturing and (RR) Rural Residential to (IP) Industrial Park.

E-6

The project site Plot Plans for Buildings E and D contain parking spaces for 331 trucks and trailers—251 at Building Site D and 80 at Building Site E. The Project will also contain 160 loading docks-- 109 at Building D and 51 at Building E. The Plot Plans in Draft EIR 546 indicate that Building E and D will be located directly adjacent to rural residential properties along the southern property boundary line. These types of high cube logistics warehouses operate 24 hours a day and 7 days per week.



COMMENT LETTER E

After reviewing the Draft EIR 546 a large number of major flaws are readily apparent in this document that raise a number of health and safety concerns to the residents of our rural neighborhoods, Community of Mead Valley, surrounding Communities of Greater Lake Mathews, Greater Mead Valley, Woodcrest, Orangecrest and the City of Riverside

E-7

There currently is a similar Knox Business Center high cube warehouse at 17789 Harvill that has multiple tenants, which is creating enormous delays in trucks staging (queuing) outside of the facility. More than 30 trucks have been observed lining up on Harvill Ave and along the Harley Knox overpass with their engines idling for hours as they wait their turn to enter this facility. This is causing a traffic nightmare, CARB violations, and safety hazard on Harvill Ave. as these trucks are idling for hours at a time and blocking traffic as cars are turning left from Harley Knox onto Harvill Ave. Some near accidents have been observed. Harvill Ave. was never built to County width standards and therefore trucks cannot park along Harvill Ave. without being in the right lane of traffic.

E-8

First

The Draft EIR is flawed at it fails to mention that Building D and E are built to accommodate more than one tenant. The Buildings have two entrance gates and truck access locations along Old Oleander Ave. There are two offices on the northeast gates and northwest side of each building. There are two separate loading docks and parking spaces on each side of the buildings. Oleander is 78' in width with 2 lanes. See Figure 3-8, Plot Plan No. 25838. Old Oleander is the primary access for both Building E and D requiring arriving trucks to enter the facilities turning left into all of the truck entrances. Traffic studies Appendix J1 Traffic Impact Analysis. "Consistent with the 2015 Traffic Study, the ITE High-Cube Warehouse / Distribution Center land use (ITE Land Use Code 152) has been utilized for the purposes of this supplemental analysis" It is unclear as to what information has been updated and what information is still contained from the 2015 traffic study. Various maps show Building E with outdated Plot Plan information and inaccurate outdated traffic assumptions. The traffic study is confusing and based on old outdated information from 2015 performed over 2 years ago. Since this study was created there have been numerous warehouses that have opened up along Harvill Ave. and the Harley Knox Blvd interchange. The fact that Harvill Ave. is undersized cannot be over stated. Trucks cannot park along this street without blocking the right hand lane.

E-9

E-10

Old Oleander is also undersized for these types of logistics warehouses. Entrances have short distances between them which will make it difficult for trucks try to turn left into the four truck driveways. The center continuous left-turn lane will only support a few trucks at a time. It is quite possible that trucks will be forced to queue along the shoulder of Old Oleander Road and then try to turn left into one of the four driveways as other trucks are trying to turn left into a driveway just down the street.

E-11

Oleander is an Industrial Collector and is designated to have 2 lanes and have a minimum right-of-way of 78-feet. Industrial Collectors are circulatory streets with a continuous left-turn lane with at least one end connecting to a road of equal or greater classification.

E-12

Decker Road – Decker Road is a north-south oriented roadway bisecting the Project. The Project proposes to construct Decker Road from Oleander Avenue to the southern Project boundary at its

E-13



COMMENT LETTER E

ultimate full section width as a secondary highway (100-foot right-of-way). The Draft EIR does not adequately address the fact that Decker road south of the project boundaries is a non-dedicated unimproved dirt road. Trucks will be driving down a narrow street with 3 speed humps, pot holes, uneven surfaces, dust, mud and no painted markings on the road. No stop sign or street sign at Markham Street. Decker Road is not suitable for heavy truck traffic 24-7 and the noise pollution, air pollution, vibration and Jake Brake noise created from these trucks will destroy the quality of life for thousands of rural residents who live along the routes that these trucks will be driving. The Draft EIR does not analyze or address this in the traffic study or any other appendices or reports.

E-13
(cont.)

Traffic conditions have changed dramatically since this study was performed in 2015. The Draft EIR is flawed and a new current traffic study must be performed to adequately address the numerous flaws in this study.

E-14



E-15

Harvill Ave right hand lane blocked as trucks are trying to gain entry into the logistics warehouse at Harvill X Old Oleander Road. Trucks are blocking traffic as cars are turning left from Harley Knox onto Harvill Ave. There were a number of near accidents caused by these trucks stopped in the right lane of traffic.

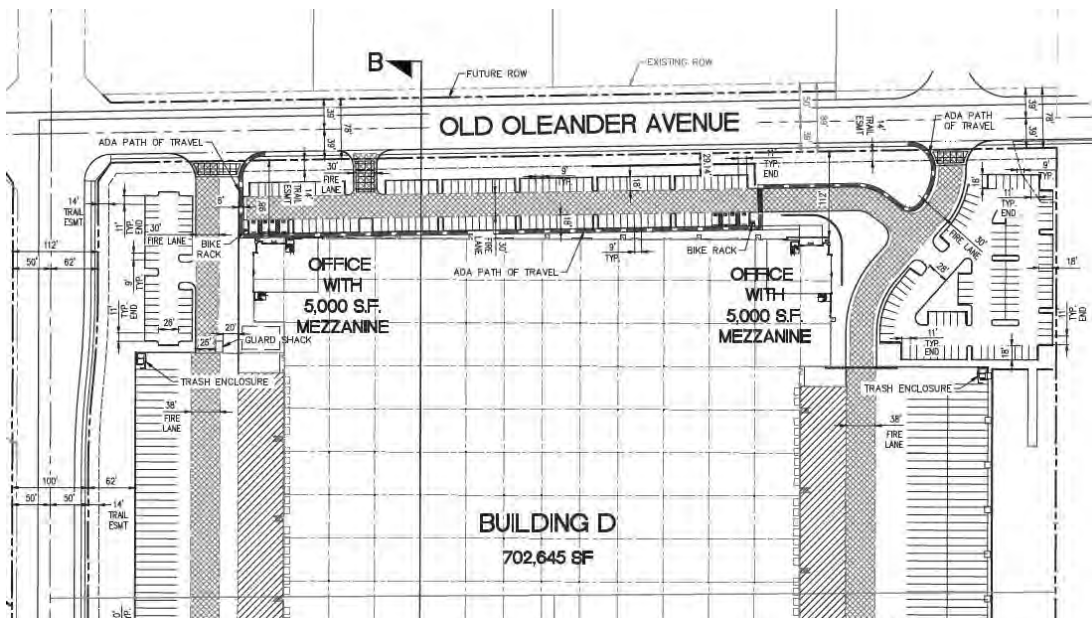


COMMENT LETTER E



Truck blocking Harvill as the driver turns left from the center median to get into the warehouse gate entrance at 17789 Harvill Ave. This is the same type of conditions that trucks will incur trying to turn left from Old Oleander into the driveways of Building E and D and not addressed in the Draft EIR.

E-16





COMMENT LETTER E

The Draft EIR 546 fails to analyze the impacts from multiple tenants and inadequately analyzes truck queuing and staging areas along Old Oleander Ave. or perhaps Decker Road. These proposed warehouses will be operating 24 hours per day and 7 days per week directly adjacent to rural homes.

E-17

Second.

The project seeks to combine a number of parcels together with various zoning and land use designations to create 2 large parcels in order to build two distinct high cube logistics warehouses. These two high cube warehouses are being considered as one project. **This type of piecemealing or segmentation is not allowed under CEQA. Therefore Draft EIR 546 must be revised and recirculated so that this error to piecemeal the project can be corrected.** The State CEQA Guidelines define a project under CEQA as “the whole of the action” that may result either directly or indirectly in physical changes to the environment. This broad definition is intended to provide the maximum protection of the environment.

E-18

In general, if an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis. The project description should include all project components, including those that will have to be approved by responsible agencies. When future phases of a project are possible, but too speculative to be evaluated, the EIR should still mention that future phases may occur, provide as much information as is available about these future phases, and indicate that they would be subject to future CEQA review.

E-19

CEQA case law has established the following general principles on project segmentation for different project types:

“For a phased development project, even if details about future phases are not known, future phases must be included in the project description if they are a reasonably foreseeable consequence of the initial phase and will significantly change the initial project or its impacts” *Laurel Heights Improvement Association v Regents of University of California* (1988) 47 Cal. 3d 376.

Draft EIR 546 does not mention future Trammel Crow phases for warehouses within the Knox Business Park or the impacts that these future high cube warehouses will have on the surrounding rural neighborhoods, Community of Mead Valley, surrounding Communities of Greater Lake Mathews, Greater Mead Valley, Woodcrest, Orangecrest or the City of Riverside.

E-20

For a linear project with multiple segments such as a highway, individual segments may be evaluated in separate CEQA documents if they have logical termini and independent utility. *Del Mar Terrace Conservancy, Inc. v. City Council* (1992) 10 Cal. App. 4th 712.

For a planning approval such as general plan amendment, the project description must include reasonably anticipated physical development that could occur in view of the approval. *City of Redlands v. County of San Bernardino* (2002) 96 Cal. App. 4th 398.

For a project requiring construction of offsite infrastructure (e.g., water and sewer lines), the offsite infrastructure must be included in the project description. *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App. 4th 713.



COMMENT LETTER E

For modification of a permit for an existing facility, the scope of the project description can be limited to the scope of the permit modification and does not cover the entire facility. *Citizens for East Shore Parks v. State Lands Commission* (2011) 202 Cal.App. 4th 549. (<https://ceqaportal.org/tp/ProjectDiscription03-23-161.pdf>).

E-20
(cont.)

Building Industrial High Cube logistics warehouses at this location will set a precedent for future warehouses in the rural and business park zoned areas next to and nearby this proposed project.

E-21

Third

The EIR assessment for Building "E" on the west side of Decker Road has been modified substantially in the number of parcels, combined lot size and building size. Modification to the Draft EIR for Building "E" describe different scenarios in regards to traffic flow, differing elevation height measurement of the building and various other inconsistencies that affect every aspect of the Environmental Impact Report. This Draft EIR must be rejected because the project description is inaccurate and is described differently in different parts of the document. The approval by the ALUC is also inconsistent and inaccurate with the EIR in the project size and description.

E-22

County of Inyo v. City of Los Angeles (1977) 32 Cal. App. 3d 795:
"EIR was rejected because the project description was inaccurate and was described differently in different parts of the document" (AEP CEQA Portal, CEQA Portal Topic paper)

Project Description in the State CEQA Guidelines.

The project description is addressed in the following sections of the State CEQA Guidelines:
Section 15378 – Defines the term “project” as used within CEQA, and the types of actions that either do or don’t constitute a project for the purposes of CEQA.

Section 15124 – Discusses the types of information about a proposed project that should be included in the Project Description.

Fourth

MVAP 6.1 In conjunction with the first warehousing/distribution building proposed for the industrial area located along Interstate 215 (including land designated Light Industrial, Business Park, and Light Industrial with a Community Center Overlay) whereby the cumulative square footage of warehousing/distribution space in the area would exceed 200,000 square feet, an Environmental Impact Report (EIR) shall be prepared that assesses the potential impacts of the project. The EIR must address air quality, including a health risk assessment of diesel particulates and impacts to sensitive receptors, truck traffic and noise, and the cumulative impacts of reasonably foreseeable warehouse development in the area (Mead Valley Area Plan, pg. 32).

E-23

Draft EIR 546 does not adequately address air quality, including the health risk assessment of diesel particulates and impacts to sensitive receptors, truck traffic and noise, and the cumulative impacts of reasonably foreseeable warehouse development in the area. Impacts such as noise pollution, truck traffic impacts to sensitive receptors (rural residential property) that abuts this project, impacts of using Decker Road which is a unimproved dirt road with speed bumps, pot

E-24



COMMENT LETTER E

holes, uneven surfaces, lack of painted road lines, no stop sign and no road sign. Decker is listed as the secondary access to Buildings D and E. No mention in the EIR that Decker Road will allow trucks from this Project to use a large number of local roads to get to the Ports.

Draft EIR 546 not only fails to meet CEQA guidelines, but also falls short of the Riverside County General Plan - Mead Valley Area Plan for land use with NO buffer between sensitive receptors and Building "D". The total square footage of Building "D" and "E" will be over 1.1 million square feet of high cube warehouses up to 55' tall. The buildings will have very tall slopes up to 17' tall next to homes, a secondary highway and community trail. The EIR does not address the ineffective noise / pollution barriers that will be put in place as an attempt to protect rural residents against harmful cumulative effects of noise pollution, air pollution, light trespass, truck traffic, vibration day and night 24-7.

The EIR fails to address or analyze homes directly south of this project along the hills west of Decker Road. These homes will be directly impacted by the noise pollution, air pollution, rock blasting, vibration and truck traffic. Although these homes will be greatly impacted the property owners were never notified of the General Plan Amendments and zone changes that will greatly impact their lives. This is another example of how sound will be amplified by the sound waves rising above the sound walls and air pollution rising against the hills.



"The Business Park uses on the west side of Harvill Avenue provide a buffer for residential uses to the west" (<http://planning.rctlma.org/Portals/0/genplan/content/ap1/meadvalley.html>).

This proposed project eliminates the Business Park buffer provided through the Riverside County General Plan – Mead Valley Area Plan.

E-24
(cont.)

E-25



COMMENT LETTER E

“A General Plan is required by State law and is the County's over-arching policy document for land use matters. It determines what the housing needs will be, how roads will be placed, and where commercial and industrial uses will be situated throughout the County for the next 20 years and beyond. The General Plan Elements (see Item 1., below) generally discuss countywide policies and plans. The Area Plans (see items 2 and 3, below) within the General Plan address regional issues and policies, to address the special needs of each unique community within the County. Lastly, the Area Plans contain parcel-level maps that indicate the General Plan "land use designation" for each property subject to County jurisdiction. Per State laws, a parcel's zoning will have to be brought into compliance with the General Plan (for example, the site's land use designations) before a project can be approved”
<http://planning.rctlma.org/ZoningInformation/GeneralPlan.aspx>).

E-26

The simplest way to summarize our vision for Riverside County is to say that:
“Riverside County is a family of special communities in a remarkable environmental setting.”
 Riverside County Vision Statement. Pg. V3)

Health

We value the health of our residents. Therefore, we seek to reverse significant negative national health trends so that: 1) children live healthier and longer lives than their parents; 2) air and water quality are improved, 3) respiratory illnesses are reduced so that people spend fewer days out of work and school because of health problems; 4) health care costs have decreased; 5) obesity has decreased; and 6) people are physically active.
 (Riverside County Vision Statement, Pg. V3)

E-27

The Draft EIR for this project for Industrial High Cube Warehouses does not give residents a buffer from this harmful high polluting industry. Children, the elderly, and people with respiratory illness and heart disease are most affected by living next to and near high pollution industries such as logistics warehouses that have large numbers of diesel trucks that create high amounts of particulate matter and other unhealthy toxic gases into the air. Rubber particles from truck tires was never addressed in the EIR. Tire particles are very small and can penetrate deeply into your lungs causing serious health problems. Hundreds of trucks will be traveling on our local rural roads to get to the ports of LA and Long Beach instead of using Harvill to access the I-215 Freeway. Trucks cause excessive wear and tear on our streets increasing tire wear and rubber particles into the air that we breathe.

E-28

E-29

**Mead Valley Area Plan
 Industrial Development**

The Mead Valley Area Plan includes an extensive area westerly of Interstate 215 from Nandina Avenue on the north to Nuevo Road and the Perris city limits on the south that is designated Light Industrial, Business Park, or Light Industrial with a Community Center Overlay. It is the policy of Riverside County to stimulate economic development in this area of Mead Valley. This area has access to Interstate 215 via two interchanges and includes areas that have all of the infrastructure in place to support economic development. However, given the proximity of the rural community and residential uses, the impacts of industrial expansion on localized air quality, traffic, noise, light and glare need to be assessed in order to apply appropriate measures to mitigate impacts so that the environmental quality of the community and residents' health and welfare are maintained (Mead Valley Area Plan, pg. 36).

E-30



COMMENT LETTER E

Policies:

MVAP 6.1

In conjunction with the first warehousing/distribution building proposed for the industrial area located along Interstate 215 (including land designated Light Industrial, Business Park, and Light Industrial with a Community Center Overlay) whereby the cumulative square footage of warehousing/distribution space in the area would exceed 200,000 square feet, an Environmental Impact Report (EIR) shall be prepared that assesses the potential impacts of the project. The EIR would be required to address air quality, including a health risk assessment of diesel particulates and impacts to sensitive receptors, truck traffic and noise, and the cumulative impacts of reasonably foreseeable warehouse development in the area (Mead Valley Area Plan, pg. 36).

E-30
(cont.)

EIR 546 fails to measure "impacts of industrial expansion on localized air quality, traffic, noise, light and glare. This must be reassessed in order to apply appropriate measures to mitigate impacts so that the environmental quality of the community and residents' health and welfare are maintained. The EIR fails to give adequate setback between this proposed project and residential uses. WRCOG and SCAQMD requires a 1000 foot buffer between sensitive receptors and logistics warehouses (See, <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/chapter-2---air-quality-issues-regarding-land-use.pdf?sfvrsn=2>). The EIR fails to address air quality, including a health risk assessment of diesel particulates and impacts to **sensitive receptors**, truck traffic and noise, and the cumulative impacts of reasonably foreseeable warehouse development in the area (Riverside County General Plan- Mead Valley Area Plan).

E-31

Fifth.

Rock blasting on the Project Site near residents along Redwood Street, Nance, Day, Decker and Oleander is not adequately analyzed or addressed in the Draft EIR.

The following blasting noise and vibration monitoring and abatement plan shall be adopted and submitted to the County prior to commencement of blasting activities:

- Pre-blasting inspections shall be offered to property owners within 200 feet of the blast site.
- Existing damage of each structure shall be documented.
- Post-blasting inspections shall be offered to assess new or additional damage to each structure once blasting activities have ceased for those property owners who accepted pre-blast inspections.
- Property owners within at least 200 feet of the blast site shall be notified via postings on the construction site at least 24 hours before the occurrence of major construction related noise and vibration impacts (such as grading and rock blasting) which may affect them.
- The County may impose conditions and procedures on the blasting operations as necessary. The construction contractor shall comply with these measures for the duration of the blasting permit. The County may inspect the blast site and materials at any reasonable time (County of Riverside Ordinance No. 787) (Noise Impact Analysis, pg. 6).

E-32

The EIR fails to address the impacts to residents directly adjacent to the project site. "Property owners within at least 200 feet of the blast site shall be notified via postings on the construction



COMMENT LETTER E

site at least 24 hours before the occurrence of major construction related noise and vibration impacts (such as grading and rock blasting) which may affect them” (Noise Impact Analysis, pg. 6).

Certainly this is not adequate as residents will not have access to the Project site once construction is under way. Residents will not be aware of any signage or posting on the construction site and 24 hours is not enough notice to take measures to safeguard their property and livestock. Residents surrounding this project site must be notified in person, written notice or with a notice attached to the property gate the date and time that blasting will occur at least 72 hours prior to blasting. The EIR fails to take into account that this a rural neighborhood where many residents have large livestock and other animals that may become frightened from the noise and vibrations of these blasts. Residents have the right to protect their property (including livestock) from injury and damage.

**E-32
(cont.)**

Sixth.

Truck and vehicle traffic is not adequately addressed in the Draft EIR. Two main entrances along Oleander are indicated on Building "D" & "E" Site Plans. These plans also indicate two distinct offices with one at the northwest and one at the northeast corners of Building "D" & "E" This indicates that buildings "E" and "D" will have more than one tenant. Trammel Crow Knox Business Park Building at 17789 Harvill Ave. has several tenants, which is creating enormous traffic, health and safety concerns with 30 or more diesel trucks lined up outside of the entrance to the facility. These logistics trucks are lined up along Harvill Ave. idling for hours, blocking the right lane of the road and left turn lane onto Harvill from Harley Knox.

Building "D" has a truck entrance on the east side of the building and a truck entrance on the west side of the building. The EIR must clearly indicate if Building "D" and/or "E" will have multiple tenants as this is already creating massive tie ups during the staging of trucks into the warehouse at 17789 Harvill Ave. CARB does not allow trucks to idle for more than 5 minutes and yet trucks are allowed to idle for hours as they are waiting to enter the high cube warehouse at 17789 Harvill Ave. Trucks are idling along Oleander Ave as they sleep in their trucks. EIR 546 does not adequately address the direction that trucks will enter the building or what streets they will use. All trucks must be directed to enter and exit onto Harvill Ave. from Oleander and travel to the Harley Knox Blvd overpass to access the I-215 Freeway. Logistics trucks from these warehouses must not be allowed to use our dangerous narrow rural roads. The Draft EIR must include language that indicates all trucks use Harvill Ave. Decker Road must be closed to through traffic past the Project’s southern boundary line. Closure of Decker Road must include barriers that prevent logistics trucks from accessing Decker Road past the southern boundary line of Building “D”. This will allow EMWD to continue to access the road to the water tank.

E-33



COMMENT LETTER E



Harvill Ave. with trucks lined up to enter the warehouse at 17789 Harvill Ave.

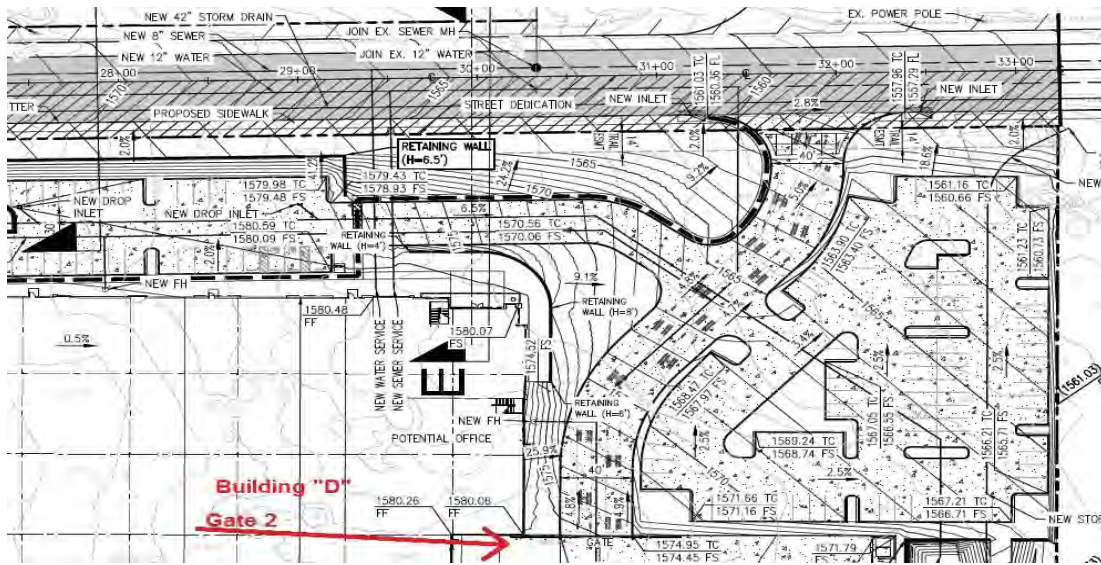


E-33
(cont.)



COMMENT LETTER E

Harvill Ave. with trucks parked in the right lane and cars having to move over to the left lane. Harvill Ave was never built to County standards and is not wide enough for trucks to park along the side of the road and allow other vehicles to drive in the right lane. Harvill Ave. is the main thoroughfare for thousands of trucks that will be accessing Building "E" and "D", current and future high cube logistics warehouses. Traffic studies for this project have not adequately addressed the number of trucks from these warehouses, impacts from these trucks, routes that these trucks will take to access the ports of LA and Long Beach, the health and safety of local residents who will be driving not only Harvill Ave, but numerous other roads that trucks from these warehouses will be using throughout the region.



E-33
(cont.)

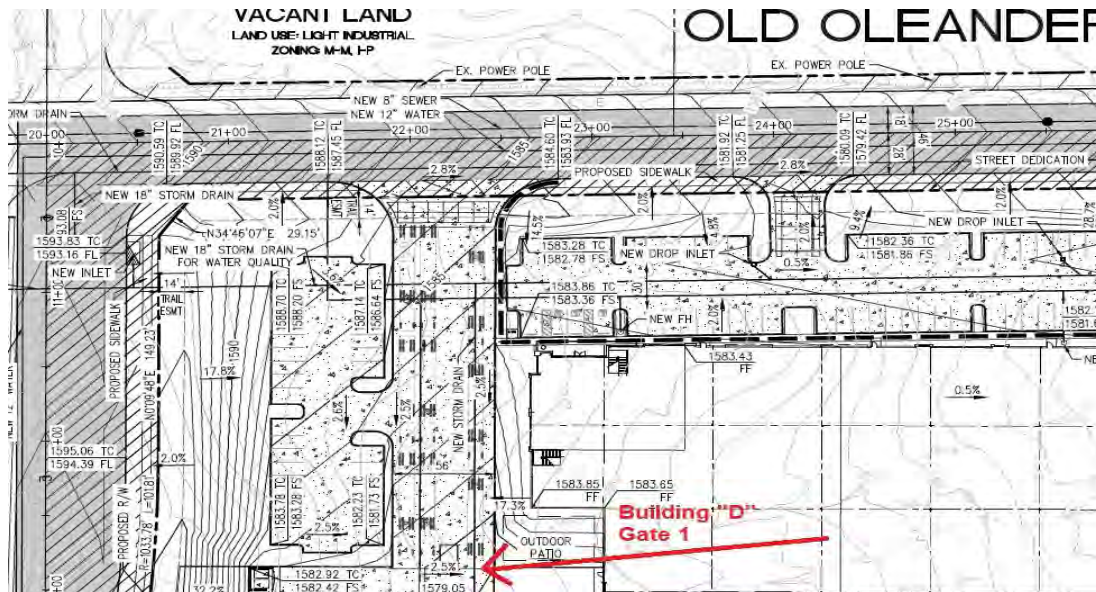
Building "D" site map dated February 24, 2017 shows the east entrance along Oleander that allows just 4 trucks to queue on site behind the gate to access the building. Knox Logistics Warehouse at 17789 Harvill Ave. shows room for 7 trucks to queue on site. In addition there is a separate lane along Harvill for trucks to access this facility. Unfortunately, this is still not sufficient safe guards as over 30 trucks are attempting to enter the warehouse at 17789 Harvill Ave. at any given time during the day. This is happening everyday all day long as trucks are idling for hours and obstructing traffic creating very hazardous conditions. Idling trucks are producing far more air pollution particulates and noxious fumes.

E-34

Having two gates and two separate offices one at the east side of the building and one on the west side of the building indicates that Building "D" and "E" are set up for two tenants per warehouse. This is not addressed in the EIR. Traffic studies, air quality studies, noise studies, health and safety concerns for the community are not adequately addressed in the EIR. Both Building "D" and "E" are adjacent to and very close to hundreds of rural residents.



COMMENT LETTER E

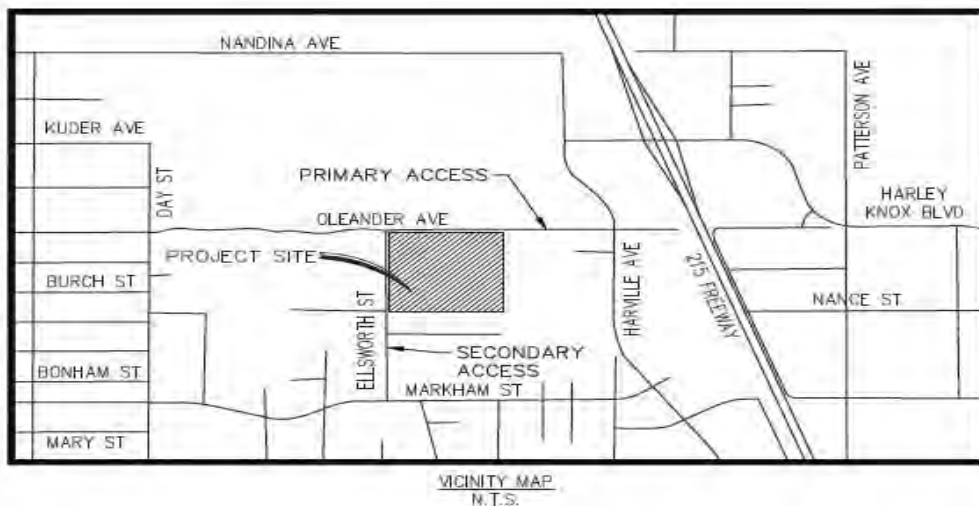


E-34
(cont.)

Building D showing Gate 1 that allows 6 trucks to queue on site. Trucks will be lining up traveling west on Oleander requiring trucks to turn left into Building "D" or "E" from Oleander increasing idling time as trucks wait to enter the building and turn left.

Seventh.

Another issue of concern is that children are coming from Moreno Valley to Citrus Hill High School located at Markham and Wood Road. Hundreds of vehicles are traveling on Markham every day as parents take their children to and from school Monday through Friday. The cars are bumper to bumper from Harley Knox to Wood Road. This has not been addressed in the traffic study or any other portion of the Draft EIR. Adding logistics trucks to Markham increases the pollution, noise and dangerous conditions on our local roads.



E-35



COMMENT LETTER E

The site plan indicates that Old Oleander will be the Primary Access and Ellsworth / Decker will be the secondary access for trucks coming into and leaving Building D and E. This has not been evaluated in the EIR as there are a host of very serious concerns using Ellsworth / Decker Road south of the project for any logistic truck access or any type of vehicle traffic or activity.

Ellsworth Street/ Decker Road improvements as indicated in the project EIR will consist of the area from Oleander to the south property line. Decker Road from the project south property line to Markham is an unimproved dirt road that is not County maintained and therefore not adequate for heavy truck traffic. Decker Street has pot holes, speed bumps and certainly not up to any standards that would meet CEQA guidelines for this project. Issues of concern include: dust, noise, vibration, air pollution, health and safety as these trucks drive down our rural neighborhood streets. The intersection at Markham and Decker has severe line of sight obstruction as Markham goes up a hill and has an "S" curve obstructing the view of vehicles turning onto Markham from Decker Road. This road is so dangerous that K-rails were installed to keep cars from running off the road into homes. None of these adverse impacts were assessed in the Draft EIR. There is no stop sign or signal light at Markham and Decker.

E-36



E-37

Ellsworth / Decker Street at Markham looking west. No stop sign or street sign

Logistics Trucks for Buildings "D" and "E" will be coming down the hill on Markham using their Jake Brakes in this rural neighborhood. The noise will be intolerable and 24-7.

E-38



COMMENT LETTER E



E-39

Markham along the top of the hill showing K-rails used to protect homes. K-rails are not going to stop a logistics truck from exiting the road along this steep grade on Markham Street.



E-40

Day Street at Cajalco

Trucks will try to gain access onto Markham using Decker as a shortcut to Cajalco Road traveling to Day Street. Trucks will either access Harvill Ave. or Decker Road as they go to and from the ports. It is obvious that Harvill Ave is already having Level of Service issues that are significant and should be rated LOS D. Markham is also at a level LOS E during school drop off



COMMENT LETTER E

and pick up times as cars are bumper to bumper from Harley Knox all the way to Wood Road.

↑ E-40
← (cont.)

Eighth.

No signal lights are indicated on the EIR for intersections at Oleander and Decker Road or Decker at Markham or Markham at Day Street or Cajalco at Day Street. The EIR does not analyze the time frame for future building projects that will complete Oleander to full width.

← E-41
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The traffic study does not address the additional truck traffic impacts to the rural communities of Mead Valley, Greater Lake Mathew and the City of Riverside. Once trucks access Markham Street they can find a number of routes that lead to Van Buren Blvd, Cajalco Road and El Sobrante instead of using the very congested I-215 and I-60 freeways to the I-91. The impacts of using other routes that transverse though rural communities has not been adequately analyzed in the Draft EIR. There are a number of elementary schools and middle school near Cajalco and Clark Street, a library, a community center and senior center. The impacts to these sensitive receptors has not been addressed in the Draft EIR as hundreds of trucks from the Project will be using Cajalco Road which passes a number of public facilities.

← E-42
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← E-43
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Idling trucks have impacts on the entire region as the difference between idling for 5 minutes and 2 hours produces 24 times as much air pollution per truck. That would be 720 times as much for 30 trucks and then multiply by the hours of the day that new trucks are entering the line at 17789 Harvill Ave. Future impacts of additional warehouses and their idling trucks has not been analyzed in the Draft EIR. This constant idling during the day with hundreds of trucks adds up to considerable impacts that are not being addressed in the Draft EIR. Multiple tenants are part of the problem as it takes longer to process each truck into the facility. The Draft EIR has not addressed the impacts of multiple tenants for Building "E" and "D". The lack of lanes and turn lanes on Oleander Ave. as trucks are turning left into both Building "D" and "E". Both Building D and E need dedicated turn lanes along Old Oleander Ave and these lanes should allow for up to 30 trucks to safely access these facilities at one time. Currently building "D" allows for 10 trucks to enter the facility behind the access gate.

← E-43
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← E-44
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← E-45
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Ninth.

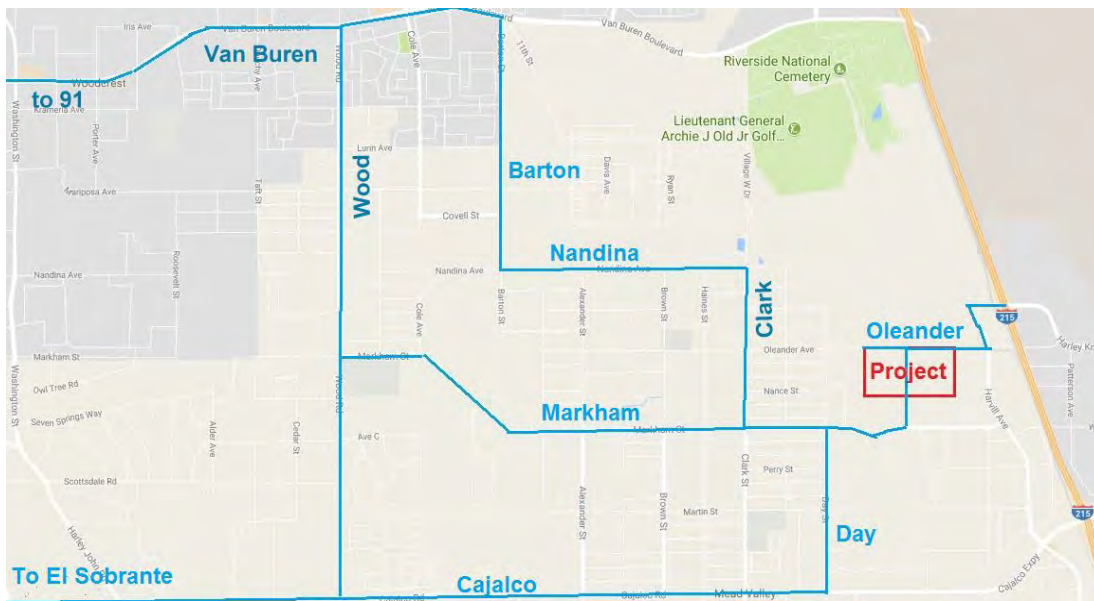
The Draft EIR indicates that there is no funding and therefore no new improvements will be made along the I-215 to add lanes to the off and on ramps on Harley Knox Blvd or to the I-215 Freeway far into the future. The Draft EIR does not address the accumulative traffic impacts due to additional future warehouses that are planned for the area along the I-215 and I-60 Freeways that will add substantial truck traffic to the freeway system. Additional high cube warehouses are planned for Sycamore Canyon Industrial Park, Meridian Business Park, Perris warehouses and Moreno Valley 40 million Sq. Ft. World Trade Center. The City of Perris is also adding high cube warehouses to their area that will be using the I-215 Freeway.

← E-45
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← E-46
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COMMENT LETTER E



**E-46
(cont.)**

Routes that logistics trucks from the warehouses in this project will be taking to get to the ports of LA and Long Beach. EIR 546 has not adequately evaluated the impacts of using these roads to get to the ports.

Tenth.

Noise is not adequately evaluated in the Draft EIR. Noise Barriers must be reevaluated to conform to Federal Transportation Guidelines to be effective in protecting residents especially those who live next door. The Draft EIR must provide an adequate buffer between rural homes and Building D and E. WRCOG and SCAQMD guidelines require 1000 foot buffer to adequately protect residents from the negative impacts of high cube warehouses. **Buffers must measure between the end of the property line and the sound barrier.**

E-47

4.4 Barriers

A noise barrier is an obstacle placed between a noise source and a receiver which interrupts the path of the noise. They can be made out of many different substances:

1. Sloping mounds of earth, called berms
2. Walls and fences made of various materials including concrete, wood, metal, plastic, and stucco.
3. Regions of dense plantings of shrubs and trees
4. Combinations of the above techniques

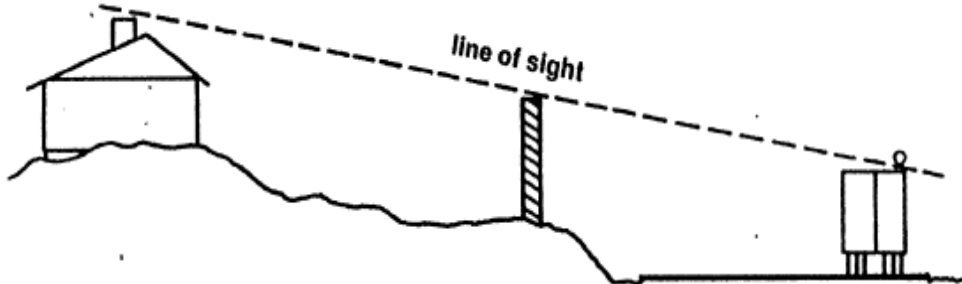
E-48

The choice of a particular alternative depends upon considerations of space, cost, safety and aesthetics, as well as the desired level of sound reduction. The effectiveness of the barrier is dependent on the mass and height of the barrier, and its distance from the noise source and the receiver. To be effective a barrier must block the “line of sight” between the highest point of a



COMMENT LETTER E

noise source, such as a truck's exhaust stack, and the highest part of the receiver. This is illustrated in Figure 4.16.



4.16 To be effective, a barrier must block the “line of sight” between the highest point of a noise source and the highest part of a receiver.

To be most effective, a barrier must be long and continuous to prevent sounds from passing around the ends. It must also be solid, with few, if any, holes, cracks or openings. It must also be strong and flexible enough to withstand wind pressure.

Safety is another important consideration in barrier construction. These may include such requirements as slope, the distance from the roadway, the use of a guard rail, and discontinuation of barriers at intersections.

Aesthetic design is also important. A barrier constructed without regard for aesthetic considerations could easily be an eyesore. A well-designed berm or fence can aesthetically improve an area from viewpoints of both the motorist and the users of nearby land (FHA: Physical Techniques to Reduce Noise Impacts).

https://www.fhwa.dot.gov/ENVIRONMENT/noise/noise_compatible_planning/federal_approach/audible_landscape/al04.cfm

Role of Topography

To work effectively, the barrier must be high enough and long enough to block the view of the road from the area that is to be protected. Sound barriers do very little for homes on a hillside overlooking a road.

E-48
(cont.)

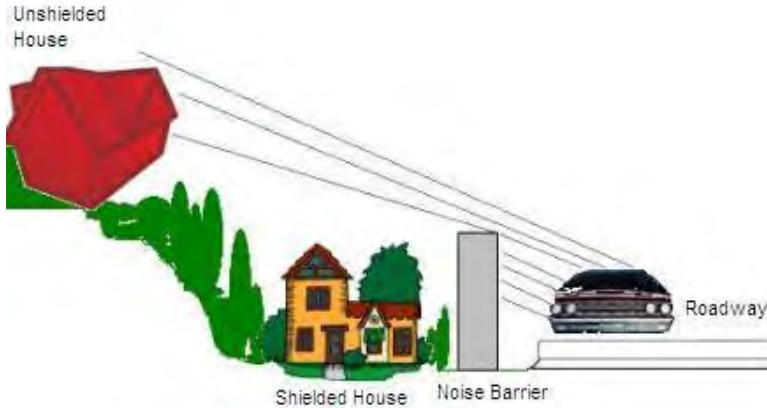
E-49

E-50

E-51



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Source: FHWA Website

As seen above, the house at the bottom of the hill is protected by the sound barrier, but the one on top of the hill (overlooking the roadway) is not.

In addition, buildings higher than barriers, homes scattered too far apart, and openings in noise barriers for driveway connections or intersecting streets are not good areas for sound barriers. In some cases, SHA can offer alternatives to help reduce noise levels. These alternatives are evaluated on a case-by-case basis consistent with Federal guidelines (Sound Barriers Guideline – Highway Traffic Noise, <http://www.roads.maryland.gov/Index.aspx?PageId=827>)

**E-51
(cont.)**

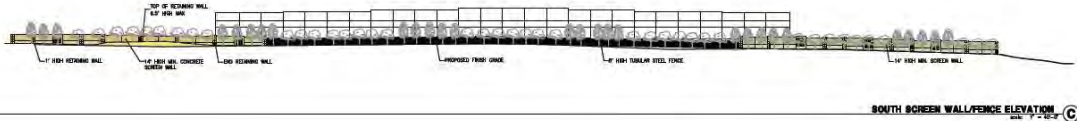


Sound walls are up to 8' tall and smoke stacks for trucks are 11.5' tall. Buildings are being proposed lower than ground level. Because of line of sight angle from the proposed project to homes the sound walls offer little or no protection for rural residents living near this project and

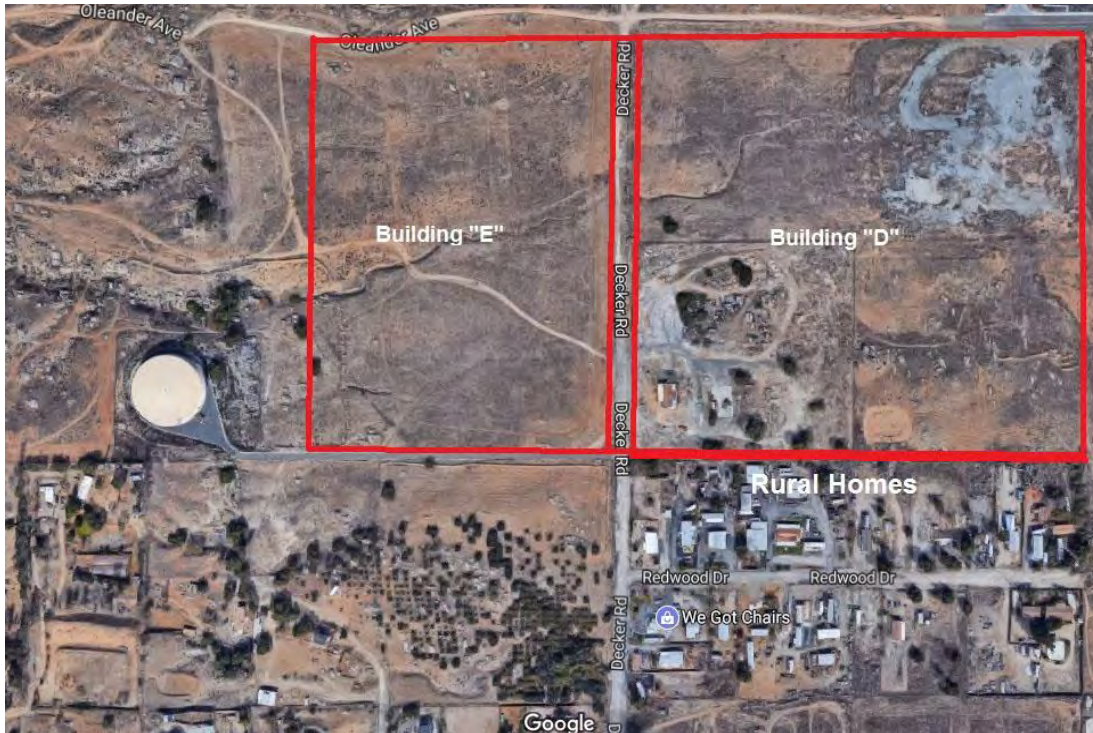


COMMENT LETTER E

uphill from this project. Sound walls/barriers are not going to be constructed the full length of the perimeter. Minimum distance sound walls will not protect rural neighborhoods surrounding this project from significant negative impacts such as sound, vibration, air pollution and light trespass. Short walls that are narrow in width are ineffective in stopping sound from the hundreds of trucks going into and out of these warehouses night and day. These impacts have not been adequately evaluated in the Draft EIR.



Elevation for building D (above exhibit) shows metal fencing along the majority of the southern perimeter. A very narrow 14' wall is shown along the outside edges of the fence barrier. This barrier is not a sufficient to reduce noise, pollution or light trespass to a healthy level for the adjacent property owners. The EIR does not properly evaluate these barriers. Building E has these same deficiencies as the southern and western barriers are not sufficiently designed to obstruct noise, pollution and light trespass to healthy and safe levels.



E-51
(cont.)

Rural homes with no buffer between homes and proposed warehouses. Inadequate noise, sound, light trespass and air pollution mitigation.



COMMENT LETTER E

Eleventh.

E3.0 PROJECT DESCRIPTION

1. Earthwork and Grading

Grading would occur over the entire Building E Site; no portion of the site would be left undisturbed.

Proposed earthwork activities would result in approximately 80,000 cubic yards of cut and 80,000 cubic yard of fill. Based on the expected shrinkage and compaction of on-site soils, earthwork activities are expected to balance and no import or export of earthwork materials would be required.

When grading is complete, manufactured slopes ranging from approximately four to 15 feet in height would occur along the south, east, and west perimeters of the property, and the Building E property would have a slight west-to-east-slope, as depicted on Figure 3-14, *Conceptual Grading Plan – Building E Site*. After grading, the highest point of the property would be its southwest corner (approximately 1,630 AMSL) and the lowest point of the property would be at the bottom of the detention basin near its northeast corner (approximately 1,588 AMSL). To accommodate the proposed grading concept, retaining walls ranging in height from one to seven feet tall would occur on the property. Also, a mechanically stabilized earth wall up to 18 feet in height is proposed along the west and south sides of the proposed water quality basin (Knox Building Park Buildings D and E Environmental Impact Report No. 546, pg. 3-19).

E-52

The Draft EIR does not adequately assess noise and pollution impacts along the western, eastern and southern portion of Building "E". Retaining walls will not reduce noise pollution to safe levels due to line of sight view from Building "E" to Nance Street, the western portions of Oleander and south of Building E. The description of earth walls and retaining walls is not clear as to height and location so that an adequate assessment can be made. Both Buildings D and E will be up to 14' below grade. This was not evaluated in the Draft EIR as the height of the buildings at ground level would affect the noise impacts, air pollution, light trespass, and possible hydrology impacts from water flowing from the nearby hills and arroyos.

E-53

Twelfth.

There are numerous biological and cultural resources not adequately analyzed in the Draft EIR.

A PHASE I AND II CULTURAL RESOURCES ASSESSMENT FOR THE DECKER PARCELS II PROJECT document is outdated and no longer reflects the current cultural assessments for Building Site "E" or "D". Additional information related to this project site cultural resources was submitted to the County after April 29, 2016.

E-54

The Draft EIR does not reflect this new information. The Soboba Tribe feels that the artifacts and area are very culturally sensitive. Preservation of these cultural sites (boulders) and artifacts is extremely important. Any cultural artifacts should be returned to the Saboba Tribe.

Over 20 years ago before the water tank was built, I met with archeologist Daniel McCarthy from the UCR Eastern Research Center who went over the cultural significance of this site. The entire area proposed for Building E and D have significant cultural artifacts and are part of a historic Native American Village.

E-55



COMMENT LETTER E

The Draft EIR does not adequately analyze rock blasting impacts to Cultural resources on and off this project site.

E-56

Biological Resources include burrowing owls, black tailed rabbits, quail, hawks and roadrunners have not been adequately analyzed and addressed. This area is part of a wildlife corridor from the Motte Reserve to the Sycamore Canyon Wilderness Park. Burrowing Owls have thrived in this area for years and their numbers are twiddling rapidly. At the present rate of habitat destruction the owls will be extinct in Riverside County is just a few years. Borrowing Owls are a species of special concern and may soon be considered for the Federal or State endangered species list.



E-57

Pictures that I took of Burrowing Owls at the Project Site on July 3, 2017. There are a number of nesting Burrowing Owls at the project site for GPA 1151 & 1152. The EIR for the Burrowing Owl study is outdated and does not reflect the current numbers, habitat and nesting pairs on the Project site. The EIR must be reevaluated for Burrowing Owls on and near the project site as months of grading and rock blasting will have negative impacts on Burrowing Owls nesting and living in the area.

As part of proposed grading activities, blasting would be necessary in hard rock areas in the southern portion of the Building D Site boundaries. Based on the excavation plans prepared on June 16, 2015, by the Henry-Ann Company, rock blasting within the Building D Site is expected to include the drilling of up to 5,253 holes in the largest area, in which small charges would be placed to fragment the rocks into smaller, crushable pieces. Approximately 112,090 cubic yards (c.y.) of rock is expected to be produced during proposed blasting activities, which would be crushed and used on the Project site as construction base. An electric rock crusher powered by a 300-horsepower diesel generator is proposed to further break down the fragmented rocks. The Project Applicant calculates that approximately 2,759 tons of rock would be processed on the Project site per day during the blasting and rock crushing phase of construction (approximately 65 working days) (Urban Crossroads, Inc, 2016a, pp. 31-32).

E-58

Rock Blasting would also need to take place on the lot for Building "E".

The Draft EIR greatly understates construction impacts at the site where construction is anticipated to occur for almost 2 years (23 months), eight hours a day, five days per week. Substantial blasting (drilling 5,253 holes in the largest area) and subsequent rock crushing operations would be necessary to crush approximately 2,759 tons of rock onsite per day for 65 days. Rock crushing and blasting was not adequately considered in the Draft EIR terms of impacts to hazards, noise/ vibration, cultural resources, and biological resources.

Rock blasting impacts on Burrowing Owls within the area between Harvill, Day Street, Nandina and Markham have not been adequately considered especially during nesting periods.

E-59



COMMENT LETTER E

Burrowing Owls, a California Species of Special Concern, live in the ground in the vicinity of the blasting area and would be greatly impacted by the vibrations and noise from months of constant rock blasting. Owl reproduction may cease altogether. Fledglings may be greatly impacted by the noise and vibration. The Burrowing Owl habitat will be destroyed and the birds will die.

E-59
(cont.)

The EIR does not address night time construction mitigation measures as warehouses are concrete tilt up buildings where the concrete is poured at night. Light trespass and noise are a big concern and have been a huge problem with a current high cube warehouse now under construction by this same company nearby. Many wildlife are nocturnal and would be adversely impacted by night time construction lighting and noise.

E-60

Thirteenth.

3.5 OPERATIONAL CHARACTERISTICS

"At the time this EIR was prepared, the future user(s) of proposed Buildings D and E were unknown; however, the Project Applicant expects the buildings to be occupied by high-cube warehouse users. The proposed business park warehouse buildings are not designed to accommodate an occupant that requires cold storage (i.e., refrigeration); therefore, the analysis in this EIR assumes that the proposed buildings would not house a tenant that uses cold storage" (SCH No. 201508108, Page 3-31).

E-61

There are indications that both Buildings "E" and "D" will be leased and will have multiple tenants and therefore should require refrigerated hook-ups. There is no way to predict who will be leasing these buildings over the years. With four tenants the chances that cold storage will be needed is fairly high. Both buildings have multiple office spaces and entrances with entrance gates. It would be very easy to divide these buildings in half with a wall so that you would in affect have two leased facilities. The Draft EIR does not assess the impacts of (4) tenants leasing the buildings instead of two. The added impacts from creating 4 facilities instead of 2 needs to be thoroughly evaluated in the Draft EIR. The current warehouse at 17789 Harvill Ave. has tenants that use cold storage. The Draft EIR is flawed in its lack of analysis for cold storage uses and refrigerated hook-ups.

MM 4.3-3 (Applies to the Building D Site and the Building E Site) Within six months of building occupancy, signs shall be posted at the building informing truck drivers about the health effects of diesel particulates, the California Air Resources Board diesel-fueled vehicle idling regulations, and the importance of being a good neighbor by not parking in residential areas. Developer and all successors shall include this obligation in all leases of the Project so that all tenants shall fulfill the terms and conditions of this County condition of approval (Knox Business Park Bldgs D and E Draft EIR-4, page S-18).

E-62

Violations of MM 4.3-3 are taking place at Knox Business Park warehouse at Old Oleander and Harvill Ave. with a large number of trucks idling for hours, trucks parking along streets next to homes with their trucks idling as the truck drivers sleep, truck trailers and trucks parked outside of the truck parking stalls and along the north end of the warehouse at 17789 Harvill Ave. There is no enforcement of these rules. Draft EIR 546 must include a detailed accounting of how

E-63



COMMENT LETTER E

enforcement of these mitigation measures will be addressed.

↑ E-63
 ← (cont.)

Fourteenth.

Fire access appears to be lacking with all fire access through the entrance gates on the north side of Building "E" and "D". What will be stored in these facilities over time? There are a number of hazardous materials that could pose serious health and safety concerns if they were to catch fire, explode or spill. This problem is magnified considering the distance from a number of neighborhoods adjacent to Building "D" with no buffer between homes. There are just three entrances at the north end along Old Oleander Ave. There appears to be a lack of access along the east, west or south of buildings E and D. With the steep slopes up to 17', water basins blocking the east side and residents along the south side of these buildings it appears that fire access would be difficult if trucks are lined up along the entrances. The Draft EIR does not evaluate fire access concerns due to limiting access to the north side of the buildings.

← E-64
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Fifteenth.

Jobs.

"Because users of the Project's buildings are not yet known, the number of jobs that the Project would generate cannot be precisely determined; therefore, for purposes of analysis, employment estimates have been calculated using data and average employment density factors utilized in the County of Riverside General Plan. The General Plan estimated that light industrial business would employ one (1) worker for every 1,030 s.f. of building area. Based on this employment generation rate, the Project is expected to create approximately 1,081 new, recurring jobs" (1,113,627 s.f. ÷ 1,030). (Riverside County, 2016 Appendix E, Table ES-5). SCH No. 201508108, Page 3-32.

← E-65
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The General Plan job estimates are completely outdated and obsolete as most logistics high cube warehouse facilities are moving toward complete automation and robotic technology that requires just a handful of employees to run a huge logistics warehouse facility. This technology will soon be fully functioning in the logistics industry. Building "E" and "D" for massive logistics warehouses attempts to replace the current Business Park land use zoning (Riverside County General Plan – Mead Valley Area plan) that actually creates a large number of real permanent jobs versus the massive logistic warehouses that will have a handful of tech employees that repair and maintain the equipment and software, a few managers and office staff.

The Draft EIR does not address the true estimates of jobs being created by this Project. A true estimate is difficult to predict, but it is a fact that within the next few years and very possibly by the time that these warehouses are built, the automation and robotic technology will have eliminated a large portion of the 1,081 jobs estimated to occur. It is hard to know if trucks will be driverless, but certainly the workers within the facilities will be very limited in numbers. The Draft EIR for this project is extremely flawed in the assumption that over 1,000 jobs will be created.

"Envision a self-guided forklift streaming down a narrow aisle, feeding inventory into a rack system towering 40 feet above the warehouse floor, while an auto-guided mini-robot transports outbound inventory to fulfillment stations lit up like holiday lights, enabling order processing of



COMMENT LETTER E

up to 2,400 picks per hour. As the perfect order is complete, a high-speed conveyor shuttles packages toward a stationary robot, which loads the contents into a driverless tractor-trailer. Could this be a look into the warehouse of the 22nd century? Nope, it's the modern distribution center of today" (Warehouse Automation: The Next Generation by Charlie Fiveash, January 27, 2016, Inbound Logistics).

E-65
(cont.)

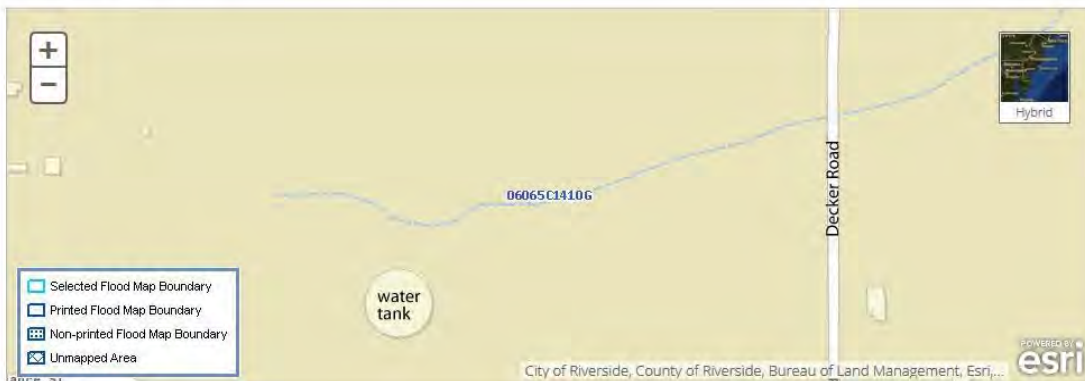
Sixteenth.

Blue Line Stream - Any stream shown as a solid or broken blue line on 7.5 Minute Series quadrangle maps prepared by the U.S. Department of the Interior Geological Survey (USGS). A blue line stream may be any creek, stream or other flowing water feature, perennial or ephemeral, indicated on USGS quadrangle maps, with the exception of man-made watercourses. The United States Army Corps of Engineers uses USGS blue line stream markings as a preliminary indicator of "Waters of the United States". Streams identified on USGS maps in such a manner are therefore generally subject to federal environmental regulations. (Riverside County Flood Control) <http://www.floodcontrol.co.riverside.ca.us/GlossaryTerms.aspx>

E-66

FEMA Flood Map Service Center : Search By Address

Locator Map



Riverside County Flood Map clearly shows a blue line stream traversing across the entire Project site. The blue line stream is part of the wetlands to the west of the project site. All of this is subject to "waters of the United States" are therefore generally subject to federal environmental regulations. The Draft EIR does not adequately analyze the impacts of the blue line stream, hillside arroyo or the year round stream coming out of the granite cave.

Draft EIR is clearly flawed in their assessment of a Blue line Stream as this stream runs through the entire Project site.

"Erosion Threshold (a) for the Building D Site and Building E Site: No Impact. The Project site does not contain any active streams or rivers, no streams or rivers are located in close proximity to the Project site, and the Project would not discharge water directly to an active stream or river. The Project would be required to prepare and comply with NPDES permits, SWPPPs, and WQMPs, which would treat and filter runoff to reduce erosion. Therefore, no impact to deposition, siltation, or erosion that may modify the channel of a river or stream or the bed of a

E-67



COMMENT LETTER E

lake would occur” (Knox Building Park Bldgs D and E Draft EIR NO. 546, S.0 EXECUTIVE SUMMARY, pg. S-38).

↑ E-67
 ↓ (cont.)

Seventeenth.

The Draft EIR does not include the WRCOG and SCAQMD good neighbor policy that sets a 1000 foot buffer between sensitive receptors and distribution warehouses. The current proposal for Building "D" has the warehouse project directly next to homes. No setback or buffer as trucks will be traveling from the east side of the warehouse to the west side of the warehouse using a driveway just a few feet from rural property lines. Small walls along the parking spaces will not prevent air pollution or noise from back up beepers, the hazards and dangers of noise pollution, air pollution, vibration and light trespass 24-7. Trucks are able to park outside of the parking stalls along the southern driveway as is occurring right now at the logistics warehouse at Harvill Ave. and Oleander. (WRCOG Good Neighbor Policy Guidelines for Siting Warehouse/ Distribution Facilities). [Good Neighbor Guidelines for Siting Warehouse/Distribution Facilities](#).

↑ E-68
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↑ E-69
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Warehouse at Oleander X Harvill has numerous trucks parked outside of the parking stalls along the north side of the building. Trucks are idling along this area, unloading, back up beepers going off day and night. GPA 1151 & 1152 proposed project has this same style of driveway along the south of Building "D" directly adjacent to rural homes. The Draft EIR does not address parking issues such as this, trucks backed up onto local roads idling for hours as they arrive to unload their goods. Trucks parked in the middle of the road as Harvill was not designed for trucks to park on the shoulder. These same conditions exist for Building "D" and "E" with trucks having to turn left to enter the buildings and limited truck queuing space at the warehouse entrance behind the guard shack. Multiple tenants add to flaws in project design and analysis.

The SCAQMD recommends prohibiting placement of loading docks or major truck routes within

↑ E-70
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COMMENT LETTER E

500 meters or 1640.42 feet from sensitive receptors. (See, <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/chapter-2---air-quality-issues-regarding-land-use.pdf?sfvrsn=2>).

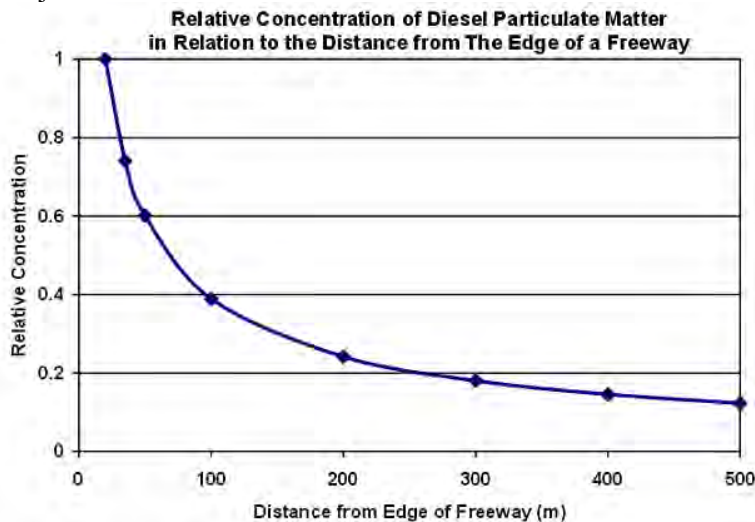
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E-70
(cont.)
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Eighteenth.

Decker Road a rural dirt road and would be changed into a truck highway with the approval of this project. The Draft EIR has not addressed or analyzed any of the impacts from trucks using Decker Road to access Markham that allows logistics trucks to drive throughout our quite rural neighborhoods to get to the I-91 Freeway instead of using Harvill to get to the I-215 Freeway. Harvill Ave. has always been promised to the community of Mead Valley as the only access route for warehouse trucks and these trucks would access the I-215 Freeway and not our rural roads.

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E-71
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The Draft EIR for this project changes everything as trucks are designated to use Decker Road as a secondary access for trucks travel. Decker Road currently only travels to Markham Street. The Draft EIR does not analyze the impacts of Decker Road as a secondary route for logistics trucks for this Project.



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E-72
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<http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/chapter-2---air-quality-issues-regarding-land-use.pdf?sfvrsn=2>

Residents and those using the church including children and seniors living nearby will be greatly impacted by the huge concentrations of ozone and particulate matter from the hundreds trucks using this facility every day. Particulate matter is very small and enters the lungs, brain and cells affecting the young weakening lung function. In Southern California, 5,000 premature deaths every year are attributed to air pollution and particulate matter from diesel trucks.

Nineteenth

Article from SCAG.



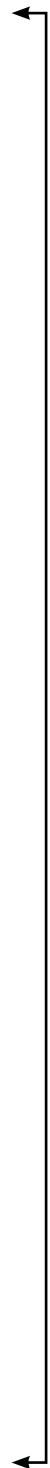
COMMENT LETTER E

What is Environmental Justice?

Environmental Justice is about equal and fair access to a healthy environment, with the goal of protecting underrepresented and poorer communities from incurring disproportionate environmental impacts. The SCAG region is demographically and economically diverse, and displays the extremes in household income. The region includes heavily urban and entirely rural areas, as well as terrain that in some instances make achieving air quality goals challenging.

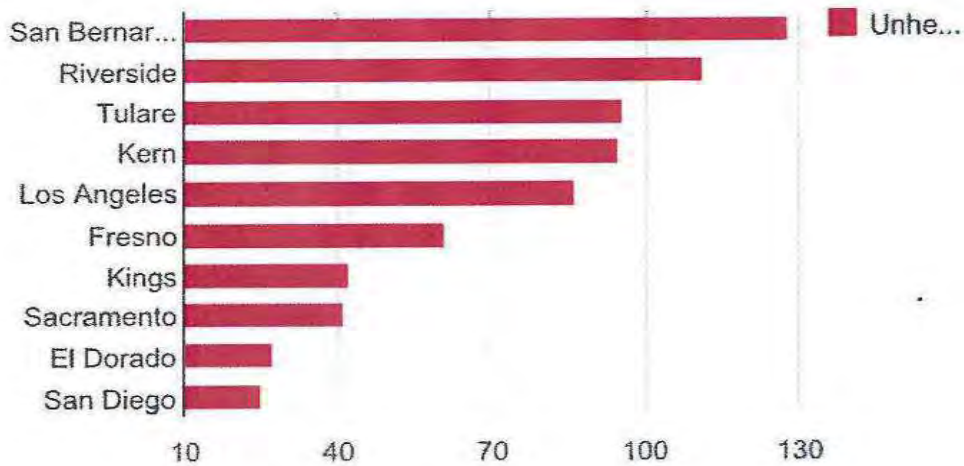
Considerations of Environmental Justice are both good planning practices as well as to meet the federal and state requirements. The federal requirements originated from Title VI of the Civil Rights Act of 1964 (Title VI). Title VI establishes the need for transportation agencies to disclose to the public the benefits and burdens of proposed projects on minority populations. The understanding of civil rights has then been expanded to include low-income communities, in addition to minority populations. In addition to federal requirements, SCAG must comply with California requirements for Environmental Justice. (www.scag.ca.gov/programs/Pages/EnvironmentJustice.aspx).

Mead Valley qualifies as an underrepresented and poor community under Title VI of the Civil Rights Act of 1964 (Title VI) with 72% of the residents of Mead Valley being Hispanic or Latino and over 43% of Mead Valley residents living below the poverty level according to the 2010 Census. The Draft EIR does not address Environmental Justice and the impacts on Mead Valley as a minority community.



E-73

Most ozone polluted counties in the U.S.



Source: American Lung Association

Twentieth.

The Draft EIR is not in line with the Riverside County Vision and Mead Valley Area Plan.



E-74



COMMENT LETTER E

Riverside County Vision

The simplest way to summarize our vision for Riverside County is to say that:

“Riverside County is a family of special communities in a remarkable environmental setting.”

RCIP - General Plan - Mead Valley Area Plan Vision for the area: "The Mead Valley land use plan provides for a predominantly rural community character with an equestrian focus. This is reflected by the Very Low Density Residential and Low Density Residential land use designations within the Rural Community Foundation Component and Rural Residential designation within the Rural Foundation Component that dominate the planning area."

Certainly this current proposed project is not in line with the vision set forth by the residents of Mead Valley through the Riverside County General Plan and Mead Valley Area Plan.

The current General Plan land use for Mead Valley is overwhelmingly rural community designation: Estate Density Residential, Very Low Density Residential and Low Density Residential. The Mead Valley Area Plan shows most of the zoning for proposed Building "D" and "E" to be Business Park that allows for a buffer between residential and businesses.

Page 52. MVAP 21.1 Identify ridgelines that provide a significant visual resource for the Mead Valley planning area through adherence to the policies within the Hillside Development and Slope section of the General Plan Land Use Element.

http://planning.rctlma.org/Portals/0/genplan/general_plan_2013/1%20General%20Plan/Chapter%203-Land%20Use%20Element%20Adopted-Final%20Clean.pdf

Hillside Development & Slope

Natural slopes are one of Riverside County’s primary aesthetic resources. Foothill and mountain areas, which are visible throughout the County, create a dramatic backdrop for local communities and help define the character of the County.

Hillside areas also provide an important location for habitat as well as for certain lifestyle choices. In addition, there are public safety issues, such as slope failures, landslides, and mudslides, that occur naturally or as a result of development, grading, and landscaping. The severity of these slopes, the ability to provide infrastructure and services (such as transportation, water, sewer, etc.), and safety considerations can drastically alter the use and development potential of individual properties.

Development on hillsides within the County, where land use designations permit, will require careful siting, grading, and design in order to minimize exposure to hazards and to maintain and enhance the scenic quality of the County (Page LU-34).

Draft EIR does not adequately address the Hillside Development and Slope Land Use Element of the General Plan. Hillside areas are important locations for wildlife habitat and to preserve the scenic quality of the County.

- EIR is fatally flawed. Building "D" and "E" are two separate high cube warehouses being considered as one project. **This type of piecemealing or segmentation is not allowed**

E-74
(cont.)

E-75

E-76

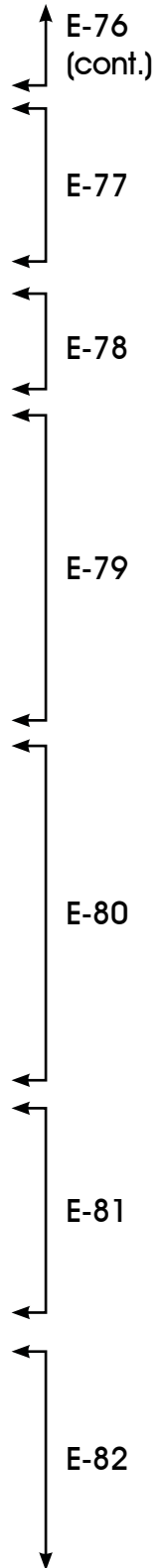


COMMENT LETTER E

under CEQA. Therefore EIR 546 must be revised and recirculated so that this error to piecemeal the project can be corrected.

- The Draft EIR assessment for Building "E" on the west side of Decker road has been modified substantially in the number of the parcels and size of the building. Modification to the Draft EIR for Building "E" describe different scenarios in regards to traffic flow, differing elevation height measurement of the building and various other inconsistencies that effect every aspect of the Draft Environmental Impact Report.
- Future Trammel Crow project phases are not included in the Draft EIR for this project as required by CEQA. The impacts of future high cube warehouses for the area such as truck traffic, noise, air pollution, light trespass, etc. have not been adequately evaluated.
- Draft EIR 546 does not adequately address the impacts of air quality, noise, truck traffic impacts to sensitive receptors (rural residential property) that abuts this project. Draft EIR 546 not only fails to meet CEQA guidelines, but also falls short of the Riverside County General Plan - Mead Valley Area Plan and General Plan Vision for land use with NO buffer between sensitive receptors and Building "D" as well as sensitive receptors a short distance away in the nearby hills to the west and south. The Draft EIR must address air quality, including a health risk assessment of diesel particulates and impacts to sensitive receptors, truck traffic and noise, and the cumulative impacts of reasonably foreseeable warehouse development in the area (Mead Valley Area Plan, pg. 32).
- Truck and vehicle traffic is not adequately addressed in the Draft EIR. Two main entrances along Oleander are indicated on Building "D" & "E" Site Plans. These plans also indicate two distinct offices with one at the northwest and one at the northeast corners of Building "D" & "E" This indicates that buildings "E" and "D" will have more than one tenant. Impacts from multiple tenants are not addressed in the Draft EIR. Similar warehouse at 17789 Harvill owned by Trammel Crow has multiple tenants which is creating a number of serious violations of CEQA and CARB. Trucks idling for hours as they are queuing to enter the facility. Lining up in the roadway of Harvill Ave. blocking traffic. Idling within the facility for hours. Parking in unauthorized areas because truck trailer parking is full.
- Ellsworth Street / Decker Road is set as the secondary access for Building "E" and "D". Draft EIR fails to adequately evaluate and disclose project impacts from allowing truck access past the improved sections of Ellsworth / Decker Road. This is an unimproved dirt road with pot holes, speed bumps and uneven surfaces that is certainly not up to any standards that would meet CEQA or AQMD guidelines for noise, dust, vibration and air quality.

Additional issues of concern include: dust, noise, vibration, air pollution, health, light trespass, and safety as these trucks drive down our rural neighborhood streets. The intersection at Markham and Decker has severe line of sight obstruction as Markham goes up a hill and has an "S" curve obstructing the view of vehicles turning onto Markham from Decker Road. Markham is so dangerous that K-rails were installed to keep cars from running off the road into homes. Trucks will be using Jake Brakes going



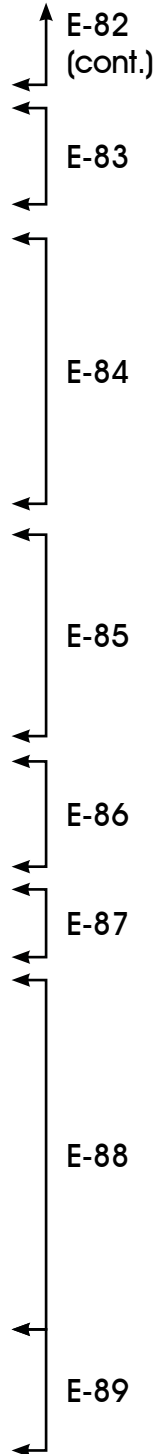


COMMENT LETTER E

up and down the hill on Markham 24-7. None of these adverse impacts were adequately evaluated in the Draft EIR.

- Portions of Ellsworth / Decker Road must be closed to Truck traffic going south from Building “E” and “D” due to adverse impacts from truck traffic in a rural residential neighborhood. Guard rails need to be installed to close the road to through truck traffic.
- The EIR underestimates the impacts of having one access road if Decker / Ellsworth is closed off to truck traffic. Oleander is listed as the primary access road. Oleander intersects Harvill Ave. passing the warehouse at 17789 Harvill Ave. that is currently receiving a number of complaints due to serious CARB violations. Trucks idling on and off the premises for hours. Trucks parking in unauthorized areas instead of truck parking spaces. Trucks that are idling next to a residential home for hours. Trucks in the middle of the road blocking traffic as they try to line up to get into the facility. These impacts have not been addressed or evaluated in Draft EIR 546.
- Draft EIR is inconsistent in the analysis of the buildings height, slopes, sound walls, noise pollution, and air pollution. The Draft EIR underestimates the impacts of Truck traffic to the communities of Mead Valley, Orangecrest, Woodcrest and Greater Lake Mathews and city of Riverside. Allowing Decker / Ellsworth as the secondary access encourages heavy truck traffic to travel throughout our rural communities using local country roads and highways.
- USGS Blue line stream traverses through the entire length of the project site. Wetlands are part of the streambed. The Draft EIR does not adequately address this stream “Waters of the State”.
- The EIR does not adequately address rock blasting noise and vibration for months directly next to homes with inadequate notice.

This proposed change is an assault on our rural equestrian lifestyle. Proposed General Plan Amendments and zone changes propose to change land use from rural to industrial zoning instead of Business Park and inside of our rural equestrian community next to homes. These logistics distribution warehouses will destroy the quality of life for not only residents in Mead Valley, but for the entire region as the accumulation of massive logistics warehouses and their logistics trucks creates havoc on our local roads, increases noise pollution beyond the allowable state standards, adding to the worse air pollution in the nation, decreases the level of service LOS on our roads to "E" and "F" which is far below state standards. Noise levels from backup beepers, trucks idling and trucks moving along Oleander and Decker are above the threshold of allowable CEQA standards. Using rock blasting for months on end directly next to rural homes, cultural and biological resources have not been adequately evaluated in the EIR. The area along Day and Nance is known for its tremendous scenic view of the mountains and hills from Moreno Valley to Perris Valley and beyond will be destroyed. These scenic resources were not analyzed in the EIR.





COMMENT LETTER E

Conclusion

Draft EIR 546 is fatally flawed and must be substantially revised and recirculated to correct numerous and significant flaws, errors and omissions much of which are included in this letter. Additional mitigation measures will need to be included into any future Environmental Impact Reports regarding GPA 1151 & GPA 1152.

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E-90

The Rural Association of Mead Valley is totally opposed to this proposed project of General Plan Amendments GPA 1151 & 1152 and request for zone changes from Business Park land use to Industrial Park so that two massive logistics warehouse can be built directly next to homes in the middle of our rural community.

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E-91

Sincerely,

Debbie Walsh
President, Rural Association of Mead Valley



COMMENT LETTER F

Subject: FW: Opposition to 1151 and 1152 Eir 546

From: Ayjai Anzaldi [<mailto:biggtrukgirl1@gmail.com>]
Sent: Thursday, July 06, 2017 2:36 PM
To: Brady, Russell <rbrady@RIVCO.ORG>
Subject: Opposition to 1151 and 1152 Eir 546

I strongly oppose rezoning to allow the huge warehouses in our neighborhood. We want to keep our area rural. The roads cannot handle an influx in traffic to this magnitude.

←
F-1
←

No to 1151 and 1152!

Thank You

Anjanette Anzaldi



COMMENT LETTER G

BLUM | COLLINS LLP

Aon Center
707 Wilshire Boulevard
Suite 4880
Los Angeles, California
90017

213.572.0400 phone
213.572.0401 fax

July 6, 2017

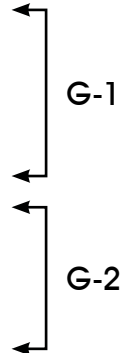
Russell Brady, Planner
Riverside County Planning Dept.
4080 Lemon Street, 12th Floor
Riverside, CA 92501
rbrady@rivco.org

VIA FIRST CLASS MAIL & EMAIL

Re: *Knox Business Park Buildings D and E, State Clearinghouse No. 2015081081*

Dear Mr. Brady and the County of Riverside:

On behalf of the Golden State Environmental & Social Justice Alliance, a California Social Purpose Corporation, Entity #C4017878, this is to submit comments under the California Environmental Quality Act (“CEQA”) on the Draft Environmental Impact Report (“DEIR”) for the Knox Business Park Buildings D and E project (“the Project”). We are attaching herewith the comments and modeling files of Soil Water Air Protection Enterprises (“SWAPE”).



Thank you for the opportunity to comment on the DEIR. Please advise us of the availability of a Final EIR, should you wish to prepare one, as well as of the further steps of your review of this Project at bentley@blumcollins.com and collins@blumcollins.com. This is a formal request to be notified pursuant to Pub. Res. Code § 21092.2. Thank you.

Sincerely,

/s/Hannah Bentley

Hannah Bentley
Contract Attorney
BLUM | COLLINS LLP

Enclosures: SWAPE Comments
SWAPE Modeling Files



COMMENT LETTER G



Technical Consultation, Data Analysis and
Litigation Support for the Environment

2656 29th Street, Suite 201
Santa Monica, CA 90405

Matt Hagemann, P.G., C.Hg.
(949) 887-9013
mhagemann@swape.com

July 5, 2017

Hannah Bentley
Blum Collins, LLP
707 Wilshire Blvd., 48th Floor
Los Angeles, CA 90017

Subject: Comments on the Knox Business Park Buildings D and E

Dear Ms. Bentley,

We have reviewed the July 2017 Draft Environmental Impact Report (DEIR) and associated attachments for the Knox Business Park Buildings D and E ("Project") located in unincorporated Riverside County. The Project would involve the construction of two high-cube warehouses, D and E, approximately 702,645 square feet and 410,982 square feet, respectively. Warehouse D will also have a parking lot for 243 passenger vehicles and warehouse E will have a parking lot for 229 passenger vehicles and 80 trucks (p. S-4, p. S-5).

G-3

Our review concludes that the DEIR fails to adequately evaluate the Project's local and regional air quality and health risk impacts. As a result, the Project's pollutant emissions and health risk impacts associated with the construction and operation of the proposed Project are underestimated and inadequately addressed. Until an updated Draft Environmental Impact Report (DEIR) is prepared and recirculated to adequately assess and mitigate the potential air quality and health impacts the Project may have on the surrounding environment, the Project should not be approved.

G-4

Health Risk Assessment

Diesel Particulate Matter Health Risk Emissions Inadequately Evaluated

According to DEIR, the Project will generate substantial diesel particulate matter (DPM) emissions during Project construction and operation, which is known as a human carcinogen and identified as a toxic air contaminant (TAC). In an effort to determine the health risk impacts associated with exposure to the Project's DPM emissions, the DEIR prepared a health risk assessment. Review of the DEIR's health risk assessment, however, demonstrates that: (1) a construction health risk assessment was not prepared,

G-5



COMMENT LETTER G

even though the DEIR explicitly states that Project construction would produce DPM emissions; and (2) the DEIR’s operational health risk assessment relied upon outdated health risk assessment guidance that fails to account for the heightened sensitivities to toxics in infants and children. As a result, we find both the Project’s construction-related and operational health risk impacts to be inadequately addressed and greatly underestimated. Until an updated DEIR is prepared and recirculated to adequately evaluate the Project’s construction and operational health risk impacts, the Project should not be approved.

G-5
(cont.)

Failure to Evaluate the Project’s Construction-Related Health Risk Impacts

As previously stated, the DEIR incorrectly concludes that the Project’s construction-related health risk impact would be less than significant with mitigation without preparing any sort of health risk analysis or quantified health risk assessment to support this significance determination (p. 4.3-29, 4.3-39, 4.3-40). The DEIR attempts to justify how this conclusion was made, stating that because the Project’s construction-related, local peak daily emissions generated within the Project Site would not exceed the applicable construction Localized Significance Thresholds (LSTs) once mitigation is implemented, as developed by the South Coast Air Quality Management District (SCAQMD), localized air quality impacts from construction activities on the off-site sensitive receptors would be less than significant (p. 4.3-29, 4.3-39, 4.3-40). We find this justification and resultant significance determination, however, to be inadequate, as the SCAQMD and OEHHA both recommend that short term health risk assessments be prepared. Furthermore, while the LST method relied upon in the DEIR assesses the impacts of pollutants at a local level, it only evaluates impacts from criteria air pollutants. As a result, health impacts from exposure to TACs during Project construction, such as DPM, were not analyzed, thus leaving a gap within the DEIR’s analysis. Due to these reasons, we find the DEIR’s health risk assessment to be inadequate and require that an updated DEIR be prepared to adequately evaluate the Project’s construction-related health risk impacts.

G-6

According to the Final Localized Significance Threshold Methodology document prepared by the SCAQMD, the LST analysis is only applicable to NO_x, CO, PM₁₀, and PM_{2.5} emissions, which are collectively referred to as criteria air pollutants.¹ Because the LST method can only be applied to criteria air pollutants, this method cannot be used to determine whether emissions from DPM will result in a significant health risk impact to nearby sensitive receptors. By failing to prepare a construction-related health risk assessment in addition to the LST analysis, the DEIR fails to provide a comprehensive analysis of the sensitive receptor impacts that may occur as a result of exposure to substantial air pollutants. Furthermore, the SCAQMD provides a specific numerical threshold of 10 in one million for determining a project's health risk impact, which supports the requirement of a construction-related health risk assessment in addition to the LST analysis. Therefore, in order to determine the proposed Project’s construction-related health risk impact, the DEIR should have conducted an assessment that compares the Project’s construction-related health risk to the SCAQMD specific numeric threshold of 10 in one million.

G-7

¹ “Final Localized Significance Threshold Methodology.” SCAQMD, Revised July 2008, available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf>, incorporated herein by this reference. All citations in the following footnotes are also incorporated herein by reference.



COMMENT LETTER G

This suggestion that the DEIR should have prepared a construction-related health risk assessment in addition to the LST analysis is further supported by additional SCAQMD guidance. According to the SCAQMD’s June 5, 2015 *Risk Assessment Procedures for Rules 1401, 1401.1, and 212*, it is recommended that health risk impacts from short-term projects, such as Project construction, also be assessed. The Guidance document states,

“Since these short-term calculations are only meant for projects with limits on the operating duration, these short-term cancer risk assessments can be thought of as being the equivalent to a 30-year cancer risk estimate and the appropriate thresholds would still apply (i.e. for a 5-year project, the maximum emissions during the 5-year period would be assessed on the more sensitive population, from the third trimester to age 5, after which the project’s emissions would drop to 0 for the remaining 25 years to get the 30-year equivalent cancer risk estimate).”²

As you can see in the excerpt above, a health risk assessment is required by the SCAQMD to determine whether or not Project construction would expose sensitive receptors to substantial air pollutants, contrary to what is stated in the DEIR, and as such, a proper health risk assessment should have been prepared.

As stated in the DEIR, diesel-powered, heavy duty, off road equipment, as well as diesel-powered hauling trucks will be used during Project construction, all of which will generate substantial amounts of DPM emissions (p. 4.3-18). According to the DEIR, the Project site is surrounded by multiple sensitive receptors, including: (1) residential zone 191 feet southwest of the Project site; (2) warehouse workers that will be on-site; and (3) school children attending the Thomas Rivera Middle School one mile away from the site, who would all be exposed to these DPM emissions once Project construction commences (Appendix B2, p. 1). Even though the DEIR acknowledges the existence of sensitive communities within the vicinity of the Project site, and recognizes the risk of exposure to substantial amounts of DPM emissions and other TACs during Project construction, the DEIR still fails to conduct a construction health risk assessment. The DEIR explicitly states that the reason an operational health risk assessment was conducted was to evaluate the impacts of operational DPM emissions on these surrounding sensitive receptors (p. 4.3-23). Therefore, following this same reasoning, the DEIR should have also evaluated the Project’s construction-related health risk impacts, as construction would also generate substantial amounts of DPM emissions that may expose sensitive receptors to harmful pollutant concentrations.

Not only is the omission of a construction-related health risk assessment inconsistent with SCAQMD guidance and the DEIR’s own reasoning, but it also directly contradicts recommendations made with the most recent health risk guidance published by Office of Environmental Health Hazard Assessment (OEHHA), the organization responsible for providing recommendations and guidance on how to conduct health risk assessments in California. In February of 2015, OEHHA released its most recent *Risk*

G-8

² Risk Assessment Procedures for Rules 1401, 1401.1 and 212, SCAQMD, June 2015, available at: <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/riskassprocjune15.pdf?sfvrsn=2>, p. IX-2



COMMENT LETTER G

Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments, which was formally adopted in March of 2015.³ This guidance document describes the types of projects that warrant the preparation of a health risk assessment. As previously stated, grading and construction activities for the proposed Project will produce emissions of DPM through the exhaust stacks of construction equipment over an approximate 23-month construction period (p. 3-33). The OEHHA document recommends that all short-term projects lasting at least two months be evaluated for cancer risks to nearby sensitive receptors.⁴ Therefore, per OEHHA guidelines, health risk impacts from Project construction should have been evaluated by the DEIR. This recommendation reflects the most recent health risk assessment policy, and as such, an assessment of health risks to nearby sensitive receptors from construction should be included in a revised CEQA evaluation for the Project.

G-8
(cont.)

In an effort to demonstrate the potential risk posed by construction of the proposed Project to nearby sensitive receptors, we prepared a simple screening-level health risk assessment. The results of our assessment, as described in the sections below, provide substantial evidence demonstrating that potential health risk impacts associated with construction of the proposed Project could cause a new significant air quality impact, contrary to what is stated in the DEIR. As such, an updated DEIR should be prepared and recirculated to adequately evaluate the proposed Project’s health risk impacts during construction, and additional mitigation measures should be identified and incorporated into the Project design, where necessary.

G-9

Use of Incorrect Exposure Parameters in Operational Health Risk Assessment

Not only did the DEIR fail to prepare a construction-related health risk assessment, but it also failed to adequately evaluate the Project’s operational health risk impact. Specifically, the DEIR failed to account for heightened sensitivities to infants and children within its health risk assessment. As a result, the Project’s operational health risk impact is inadequately evaluated.

G-10

The DEIR uses the following exposure assumptions to assess the cancer risk posed to the three sensitive receptors most likely to be impacted by Project operation: a resident (MEIR), a school child (MEISC), and an on-site warehouse worker (MEIW) (see excerpt below) (Appendix B2, p. 17).

³ “Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments.” OEHHA, February 2015, available at: http://oehha.ca.gov/air/hot_spots/hotspots2015.html

⁴ “Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments.” OEHHA, February 2015, available at: http://oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf, p. 8-18



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TABLE 2-6: EXPOSURE ASSUMPTIONS FOR INDIVIDUAL CANCER RISK

| Exposure Parameter | Units | Residential | Worker | School Child ^a |
|------------------------------|-----------|-------------|--------|---------------------------|
| Exposure Frequency | days/year | 350 | 245 | 180 |
| Exposure Duration | years | 70 | 40 | 9 |
| Inhalation Rate ^b | L/kg-day | 302 | 149 | 581 |
| Exposure Duration | Years | 70 | 40 | 9 |
| Exposure Time | hours/day | 24 | 12 | 10 |

^a To represent the unique characteristics of the school-based population, the assessment employed the U.S. Environmental Protection Agency's guidance to develop viable dose estimates based on reasonable maximum exposures (RME). RME's are defined as the "highest exposure that is reasonably expected to occur" for a given receptor population. As a result, lifetime risk values for the student population were adjusted to account for an exposure duration of 180 days per year for nine (9) years. The 9 year exposure duration is also consistent with OEHHA Recommendations and consistent with the exposure duration utilized in school-based risk assessments for various schools within the Los Angeles County Unified School District (LAUSD) that have been accepted by the SCAQMD.

^b The residential breathing rate of 302 L/kg-day represents the 80th percentile breathing rate per ARB and consistent with SCAQMD Risk Assessment Procedures for Rules 1401 and 212, the worker breathing rate of 149 L/kg-day is also consistent with SCAQMD Risk

Using these exposure assumptions, the DEIR concludes that "at maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project DPM source emissions is estimated at 6.19 in one million, which is less than the threshold of 10 in one million" (Appendix B2, 1). This conclusion, however, is incorrect, as it is based on a flawed analysis that relies upon outdated guidance. As a result, the Project's residential health risk impact is underestimated.

The DEIR relies upon the South Coast Air Quality Management District's (SCAQMD) old July 1, 2005 *Risk Assessment Procedures for Rules 1401 and 212*⁵ to assess the Project's health risk impacts, which does not account for heightened sensitivities to children and infants. According to the SCAQMD,

"This version of 'Risk Assessment Procedures for Rules 1401 and 212' is based on 'The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments' ('Guidance Manual') finalized by the state Office of Environmental Health Hazard Assessment (OEHHA) in August 2003 and the '(California) Air Resources Board (CARB) Recommended Interim Risk Management Policy for Inhalation-Based Residential Cancer Risk' ('Interim Policy') issued on October 9, 2003."⁶

As you can see in the excerpt above, the guidance document relied upon by the DEIR to evaluate the Project's health risk impacts is based off of guidance published in 2003, more than 10 years after the DEIR was prepared. Since then, the SCAQMD released an updated *Risk Assessment Procedures for Rules 1401 and 212*,⁷ which was prepared on June 5, 2015, that reflects the Office of Environmental Health

⁵ "Risk Assessment Procedures for Rules 1401, 1401.1 and 212." SCAQMD, July 1, 2005, available at: <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/risk-assessment-procedures-v-7.pdf?sfvrsn=4>

⁶ "Risk Assessment Procedures for Rules 1401, 1401.1 and 212." SCAQMD, July 1, 2005, available at: <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/risk-assessment-procedures-v-7.pdf?sfvrsn=4>, p. 1

⁷ "Risk Assessment Procedures for Rules 1401, 1401.1 and 212." SCAQMD, June 5, 2015, available at: <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/riskassprocjune15.pdf?sfvrsn=2>

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Hazard Assessment’s (OEHHA) February 2015 *Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments*, which was formally adopted in March, 2015.⁸ According to the SCAQMD, these updated health risk procedures became effective on July 5, 2015, and are applicable to assessments conducted on or after this date.⁹ Both the SCAQMD’s and OEHHA’s updated guidance documents, which require that health risk assessments account for heightened sensitivities to children and infants, were made available prior to the preparation of the DEIR (July 2017), and as such, the DEIR should have used this updated guidance when evaluating the Project’s health risks. By failing to do so, the Project’s operational health risk impact to residential receptors is underestimated.

According to the SCAQMD’s June 5, 2015 *Risk Assessment Procedures*¹⁰ and OEHHA’s February 2015 *Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments*,¹¹ residential exposure assessments should account for the heightened sensitivities that children and infants have towards cancer causing substances. In an effort to account for this heightened sensitivity, the SCAQMD and OEHHA recommend that the Age Sensitivity Factors and Age-Specific Breathing Rates be used. Age Sensitivity Factors (ASFs) were developed by OEHHA to take into account the increased sensitivity to carcinogens during early-in-life exposure. OEHHA and the SCAQMD recommend “an ASF of 10 for exposures that occur from the third trimester of pregnancy to 2 years, and an ASF of 3 for exposures that occur from 2 years through 15 years of age.”¹² The SCAQMD and OEHHA also recommend that breathing rates for specific age groups (i.e., 3rd trimester, 0-2, 2-16, and 16-30 years) be used to assess residential exposures. Specifically for residential exposures, the SCAQMD recommends using the high end daily breathing rate (DBR) (e.g., 95th percentile) for children from the 3rd trimester through age 2, and 80th percentile DBR for all other ages.¹³ Table 9.1 of the SCAQMD’s guidance document reflects the specific age-specific values that should be used when assessing residential risk (see excerpt below).¹⁴

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⁸ “Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments.” OEHHA, February 2015, available at: http://oehha.ca.gov/air/hot_spots/hotspots2015.html

⁹ Risk Assessment, SCAQMD, available at: <http://www.aqmd.gov/home/permits/risk-assessment>

¹⁰ “Risk Assessment Procedures for Rules 1401, 1401.1 and 212.” SCAQMD, June 5, 2015, available at: <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/riskassprocjune15.pdf?sfvrsn=2>

¹¹ “Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments.” OEHHA, February 2015, available at: <https://oehha.ca.gov/media/downloads/crn/2015guidancemanual.pdf>.

¹² “Risk Assessment Procedures for Rules 1401, 1401.1 and 212.” SCAQMD, June 5, 2015, available at: <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/riskassprocjune15.pdf?sfvrsn=2>, p. 19

¹³ “Risk Assessment Procedures for Rules 1401, 1401.1 and 212.” SCAQMD, June 5, 2015, available at: <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/riskassprocjune15.pdf?sfvrsn=2>, p. 19

¹⁴ “Risk Assessment Procedures for Rules 1401, 1401.1 and 212, Attachment M.” SCAQMD, March 2016, available at: <http://www.aqmd.gov/docs/default-source/permitting/attachment-m.pdf?sfvrsn=4>, Table 9.1, p. 36

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Table 9.1
Residential Combined Exposure Factor (CEF)

| Age | Daily Breathing Rate (L/kg-day) | Age Specific Factor | Exposure Duration (years) | Fraction of Time at Home | Exposure Frequency (350 days/year) | CEFR |
|------------|---------------------------------|---------------------|---------------------------|--------------------------|------------------------------------|--------|
| -0.25 to 0 | 361 | 10 | 0.25 | 1 | 0.96 | 676.63 |
| 0 to 2 | 1,090 | 10 | 2 | 1 | 0.96 | |
| 2 to 16 | 572 | 3 | 14 | 1 | 0.96 | |
| 16 to 30 | 261 | 1 | 14 | 0.73 | 0.96 | |

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As you can see in the table above, the SCAQMD and OEHHA recommend that age-specific breathing rates and age sensitivity factors be used to assess residential exposures in an effort to account for heightened sensitivities to infants and children. When this table is compared to the exposure assumptions used by the DEIR to evaluate the Project’s risk, we find that none of these age-specific factors were used. By failing to account for heightened sensitivities to children and infants when assessing residential exposures, the DEIR greatly underestimates the Project’s health risk impact.

Updated Health Risk Assessment Indicates Significant Health Impact

In an effort to demonstrate the potential health risk posed to nearby sensitive receptors during Project construction and operation, we prepared a simple screening-level health risk assessment. The results of our assessment, as described below, provide substantial evidence that DPM emissions from Project construction and operation, when evaluated correctly using the most up to date guidance, may result in a potentially significant health risk impact, contrary to what is stated in the DEIR. As such, an updated DEIR should be prepared and recirculated to adequately evaluate the proposed Project’s health risk impacts during construction and operation, and additional mitigation measures should be identified and incorporated into the Project design, where necessary.

Potentially Exposed Populations

According to the DEIR, there are numerous sensitive receptors located near the Project site, of which, three of them would have the greatest potential exposure. The DEIR states,

“The residential land use with the greatest potential exposure to Project DPM source emissions is located approximately 191 feet south of the Project site. The worker receptor land use with the greatest potential exposure to Project DPM source emissions is located to the east, immediately adjacent to the Project site. The school site land use with the greatest potential exposure to Project DPM is located at Thomas Rivera Middle School located approximately 1.0 mile (5,280 feet) southwest of the Project site.” (p. 4.3-23).

The residential land use approximately 191 feet away, as well as the children attending Thomas Rivera Middle School approximately 1.0 mile away from the Project site would be exposed to DPM during Project construction and operation. Similarly, on-site workers working at the warehouse long-term would be exposed to DPM emissions from diesel hauling trucks and on-site heavy-duty equipment used

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during Project operation. Therefore, in an effort to provide a comprehensive analysis, we assessed the risk posed to each of these three types of sensitive receptors, as follows: (1) the maximally exposed residential receptor (MEIR); (2) the maximally exposed school child (MEISC) at Thomas Rivera Middle School; and (3) the maximally exposed individual worker (MEIW), in which case, would be a full-time warehouse worker once the Project is approved and operational (see table below).

| Receptor Type | Receptor Description | Distance from Project Site (feet) | Distance from Project Site (meters) |
|---------------|-----------------------------|-----------------------------------|-------------------------------------|
| MEIR | Single-Family Home | 191 | 58 |
| MEISC | Thomas Rivera Middle School | 5,280 | 1,609 |
| MEIW | On-Site Warehouse | - | - |

Modeling Parameters

As of 2011, the Environmental Protection Agency (EPA) recommends AERSCREEN as the leading air dispersion model, due to improvements in simulating local meteorological conditions based on simple input parameters.¹⁵ The model replaced SCREEN3, and AERSCREEN is included in the OEHHA¹⁶ and the California Air Pollution Control Officers Associated (CAPCOA)¹⁷ guidance as the appropriate air dispersion model for Level 2 health risk screening assessments (“HRSAs”). A Level 2 HRSA utilizes a limited amount of site-specific information to generate maximum reasonable downwind concentrations of air contaminants to which nearby sensitive receptors may be exposed. If an unacceptable air quality hazard is determined to be possible using AERSCREEN, a more refined modeling approach is required prior to approval of the Project.

We prepared a preliminary health risk screening assessment of the Project's construction and operational emissions. For the Project’s operational health risk assessment, we did not prepare an AERSCREEN model, as the DEIR already estimates the annual average concentrations at each sensitive receptor location using AERMOD. Therefore, we relied upon the annual average concentrations provided in Table A1, A2, and A3 of Appendix B2 of the DEIR to assess the Project’s operational health risk impacts (Appendix B2, pp. 371-373). For the Project’s construction-related health risk, we used the annual PM₁₀ exhaust emissions from the DEIR’s CalEEMod model, which can be found in Appendix F of the DEIR (Appendix F, pp. 61). The CalEEMod model’s annual emissions indicate that construction activities will generate approximately 1,899 pounds of DPM over the 588-day construction period (Appendix F, pp. 64).¹⁸ The AERSCREEN model relies on continuous average emission rate to simulate maximum downward concentrations from point, area, and volume emission sources. To account for

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¹⁵ “AERSCREEN Released as the EPA Recommended Screening Model,” USEPA, April 11, 2011, *available at*: http://www.epa.gov/ttn/scram/guidance/clarification/20110411_AERSCREEN_Release_Memo.pdf

¹⁶ “Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments.” OEHHA, February 2015, *available at*: <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf>.

¹⁷ “Health Risk Assessments for Proposed Land Use Projects,” CAPCOA, July 2009, *available at*:

http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA_health_risk_assessment_LU_Guidelines_8-6-09.pdf

¹⁸ Construction is anticipated to start 1/1/2016 and end on 8/10/2017. The total number of days within this period is therefore approximately 588 days.

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variability in off-road equipment use over the Project’s construction, we calculated an average DPM emission rate by the following equation.

$$\text{Emission Rate } \left(\frac{\text{grams}}{\text{second}} \right) = \frac{1,899 \text{ lbs}}{587 \text{ days}} \times \frac{453.6 \text{ grams}}{1 \text{ pound}} \times \frac{1 \text{ day}}{24 \text{ hours}} \times \frac{1 \text{ hour}}{3,600 \text{ seconds}} = 0.01699 \text{ g/s}$$

Using this equation, we estimated a construction emission rate of 0.01699 grams per second (g/s). Construction activity was simulated as a 58.6-acre rectangular area source in AERSCREEN, which is consistent with the Project acreage provided in the DEIR (p. S-2), with dimensions of 679 meters by 349 meters. A release height of three meters was selected to represent the height of exhaust stacks on construction equipment and other heavy-duty vehicles, and an initial vertical dimension of one and a half meters was used to simulate instantaneous plume dispersion upon release. An urban meteorological setting was selected with model-default inputs for wind speed and direction distribution.

Modeling Outputs

The AERSCREEN model generates maximum reasonable estimates of single hour DPM concentrations from the Project site. EPA guidance suggests that in screening procedures, the annualized average concentration of an air pollutant be estimated by multiplying the single-hour concentration by 10%.¹⁹ For example, for the MEIR the single-hour concentration estimated by AERSCREEN for Project construction is approximately 3.083 µg/m³ DPM at approximately 50 meters downwind. Multiplying this single-hour concentration by 10%, we get an annualized average concentration of 0.3083 µg/m³ for Project construction at the MEIR.

Using this method, we derived the annualized average concentration from the single hour concentration for each of the sensitive receptors based on their distance from the Project site. To assess the Project’s operational health risk impacts we relied upon the annual average concentrations provided in Table A1, A2, and A3 of Appendix B2 of the DEIR (Appendix B2, pp. 371-373). A summary of the annualized average DPM concentrations for each of the sensitive receptors for Project construction and operation are provided in the table below.

| Receptor | Phase | AERSCREEN Distance (meters) | Maximum Single Hour DPM Concentration (µg/m ³) | Annualized Average DPM Concentration (µg/m ³) |
|----------|--------------|-----------------------------|--|---|
| MEIR | Construction | 50 | 3.083 | 0.3083 |
| | Operation | 50 | - | 0.0194 |
| MEISC | Construction | 1,600 | 0.440 | 0.0440 |
| | Operation | 1,600 | - | 0.00034 |
| MEIW | Operation | 1 | - | 0.01452 |

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¹⁹ http://www.epa.gov/ttn/scram/guidance/guide/EPA-454R-92-019_OCR.pdf

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Exposure Assumptions

We calculated the excess cancer risk for each sensitive receptor location, for adults, children, and/or infant receptors using applicable health risk assessment methodologies prescribed by OEHHA and the SCAQMD. OEHHA recommends the use of Age Sensitivity Factors (“ASFs”) to account for the heightened susceptibility of young children to the carcinogenic toxicity of air pollution.²⁰ According to the revised guidance, quantified cancer risk should be multiplied by a factor of ten during the first two years of life (infant), and by a factor of three for the subsequent fourteen years of life (child aged two until sixteen). Furthermore, in accordance with guidance set forth by the SCAQMD and OEHHA, we used 95th percentile breathing rates for infants and 80th percentile breathing rates for children and adults in the MEIR.²¹ We used a cancer potency factor of 1.1 (mg/kg-day)⁻¹ and an averaging time of 25,550 days.

Health Risk at the Maximally Exposed Individual Receptor (MEIR)

OEHHA recommends that a 30-year exposure duration be used as the basis for estimating cancer risk at the MEIR.²² Consistent with OEHHA guidance, exposure to the MEIR was assumed to begin in the infantile stage of life to provide the most conservative estimate of air quality hazards. The results of our calculations are shown below.

| The Maximum Exposed Individual at an Existing Residential Receptor (MEIR) | | | | | |
|--|-------------------------|---|----------------------------------|--------------------------|--------------------|
| Activity | Duration (years) | Concentration (µg/m³) | Breathing Rate (L/kg-day) | ASF | Cancer Risk |
| Construction | 1.61 | 0.3083 | 1090 | 10 | 8.2E-05 |
| Operation | 0.64 | 0.0194 | 1090 | 10 | 2.0E-06 |
| Infant Exposure Duration | 2.25 | | | Infant Exposure | 8.4E-05 |
| Operation | 14.0 | 0.0194 | 572 | 3 | 7.0E-06 |
| Child Exposure Duration | 14.0 | | | Child Exposure | 7.0E-06 |
| Operation | 14.0 | 0.0194 | 233 | 1 | 9.5E-07 |
| Adult Exposure Duration | 14.0 | | | Adult Exposure | 9.5E-07 |
| Lifetime Exposure Duration | 30.0 | | | Lifetime Exposure | 9.16E-05 |

The excess cancer risk to adults, children, and infants at the MEIR located approximately 50 meters away, over the course of Project construction and operation are 0.95, 7, and 84 in one million, respectively. Furthermore, the excess cancer risk over the course of a residential lifetime (30 years) at the MEIR is approximately 91.6 in one million. The infantile and lifetime cancer risks greatly exceed the

²⁰ “Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments.” OEHHA, February 2015, available at: <https://oehha.ca.gov/media/downloads/crn/2015guidancemanual.pdf>.

²¹ “Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics ‘Hot Spots’ Information and Assessment Act,” SCAQMD, June 5, 2015, available at: <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab2588-risk-assessment-guidelines.pdf?sfvrsn=6>, p. 19

²² “Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments.” OEHHA, February 2015, available at: <https://oehha.ca.gov/media/downloads/crn/2015guidancemanual.pdf>, p. 8-1.

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SCAQMD threshold of 10 in one million. As a result, the Project could have a potentially significant health risk impact to the MEIR.

Health Risk Posed to a Student Receptor at the Thomas Rivera School

We calculated the excess cancer risk to middle school students using applicable health risk assessment methodologies prescribed by OEHHA. As previously discussed, AERSCREEN calculates an annual average air concentration, assuming that emissions would be uniformly emitted over 24 hours per day, 7 days per week.²³ The students, however, would only be in school for an average of 10 hours per day, 5 days per week.²⁴ Similarly, Project construction is assumed to only occur during daylight hours, Monday through Friday. Therefore, an adjustment factor (“AF”) would need to be applied to the annual average concentration calculated in AERSCREEN in order to accurately estimate the cancer risk posed to these students during school hours. An exposure frequency of 180 days per year was used to reflect the number of days in a typical school year, and an exposure duration of approximately 9 years was used to represent the duration of Project construction and operation. OEHHA also recommends that the 95th percentile, moderate intensity breathing rates be used to determine risk to children at schools.²⁵ The results of our calculations are summarized in the table below.

Thomas Rivera Middle School Child Receptor (MEISC)

| Activity | Duration (years) | Concentration (µg/m ³) | Breathing Rate (L/kg-day) | ASF | AF | Cancer Risk |
|----------------------------------|------------------|------------------------------------|---------------------------|-----|-------------------------|----------------|
| Construction | 1.61 | 0.04396 | 640 | 3 | 3.36 | 3.5E-05 |
| Operation | 7.39 | 0.000034 | 640 | 3 | 3.36 | 1.3E-08 |
| Student Exposure Duration | 9.00 | | | | Student Exposure | 3.5E-05 |

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The excess cancer risk to a school child from ages five to fourteen years old is approximately 35 in one million, which greatly exceeds the SCAQMD threshold of 10 in one million. As a result, the Project's construction and operational emissions do, in fact, present a potentially significant impact to nearby sensitive receptors at the Thomas Rivera Middle School.

Health Risk Posed to On-Site Warehouse Employee

For worker exposure, the default assumes working age begins at 16 years, and that exposures to facility emissions occur during the work shift, typically up to 8 hours per day during work days.²⁶ Exposure would only begin after construction, when the warehouse is in operation and would have employees on-site. OEHHA recommends default (Tier 1) point estimate 8-hour breathing rates in L/kg-8-hrs based on the mean and 95th percentile of moderate intensity activities, 170 and 230 L/kg-8-hrs, respectively, for

²³ “Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments.” OEHHA, February 2015, available at: <https://oehha.ca.gov/media/downloads/crn/2015guidancemanual.pdf>, p. 5-26

²⁴ http://www.baaqmd.gov/~media/Files/Engineering/Air%20Toxics%20Programs/hrsa_guidelines.ashx?la=en

²⁵ “Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments.” OEHHA, February 2015, available at: <https://oehha.ca.gov/media/downloads/crn/2015guidancemanual.pdf>, p. 5-30, 5-32

²⁶ “Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments.” OEHHA, February 2015, available at: <https://oehha.ca.gov/media/downloads/crn/2015guidancemanual.pdf>, p. 5-26



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adults 16-70 years old.²⁷ The warehouse employees, however, would only be on-site for an average of 8 hours per day, 5 days per week.²⁸ Therefore, similar to the student health risk, an adjustment factor would also need to be applied to the annual average concentration calculated in order to accurately estimate the cancer risk posed to on-site employees during working hours. An exposure frequency of 250 days was used to reflect the number of work days that would occur in any given year, and exposure duration of 25-years was used, which is the recommended duration for a MEIW.²⁹ The results of our calculations are summarized in the table below.

| The Maximum Exposed Individual at an On-Site Occupational Worker Receptor (MEIW) | | | | | | |
|--|------------------|------------------------------------|---------------------------|-----|------------------------|----------------|
| Activity | Duration (years) | Concentration (µg/m ³) | Breathing Rate (L/kg-day) | ASF | AF | Cancer Risk |
| Operation | 25 | 0.01452 | 230 | 1 | 4.20 | 3.8E-06 |
| Worker Exposure Duration | 25 | | | | Worker Exposure | 3.8E-06 |

The excess cancer risk to a warehouse employee is approximately 3.8 in one million, which does not exceed the SCAQMD threshold of 10 in one million. As a result, the Project's operational emissions do not present a potentially significant health risk impact to the on-site MEIW.

As is demonstrated in the summary table below, the infant and lifetime health risks posed to the MEIR, as well as the overall risk to a school child (MEISC) at the Thomas Rivera Middle School all exceed the SCAQMD threshold of 10 in one million, thus resulting in a potentially significant impact.

| Receptor | Exposure Type | Excess Cancer Risk (in one million) | Significance Threshold (in one million) | Exceed? |
|----------|------------------------|-------------------------------------|---|-------------------|
| | <i>Infant</i> | <i>84</i> | <i>10</i> | <i>Yes</i> |
| MEIR | Child | 7 | 10 | No |
| | <i>Lifetime</i> | <i>92</i> | <i>10</i> | <i>Yes</i> |
| MEISC | <i>Lifetime</i> | <i>35</i> | <i>10</i> | <i>Yes</i> |
| MEIW | Lifetime | 3.8 | 10 | No |

It should be noted that our analysis represents a screening-level health risk assessment, which is known to be more conservative, and tends to err on the side of health protection.³⁰ The purpose of a screening-level health risk assessment, however, is to determine if a more refined health risk assessment needs to be conducted. If the results of a screening-level health risk are above applicable thresholds, then the Project needs to conduct a more refined health risk assessment that is more representative of site

²⁷ "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, available at: <https://oehha.ca.gov/media/downloads/crn/2015guidancemanual.pdf>, p. 5-26

²⁸ http://www.baaqmd.gov/~media/Files/Engineering/Air%20Toxics%20Programs/hrsa_guidelines.ashx?la=en

²⁹ "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, available at: <https://oehha.ca.gov/media/downloads/crn/2015guidancemanual.pdf>, p. 5-26

³⁰ <https://oehha.ca.gov/media/downloads/crn/2015guidancemanual.pdf>, p. 1-5

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specific concentrations. Our screening-level health risk assessment demonstrates that construction and operation of the Project could result in a potentially significant health risk impact, when correct exposure assumptions and up-to-date, applicable guidance are used. As a result, a refined health risk assessment must be prepared to examine air quality impacts generated by Project construction and operation using site-specific meteorology and specific equipment usage schedules. An updated DEIR must be prepared to adequately evaluate the Project's health risk impact, and should include additional mitigation measures to reduce these impacts to a less-than-significant level.

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Sincerely,

Matt Hagemann, P.G., C.Hg.

Jessie Jaeger



COMMENT LETTER H

Subject: FW: EIR 546

-----Original Message-----

From: Robin Chaney [mailto:ztazgo@sbcglobal.net]
Sent: Thursday, July 06, 2017 4:37 PM
To: Brady, Russell <rbrady@RIVCO.ORG>
Subject: EIR 546

To whom it may concern:

I oppose general plan amendment 1151 and 1152. This area is a rural, residential area. It is no place for warehouses! This proposal would bring more truck traffic, and air pollution to our rural, residential area. I, as one who lives in this area, am vehemently opposed to any of this kind of addition to our part of Riverside.

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Very sincerely,

Robin Chaney

Sent from my iPhone
Confidentiality Disclaimer

This email is confidential and intended solely for the use of the individual(s) to whom it is addressed. The information contained in this message may be privileged and confidential and protected from disclosure. If you are not the author's intended recipient, be advised that you have received this email in error and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. If you have received this email in error please delete all copies, both electronic and printed, and contact the author immediately.

County of Riverside California <<http://www.countyofriverside.us/>>



COMMENT LETTER I

Subject: FW: No to rezoning- EIR 546
Attachments: image001.jpg

From: Erika Gonzalez [mailto:gonzalez.erika2020@gmail.com]
Sent: Thursday, July 06, 2017 4:01 PM
To: Brady, Russell <rbrady@RIVCO.ORG>
Subject: No to rezoning- EIR 546

Dear Mr. Brady,

I strongly oppose the rezoning efforts being led mostly by warehouse developers who want to build in the rural land of Mead Valley.

During the last decade, there has been massive warehouse relocation efforts which have negatively affected my community. Not only has traffic congestion increased, but the air quality has also tremendously worsened as a result of construction of these warehouses.

While some may argue the warehouses bring in jobs and revenue to the local economy, in my perspective [thinking long-term] there are greater detrimental effects.

Environmentally, areas which have already been developed, have been stripped of their natural vegetation affecting all ecological species who consider that lands their home. Additionally, heavy traffic including big commercial trucks, raises safety concerns for all residents in the community.

I urge you to please take a look at the timing and sequencing of all the new developments which has taken place in the Mead Valley community and its peripheries. The rate of the continuous development, is not taking into consideration the growth managements principles that are clearly outlined in the General Plan.

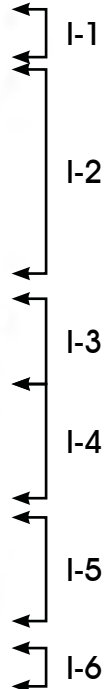
Furthermore, in a span of less than 10 years, there are more commuters in Cajalco Expressway than ever before. There are elementary schools and secondary schools within a 5 mile radius where new developments intend on taking place. Rezoning these areas can put a harder strain on the already congested streets around school and work hours.

As a community resident, I would like for these portions of land to rather be used for community vegetation projects and utilize the land for local sourcing of foods. 50-60 years ago those lands were covered in citrus fruit trees. I think we gave the ability to re-prioritize our land use practices and become part of a transformative new way of life.

Again, I oppose General Plan Amendments 1151&1152 as well included in EIR 546.

I ask you to please value residents opinions and comments.

Yours truly,
Erika Gonzalez
Mead Valley resident





COMMENT LETTER J

Subject: FW: GPA 1151 and 1152

-----Original Message-----

From: Margaret Lindou [mailto:margaretlindou@yahoo.com]

Sent: Thursday, July 06, 2017 8:24 AM

To: Brady, Russell <rbrady@RIVCO.ORG>

Subject: GPA 1151 and 1152

Dear Mr. Brady

I am writing to let you know that I am opposed to large warehouses being built in our rural areas.

My greatest concern is for the impact it will have on our local residential communities. Warehouses are proposed to be built very close to houses, leading to excessive noise and light pollution, not to mention the vastly increasing air pollution that these warehouses cause. Trucks come to deliver or pick up at all hours of the day and night. They park and idle, which is illegal, for long periods of time. This has been documented in our area. No enforcement of idling laws has been seen. Our neighborhoods are already being overrun by large semi-trucks using residential streets. This happens because roads in the area were not built for this kind of traffic. New gas taxes have been scheduled to help roads, but no mention of the roads affected by these projects.

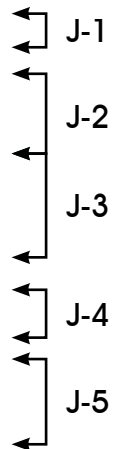
I am also concerned about wildlife in the area. I have seen burrowing owls in the area. They are an important species to our habitat, but they are becoming more scarce.

Please help to protect our local neighborhoods. Ensure that infrastructure is in place before building large warehouses. Enforce the local laws that are here to protect the community. Keep rural areas rural. They were designated as rural for a reason

Thank you for your time and consideration.

Sincerely,
Margaret Lindou
Confidentiality Disclaimer

County of Riverside California <<http://www.countyofriverside.us/>>





COMMENT LETTER K

C. Ray Miller and Peggy Miller
22075 Nance Street
Perris, CA 92570
claudierm@yahoo.com
July 5, 2017
Russell Brady - Project Planner
Riverside County Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92501
rbrady@rivco.org

**Re: Opposition to Draft Environmental Impact Report No. 546 for proposed Knox
Business Park Buildings D and E**

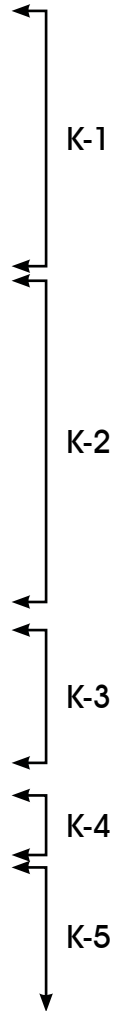
We are adamantly opposed to General Plan Amendment 1151 & 1152 and changes of zone 7873 & 7872 that will change this rural area that is currently zoned for Rural Residential and Business Park to high cube warehouses. The Draft EIR states that there is no scenic view. This assessment is wrong. These General Plan Amendments and zone changes for high cube warehouses will destroy the tremendous view that we have of the open space and surrounding mountains from Box Springs, Big Bear, Lake Arrowhead, Mt. Baldy, March Reserve Base, San Gorgonio Pass, and Moreno Valley. Instead the neighborhood will be left with the view of 44' to 55' tall logistics warehouses. It is hard to imagine losing this view for a view of a wall to a warehouse. These changes will set a precedent for future high cube warehouses to march up the hill to Day Street next to where we live. We moved to this area over 20 years and built our forever home overlooking the valleys below. The Draft EIR stating there is NO scenic view is totally inaccurate, false and not adequately evaluated. Not only do we have a scenic view, but my neighbors have a panoramic view of the mountains and valleys as well. We entertain on our porch and in our front yard. Our guests enjoy the view and the open space. We and our guests enjoy seeing all the wildlife. In the spring the hill is ablaze with wild flowers. Our great grand children get to see animals and birds and flowers that many children don't get to enjoy or know about. We always host Thunder Over the Empire. We don't want to lose our view of this magnificent show.

Logistic warehouses is not what the community was promised in 1988 when the Industrial Corridor was approved by Supervisor Norton Younglove. GPA 1151 & 1152 are in violation of the current General Plan and Mead Valley Area Plan and Riverside County General Plan vision for the area.

Draft EIR 546 is fatally flawed and needs to be completely reassessed, reanalyzed, rewritten and recirculated.

There is a better choice than high cube warehouses. **NO PROJECT OPTION.**

The best choice is to leave the area as it is as open space, as a wildlife corridor for a large number of wildlife to flourish and to allow wildlife to travel to Sycamore Canyon Wilderness





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Park and to the Motte Reserve. The wildlife corridor is part of a larger wildlife corridor that travels along the Cajalco Creek, Gavilan Hills, Canyon Lake and on to the Cleveland National Forest.

The second choice would be to retain the Business Park and Rural Residential land uses that already exist for rural homes and Business Park that would allow smaller businesses that create real jobs, sales taxes and operate from 8:00 am to 6:00 pm instead of 24-7. Keeping the current zoning as Business Park and rural homes would reduce the operational effects of the proposed high cube warehouse project substantially reducing truck trips, traffic congestion, air pollution, vehicle and truck traffic throughout our local streets, noise pollution, diesel particulate PM and NOx emissions.

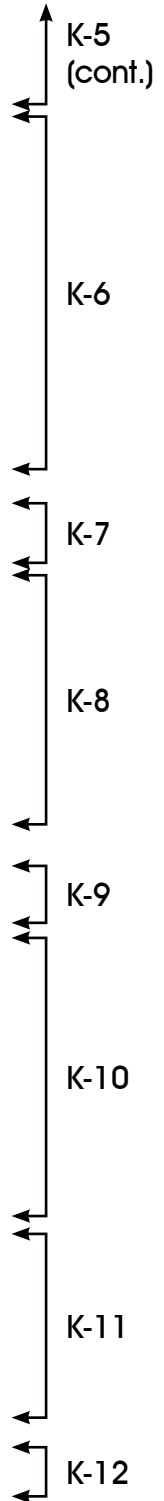
Business Park zoning acts as a buffer between Very Low Density Residential A-1-1 Zoning to the south and west of the project and Light Industrial along Harvill Ave. Business Park land uses must allow for a substantial buffer between homes and businesses. WRCOG requires a 1000 foot buffer between logistics warehouses and sensitive receptors (rural homes).

Homes along the hillside would be impacted to a greater degree due increasing air pollution as pollution rises from the valley to higher elevations similar to what occurs in Crestline where smog increases as it is pushed higher against the mountains. Noise is also affected by the surrounding hills similar to an amphitheater, where noise amplifies up hillsides shaped like the Hollywood Bowl. “The term Amphitheatre can also be used to describe naturally occurring formations which would be ideal for this purpose, even if no theatre has been constructed there” ([HYPERLINK "https://en.wikipedia.org/wiki/Amphitheatre"](https://en.wikipedia.org/wiki/Amphitheatre) <https://en.wikipedia.org/wiki/Amphitheatre>). Residents in the neighborhood can hear Taps played at the Riverside National Cemetery. This is a pleasant sound totally different from noise pollution heard from warehouses.

EIR 546 does not adequately evaluate or disclose the true health risks to residents living nearby due to harmful and unsafe noise, noise vibration, air pollution and diesel particulate matter PM. The effects of Rock Blasting to be performed during the construction process for months on end has not been adequately analyzed or evaluated. Not only does this impact the health and welfare of residents, but it also impacts the health and welfare of livestock (Agriculture). Property surrounding the project site is A-1-1 Light Agriculture which includes the grazing of cattle, horses, sheep, goats or other farm stock that can be dramatically impacted by the effects of noise, vibration and air pollution. We personally will be affected greatly because of our medical conditions. The air pollution and noise pollution as been proven to adversely affect young children. We don’t know how safe it will be for us to have our young great grand children here at our home to visit and play out side.

There is no mention in the Draft EIR of any analysis of Ordinance 625 “Right-To-Farm Ordinance” which includes raising farm animals as well as raising crops. Livestock includes horses, mules and ponies whose health and welfare will be impacted by rock blasting noise, air quality and truck traffic. Many horses are especially effected by loud noise as they are easily frightened and become nervous around loud sounds. Many people in our neighborhood have horses and ride them daily.

Current zoning of the area is overwhelmingly A-1-1 Light agriculture.





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The EIR does not adequately evaluate the harmful effects of diesel particulates, air pollution and noise pollution on residents with respiratory ailments, the young and elderly. The EIR does not include any type of study or evaluation on the effects of truck traffic from this project using Decker Ave. which allows trucks to travel throughout our narrow country roads in the community. This greatly impacts every single road in Mead Valley as all of the roads are interconnected. We live on Nance and will be using Day Street, Nandina, Clark, Van Buren, Cajalco, Harvill and a number of other roads that logistics trucks will be using every day. Our roads are already dangerous and congested. The EIR does not even mention the negative impacts of using Decker Road as a secondary access for truck traffic. 1. More air pollution and diesel particulates as these trucks will be driving slower and idling more. 2. Noise will increase as these trucks are going up and down hills using their Jake Brakes 24-7. 3. Trucks will be slowing down at a number of stop signs. 4. More trucks will increase gridlock on our local streets and highways as they drive slower than cars. 5. Trucks traveling on our local roads especially going up and down hills will increase accidents and make our roads more dangerous. 6. Our rural roads are not designed to take the abuse of hundreds of trucks using them every day. Local roads will soon decay similar to the condition of Harvill Ave. with the asphalt cracking and dislodging. Tires on these worn out roads are also impacted with increased rubber particles dislodging into the air further undermining our health, safety and welfare 7. Intersections are not designed for the wide turns that massive logistics trucks make. Logistics Trucks are 53 feet in length. These impacts have not been analyzed or addressed in the Draft EIR.

K-13
K-14
K-15

We frequently drive by the Knox Business Center warehouse at 17789 Harvill where we have observed trucks lined up along Harvill in the middle of the road numerous times. More than 30 trucks were observed, more then one time, lining up on Harvill Ave blocking the right hand lane. They were observed along Harley Knox completely blocking the right hand turn lane. In all these instances their engines were idling for hours as they waited their turn to enter this facility. The EIR is flawed in their analysis of current traffic projections along Harvill and future traffic projections that this Project will produce in the future. We personally witnessed a near accident from a vehicle turning from the right left turn lane when the right lane on Harvill was blocked by trucks.

K-16

The EIR is flawed in the number of cars and trucks using these facilities. More tenants equals more goods and more trucks entering and exiting the facilities. Robotic technology will increase the unloading and processing time, which will change the flow of traffic with less cars and more trucks entering these facilities. More trucks arriving each day will increase the number of trucks idling for hours as they try to enter the facility. Oleander will be just 2 lanes and one middle left turn lane. This increases the difficulty for trucks trying to enter the facility. More than one tenant increases this task dramatically as the number of trucks enter the middle lane to turn left. This will create a traffic nightmare along Oleander, Decker and possibly Harvill Ave.

K-17



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None of this was evaluated in the Draft EIR 546.

← K-18

MVAP 6.1 In conjunction with the first warehousing/distribution building proposed for the industrial area located along Interstate 215 (including land designated Light Industrial, Business Park, and Light Industrial with a Community Center Overlay) whereby the cumulative square footage of warehousing/distribution space in the area would exceed 200,000 square feet, an Environmental Impact Report (EIR) shall be prepared that assesses the potential impacts of the project. The EIR must address air quality, including a health risk assessment of diesel particulates and impacts to sensitive receptors, truck traffic and noise, and the cumulative impacts of reasonably foreseeable warehouse development in the area (Mead Valley Area Plan, pg. 32).

← K-19

The EIR is fatally flawed in the analysis of addressing air quality, health risk from diesel particulates and impacts to sensitive receptors, truck traffic and noise and foreseeable future impacts of GPA 1151 & GPA 1152 for two massive logistics warehouses next to rural homes along Redwood and also up the hill to the southwest of Building “E”.

← K-20

The Draft EIR fails to evaluate the true number of trucks that will be using the facility, noise generated from the warehouse and trucks, idling time of the trucks at the warehouse and on the streets, health risks to residents and livestock, use of Jake Brakes on rural streets, cumulative impacts of the warehouse project for the Greater Mead Valley, Lake Mathews, Woodcrest and Orangecrest communities.

← K-21

Multiple tenants, automation and robotics, trucks using various local roads to get to the ports of LA and Long Beach, trucks backing up along Oleander and Decker Road will increase the idling time dramatically increasing air quality, diesel particulates and impacts to sensitive receptors (rural homes) next to the project. The EIR is flawed and does not evaluate the numerous accumulative negative effects of GPA 1151 & 1152 2 massive warehouses over 1.1 million square feet directly next to homes and impacts from the hundreds of diesel trucks traveling to and from these warehouses every day.

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“The greater Los Angeles area has the worst ozone problem in the nation, but the number of unhealthful days is on a declining trend, with 2015 the best year so far. However, the number of bad air days went up in 2016, with 116 days failing to meet the federal health standard for ozone, according to state data” (Southern California’s smog clean-up future is far from clear, David Danelski, 2017). **HYPERLINK "<http://www.pe.com/2017/04/18/southern-californias-smog-clean-up-future-is-far-from-clear>" <http://www.pe.com/2017/04/18/southern-californias-smog-clean-up-future-is-far-from-clear>**

← K-23

Combustion-related particulate matter is associated with a host of severe impacts such as heart attacks, stroke, cardiovascular death (Dockery et al, 2002) and lung cancer (Pope et al, 2002) in

← K-24



COMMENT LETTER K

adults. In children, fine particles are associated with upper and lower respiratory impacts as well as retardation of lung growth (Gauderman et al, 2004) and crib death. Carbon soot particles from diesel engines adsorb onto their surfaces other metals and toxic substances produced by diesel engines such as cancer-causing aldehydes (like formaldehyde) and PAH (polycyclic aromatic hydrocarbons.) Occupational health studies link cancers, particularly lung cancer to diesel exhaust exposures. Traffic studies suggest increased rates of respiratory and cardiovascular disease and risk of premature death near busy urban streets or highways (Clean Air Task Force, Diesel Soot Health Impacts)
http://www.catf.us/methane/black_carbon/diesel/dieselhealth/faq.php?site=0.

K-24
(cont.)

In the REMSAD study, Abt Associates, for the Clean Air Task Force, estimate that approximately 21,000 people in the U.S. die prematurely each year from breathing diesel soot, 3,000 of these from lung cancer. Another 27,000 heart attacks, 14,500 hospitalizations and 2.4 million lost work days are attributable to diesel particulate matter exposures. For more details see Abt report at: HYPERLINK "<http://www.catf.us/goto/AbtREMSAD/>" \t "_blank"

“For a phased development project, even if details about future phases are not known, future phases must be included in the project description if they are a reasonably foreseeable consequence of the initial phase and will significantly change the initial project or its impacts”
Laurel Heights Improvement Association v Regents of University of California (1988) 47 Cal. 3d 376.

K-25

Draft EIR 546 does not mention future Trammel Crow phases for warehouses within the Knox Business Park or the impacts that these future high cube warehouses will have on the surrounding rural neighborhoods, Community of Mead Valley, surrounding Communities of Greater Lake Mathews, Greater Mead Valley, Woodcrest, Orangecrest or the City of Riverside.

At the BBQ where the community residents were given invitations to an event at the iHerb opening Trammel Crow staff told us that there was no stream on the property and there was no Native American Indian Village. The staff said the statements were fake old tales that did not really exist. Of course the residents know the truth that there is a cave with a stream in it and that the Native American Village is real.

K-26

We attended the ALUC airport land use meeting regarding GPA 1151 & 1152. In that report it mentions that the warehouses are planned for a height of 55’ and yet in the EIR the warehouses are described as 44’. The project description is inconsistent and inaccurate in a number of ways.

County of Inyo v. City of Los Angeles (1977) 32 Cal. App. 3d 795:
 "EIR was rejected because the project description was inaccurate and was described differently in different parts of the document" (AEP CEQA Portal, CEQA Portal Topic paper)

K-27

Project Description in the State CEQA Guidelines.

The project description is addressed in the following sections of the State CEQA Guidelines:
Section 15378 – Defines the term “project” as used within CEQA, and the types of actions that either do or don’t constitute a project for the purposes of CEQA.



COMMENT LETTER K

Section 15124 – Discusses the types of information about a proposed project that should be included in the Project Description.

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MVAP 6.1 In conjunction with the first warehousing/distribution building proposed for the industrial area located along Interstate 215 (including land designated Light Industrial, Business Park, and Light Industrial with a Community Center Overlay) whereby the cumulative square footage of warehousing/distribution space in the area would exceed 200,000 square feet, an Environmental Impact Report (EIR) shall be prepared that assesses the potential impacts of the project. The EIR must address air quality, including a health risk assessment of diesel particulates and impacts to sensitive receptors, truck traffic and noise, and the cumulative impacts of reasonably foreseeable warehouse development in the area (Mead Valley Area Plan, pg. 32).

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EIR 546 does not adequately address the impacts of air quality, noise, truck traffic impacts to sensitive receptors (rural residential property) that are next to and close to this project and the fact that homes are surrounding this project up a hill amplifying the sound. The impacts from diesel soot surrounding this project and on all of our rural roads. The impacts of using Decker Road where not analyzed. This is a unimproved dirt road with speed bumps, pot holes, uneven surfaces, lack of painted road lines, no stop sign and no road sign for secondary access to Buildings D and E. The EIR never mentions if Nance Street will be pushed through from Day Street to Decker Road. Will Oleander go through to Day Street as an Industrial arterial road? Will Day Street turn into a secondary arterial road? Will Markham be widened into four lanes?

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← K-30
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The community is being kept in the dark on what is transpiring in our community and this also affects all of the rural communities nearby. We have a right to know!!! The EIR is fatally flawed in so many ways that it needs to be completely rewritten and overhauled. IT fails to meet CEQA and the Riverside County General Plan. The community has not been allowed to have input into this project that will forever change our rural community and lifestyle.

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The project has short walls with metal fencing that does nothing to protect the surrounding residents from the negative impacts of noise pollution and air pollution. The esthetics is not very pleasing as all we see is these massive warehouses with the back end of hundreds of truck trailers lined up instead of the beautiful view of the valleys and mountains. The current warehouse at Harvill and Oleander has conditions of approval that required a metal wall along the truck parking spaces, but instead the developer is using chain link fencing which costs much less. There are so many breaches in the conditions of approval and mitigation measures that are not being enforced. Who is responsible to oversee and make sure there are no breaches in the conditions of approval?

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Building "D" site map dated February 24, 2017 shows the east entrance along Oleander that allows just 4 trucks to queue on site behind the gate to access the building. Knox Logistics Warehouse at 17789 Harvill Ave. shows room for 7 trucks to queue on site. In addition there is a separate lane along Harvill for trucks to access this facility. Unfortunately this is still not sufficient safe guards as over 30 trucks are attempting to enter the warehouse at 17789 Harvill. This is happening everyday all day long as trucks are idling for hours and obstructing traffic creating very hazardous conditions. Idling trucks are producing far more air pollution particulate

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matter and smog than trucks that are moving.

Every day during school there is a long line of cars coming up and down Markham as parents take their children to and from school from Moreno Valley to Citrus Hill High. The EIR is flawed as this is not in the EIR. Markham is already bumper to bumper and now the project will add hundreds of huge logistics trucks to this road.

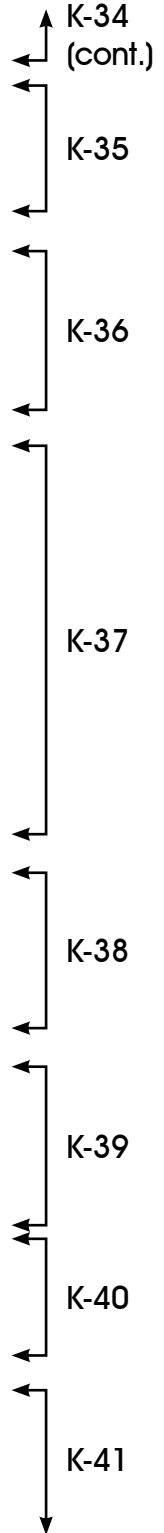
The site plan indicates that Old Oleander will be the Primary Access and Ellsworth / Decker will be the secondary access for trucks coming into and leaving Building D and E. This is not properly assessed in the EIR as there are a host of very serious concerns using Ellsworth / Decker Road south of the project for any logistic truck access or any type of vehicle traffic or activity.

Ellsworth Street improvements as indicated in the project EIR will consist of the area from Oleander to the south property line. Decker Road from the project south property line to Markham is an unimproved dirt road that is not County maintained and therefore not adequate for heavy truck traffic. Decker Street has pot holes, speed bumps and certainly not up to any standards that would meet CEQA guidelines for this project. Issues of concern include: dust, noise, vibration, air pollution, health and safety as these trucks drive down our rural neighborhood streets. The intersection at Markham and Decker has severe line of sight obstruction as Markham goes up a hill and has an "S" curve obstructing the view of vehicles turning onto Markham from Decker Road. This road is so dangerous that K-rails were installed to keep cars from running off the road into homes. None of these adverse impacts were assessed in the Draft EIR. If trucks were allowed to use Decker to access Markham their turning radius would cause them to block both lanes as they moved slowly onto Markham.

No signal lights are indicated on the EIR which is flawed as there is no analysis in the traffic study for intersections at Oleander and Decker Road or Decker at Markham or Markham at Day Street or Cajalco at Day Street. The EIR does not analyze the time frame for future building projects that will complete Oleander to full width. This narrow road will lead to trucks having more difficulty entering the facility and time delays that equal more pollution from truck idling.

The traffic study does not address the additional truck traffic impacts to the rural communities of Mead Valley and Greater Lake Mathew and the City of Riverside. Once trucks access Markham Street they can find a number of routes that lead to Van Buren Blvd, Cajalco Road and El Sobrante instead of using the very congested I-215 and I-60 freeways to the I-91. The impacts of using other routes that transverse though rural communities has not been assessed in the Draft EIR. There are a number of elementary schools and middle school near Cajalco and Clark Street, a library, a community center and senior center. The impacts to these sensitive receptors has not been addressed in the Draft EIR as hundreds of trucks from the Project will be using Cajalco Road that passes a number of public facilities.

Idling trucks have impacts on the entire region as the difference between idling for 5 minutes and 2 hours produces 24 times as much air pollution per truck. That would be 720 times as much for 30 trucks and then multiply by the hours of the day that new trucks are entering the line. This constant idling during the day with hundreds of trucks adds up to considerable impacts that are





COMMENT LETTER K

not being addressed in the Draft EIR. Multiple tenants are part of the problem as it takes longer to process each truck into the facility. The Draft EIR has not addressed the impacts of multiple tenants for Building "E" and "D". The lack of lanes and turn lanes on Oleander Ave. as trucks are turning left into both Building "D" and "E". Turn lanes should allow for up to 30 trucks to safely access these facilities at one time. Currently building "D" allows for 10 trucks to enter the facility behind the access gate.

K-41
(cont.)

Noise is not adequately evaluated in the Draft EIR. Noise Barriers must be reevaluated to conform to Federal Transportation Guidelines to be effective in protecting residents especially those who live next door. The Draft EIR must provide an adequate buffer between rural homes and Building D and E. WRCOG and SCAQMD guidelines require 1000 foot buffer to adequately protect residents from the negative impacts of high cube warehouses. Buffers must measure between the end of the property line and provide a substantial buffer that starts at the noise/ sound barrier.

K-42

K-43

A noise barrier is an obstacle placed between a noise source and a receiver which interrupts the path of the noise. They can be made out of many different substances:

- Sloping mounds of earth, called berms
- Walls and fences made of various materials including concrete, wood, metal, plastic, and stucco.
- Regions of dense plantings of shrubs and trees
- Combinations of the above techniques

The choice of a particular alternative depends upon considerations of space, cost, safety and aesthetics, as well as the desired level of sound reduction. The effectiveness of the barrier is dependent on the mass and height of the barrier, and its distance from the noise source and the receiver. To be effective a barrier must block the "line of sight" between the highest point of a noise source, such as a truck's exhaust stack, and the highest part of the receiver. This is illustrated in Figure 4.16.

K-44

INCLUDEPICTURE

"https://www.fhwa.dot.gov/ENVIRonment/noise/noise_compatible_planning/federal_approach/audible_landscape/pg53img27.png" * MERGEFORMATINET

4.16 To be effective, a barrier must block the "line of sight" between the highest point of a noise source and the highest part of a receiver.

To be most effective, a barrier must be long and continuous to prevent sounds from passing around the ends. It must also be solid, with few, if any, holes, cracks or openings. It must also be strong and flexible enough to withstand wind pressure.

Safety is another important consideration in barrier construction. These may include such requirements as slope, the distance from the roadway, the use of a guard rail, and discontinuation of barriers at intersections.

Aesthetic design is also important. A barrier constructed without regard for aesthetic considerations could easily be an eyesore. A well-designed berm or fence can aesthetically improve an area from viewpoints of both the motorist and the users of nearby land (FHA: Physical Techniques to Reduce Noise Impacts).

K-45

https://www.fhwa.dot.gov/ENVIRonment/noise/noise_compatible_planning/federal_approach/audible_landscape/al04.cfm



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Role of Topography

To work effectively, the barrier must be high enough and long enough to block the view of the road from the area that is to be protected. Sound barriers do very little for homes on a hillside overlooking a road.

INCLUDEPICTURE
"http://roads.maryland.gov/OHDImages/Sound%20Barrier%20Website/Shadow%20Effect.JPG"
* MERGEFORMATINET

Source: FHWA Website

As seen above, the house at the bottom of the hill is protected by the sound barrier, but the one on top of the hill (overlooking the roadway) is not.

In addition, buildings higher than barriers, homes scattered too far apart, and openings in noise barriers for driveway connections or intersecting streets are not good areas for sound barriers. In some cases, SHA can offer alternatives to help reduce noise levels. These alternatives are evaluated on a case-by-case basis consistent with Federal guidelines (Sound Barriers Guideline – Highway Traffic Noise, <http://www.roads.maryland.gov/Index.aspx?PageId=827>)

Sound walls are up to 8' tall and smoke stacks for trucks are 11.5' tall. Buildings are being proposed LOWER than ground level. Because of line of sight angle from the proposed project to homes the sound walls offers no protection for rural residents living near this project and uphill from this project. Sound walls/barriers are not going to be constructed the full length of the perimeter. Minimum distance sound walls will not protect rural neighborhoods surrounding this project from significant negative impacts such as sound, vibration, air pollution and light trespass. Short walls that are narrow in width are ineffective in stopping sound from the hundreds of trucks going into and out of these warehouses night and day. These impacts have not been adequately evaluated in the Draft EIR.

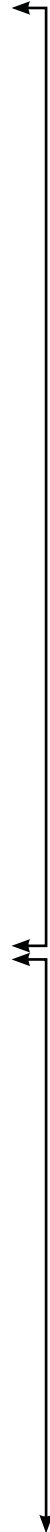
E3.0 PROJECT DESCRIPTION

1. Earthwork and Grading

Grading would occur over the entire Building E Site; no portion of the site would be left undisturbed.

Proposed earthwork activities would result in approximately 80,000 cubic yards of cut and 80,000 cubic yard of fill. Based on the expected shrinkage and compaction of on-site soils, earthwork activities are expected to balance and no import or export of earthwork materials would be required.

When grading is complete, manufactured slopes ranging from approximately four to 15 feet in height would occur along the south, east, and west perimeters of the property, and the Building E property would have a slight west-to-east-slope, as depicted on Figure 3-14, *Conceptual Grading Plan – Building E Site*. The slopes are excessive. The slopes ratios appear to be too high and this needs to be looked at. After grading, the highest point of the property would be its southwest corner (approximately 1,630 AMSL) and the lowest point of the property would be at the bottom of the detention basin near its northeast corner (approximately 1,588 AMSL). To accommodate the proposed grading concept, retaining walls ranging in height from one to seven feet tall would



K-46

K-47



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occur on the property. Also, a mechanically stabilized earth wall up to 18 feet in height is proposed along the west and south sides of the proposed water quality basin (Knox Building Park Buildings D and E Environmental Impact Report No. 546, pg. 3-19). Who will monitor the mechanically stabilized earth? Trammel Crow is currently constructing a warehouse and we recently observed how mechanically stabilized earth was being done using a small hose to water and a small cat that was running up and down the slope. Our research for stabilizing earth shows it needs to be deeply soaked with water and a vibrating sheep foot used to compact the dirt.

K-47
(cont.)

The Draft EIR does not adequately assess noise and pollution impacts along the western, eastern and southern portion of Building "E". Retaining walls will not reduce noise pollution to safe levels due to line of sight view from Building "E" to Nance Street and the western portions of Oleander. The description of earth walls and retaining walls is not clear as to height and location so that an adequate assessment can be made. Both Buildings D and E will be up to 14' below grade. This was not evaluated in the Draft EIR as the height of the buildings at ground level would affect the noise impacts, air pollution and possible hydrology impacts from water flowing from the nearby hills.

K-48

K-49

We live directly next to the open space where eagles and hawks fly freely overhead. Burrowing owls can be seen raising their young. The hill is covered with wild flowers every spring.

K-50

The Draft EIR does not adequately analyze rock blasting impacts to Cultural resources on and off this project site.

K-51

As part of proposed grading activities, blasting would be necessary in hard rock areas in the southern portion of the Building D Site boundaries. Based on the excavation plans prepared on June 16, 2015, by the Henry-Ann Company, rock blasting within the Building D Site is expected to include the drilling of up to 5,253 holes in the largest area, in which small charges would be placed to fragment the rocks into smaller, crushable pieces. Approximately 112,090 cubic yards (c.y.) of rock is expected to be produced during proposed blasting activities, which would be crushed and used on the Project site as construction base. An electric rock crusher powered by a 300-horsepower diesel generator is proposed to further break down the fragmented rocks. The Project Applicant calculates that approximately 2,759 tons of rock would be processed on the Project site per day during the blasting and rock crushing phase of construction (approximately 65 working days) (Urban Crossroads, Inc, 2016a, pp. 31-32).

K-52

The Draft EIR greatly understates construction impacts at the site where construction is anticipated to occur for almost 2 years (23 months), eight hours a day, five days per week. Substantial blasting (drilling 5,253 holes in the largest area) and subsequent rock crushing operations would be necessary to crush approximately 2,759 tons of rock onsite per day for 65 days. While the effects of blasting and crushing operations are likely *severe*, they were inadequately considered in the Draft EIR terms of impacts to hazards, noise/ vibration, cultural resources, and biological resources. The EIR does not adequately address the impacts to our homes from rock blasting. When damage occurs it will be our job to get money out of the developer and builder to fix the damage. Will this get fixed properly? Will we have to use the developers repair person? How long before it gets fixed and we get paid? How many times will this happen? The EIR is flawed as rock blasting should not cause damage to any homes or



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structures and notices need to be placed on our fences and mailed to our homes so we can protect our homes and livestock. **Gas leaks, water leaks, broken windows, electrical lines and wiring broken. This is a major health and safety concern!!!**

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K-52
(cont.)
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Rock blasting impacts on burrowing owls and other habitat within the area between Harvill, Day Street, Nandina, Nance and Markham have not been adequately analyzed or addressed especially during nesting periods. Burrowing Owls, a California Species of Special Concern, live in the ground in the vicinity of the blasting area and would be greatly impacted by the vibrations and noise from months of constant rock blasting. Owl reproduction may cease altogether. Fledglings may be greatly impacted by the noise and vibration. Other wildlife will have reduced food sources.

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K-53
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Violations of MM 4.3-3 are taking place at Knox Business Park warehouse on Old Oleander with a large number of trucks idling for hours, trucks parking along streets next to homes with their trucks idling as they sleep, truck trailers and trucks parked outside of the truck parking stalls and along the north end of the warehouse at 17789 Harvill Ave. There is no enforcement of these rules. Draft EIR 546 must include a detailed accounting of how enforcement of these mitigation measures will be addressed.

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K-54
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There is no way to determine the number of jobs that these two warehouses will bring to the community. Many workers could be from another County or area. One thing is for sure the numbers estimated in the EIR are completely flawed. With all of the new technologies that the logistics industry is about to start using it is obvious that only a handful of employees will be needed to manage a warehouse. "Because users of the Project's buildings are not yet known, the number of jobs that the Project would generate cannot be precisely determined; therefore, for purposes of analysis, employment estimates have been calculated using data and average employment density factors utilized in the County of Riverside General Plan. The General Plan estimated that light industrial business would employ one (1) worker for every 1,030 s.f. of building area. Based on this employment generation rate, the Project is expected to create approximately 1,081 new, recurring jobs" (1,113,627 s.f. ÷ 1,030). (Riverside County, 2016 Appendix E, Table ES-5). SCH No. 201508108, Page 3-32.

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K-55
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There is a numbered USGS blue stream, several arroyos upstream and also riparian habitat just west of the project site. The EIR does not analyze the true amount of water coming from the hill downstream to Building "E". The building is set BELOW grade. All of the water swiftly moving against the walls which appear inadequate. Where will all of this excess water go?

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K-56
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COMMENT LETTER K

Riverside County Flood Map clearly shows blue line stream traversing across the entire Project site. The blue line stream is part of the wetlands to the west of the project site. All of this is subject to “waters of the United States” are therefore generally subject to federal environmental regulations. The Draft EIR does not adequately analyze the impacts of the blue line stream, hillside arroyo or the year round stream coming out of the granite cave.

K-57

Draft EIR is clearly flawed in their assessment of a Blue line Stream as this stream runs through the entire Project site.

The Draft EIR does not include the WRCOG and SCAQMD good neighbor policy that sets a 1000 foot buffer between sensitive receptors and distribution warehouses. The current proposal for Building "D" has the warehouse project directly next to homes. No setback or buffer as trucks will be traveling from the east side of the warehouse to the west side of the warehouse using a driveway just a few feet from rural property lines. Small walls along the parking spaces will not prevent air pollution or noise from back up beepers, the hazards and dangers of noise pollution, air pollution, vibration and light trespass 24-7. Trucks are able to park outside of the parking stalls along the southern driveway as is occurring right now at the logistics warehouse at Harvill Ave. and Oleander. (WRCOG Good Neighbor Policy Guidelines for Siting Warehouse/ Distribution Facilities). [HYPERLINK](#)

K-58

["http://www.wrcog.cog.ca.us/DocumentCenter/View/318"](http://www.wrcog.cog.ca.us/DocumentCenter/View/318) \t "_blank" [Good Neighbor Guidelines for Siting Warehouse/Distribution Facilities.](#)

The SCAQMD recommends prohibiting placement of loading docks or major truck routes within 500 meters or 1640.42 feet from sensitive receptors (rural homes).

K-59

There are many seniors and small children and those with respiratory illnesses living directly in the path of this smog and particulate matter being spewed into our neighborhoods and community. The EIR does not analyze or address the additional effects of this added pollution that directly and negatively affects our health and safety. The tiny particles are very small and enters the lungs, brain and cells affecting the young weakening lung function. In Southern California, 5,000 premature deaths every year are attributed to air pollution and particulate matter from diesel trucks.

K-60

EIR is fatally flawed. Building "D" and "E" are two separate high cube warehouses being considered as one project. **This type of piecemealing or segmentation is not allowed under CEQA. Therefore EIR 546 must be revised and recirculated so that this error to piecemeal the project can be corrected.**

K-61

The Draft EIR assessment for Building "E" on the west side of Decker road has been modified substantially in the number of the parcels and size of the building. Modification to the Draft EIR for Building "E" describe different scenarios in regards to traffic flow, differing elevation height measurement of the building and various other inconsistencies not analyzed in the Draft Environmental Impact Report.

K-62

Future Trammel Crow project phases are not included in the Draft EIR for this project as required by CEQA. The impacts of future high cube warehouses for the area such as truck

K-63



COMMENT LETTER K

traffic, noise, air pollution, light glare, etc. have not been adequately evaluated.

Draft EIR 546 does not adequately address the impacts of air quality, noise, truck traffic impacts to sensitive receptors (rural residential property) that abuts this project. Draft EIR 546 not only fails to meet CEQA guidelines, but also falls short of the Riverside County General Plan - Mead Valley Area Plan and General Plan Vision for land use with NO buffer between sensitive receptors and Building "D". The Draft EIR must address air quality, including a health risk assessment of diesel particulates and impacts to sensitive receptors, truck traffic and noise, and the cumulative impacts of reasonably foreseeable warehouse development in the area (Mead Valley Area Plan, pg. 32).

EIR underestimates the impacts of having one access road if Decker / Ellsworth is closed off to truck traffic. Oleander is listed as the primary access road. Oleander intersects Harvill Ave. passing the warehouse at 17789 Harvill Ave. that is currently receiving a number of complaints due to serious CARB violations. Trucks idling on and off the premises for hours. Trucks parking in unauthorized areas instead of truck parking spaces. Trucks that are idling next to a residential home for hours. Trucks in the middle of the road blocking traffic as they try to line up to get into the facility. These impacts have not been addressed in Draft EIR 546.

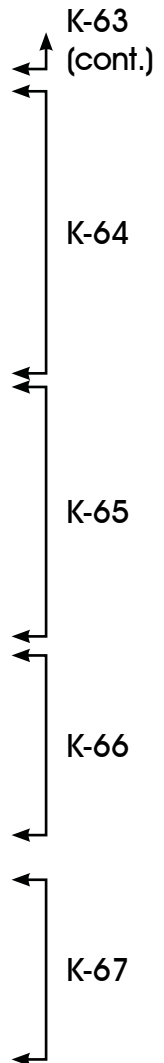
Draft EIR is flawed in the noise analysis in regard to rock blasting noise, which will continue for months directly next to homes and near homes that are uphill from the project site. This fails to meet CEQA guidelines. Notice of blasting with just 24 hours' notice on the construction site is woefully inadequate. Residents cannot get on the construction site, cannot see the notice and have no way of being aware that a notice has been posted.

Conclusion

EIR 546 is fatally flawed and must be revised and recirculate to correct numerous and significant flaws, errors and omissions much of which are included in this letter. Additional mitigation measures will need to be included into any future Environmental Impact Reports regarding GPA 1151 & GPA 1152.

Sincerely,

C. Ray Miller and Peggy Miller





COMMENT LETTER L



PECHANGA TRIBAL HISTORIC PRESERVATION OFFICE
Temecula Band of Luiseño Mission Indians

Post Office, Box 2183 • Temecula, CA 92593
Telephone (951) 770-6300 • Fax (951) 506-9491

July 6, 2017

Tribal Historic Preservation
Officer:
Gary P. DuBois, JD, MSW

THPO Historian:
Lisa Woodward, Ph.D.

Advisory Review Board:
Neal Ibanez
Bridgett Barcello
Darlene Miranda
Evie Gerber
Andrew Masiel, Sr.
Richard B. Scearce
Robert Villalobos

VIA E-Mail and USPS

Mr. Russell Brady
County of Riverside TLMA
4080 Lemon Street, 12th Floor
Riverside, CA 92501

Re: Pechanga Tribe Comments on the Draft Environmental Impact Report No. 546 for Knox Business Park Buildings D and E (General Plan Amendments No. 1151 and 1152; Change of Zone No. 7872 and No. 7873; Tentative Parcel Maps No. 36950 and No. 36950 and No. 36962; and Plot Plan No. 25838 and No. 25837)

Dear Mr. Brady;

These comments are submitted on behalf of the Pechanga Band of Luiseño Indians (“Tribe”), a federally-recognized Indian tribe and sovereign government, in response to the Notice of Availability for the above-named Project. The Tribe formally requests, pursuant to Public Resources Code §21092.2, to be notified and involved in the entire CEQA environmental review process for the duration of the referenced project (the “Project”). If you have not done so already, please add the Tribe to your distribution list(s) for public notices and circulation of all documents, including environmental review documents, archaeological reports, and all documents pertaining to this Project. The Tribe further requests to be directly notified of all public hearings and scheduled approvals concerning this Project. Please also incorporate these comments into the record of approval for this Project.

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L-1
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I. Tribal Involvement and Tribal Information

The Tribe has actively worked with the County and Project Applicant regarding avoidance and appropriate mitigation measures for the significant tribal cultural resources located within the Project boundaries, including map revisions to achieve avoidance of the significant sites. Further, the Tribe has been consulting with the County under AB 52 and provided information on the tribal cultural values of the resources located within the Project area.

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L-2
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The Tribe evaluated the significance of the area using Tribal knowledge, oral history, internal records, ethnological documentation, and the archaeological research conducted for the Project, in addition to applying the criteria for the National Register of Historic Places (NRHP) and the California Register of Historic Resources (CRHR). The Tribe submitted this information in a 24-page confidential letter to the County on July 12, 2016, which was discussed in our consultation meeting with the County, applicant, and their consultants.

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L-3
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COMMENT LETTER L

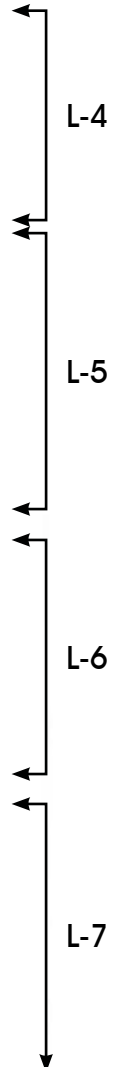
Pechanga Comment Letter to the County of Riverside
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II. AB 52 Failures in the DEIR

It is important to note that AB 52 recognizes *Tribes' expertise* with regard to their tribal history and practices, and CEQA requires a sufficient degree of analysis using tribal knowledge about the land and tribal cultural resources to assess the presence of and impacts to tribal cultural resources. While the DEIR identifies that the Tribe provided information on the resources within the Project area, rather than incorporating that information into the CEQA analysis, the DEIR questions Tribal knowledge and suggests that the Tribe failed to provide substantial evidence to support the presence of tribal cultural resources. Unfortunately, the DEIR fails to analyze and incorporate the tribal values of the resources in its discussion, and essentially dismisses the information provided by the Tribe. The Tribe also notes that the DEIR is contrary to the format of Appendix G (the CEQA checklist), which structure the County recently informed the Tribe it used for all projects. The DEIR lacks a separate section for Tribal Cultural Resources, consideration of which under the law is required to be separate from archaeological resources. The revised checklist now has Tribal Cultural Resources considerations under section XVII. In fact, the entire discussion, which is minimal at best, regarding tribal cultural resources is located within the archaeological resources section of the DEIR. This fact alone demonstrates that the County relies on archaeology to assess tribal cultural resources, using limited site testing and not incorporating Tribal information and Tribal values. The DEIR, as drafted, is inconsistent with the form of Appendix G, and further, contrary to AB 52 because it lacks a separate discussion on tribal cultural resources, instead relying solely on analysis completed using archaeological considerations.

In addition, we remind the County that under AB 52, Tribes are the experts in their culture, not archaeological consultants. The cultural section is clearly focused only on the archaeological (scientific) values of the resources in the Project area, ignoring and minimizing the cultural values identified by the Tribe. Not only is the document flawed because it fails to analyze tribal cultural resources, we also question how the County prepared the cultural section as it stands without any tribal input. The Tribe did not have the opportunity to review the cultural section of the DEIR prior to release, nor did the Tribe have the chance to offer appropriate language for inclusion in the discussion regarding tribal cultural resources, despite our active involvement in the AB 52 consultation process.

We also question the standard that the County is applying in determining what comprises "substantial evidence" for purposes of identifying a tribal cultural resource. The Tribe provided 24 pages of cultural information, in addition to information shared over several consultation sessions, none of which is discussed in the DEIR. The cultural section summarily concludes that the Tribe failed to provide substantial evidence of the presence of TCRs within the Project, despite the information provided during the course of our AB 52 consultations. The DEIR fails to acknowledge Tribal cultural values, and as a result, dismisses the cultural information provided by the Tribe, going so far as to state that the Tribe failed to meet the evidentiary burdens of AB 52. Without a clear set of criteria for determining the value of the information provided by the Tribe, this "criteria" can be applied in an arbitrary manner. Further, we are concerned with how these criteria are being used to



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determine the sufficiency of tribal cultural knowledge, particularly when the County has failed to undertake a proper CEQA analysis of tribal cultural resources in the DEIR.

Based on the above issues with the DEIR, the Pechanga Tribe requests to continue our AB 52 consultations to address the failures in the document as related to tribal cultural resources.

III. Archaeological Report Comments

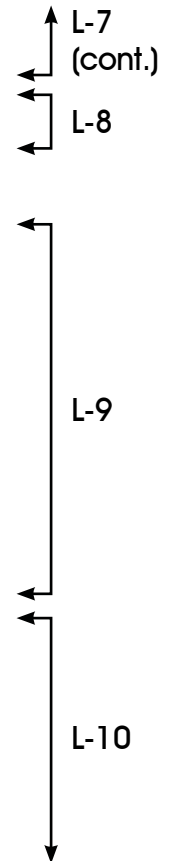
In the archaeological phase I and phase II studies for this Project, outdated archaeological theories included in the cultural setting section of the report suggest the Tribes now involved in commenting on this Project are relative “newcomers” to southern California. The “Shoshonean intrusion,” as referred to by archaeologists, proposes that Shoshone, or their ancestors, moved from the Great Basin into southern California around 1,500 BP. New research suggests people moved into southern California at earlier dates and were absorbed into the existing populations rather than displacing them. Recently, archaeologists have proposed a modification of the theory of not only an earlier date, but also movement from central California to the south instead of from the Great Basin (Sutton 2009¹; Shaul 2014²). While this theory is not believed or supported by Pechanga, it is troubling to continue to see this hypothesis included in the “Cultural Setting” sections of Cultural Resource Management (CRM) reports. Whereas tribal information spanning thousands of years, across hundreds of generations in unbroken oral history told through traditional songs and narratives, is continually dismissed by CRM consultants which are then adopted by lead agencies and condoned by the CEQA process.

The Tribe’s knowledge of our ancestral territory is also documented in published academic works in the areas of anthropology, history and ethno-history; and through recorded ethnographic and linguistic accounts. Of the many anthropologists and historians who have presented discussions of the Luiseño traditional territory and village descriptions, include (Sparkman 1908³; Strong 1929⁴; Kroeber 1925⁵; White 1963⁶; True 1958⁷).

‘Atáaxum (Luiseño) history begins with the creation of all things at ‘éxva Teméeku (EXH-vah Teh-MEH-koo). The place known today as Temecula, derives its etymology from this physical place where the Murrieta and Temecula Creeks converge to form the Santa Margarita River which flows

¹ Sutton, Mark Q. 2009. People and Language: Defining the Taki Expansion in Southern California. *PCASQ* 41(2&3):31-93.
² Shaul, David. 2014. *A Prehistory of Western North America: The Impact of Uto-Aztecan Languages*. University of New Mexico Press, Albuquerque.
³ Sparkman, Philip Stedman 1908. The Culture of the Luiseño Indians. *University of California Publications in American Archaeology and Ethnology* 8(4):187-234.
⁴ Strong, William D. 1929. Aboriginal Society in Southern California. *University of California Publications in American Archaeology and Ethnology* 26:1-349.
⁵ Kroeber, A.L. 1925. *Handbook of the Indians of California*. Bureau of American Ethnology, Bulletin 76. Reprinted by Dover Publications, New York, 1976.
⁶ White, Raymond C. 1963. Luiseño Social Organization. *University of California Publications in American Archaeology and Ethnology* 48(2):91-194.
⁷ True, D.L. 1958. An Early Complex in San Diego County, California. *American Antiquity* 23:255–263.
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onto the Pacific Ocean. This is where our Origin Story and ancestral songs say *Tiukumit* (TOO-koo-mit, Father Night Sky) and *Tamáyawut* (Ta-MAI-yah-whooot, Mother Day Earth) created the world. The Shoshonean Intrusion theory contradicts these tribal beliefs and because it is included in this report to shape the theoretical framework for evaluation of the Project, it ultimately allows for the dismissal of the Tribes involved in the process if the site proves to be older than 1,300 years ago. By utilizing the dates proposed in the table included in the report, anything older than the “Shoshonean intrusion” would not “belong” to the *Atáaxum*.

L-10
(cont.)

Nonetheless, only the milling features were documented and assessed with testing occurring adjacent to these ancestral kitchens (“milling features”). Due to this minimal testing, the sites are deemed by the archaeologist, to be less than significant. It is also reported that 90% of the property was plowed and disked for many years, with the conclusion that the area was “moderately to severely disturbed.” Only eight (8) shovel test pits were excavated to the depth of 30 cm, with no artifacts recovered, thus resulting in a “not unique and not significant under CEQA” conclusion. However, agricultural activity can disturb the soil up to 50 cm below the surface, meaning intact soils, artifacts, and possible cultural deposits could be present below the plow zone. Additional residue analysis conducted at the request of the Tribe, revealed important information about the region’s ecological zone, revealed the area to be a meadow environment, conducive to plant and animal resources necessary to support a large population.

L-11

IV. Eligibility Criteria Using Tribal Values

The DEIR focuses only on the presumed (limited) scientific values that the resources may yield, and ignores the tribal information that such resources will provide. As pointed out in our letter, analyzing these resources in a culturally-informed manner would provide information on settlement patterns, trade and travel, material culture, economic patterns, and kinship relations, among other data. Further, the scientific studies (protein and pollen residue analysis) conducted on this site provide both scientific and cultural information that demonstrates additional research potential for this area. Those studies established what the environment looked like before contact, when the Tribe’s ancestors flourished in this area. This information is also important from a scientific values perspective because it demonstrates the changes in the environment from pre-contact to present day, as well as information on resource procurement and use by the ancestors. Additional information that the Tribe believes would be obtained from these resources is analyzed in our July 2016 letter and we refer the County to that correspondence rather than repeating our arguments here. The majority of the information provided by the Tribe has been ignored or minimized in the DEIR and we intend to continue to work with the County during the AB 52 consultation process to address the deficiencies in the document.

L-12

The Tribe has, in good faith, provided information to the County in support of the presence of TCRs on the Project site. The County cannot simply decide what information it deems acceptable, eschewing that which it does not understand. The DEIR is flawed as drafted because it lacks appropriate analysis, using tribal cultural values, of the TCRs located within the Project area.

L-13

V. Mitigation Measures

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Pechanga previously offered proposed mitigation measures in our July 12, 2016, letter. We note that the County did not adopt all of the measures suggested, and unfortunately, has not consulted further with the Tribe on appropriate mitigation, as required by AB 52. The Pechanga Tribe requests additional meetings to continue consultation to arrive at mitigation measures that are agreeable to all parties. Initially, however, the Tribe suggests the following revisions to the existing Cultural Resources section in the DEIR (underlines are additions; strikeouts are deletions).

L-14

MM 4.5-1 Prior to the issuance of grading permits, the developer/permit applicant shall enter into a monitoring agreement with the Pechanga and Soboba Native American Tribes. A Native American monitor shall be on-site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, and trenching. In conjunction with an Archaeological Monitor, the Native American Monitor shall have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The developer/permit applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this condition.

L-15

MM 4.5-2 Building D Site: In accordance with the letter dated February 2, 2017 to Heather Thomson, County Archaeologist from Project Archaeologist Brian F. Smith and Associates, regarding "Relocation of Bedrock Milling Features Located Within Knox Business Park (Decker Parcels I and II" and as a condition of the grading permit for the Building D Site (Planning Case No. 36950), before construction activities are allowed to start, and using professional archaeological methods, any visible artifacts associated with Sites CA-RIV-8401 and CA-RIV-8402 shall be recovered and recorded, and photo documentation of each situ shall occur. The current Department of Parks and Recreation forms for the sites shall be updated, detailing which features were relocated, the process through which this was done, and updated maps using sub meter GIS technology to document the new location of each feature. The relocation information shall be included in a Phase IV Monitoring Report.

L-16

MM 4.5-3 Building E Site: In accordance with the letter dated February 2, 2017 to Heather Thomson, County Archaeologist from Project Archaeologist Brian F. Smith and Associates, regarding "Relocation of Bedrock Milling Features Located Within Knox Business Park (Decker Parcels I and II" and as a condition of the grading permit for the Building E Site (Planning Case No. 36962), before construction activities are allowed to start, and using professional archaeological methods, any visible artifacts associated with Sites CA-RIV-1330H and CA-RIV-11874 shall be recovered and recorded, and photo documentation of each situ shall occur. The current Department of Parks and Recreation forms for the sites shall be updated, detailing which features were relocated, the process through which this was done, and updated maps using sub meter GIS technology to document the new location of each feature. The relocation information shall be included in a Phase IV Monitoring Report.

L-17

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MM 4.5-4 Building E Site: Prior to issuance of a grading permit for Planning Case No. 36962, The developer/permit applicant shall provide evidence to the County Archaeologist that the following notes have been provided on the Grading Plan: "Temporary fencing shall be provided for the protection of the off-site parcel located to the immediate west during any grading activities within 100 feet of the western property boundary. The fence shall be installed under the supervision of the County approved archaeologist and Native American monitors, prior to commencement of grading or brushing and be removed only after grading operations have been completed."

L-18

MM 4.5-5 Prior to the issuance of grading permits, the developer/permit applicant shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist has been contracted to implement a Cultural Resource Monitoring Program. A Cultural Resource Monitoring Plan shall be developed that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with this project. This document shall be provided to the County Archaeologist for review and approval prior to issuance of the grading permit. These measures shall include, but shall not be limited to, the following:

- a) Archaeological Monitor: An adequate number of qualified monitors shall be present to ensure that all earth-moving activities are observed; the monitors shall be on-site during all grading activities for areas to be monitored including any off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist.
- b) Cultural Sensitivity Training: The Project Archaeologist and a representative designated by the Tribe shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all Construction Personnel. Training will include a brief review of the cultural sensitivity of the Project site and the surrounding area; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. This is a mandatory training and all construction personnel must attend prior to beginning work on the Project site. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.
- c) Building D Site Controlled Grading: Several bedrock milling features at cultural sites CA-RIV-8401 and CA-RIV-8402 will be impacted during construction activities and the soils surrounding them will be disturbed. A controlled grading program will be developed by the Project Archaeologist, and shall be reviewed by the County

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Archeologist and Native American Tribes, and included in the Cultural Resources Monitoring Program. The controlled grading program shall require the systematic removal of the ground surface to allow for the identification, documentation and recovery of any subsurface cultural deposits. Results of the controlled grading program shall be included in the Phase IV Monitoring Report.

Building E Site Controlled Grading: Several bedrock milling features at cultural sites CA-RIV-8901, CA-RIV-1330/H and CA-RIV-11874 will be impacted during construction activities and the soils surrounding them will be disturbed. A controlled grading program will be developed by the Project Archaeologist, and shall be reviewed by the County and Native American Tribes, and included in the Cultural Resources Monitoring Program. The controlled grading program shall require the systematic removal of the ground surface to allow for the identification, documentation and recovery of any subsurface cultural deposits. Results of the controlled grading program shall be included in the Phase IV Monitoring Report.

MM 4.5-6 If during ground disturbance activities, unanticipated cultural resources are discovered, the following procedures shall be followed:

- a) All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the applicant shall call the County Archaeologist immediately upon discovery of the cultural resource*. A meeting shall be convened between the developer, the project archaeologist**, the Native American tribal representative (or other appropriate ethnic/cultural group representative), and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery; avoidance, etc.) for the cultural resource.
- b) Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.

* A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to sacred or cultural importance.

** If not already employed by the project developer, a County approved archaeologist shall be employed by the project developer to assess the value/importance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary.

MM 4.5-7 Prior to building final, provide evidence to the satisfaction of the County Archaeologist that all archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project; such as testing of archaeological sites that took place years ago), have been curated at ~~the Western Science Center~~, a Riverside County Curation facility that meets federal standards per 36 CFR Part

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L-21



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79 and therefore will be professionally curated and made available to other archaeologists/researchers and tribal members for further study. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.

L-21
(cont.)

MM 4.5-8 Upon completion of the implementation phase, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with the grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the TLMA website. The report shall include results of any feature relocation or residue analysis required as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting. A report documenting the field and analysis results and interpretation of the artifact and research data within the research context shall be completed and submitted to the satisfaction of the Lead Agency (County of Riverside) prior to issuance of any building permits. The report will include Department of Parks and Recreation (DPR) and Primary Archaeological Site Forms. A final copy shall be submitted to the Eastern Information Center (EIS) and Native American tribes that request a copy.

L-22

The Pechanga Tribe looks forward to continuing to work together with the County of Riverside in protecting the invaluable Luiseno cultural resources found throughout the County. We intend to continue asserting our rights under AB 52 and to continue to work with all parties until the tribal cultural values of these resources are properly described, appropriate mitigation measures are agreed upon, and a Final EIR approved. We will contact the County forthwith to schedule a meeting to discuss issues with the DEIR and to come to agreed-upon mitigation measures as required by AB 52.

L-23

Sincerely,

Gary P. DuBois, JD, MSW
Tribal Historic Preservation Officer
Director, Pechanga Cultural Resources Department

cc: Shellie Clack, Deputy County Counsel
David Jones, Chief Engineering Geologist
Heather Thomson, County Archaeologist
Laura Miranda, Esq., Attorney for Pechanga
Pechanga Office of the General Counsel

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COMMENT LETTER M

Subject: FW: Oppose GPA 1151 and 1152 Please stop rezoning to warehouses

From: Lindsay Robinson [<mailto:lr92555@gmail.com>]
Sent: Thursday, July 06, 2017 12:45 PM
To: Brady, Russell <rbrady@RIVCO.ORG>
Cc: Supervisor Jeffries - 1st District <district1@RIVCO.ORG>; dsitric2@rcbos.org; District3 <District3@Rivco.org>; District 4 Supervisor V. Manuel Perez <District4@RIVCO.ORG>; District5 <District5@Rivco.org>
Subject: Oppose GPA 1151 and 1152 Please stop rezoning to warehouses

Dear Mr. Brady and County Supervisors, staff, residents,

I am writing to voice my opposition to the general plan amendments 1151 and 1152 that request rezoning in the Greater Mead Valley rural area to warehouses. Keep warehouses in the Industrial Corridor where they belong. The Inland Empire and Riverside County have gone overboard on allowing warehouses next to residential areas and encroaching on the few remaining rural areas is especially offensive and unnecessary. Residents buy their homes for many different reasons and it's usually the single most expensive investment they will make. They research and find an area that mirrors their lifestyle and dreams Changing zoning from rural to warehouses in established areas is unethical and immoral and needs to stop. Warehouses are an extreme change in zoning and should not be happening at the rate it's been going and ruining the health and quality of life for the residents. Our roads can't handle all the trucks as it is and with the warehouses already in the pipeline the congestion, pollution, noise and crime will ruin this area.

M-1

Politicians have been way to quick to rezone for warehouses- and I'm willing to wager NONE of them would allow them in their neighborhood. How many of you who promote this project and will vote on it actually live in the area? In Moreno Valley, the city staff and council who were so hell bent to approve the wlc don't live near it and the staff don't even live in the city. Please don't be like Moreno Valley- give the residents (your constituents) priority over out of town wealthy developers who are going to make their millions and leave the residents to suffer the consequences of 24 hour truck traffic, noise, pollution, street issues, etc.

M-2

The EIR is flawed in so many ways as are all the warehouse EIRs put forward in our area. The traffic data is flawed, the negative impacts are treated too lightly, lack of police to enforce the idling laws already on the books, and the list goes on indefinitely.

M-3

Please do not approve this rezone and stop all the other rezoning battles currently being fought by the residents. Please put the health and quality of life of the residents ahead of developer's profits. Warehouses do not provide the promised jobs numbers nor income to compensate for the negative impacts and costs that the county will end up paying. We have enough warehouses in the Inland Empire and in Riverside County specifically! Set your sights higher and respect the residents!

M-4

We lost the fight in eastern Moreno Valley, but my county neighbors still can win and preserve their rural countryside.

Thank you,

Lindsay Robinson

Moreno Valley, CA 92555



COMMENT LETTER N

July 6, 2017

To Whom It May Concern:

I am writing this letter to inform you that we oppose General Plan Amendment 1151 and 1152 (EIR 546). We live in Lake Mathews and intend to keep our surrounding area rural. We spent six months searching for our property and another year and a half building our home. We invested our finances, time, and heart in the decision to live in a peaceful, quiet area where you can see the stars at night. Projects like that which is being proposed are likely to increase traffic, noise, pollution, and the need for ongoing road maintenance, just to name a few of the complication. Please consider the needs and voice of our community as a whole as we *continue* to emphasize our opposition to rezoning our local areas. In an attempt to emphasize the severity of this issue for us, let me inform you that as a couple we took time away from our businesses to attend the May 23rd public hearing to oppose another proposed rezoning project. Please know that we do not support this rezoning proposal or building project and will continue to make the necessary contacts to protect our land and vision for a peaceful, rural lifestyle.

N-1

Best,

Dr. Krystle Rowe
Landon Sharp
(909) 815-9553



COMMENT LETTER ○

Subject: FW: 546

From: domechar@aol.com [mailto:domechar@aol.com]

Sent: Thursday, July 06, 2017 2:00 PM

To: Brady, Russell <rbrady@RIVCO.ORG>

Subject: RE: 546

Please no more warehouses. Air quality issues and the roads can't handle anymore trucks.
Please no more. Thank you, Charlene Skog

←
← O-1

Sent from Windows Mail



COMMENT LETTER P

July 6, 2017

Attn: Russell Brady
Riverside County Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92502-1409



RE: Knox Business Park Buildings D and E – Draft Environmental Impact Report No. 546 (General Plan Amendments No. 1151 and No. 1152, Change of Zones No. 7872 and No. 7873, Tentative Parcel Maps No. 36950 and No. 36962, and Plot Plans No. 25838 and No. 25837)

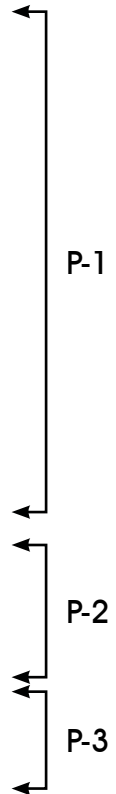
The Soboba Band of Luiseño Indians has received Draft EIR for the Knox Business Park Buildings D and E. After review I have generated the following comments to the draft EIR.

Under 4.5 Cultural Resources C:

It should be noted that for RIV-8401 1nd RIV-8402, it was concluded that there is a lack of evidence to support the claim of a Tribal Cultural Resource.

I completely disagree with this finding. In fact I completely disagree with the determination as a whole because every site study was done by evaluating each site individually rather than as a village complex (landscape) which could potentially constitute a TCR. It clearly states that a limited amount of information was gathered. The reason for limited information available is because a landscape study was never formally initiated, nor was a plan for the study created. This in turn let the archaeologist evaluate without the consideration of inter connection between sites, no consideration of prehistoric trails or intangible resources, without considerations of traditional tribal knowledge or concerns. Based on the fact that there is an existing name for the village, an extremely high concentration of features and minimal efforts to effectively evaluate the location as a landscape, it is my opinion that the conclusion was inadequate and premature.

Based on the inadequacies of the study, it is my request that the agency mandate a formal landscape study be initiated. This should include the creation of a draft of a study plan including a description of the area to be studied, informational sources, additional considerations and above all created in coordination with consulting tribes and a culturally sensitive archaeological consultant. I look forward to a response from you soon. For any specific questions or concerns, I am available 24hrs a day via email or cell phone listed below.





COMMENT LETTER P

Sincerely,

Joseph Ontiveros
Director of Cultural Resources
Soboba Band of Luiseño Indians
P.O. Box 487
San Jacinto, CA 92581
Phone (951) 654-5544 ext. 4137
Cell (951) 663-5279
jontiveros@soboba-nsn.gov



COMMENT LETTER Q



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:

July 6, 2017

rbrady@rivco.org

Russell Brady
Riverside County Planning Department
4080 Lemon Street, 12th Floor,
P.O. Box 1409
Riverside, CA 92502

**Draft Environmental Impact Report (Draft EIR) for the Proposed
Knox Business Park Buildings D and E (“Proposed Project”) (SCH: 2015081081)**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

SCAQMD’s 2016 Air Quality Management Plan

On March 3, 2017, the SCAQMD’s Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board of Directors on March 23rd. The 2016 AQMP¹ is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin (Basin). Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and lays out the challenges facing the Basin. The most significant air quality challenge in the Basin is to reduce an additional 45 percent reduction in NOx emissions in 2023 and an additional 55 percent reduction in NOx emissions beyond 2031 levels for ozone attainment.

Q-1

Project Description

The Lead Agency proposes the construction and operation of two high-cube warehouses totaling 1,113,627 square feet (sf) on 58.6 acres (“proposed project”). Based on a review of aerial photographs, SCAQMD staff found that the areas immediately north, east, and west of the proposed project are vacant, while there are single-family homes scattered within 500 feet south of the proposed project. Construction is expected to occur in one phase over 23 months starting in 2018².

Q-2

Air Quality and Health Risk Assessment (HRA) Analyses

In the Air Quality Section, the Lead Agency quantified the proposed project’s construction and operation emissions and compared them to SCAQMD’s regional and localized air quality CEQA significance thresholds. The air quality analysis was based on approximately 2,115 total vehicle trips, including 806 daily diesel truck trips³. The Lead Agency found that regional operational NOx emissions are significant and unavoidable. Additionally, the Lead Agency performed a HRA and found that the Maximum Exposed Individual Resident cancer risk would be 5.97 in one million which is below SCAQMD’s CEQA significance threshold of 10 in one million for cancer risk⁴.

Q-3

¹ South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Available at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

² Draft EIR. Section 3.0, *Project Description*. Page 3-33.

³ Draft EIR. Section 4.15, *Transportation*. Table 4.15-14: Project Trip Generation (Based on ITE 9th Edition and 1,259,050 SF “2016 Study”).

⁴ Draft EIR. Appendix B1, *Air Quality Impact Analysis*. Table 3: Summary of Cancer Risks.



COMMENT LETTER Q

Russell Brady

2

July 6, 2017

SCAQMD staff has concerns about the air quality and HRA analyses in the Draft EIR. First, the analyses were based on inconsistent truck trip rates. Second, the HRA analysis used assumptions which have likely led to an under-estimation of the proposed project's health risk impacts. Details are included in the attachment. Additionally, as described in the 2016 AQMP, achieving NOx emission reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attain the ozone NAAQS as expeditiously as practicable. Therefore, SCAQMD staff recommends additional mitigation measures to further reduce the significant operational NOx emissions. Please see the attachment for more information.

← Q-4
← Q-5

Pursuant to the California Public Resources Code Section 21092.5 and the CEQA Guidelines Section 15088, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final EIR.

← Q-6

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions regarding the enclosed comments.

← Q-7

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS:JC
RVC170524-04
Control Number



COMMENT LETTER Q

Russell Brady

3

July 6, 2017

ATTACHMENT

Air Quality and Health Risk Assessment (HRA) Analyses

1. Based on a review the Air Quality Section of the Draft EIR, Appendix B1 – Air Quality Impact Analysis, and Appendix B2 – Mobile Source Health Risk Assessment, SCAQMD staff found that the truck trip rates were inconsistent. SCAQMD staff recommends that the Lead Agency address the inconsistency in the Final EIR and technical appendices, and update the air quality emission estimates and health risk calculations. Q-8

2. In the HRA, the Lead Agency averaged the DPM emissions for the 70-years of exposure and used that emission rate to estimate health risks. The most recent 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) Guidance⁵ acknowledges that children are more susceptible to the exposure to air toxics and have revised the way cancer risks are estimated to take this into account. Since the emissions from the proposed project-generated trucks get cleaner with time due to existing regulations and technologies, it would not be appropriate to average out the emissions over the 70-year exposure duration since this would underestimate the health risks to children who would be exposed to higher DPM concentrations during the early years of project operation. Therefore, SCAQMD staff recommends that the DPM emissions for each year of operation be applied to each of the corresponding age bins (i.e. emissions from Year 1 of project operation should be used to estimate cancer risks to the third trimester to 0 year age bin; Year 1 and 2 of project operation should be used to estimate the cancer risks to the 0 to 2 years age bins; and so on). Q-9

3. On March 6, 2015, OEHHA adopted the revised Guidance for performing a HRA⁶. The Lead Agency prepared and publicly circulated a Notice of Preparation for the proposed project on August 31, 2015⁷. Based on a review of the Appendix B2 – Mobile Source Health Risk Assessment⁸, SCAQMD staff found that the Lead Agency performed a HRA for the proposed project on October 6, 2015. The 2015 revised OEHHA Guidance is the most recent version and was available at the time of analysis. Therefore, SCAQMD staff recommends that the Lead Agency use the 2015 revised OEHHA Guidance to revise the HRA analysis. Q-10

Siting Warehouses Near Residences

4. Based on a review of aerial photographs, SCAQMD staff found that the nearest sensitive receptor is approximately 500 feet south of the proposed project. While SCAQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions, there are concerns about the proximity of a warehouse to the existing residences and the potential long-term air quality impacts to the people living near the warehouse and along the truck routes as a result of increased truck activities. SCAQMD staff recommends that the Lead Agency use the California Air Resources Board’s (CARB) Air Quality and Land Use Handbook as a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land-use decision making process. In the CARB’s Air Quality and Land Use Handbook, CARB recommends a buffer of at least 1,000 feet between distribution centers that accommodate more than 100 trucks per day and a buffer of 500 feet from high-traffic urban roadways⁹. Q-11

⁵ Office of Environmental Health Hazard Assessment. March 6, 2016. *Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments 2015*. Available at: <https://oehha.ca.gov/air/cnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0>.

⁶ *Ibid.*

⁷ Draft EIR. Section 1.0, *Introduction*. Page 1-9. SCAQMD Control Number: RVC150707-04.

⁸ Draft EIR. Appendix B2, *Mobile Source Health Risk Assessment*. Reference 14 on Page 17.

⁹ CARB’s Air Quality and Land Use Handbook is available at: <http://www.arb.ca.gov/ch/handbook.pdf>. Guidance is for siting new sensitive land uses within 1,000 feet of a distribution center (Page 4). The buffer is a neutral mitigation measure provided to minimize truck activity emission impacts to sensitive receptors. Besides truck activity of more than 100 trucks per day, this



COMMENT LETTER Q

Russell Brady

4

July 6, 2017

Additional Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

5. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant impacts. In the event that the Lead Agency, after revising the HRA analysis based on the comments provided above, finds that the proposed project would result in significant health risk impacts, SCAQMD staff recommends incorporating the following mitigation measures in the Final EIR in addition to mitigation measure (MM) 4.3-1 through MM 4.3-10¹⁰. The recommended mitigation measures are also capable of further reducing the significant NOx emissions during operation. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website¹¹.

Q-12

a. **MM 4.3-11 (Applies to the Building D Site and the Building E Site): All on-site cargo handling equipment (CHE), including yard trucks, hostlers, yard goats, pallet jacks, forklifts, and other on-site equipment shall be powered by electricity.**

Q-13

b. **MM 4.3-12 (Applies to the Building D Site and the Building E Site): All Heavy-Heavy Duty (HHD) vehicles shall conform to 2010 EPA truck standards or better. Users shall maintain compliance through normal course of business and document compliance on an annual basis to the Lead Agency. Trucks incapable of conforming to 2010 EPA truck standards or utilizing the electrical hookup for powering refrigeration shall be prohibited from accessing the site.**

Q-14

c. **MM 4.3-13 (Applies to the Building D Site and the Building E Site): Provide electric vehicle (EV) Charging Stations for trucks and cars.** Please see the discussion below regarding EV charging stations.

Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts. Further, trucks that run at least partially on electricity are projected to become available during the life of the proposed project as discussed in the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy¹². It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, SCAQMD staff recommends the Lead Agency require the proposed warehouse and other plan areas that allow truck parking to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Similar to the City of Los Angeles requirements for all new projects, SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations¹³. Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should appropriately sized to allow for future expanded use.

Q-15

guidance applies to distribution centers that accommodate more than 40 transport refrigeration units per day or where TRU operations will exceed 300 hours per week truck activities and sensitive receptors (Page 4).

¹⁰ Draft EIR, Section S.0, *Executive Summary*, Pages S-17 to 20.

¹¹ South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

¹² Southern California Association of Governments. April 7, 2016. Available at: <http://scagrtpscs.net/Pages/default.aspx>.

¹³ City of Los Angeles. March 30, 2017. Available at:

http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf.



COMMENT LETTER R

Subject: FW: Rezoning

From: cmtrep@yahoo.com [<mailto:cmtrep@yahoo.com>]

Sent: Thursday, July 06, 2017 12:24 PM

To: Brady, Russell <rbrady@RIVCO.ORG>

Subject: Rezoning

I strongly object to 1151 & 1152. This area is already over crowded plus too much traffic. Pollution & congestion from trucks is already a high problem in our area plus the trucks tear up our roads. Thank you, Doug & Chris Tenney
Sent from my Boost Mobile Phone.

←
→ R-1



COMMENT LETTER S

Subject: FW: General Plan Amendment 1151 and 1152 EIR 546

From: tntconser@aol.com [<mailto:tntconser@aol.com>]
Sent: Thursday, July 06, 2017 12:41 PM
To: rbrady@rivco.org.
Subject: General Plan Amendment 1151 and 1152 EIR 546

I am writing to say I strongly oppose General Plan Amendment 1151 and 1152 that would allow rezoning and possibly building of two ware houses to close to rural homes.
We have more than enough warehouses as it is, and it really makes the areas look ugly.
We need to keep and embrace our rural areas. Wildlife MUST be protected. Ways of life MUST be protected. Our environment MUST be protected.
There are already way to many tucks on the roads now, adding emissions. We need to preserve our lands for generations, and our air.
Please do NOT allow 1151 and 1152 to go through.

Thank you,
Mary Tithof
17831 Big Sky Cir
Perris, CA 92570

951-940-9596

← S-1
← S-2
← S-3
← S-4



COMMENT LETTER T

RINCON BAND OF LUISEÑO INDIANS

Cultural Resources Department

1 W. Tribal Road · Valley Center, California 92082 ·
(760) 297-2635 Fax: (760) 692-1498



July 14, 2017

Heather Thomson
Riverside County
Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92502

Re: Knox Business Park Buildings D & E (Decker Parcels)

Dear Ms. Thomson:

It is my pleasure to announce to you that I have joined the Rincon Band of Luiseño Indian's management team as their Cultural Resources Manager. Please allow me to introduce myself to you. My name is Destiny Colocho, and I bring with me, ten (10) years of experience in Archeology. With great enthusiasm, I am looking forward to fostering and growing our relationship with the Riverside County Planning Department.

In stepping into my new position I recently came across your notifications regarding the Knox Business Park Building D & E (Decker Parcels) DEIR. We are interested in consulting with you regarding this project. After reviewing the DEIR we have several concerns and comments. We have outlined our comments and concerns in the attached document.

If there are any further questions or concerns please do not hesitate to contact Destiny Colocho, Cultural Resources Manager at (760) 297-2635 or via email at dcolocho@rincontribe.org.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Destiny Colocho
Rincon Band of Luiseño
Cultural Resources Manager

T-1

| | | | | |
|--------------------------------|------------------------------------|-----------------------------------|--------------------------------------|--------------------------------|
| Bo Mazzetti Tribal Chairman | Tishmall Turner Vice Chairwoman | Steve Stallings Council Member | Laurie E. Gonzalez Council Member | Alfonso Kolb Council Member |
|--------------------------------|------------------------------------|-----------------------------------|--------------------------------------|--------------------------------|



COMMENT LETTER T

RE: Rincon Band of Luiseño Indians Comments on the Notice of Completion for the Draft Environmental Impact Report No 546 for the Knox Business Park Buildings D and E, Riverside County, California

The Rincon Band has reviewed the 2017 Draft Environmental Impact Report No. 546 for the Knox Business Park Buildings D and E in Riverside County, California (the 'Project') as well as the proposed mitigation measures (MM) and conditions of approval (COA) for Tentative Parcel Maps 36950 and 36962 and Plot Plans 25837 and 25838. Rincon is concerned with the lack of Tribal involvement and language consistency in both the MM and COA language. These concerns are more fully addressed in our detailed edits below. Additionally, the analysis presented in the DEIR regarding cultural resources is disturbing as it seems there is a blatant disregard for tribal information and oral history when identifying Tribal Cultural Resources (TCRs) and Traditional Cultural Landscapes (TCLs). This is especially disconcerting to Rincon as the Band works with Riverside County to develop a productive working partnership.

T-2

Based on the DEIR, there are 62 individually recorded cultural resources surrounding the Project with at least five of those recorded within the proposed developable footprint which the consulting tribes assert are activity areas associated with a TCL. The Cultural Resources Section of the DEIR reads as strongly biased towards scientific evidence, analysis and results as proof for the presence of TCRs/TCLs instead of placing tribal information and documentation at the forefront of the decision-making process, which is the intention and "spirit" of Assembly Bill 52 (Gatto 2014;§1(a)(3) & (b)(1) and (2)). As evidence, the DEIR states on page 4.5-7, "*The [Pechanga] Tribe cited Tribal knowledge, oral history, internal Tribe records, ethnological documentation, and the archaeological research conducted for the Building D Site and (formerly larger) Building E Site by BFSAs as the basis of this assertion, although a large majority of the documentation submitted by the Tribe to Riverside County contained a summary of Tribal knowledge and oral tradition, supported by limited scientific analysis and ethnographic data.*"

T-3

Further, the Rincon Band concurs that per Public Resources Code §21074(b), the TCL must be geographically defined in terms of size and scope. Page 4.5-7 of the DEIR states that "...substantial evidence necessary for the County to conclude that the individual resources on the Project site, or the wider landscape..." was not provided by the Pechanga Tribe (the geographical size and scope), but that "...the information supplied by the Tribe in written form...and in oral form during consultation meetings with the County and field visits in County staff's presence, was important to the County's deliberative process and was taken into consideration by the County when determining the potential significance of the on-site resources..., and in determining the significance of the proposed Project's impacts to these resources." Although Rincon was not a party to the consultations between Pechanga, Soboba and the County, it is our understanding that TCR/TCL assertions were not required to be, and often cannot be "supported" by scientific analysis and that lead agencies are not to provide an undue burden of tribes, which includes assisting them with preparing documentation and/or gathering data. Moreover, the DEIR does not provide a full or fair discussion of impacts to TCR/TCLs from a tribal point of view to adequately inform decision-makers. Based on the information provided in the DEIR, additional ethnographic data was requested by the County but not received. Rincon is concerned that the information gleaned during development of an ethnographic study may have been vital to determining potential impacts to the asserted TCL, while also identifying the geographical size and scope of the TCL, which is a point often repeated in the DEIR. Thus, Rincon questions the completeness of the DEIR and its adequacy. The language in the DEIR is a clear example of Euro-centrism and blatant reliance on the science of archaeology to describe and determine the significance, uniqueness or importance of tribal cultural resources.

T-4

It is not evident in the DEIR, MM or COA that any tribal information was taken into account as it is clearly stated repeatedly that the features that are to be impacted by the proposed development were not determined to be scientifically significant and thus, require no specific mitigation. The DEIR also states

T-5
T-6



COMMENT LETTER T

that because none of the individual activity areas contain integrity or were determined significant by the Project archaeologist, there will be no potential to cumulatively impact these resources. All tribes believe that tangible and intangible resources located within traditional territories are connections to their ancestors and are thus, significant to that tribe. Rincon believes as such of resources located within all of Luiseño territory and is highly concerned that the County did not provide any discussion to ascribe traditional values to these resources; instead, relying heavily on a discussion of what the Project archaeologist believed and determined based on archaeological methods that are clearly designed to partition tribal value and significance of a vibrant, dynamic landscape in which all parts of the material and immaterial are fully and vitally interconnected from what is typically believed to be a "...temporary seasonal milling location that lacks any evidence of encampment or long-term use...[a] type of site...common to the Late Prehistoric subsistence pattern for the region and matches the pattern of the milling station to the north and east..." This leads Rincon to posit that no information provided by a Tribe will be acceptable to support a TCR/TCL significance or uniqueness assertion. We question of the County if there is a pre-determined baseline for information that Riverside County has determined to be adequate and potentially acceptable when a tribe knows there is a TCR/TCL present within and/or surrounding a project and if this is an allowable practice under AB 52?

Finally, Rincon is pleased to learn that 12.1 acres of the Project containing the majority of the recorded activity areas, according to the DEIR, will be avoided. However, there is no discussion in the document of long-term preservation, avoidance or potential planned developments within the area. So that all tribal voices are considered and to ensure the continued avoidance and preservation of the acreage, Rincon requests the inclusion of a statement in the Final EIR outlining the method(s) in which the landowner will ensure continued avoidance and preservation, including developing a long-term preservation plan between the tribe(s), the landowner and Riverside County, if appropriate. Alternatively, if there are plans for future development impacts to the area, Rincon specifically requests to be notified in order to consult with the County and provide input and recommendations.

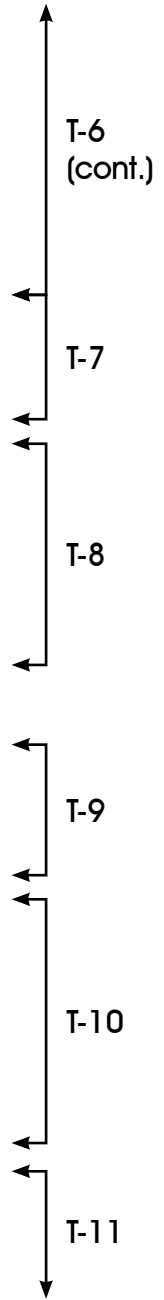
PROJECT MITIGATION MEASURES AND CONDITIONS OF APPROVAL

Based on the information provided in the DEIR and on the County website, the Project MM and COA language is not consistent, nor do they include adequate tribal involvement. As such, Rincon requests that the following edits be included in the Final EIR, in the COA for the Tentative parcel Maps and Plot Plans, and all other environmental documents associated with this Project (underlines are additions, strikeouts are deletions):

DEIR Mitigation Measures:

MM 4.5-1 Prior to the issuance of grading permits, the developer/permit applicant shall enter into a monitoring agreement with Luiseño Native American Tribes. A Native American monitor from each tribe shall be on-site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, and trenching. In conjunction with an Archaeological Monitor, the Native American Monitor shall have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The developer/permit applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this condition.

MM 4.5-2 Building D Site: In accordance with the letter dated February 2, 2017 to Heather Thomson, County Archaeologist from Project Archaeologist Brian F. Smith and Associates, regarding "Relocation of Bedrock Milling Features Located Within Knox Business Park (Decker Parcels I and II)" and as a condition of the grading permit for the Building D Site (Planning Case No. 36950), before construction





COMMENT LETTER T

activities are allowed to start, and using professional archaeological methods, any visible artifacts associated with Sites CA-RIV-8401 and CA-RIV-8402 shall be recovered and recorded by the Native American monitors and the archaeological monitor, and photo documentation of each ~~site~~ site shall occur. The current Department of Parks and Recreation forms for the sites shall be updated by the Project archaeologist, detailing which features were relocated, the process through which this was done, and updated maps using sub meter GIS technology to document the new location of each feature. The relocation information shall be included in a Phase IV Monitoring Report (See MM 4.5-8).

T-11
(cont.)

MM 4.5-3 Building E Site: In accordance with the letter dated February 2, 2017 to Heather Thomson, County Archaeologist from Project Archaeologist Brian F. Smith and Associates, regarding “Relocation of Bedrock Milling Features Located Within Knox Business Park (Decker Parcels I and II)” and as a condition of the grading permit for the Building E Site (Planning Case No. 36962), before construction activities are allowed to start, and using professional archaeological methods, any visible artifacts associated with Sites CA-RIV-1330H, CA-RIV-8901 and CA-RIV-11874 shall be recovered and recorded by the Native American monitors and the archaeological monitor, and photo documentation of each ~~site~~ site shall occur. The current Department of Parks and Recreation forms for the sites shall be updated by the Project archaeologist, detailing which features were relocated, the process through which this was done, and updated maps using sub meter GIS technology to document the new location of each feature. The relocation information shall be included in a Phase IV Monitoring Report (See MM 4.5-8).

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MM 4.5-4 Building E Site: Prior to issuance of a grading permit for Planning Case No. 36962, the developer/permit applicant shall provide evidence to the County Archaeologist that the following notes have been provided on the Grading Plan: “Temporary fencing shall be provided for the protection of the off-site parcel located to the immediate west during any grading activities within 100 feet of the western property boundary. The fence shall be installed under the supervision of the County approved archaeologist and the Native American monitors prior to commencement of grading or brushing and be removed only after grading operations have been completed. In the event that a breach of the fencing should occur, all work with 100 feet of the breach shall stop and the Project archaeologist shall notify the County archaeologist immediately. A field visit shall occur within 48 hours to be attended by the developer, Project archaeologist, County archaeologist, Native American Monitors and appropriate construction personnel to determine importance of the damages and possible recourse and remediation. Grading activities in the area will resume upon release by the County archaeologist.”

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MM 4.5-5 Prior to the issuance of grading permits, the developer/permit applicant shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist has been contracted to implement a Cultural Resource Monitoring Program. A Cultural Resource Monitoring Plan shall be developed in consultation with the Native American monitors that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with this project. This document shall be provided to the County Archaeologist for review and approval prior to issuance of the grading permit who will assure that the Native American representatives have had adequate time to review and comment prior to finalization. These measures shall include, but shall not be limited to, the following:

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a) Archaeological Monitor: An adequate number of qualified archaeological and Native American monitors shall be present to ensure that all earth moving activities are observed; the monitors shall be on-site during all grading activities for areas to be monitored including any off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist in consultation with the Native American monitors.

b) Cultural Sensitivity Training: The Project Archaeologist and a representative designated by the Tribes shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all Construction Personnel. Training will include a brief review of the cultural sensitivity of the Project site and the surrounding area; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. This is a mandatory training and all construction personnel must attend prior to beginning work on the Project site. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.

c) Building D Site Controlled Grading: Several bedrock milling features at cultural sites CA-RIV-8401 and CA-RIV-8402 will be impacted during construction activities and the soils surrounding them will be disturbed. A controlled grading program will be developed by the Project Archaeologist, in consultation with the Native American representatives, and included in the Cultural Resources Monitoring Program. The controlled grading program shall require the systematic removal of the ground surface to allow for the identification, documentation and recovery of any subsurface cultural deposits. Results of the controlled grading program shall be included in the Phase IV Monitoring Report (see MM 4.5-8).

Building E Site Controlled Grading: Several bedrock milling features at cultural sites CA-RIV-8901, CA-RIV-1330/H and CA-RIV-11874 will be impacted during construction activities and the soils surrounding them will be disturbed. A controlled grading program will be developed by the Project Archaeologist, in consultation with the Native American representatives, and included in the Cultural Resources Monitoring Program. The controlled grading program shall require the systematic removal of the ground surface to allow for the identification, documentation and recovery of any subsurface cultural deposits. Results of the controlled grading program shall be included in the Phase IV Monitoring Report (see MM 4.5-8).

MM 4.5-6 If during ground disturbance activities, unanticipated cultural resources are discovered, the following procedures shall be followed:

a) All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the applicant shall call the County Archaeologist immediately upon discovery of the cultural resource*. A meeting shall be convened between the developer, the project archaeologist**, the Native American tribal representatives (or other appropriate ethnic/cultural group representative), and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the

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County Archaeologist, as to the appropriate treatment (documentation, recovery; avoidance, etc.) for the cultural resource.

b) Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.

* A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to sacred or cultural importance.

**An archaeological monitor is required per MM 4.5-5. However, if not already employed by the project developer, a County approved archaeologist shall be employed by the project developer to assess the value/importance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary.

MM 4.5-7 Prior to building final, provide evidence to the satisfaction of the County Archaeologist that all archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project; such as testing of archaeological sites that took place years ago), have been curated at the Western Science Center, a Riverside County Curation facility that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers and tribal members for further study. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.

MM 4.5-8 Upon completion of the implementation phase, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with the grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the TLMA website. The report shall include results of any feature relocation or residue analysis required as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting. A report documenting the field and analysis results and interpretation of the artifact and research data within the research context shall be completed and submitted to the satisfaction of the Lead Agency (County of Riverside) prior to issuance of any building permits. The report will include Department of Parks and Recreation (DPR) and Primary Archaeological Site Forms. A final copy shall be submitted to the Eastern Information Center (EIS) and Native American tribes that request a copy.

Tentative Parcel Map 36950 COA:
10.PLANNING 002 Map - PDA Accepted
No recommended edits

10.PLANNING 004 Map – Unanticipated Resources
~~The developer/permit holder or any successor in interest shall comply with the following for the life of this project: 1)If during ground disturbance activities, cultural resources are discovered that were not~~

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~~assessed by the archaeological reports and/or environmental assessment conducted prior to project approval, the following procedures shall be followed. A cultural resources site is defined, for this condition, as being three or more artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to its sacred or cultural importance. a) All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted until a meeting is convened between the developer, the project archaeologist, the Native American tribal representative (or other appropriate ethnic/cultural group representative), and the County Archaeologist to discuss the significance of the find. b) At the meeting, the significance of the discoveries shall be discussed and after consultation with the Native American tribal (or other appropriate ethnic/cultural group representative) and the archaeologist, a decision is made, with the concurrence of the County Archaeologist, as to the appropriate mitigation (documentation, recovery, avoidance, etc) for the cultural resource. c) Further ground disturbance shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate preservation or mitigation measures. If during ground disturbance activities, unanticipated cultural resources are discovered, the following procedures shall be followed:~~

a) All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the applicant shall call the County Archaeologist immediately upon discovery of the cultural resource*. A meeting shall be convened between the developer, the project archaeologist**, the Native American tribal representatives (or other appropriate ethnic/cultural group representative), and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery, avoidance, etc.) for the cultural resource.

b) Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.

* A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to sacred or cultural importance.

**An archaeological monitor is required per MM 4.5-5. However, if not already employed by the project developer, a County approved archaeologist shall be employed by the project developer to assess the value/importance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary.

10.PLANNING 006 Map – PDA04987 Accepted
 No recommended edits

10.PLANNING 008 Map – If Human Remains Found
 No recommended edits

60.PLANNING 007 Map – Native American Monitor
 Prior to the issuance of grading permits, the developer/permit applicant shall enter into a monitoring agreement with Luiseño Native American Tribes. A Native American monitor from each tribe shall be on-site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, and trenching. In conjunction with an Archaeological Monitor, the Native American Monitor shall have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural

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resources. The developer/permit applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this condition.

60.PLANNING 009 Map – Feature Relocation

In accordance with the letter dated February 2, 2017 to Heather Thomson, County Archaeologist from Project Archaeologist Brian F. Smith and Associates, regarding "Relocation of Bedrock Milling Features Located Within Knox Business Park (Decker Parcels I and II" and as a condition of the grading permit for the Building D Site (Planning Case No. 36950), before construction activities are allowed to start, and using professional archaeological methods, any visible artifacts associated with Sites CA-RIV-8401 and CA-RIV-8402 shall be recovered recorded by the Native American monitors and the archaeological monitor, and photo documentation of each site shall occur. The current Department of Parks and Recreation forms for the sites shall be updated by the Project archaeologist, detailing which features were relocated, the process through which this was done, and updated maps using sub meter GIS technology to document the new location of each feature. The relocation information shall be included in a Phase IV Monitoring Report per 70.PLANNING 001.

60.PLANNING 011 Map – Project Archaeologist

Prior to the issuance of grading permits, the developer/permit applicant shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist has been contracted to implement a Cultural Resource Monitoring Program. A Cultural Resource Monitoring Plan shall be developed in consultation with the Native American monitors that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with this project. This document shall be provided to the County Archaeologist for review and approval prior to issuance of the grading permit who will assure that the Native American representatives have had adequate time to review and comment prior to finalization. ~~These measures shall include, but shall not be limited to, the following: a) Archaeological Monitor: The Plan shall document that an adequate number of qualified archaeological and Native American monitors shall be present to ensure that all earth moving activities are observed; and the monitors shall be on-site during all grading activities for areas to be monitored including any off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist in consultation with the Native American monitors.~~

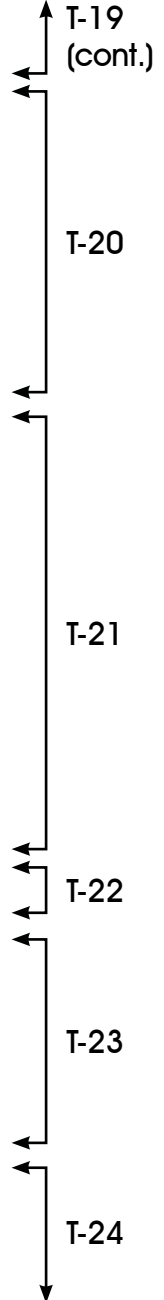
60.PLANNING 012 Map – Cultural Sensitivity Tr.
No recommended edits

60.PLANNING 013 Map – Controlled Grading

Several bedrock milling features at cultural sites CA-RIV-8401 and CA-RIV-8402 will be impacted during construction activities and the soils surrounding them will be disturbed. A controlled grading program will be developed by the Project Archaeologist, in consultation with the Native American representatives and included in the Cultural Resources Monitoring Program. The controlled grading program shall require the systematic removal of the ground surface to allow for the identification, documentation and recovery of any subsurface cultural deposits. Results of the controlled grading program shall be included in the Phase IV Monitoring Report per 70.PLANNING 001.

70.PLANNING 001 Map – Phase IV Cultural Report

~~Prior To Grading Permit Final (Archaeological Monitoring/Phase IV Report Submittal): The developer/holder shall prompt the Project Archaeologist to submit one (1) wet signed paper copy and (1) CD of a Phase IV Cultural Resources Monitoring Report that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with~~





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~~this grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the TLMA website. The County Archaeologist shall review the report to determine adequate compliance with the approved conditions of approval. Upon determining the report is adequate, the County Archaeologist shall clear this condition.~~

Upon completion of the implementation phase, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with the grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the TLMA website. The report shall include results of any feature relocation or residue analysis required as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting. A report documenting the field and analysis results and interpretation of the artifact and research data within the research context shall be completed and submitted to the satisfaction of the Lead Agency (County of Riverside) prior to issuance of any building permits. The report will include Department of Parks and Recreation (DPR) and Primary Archaeological Site Forms. A final copy shall be submitted to the Eastern Information Center (EIS) and Native American tribes that request a copy.

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70.PLANNING 002 Map – Artifact Distribution
 No recommended edits

Tentative Parcel Map 36962 COA:

10.PLANNING 006 Map – PDA 4953R1 Accepted
 No recommended edits

10.PLANNING 007 Map – PDA04978 Accepted
 No recommended edits

10.PLANNING 008 Map – PDA04928R1 Accepted
 No recommended edits

10.PLANNING 010 Map – If Human Remains Found
 No recommended edits

10.PLANNING 011 Map – Unanticipated Resources

~~The developer/permit holder or any successor in interest shall comply with the following for the life of this project: 1)If during ground disturbance activities, cultural resources are discovered that were not assessed by the archaeological reports and/or environmental assessment conducted prior to project approval, the following procedures shall be followed. A cultural resources site is defined, for this condition, as being three or more artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to its sacred or cultural importance. a)All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted until a meeting is convened between the developer, the project archaeologist, the Native American tribal representative (or other appropriate ethnic/cultural group representative), and the County Archaeologist to discuss the significance of the find. b)At the meeting, the significance of the discoveries shall be discussed and after consultation with the Native American tribal (or other appropriate ethnic/cultural group representative) and the archaeologist, a decision is made, with the concurrence of the County Archaeologist, as to the appropriate mitigation (documentation, recovery, avoidance, etc) for the cultural~~

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~~resource. e)Further ground disturbance shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate preservation or mitigation measures. If during ground disturbance activities, unanticipated cultural resources are discovered, the following procedures shall be followed:~~

~~a) All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the applicant shall call the County Archaeologist immediately upon discovery of the cultural resource*. A meeting shall be convened between the developer, the project archaeologist**, the Native American tribal representatives (or other appropriate ethnic/cultural group representative), and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery; avoidance, etc.) for the cultural resource.~~

~~b) Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.~~

~~* A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to sacred or cultural importance.~~

~~**An archaeological monitor is required per MM 4.5-5. However, if not already employed by the project developer, a County approved archaeologist shall be employed by the project developer to assess the value/importance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary.~~

60.PLANNING 003 Map – Controlled Grading

~~Some of The bedrock milling features at CA-RIV-8901 and CA-RIV-1330 and CA-RIV-11874 will be impacted during construction activities and the soils surrounding them will be disturbed. Prior to a grading permit being issued, a controlled grading program will be developed by the Project Archaeologist and will be required in order to identify and evaluate any previously unidentified subsurface artifacts or features. The document shall be provided to the County Archaeologist for review and approval prior to issuance of the grading permit.~~

~~Several bedrock milling features at cultural sites CA-RIV-8901, CA-RIV-1330/H and CA-RIV-11874 will be impacted during construction activities and the soils surrounding them will be disturbed. A controlled grading program will be developed by the Project Archaeologist, in consultation with the Native American representatives, and included in the Cultural Resources Monitoring Program. The controlled grading program shall require the systematic removal of the ground surface to allow for the identification, documentation and recovery of any subsurface cultural deposits. Results of the controlled grading program shall be included in the Phase IV Monitoring Report per 70.PLANNING 001.~~

60.PLANNING 010 Map – Grading Plan Notes

~~Prior to issuance of a grading permit for Planning Case No. 36962, the developer/permit applicant shall provide evidence to the County Archaeologist that the following notes have been provided on the Grading Plan: “Temporary fencing shall be provided for the protection of the off-site parcel located to the immediate west during any grading activities within 100 feet of the western property boundary. The fence shall be installed under the supervision of the County approved archaeologist and the Native American monitors prior to commencement of grading or brushing and be removed only after grading operations have been completed. In the event that a breach of the fencing should occur, all work with 100 feet of the breach shall stop and the Project archaeologist shall notify the County archaeologist immediately. A field~~

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visit shall occur within 48 hours to be attended by the developer, Project archaeologist, County archaeologist, Native American Monitors and appropriate construction personnel to determine importance of the damages and possible recourse and remediation. Grading activities in the area will resume upon release by the County archaeologist.”

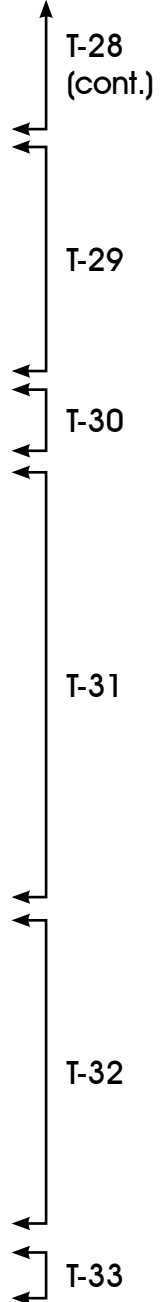
60.PLANNING 011 Map – Native American Monitor
Prior to the issuance of grading permits, the developer/permit applicant shall enter into a monitoring agreement with Luiseño Native American Tribes. A Native American monitor from each tribe shall be on-site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, and trenching. In conjunction with an Archaeological Monitor, the Native American Monitor shall have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The developer/permit applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this condition.

60.PLANNING 012 Map – Cultural Sensitivity Tr.
No recommended edits

60.PLANNING 012 Map – Project Archaeologist
Prior to the issuance of grading permits, the developer/permit applicant shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist has been contracted to implement a Cultural Resource Monitoring Program. A Cultural Resource Monitoring Plan shall be developed in consultation with the Native American monitors that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with this project. This document shall be provided to the County Archaeologist for review and approval prior to issuance of the grading permit who will assure that the Native American representatives have had adequate time to review and comment prior to finalization. These measures shall include, but shall not be limited to, the following: a) Archaeological Monitor: The Plan shall document that an adequate number of qualified archaeological and Native American monitors shall be present to ensure that all earth moving activities are observed; and the monitors shall be on-site during all grading activities for areas to be monitored including any off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist in consultation with the Native American monitors.

60.PLANNING 013 Map – Feature Relocation
In accordance with the letter dated February 2, 2017 to Heather Thomson, County Archaeologist from Project Archaeologist Brian F. Smith and Associates, regarding “Relocation of Bedrock Milling Features Located Within Knox Business Park (Decker Parcels I and II)” and as a condition of the grading permit for the Building E Site (Planning Case No. 36962), before construction activities are allowed to start, and using professional archaeological methods, any visible artifacts associated with Sites CA-RIV-1330H, CA-RIV-8901 and CA-RIV-11874 shall be recovered and recorded by the Native American monitors and the archaeological monitor, and photo documentation of each ~~site~~ site shall occur. The current Department of Parks and Recreation forms for the sites shall be updated by the Project archaeologist, detailing which features were relocated, the process through which this was done, and updated maps using sub meter GIS technology to document the new location of each feature. The relocation information shall be included in a Phase IV Monitoring Report per 70.PLANNING 001.

70.PLANNING 002 Map – Artifact Distribution
No recommended edits





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70.PLANNING 001 Map – Phase IV Cultural Report

Upon completion of the implementation phase, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with the grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the TLMA website. The report shall include results of any feature relocation or residue analysis required as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting. A report documenting the field and analysis results and interpretation of the artifact and research data within the research context shall be completed and submitted to the satisfaction of the Lead Agency (County of Riverside) prior to issuance of any building permits. The report will include Department of Parks and Recreation (DPR) and Primary Archaeological Site Forms. A final copy shall be submitted to the Eastern Information Center (EIS) and Native American tribes that request a copy.

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Plot Plan 25837 COA:

10.PLANNING 010 USE – If Human Remains Found

~~The developer/permit holder or any successor in interest shall comply with the following codes:~~

~~Pursuant to State Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted by the Coroner within the period specified by law (two working days). Subsequently, the Native American Heritage Commission shall identify the "Most Likely Descendant". The Most Likely Descendant shall then make recommendations and engage in consultation with the property owner and the County Archaeologist concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. Human remains from other ethnic/cultural groups with recognized historical associations to the project area shall also be subject to consultation between appropriate representatives from that group and the County Archaeologist.~~

If human remains are found on this site, the developer/permit holder or any successor in interest shall comply with the following codes: Pursuant to State Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. The Coroner will have two working days to determine if the remains are subject to his or her authority as part of a crime. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission (NAHC) shall be contacted by the Coroner within the period specified by law (24 hours). The NAHC shall immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, inspect the site of the discovery of the Native American human remains and may recommend means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall make recommendations or preferences for treatment within 48 hours of being granted access to the site. Upon the discovery of Native American remains, the landowner shall ensure that the immediate vicinity, where the Native American human remains are located, is not damaged or disturbed. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment. The descendants' preferences for treatment may include the following: The nondestructive removal and analysis of human remains and items associated with Native American human remains. Preservation of Native American human remains and associated items in place. Relinquishment of Native American human remains and associated items to the descendants for

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treatment. Other culturally appropriate treatment. The parties may also mutually agree to extend discussions, taking into account the possibility that additional or multiple Native American human remains, as defined in this section, are located in the project area, providing a basis for additional treatment measures. Human remains of a Native American may be an inhumation or cremation, and in any state of decomposition or skeletal completeness. Any items associated with the human remains that are placed or buried with the Native American human remains are to be treated in the same manner as the remains, but do not by themselves constitute human remains. Whenever the commission is unable to identify a descendant, or the descendants identified fail to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance. To protect these sites, the landowner shall do one or more of the following: Record the site with the commission or the appropriate Information Center. Utilize an open-space or conservation zoning designation or easement. Record a document with the county in which the property is located. The document shall be titled "Notice of Reinterment of Native American Remains" and shall include a legal description of the property, the name of the owner of the property, and the owner's acknowledged signature, in addition to any other information required by this section. The document shall be indexed as a notice under the name of the owner. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with the descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Human remains from other ethnic/cultural groups with recognized historical associations to the project area shall also be subject to consultation between appropriate representatives from that group and the County Archaeologist.

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10.PLANNING 011 USE – Unanticipated Resources

The developer/permit holder or any successor in interest shall comply with the following for the life of this permit:

If during ground disturbance activities, unanticipated cultural resources* are discovered, the following procedures shall be followed:

- 1) ~~All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted until a meeting is convened between the developer, the project archaeologist**, the Native American tribal representative (or other appropriate ethnic/cultural group representative), and the County Archaeologist to discuss the significance of the find.~~
- 2) ~~The developer shall call the County Archaeologist immediately upon discovery of the cultural resource to convene the meeting.~~
- 3) ~~At the meeting with the aforementioned parties, the significance of the discoveries shall be discussed and a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate mitigation (documentation, recovery, avoidance, etc) for the cultural resource.~~
- 4) ~~Further ground disturbance shall not resume within the area of the discovery until a meeting has been convened with the aforementioned parties and a decision is made, with the concurrence of the County Archaeologist, as to the appropriate mitigation measures.~~

~~* A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to sacred or cultural importance.~~

~~** If not already employed by the project developer, a County approved archaeologist shall be employed by the project developer to assess the value/importance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary.~~

- a) ~~All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the applicant shall call the County Archaeologist immediately upon discovery of the cultural resource. A~~

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meeting shall be convened between the developer, the project archaeologist**, the Native American tribal representatives (or other appropriate ethnic/cultural group representative), and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery; avoidance, etc.) for the cultural resource.

b) Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.

* A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to sacred or cultural importance.

**An archaeological monitor is required per MM 4.5-5. However, if not already employed by the project developer, a County approved archaeologist shall be employed by the project developer to assess the value/importance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary.

60.PLANNING 001 USE – Controlled Grading

Some of The bedrock milling features at CA-RIV-8901 and CA-RIV-1330 and CA-RIV-11874 will be impacted during construction activities and the soils surrounding them will be disturbed. Prior to a grading permit being issued, a controlled grading program will be developed by the Project Archaeologist and will be required in order to identify and evaluate any previously unidentified subsurface artifacts or features. The document shall be provided to the County Archaeologist for review and approval prior to issuance of the grading permit.

Several bedrock milling features at cultural sites CA-RIV-8901, CA-RIV-1330/H and CA-RIV-11874 will be impacted during construction activities and the soils surrounding them will be disturbed. A controlled grading program will be developed by the Project Archaeologist, in consultation with the Native American representatives, and included in the Cultural Resources Monitoring Program. The controlled grading program shall require the systematic removal of the ground surface to allow for the identification, documentation and recovery of any subsurface cultural deposits. Results of the controlled grading program shall be included in the Phase IV Monitoring Report per 70.PLANNING 001.

60.PLANNING 002 USE – Residue Analysis
No recommended edits

60.PLANNING 003 USE – Native American Monitor

Prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement with and retain a Native American Monitor from the Pechanga and/or Soboba Tribes. The Native American Monitor shall be on site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor, the Native American Monitor shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The developer/permit applicant shall submit a fully executed copy of the contract to the County Archaeologist to ensure compliance with this condition of approval. Upon verification, the Archaeologist shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure

Prior to the issuance of grading permits, the developer/permit applicant shall enter into a monitoring agreement with Luiseño Native American Tribes. A Native American monitor from each tribe shall be

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on-site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, and trenching. In conjunction with an Archaeological Monitor, the Native American Monitor shall have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The developer/permit applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this condition.

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60.PLANNING 004 USE – Project Archaeologist

Prior to the issuance of grading permits, the developer/permit applicant shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist has been contracted to implement a Cultural Resource Monitoring Program. A Cultural Resource Monitoring Plan shall be developed in consultation with the Native American monitors that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with this project. This document shall be provided to the County Archaeologist for review and approval prior to issuance of the grading permit who will assure that the Native American representatives have had adequate time to review and comment prior to finalization. ~~These measures shall include, but shall not be limited to, the following: a) Archaeological Monitor: The Plan shall document that an adequate number of qualified archaeological and Native American monitors shall be present to ensure that all earth moving activities are observed; and the monitors shall be on-site during all grading activities for areas to be monitored including any off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist in consultation with the Native American monitors.~~

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60.PLANNING 005 USE – Feature Relocation

~~Cultural sites CA-RIV-1330H, CA-RIV-008901 and CA-RIV-11874 (Decker II) cannot be avoided through Project redesign. In accordance with the letter dated February 2, 2017 to Heather Thomson, County Archaeologist from Project Archaeologist, Brian F. Smith and Associates, Inc. Regarding: "Revised Relocation of Bedrock Milling Features Located within the Decker Parcels I (Planning Case No. 36950) and Decker Parcels II (Planning Case No. 36962), before construction activities are allowed to start and using professional archaeological methods, any visible artifacts shall be recovered and recorded; photo documentation of each feature in situ shall occur. The current Department of Parks and Recreation forms for the sites shall be updated, detailing which features were relocated, the process through which this was done, and updated maps using sub meter GIS technology to document the new location of each feature. The relocation information shall be included in the Phase IV Monitoring Report.~~

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In accordance with the letter dated February 2, 2017 to Heather Thomson, County Archaeologist from Project Archaeologist Brian F. Smith and Associates, regarding "Relocation of Bedrock Milling Features Located Within Knox Business Park (Decker Parcels I and II" and as a condition of the grading permit for the Building E Site (Planning Case No. 36962), before construction activities are allowed to start, and using professional archaeological methods, any visible artifacts associated with Sites CA-RIV-1330H, CA-RIV-8901 and CA-RIV-11874 shall be recovered and recorded by the Native American monitors and the archaeological monitor, and photo documentation of each site shall occur. The current Department of Parks and Recreation forms for the sites shall be updated by the Project archaeologist, detailing which features were relocated, the process through which this was done, and updated maps using sub meter GIS technology to document the new location of each feature. The relocation information shall be included in a Phase IV Monitoring Report per 70.PLANNING 001.

70.PLANNING 001 USE – Phase IV Cultural Report

~~PRIOR TO GRADING PERMIT FINAL: The developer/holder shall prompt the Project Cultural Resources Professional to submit one (1) wet signed paper copy and (1) CD of a Phase IV Cultural~~

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~~Resources Monitoring Report that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with this grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the TLMA website. The report shall also include evidence of the required cultural/historical sensitivity training for the construction staff held during the required pre-grade meeting. The Cultural Resource Professional shall also provide evidence to the satisfaction of the County Archaeologist that all archaeological materials recovered during the Phase IV Mitigation Monitoring of the project, have been curated at a Riverside County Curation facility that meets federal standards per 36 CFR Part 79 and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid. The County Archaeologist shall review the report to determine adequate mitigation compliance was met. Upon determining the report and mitigation is adequate, the County Archaeologist shall clear this condition.~~

Upon completion of the implementation phase, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with the grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the TLMA website. The report shall include results of any feature relocation or residue analysis required as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting. A report documenting the field and analysis results and interpretation of the artifact and research data within the research context shall be completed and submitted to the satisfaction of the Lead Agency (County of Riverside) prior to issuance of any building permits. The report will include Department of Parks and Recreation (DPR) and Primary Archaeological Site Forms. A final copy shall be submitted to the Eastern Information Center (EIS) and Native American tribes that request a copy.

70.PLANNING 002 USE – Artifact Distribution
No recommended edits

70.PLANNING 003 USE – Cultural Sensitivity Tr.

The Project Archaeologist and a representative designated by the Tribe shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all Construction Personnel. Training will include a brief review of the cultural sensitivity of the Project site and the surrounding area; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. This is a mandatory training and all construction personnel must attend prior to beginning work on the Project site. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.

Plot Plan 25838 COA:

10.PLANNING 011 USE – Unanticipated Resources

The developer/permit holder or any successor in interest shall comply with the following for the life of this permit:

1)All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted until a meeting is convened between the developer, the project archaeologist**, the Native American tribal representative (or other appropriate ethnic/cultural group representative), and the County Archaeologist to discuss the significance of the find.

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~~2)The developer shall call the County Archaeologist immediately upon discovery of the cultural resource to convene the meeting.~~

~~3)At the meeting with the aforementioned parties, the significance of the discoveries shall be discussed and a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate mitigation (documentation, recovery, avoidance, etc) for the cultural resource.~~

~~4)Further ground disturbance shall not resume within the area of the discovery until a meeting has been convened with the aforementioned parties and a decision is made, with the concurrence of the County Archaeologist, as to the appropriate mitigation measures.~~

~~* A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to sacred or cultural importance.~~

~~** If not already employed by the project developer, a County approved archaeologist shall be employed by the project developer to assess the value/importance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary.~~

~~If during ground disturbance activities, unanticipated cultural resources* are discovered, the following procedures shall be followed:~~

~~a) All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the applicant shall call the County Archaeologist immediately upon discovery of the cultural resource. A meeting shall be convened between the developer, the project archaeologist**, the Native American tribal representatives (or other appropriate ethnic/cultural group representative), and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery; avoidance, etc.) for the cultural resource.~~

~~b) Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.~~

~~* A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to sacred or cultural importance.~~

~~**An archaeological monitor is required per MM 4.5-5. However, if not already employed by the project developer, a County approved archaeologist shall be employed by the project developer to assess the value/importance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary.~~

10.PLANNING 004 USE – PDA04927 Accepted
No recommended edits

10.PLANNING 005 USE – If Human Remains Found
No recommended edits

60.PLANNING 001 USE – Native American Monitor
Prior to the issuance of grading permits, the developer/permit applicant shall enter into a monitoring agreement with Luiseño Native American Tribes. A Native American monitor from each tribe shall be on-site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, and trenching. In conjunction with an Archaeological Monitor, the Native American Monitor shall have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural

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resources. The developer/permit applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this condition.

60.PLANNING 005 USE – Feature Relocation

Building D Site: In accordance with the letter dated February 2, 2017 to Heather Thomson, County Archaeologist from Project Archaeologist Brian F. Smith and Associates, regarding "Relocation of Bedrock Milling Features Located Within Knox Business Park (Decker Parcels I and II" and as a condition of the grading permit for the Building D Site (Planning Case No. 36950), before construction activities are allowed to start, and using professional archaeological methods, any visible artifacts associated with Sites CA-RIV-8401 and CA-RIV-8402 shall be recovered recorded by the Native American monitors and the archaeological monitor, and photo documentation of each site shall occur. The current Department of Parks and Recreation forms for the sites shall be updated by the Project archaeologist, detailing which features were relocated, the process through which this was done, and updated maps using sub meter GIS technology to document the new location of each feature. The relocation information shall be included in a Phase IV Monitoring Report per 70.PLANNING 001.

60.PLANNING 004 USE – Project Archaeologist

Prior to the issuance of grading permits, the developer/permit applicant shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist has been contracted to implement a Cultural Resource Monitoring Program. A Cultural Resource Monitoring Plan shall be developed in consultation with the Native American monitors that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with this project. This document shall be provided to the County Archaeologist for review and approval prior to issuance of the grading permit who will assure that the Native American representatives have had adequate time to review and comment prior to finalization. These measures shall include, but shall not be limited to, the following: a) Archaeological Monitor: The Plan shall document that an adequate number of qualified archaeological and Native American monitors shall be present to ensure that all earth moving activities are observed; and the monitors shall be on-site during all grading activities for areas to be monitored including any off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist in consultation with the Native American monitors.

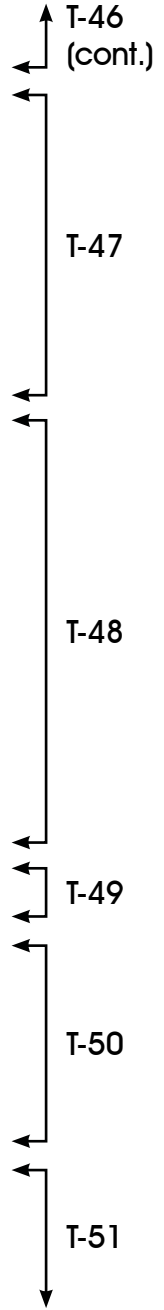
60.PLANNING 004 USE – Cultural Sensitivity Tr.
No recommended edits

60.PLANNING 005 USE – Controlled Grading

Several bedrock milling features at cultural sites CA-RIV-8401 and CA-RIV-8402 will be impacted during construction activities and the soils surrounding them will be disturbed. A controlled grading program will be developed by the Project Archaeologist, in consultation with the Native American representatives and included in the Cultural Resources Monitoring Program. The controlled grading program shall require the systematic removal of the ground surface to allow for the identification, documentation and recovery of any subsurface cultural deposits. Results of the controlled grading program shall be included in the Phase IV Monitoring Report per 70.PLANNING 001.

70.PLANNING 001 USE – Phase IV Cultural Report

~~Prior To Grading Permit Final (Archaeological Monitoring/Phase IV Report Submittal): The developer/holder shall prompt the Project Archaeologist to submit one (1) wet signed paper copy and (1) CD of a Phase IV Cultural Resources Monitoring Report that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with~~



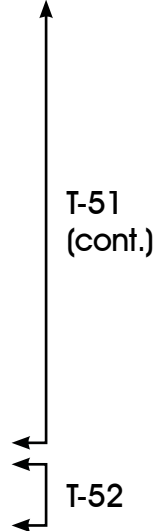


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~~this grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the TLMA website. The County Archaeologist shall review the report to determine adequate compliance with the approved conditions of approval. Upon determining the report is adequate, the County Archaeologist shall clear this condition~~

Upon completion of the implementation phase, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with the grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the TLMA website. The report shall include results of any feature relocation or residue analysis required as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting. A report documenting the field and analysis results and interpretation of the artifact and research data within the research context shall be completed and submitted to the satisfaction of the Lead Agency (County of Riverside) prior to issuance of any building permits. The report will include Department of Parks and Recreation (DPR) and Primary Archaeological Site Forms. A final copy shall be submitted to the Eastern Information Center (EIS) and Native American tribes that request a copy.

70.PLANNING 002 USE – Artifact Distribution
No recommended edits





RESPONSES

State of California Governor's Office of Planning and Research- Letter A

A-1 Riverside County acknowledges this letter indicating that the close of public review for the Draft EIR was July 3, 2017 and that the Native American Heritage Commission is the only State agency that submitted comments through the Clearinghouse. The County further acknowledges that the Project has complied with the State Clearinghouse review requirements for draft environmental documents.

Native American Heritage Commission- Letter A

A-2 Comment acknowledged.

A-3 Extensive documentation is contained in Riverside County's administrative record files for the Knox Business Park Buildings D and E Project confirming that Riverside County and Native American tribes engaged in government-to-government consultation over an approximate 24-month period, beginning in July 2015. In compliance with AB-52, Riverside County sent notification of the proposed Project to the following tribes: Agua Caliente Band of Cahuilla Indians; San Manuel Band of Mission Indians, Pala Band of Mission Indians, Morongo Band of Mission Indians, Pechanga Band of Luiseño Indians; Rincon Band of Luiseño Indians; and the Soboba Band of Luiseño Indians. The Pechanga Band of Luiseño Indians and the Soboba Band of Luiseño Indians responded and requested consultation, and government-to-government consultation occurred in compliance with the requirements of AB-52. Refer to Final EIR (FEIR) § 4.18, Tribal Cultural Resources. Documentation of the many meetings and oral and written communications between Riverside County and Native American Tribes are included in confidential records on file with the Riverside County Transportation and Land Management Agency.

A-4 The EIR concludes that impacts to Tribal Cultural Resources are less than significant (see FEIR § 4.18). Thus, mitigation measures are not required pursuant to CEQA.

A-5 Riverside County complied with Public Resources Code § 21084.1 pertaining to the proposed Project and its Draft EIR (DEIR) and Final EIR (FEIR). As concluded by the EIR, the Project would not alter or destroy a historic site and would not cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations § 15064.5. Refer to EIR § 4.5, Cultural Resources.

A-6 Riverside County complied with AB 52 and SB 18 pertaining to the proposed Project and its DEIR and FEIR. Refer to FEIR § 4.18, Tribal Cultural Resources.

A-7 Riverside County complied with AB 52 pertaining to the proposed Project and its DEIR and FEIR. Refer to Response A-3 and FEIR § 4.18, Tribal Cultural Resources.

A-8 Refer to Response A-3. Riverside County engaged in government-to-government consultation with Native American Tribes regarding the proposed Project over an approximate 24-month period,



beginning in July 2015. Also, the Project Applicant began coordination with the Pechanga Band of Luiseño Indians in June 2015, prior to the effective date of AB 52.

- A-9 Riverside County acknowledges the provisions of AB 52 and SB 18. As discussed in Response A-2 and FEIR § 4.18, the County has complied with all of the required provisions of AB 52.

Golden State Environmental and Social Justice Alliance – Letter B

- B-1 Riverside County (County) acknowledges receipt of this letter and the request to be added the public interest list pertaining to the proposed Project and its CEQA compliance process. The Golden State Environmental and Social Justice Alliance is confirmed to be on the County's notification list for the proposed Project and will receive notices at the mailing address given in this comment.
- B-2 The comment correctly summarizes information from EIR § 3.0, Project Description.
- B-3 As explained in EIR § 4.0.2, the cumulative development projects listed in EIR Table 4.0-1 are used only for the evaluation of cumulatively-considerable impacts pertaining to the subject areas of traffic and vehicular-related air quality, greenhouse gas, and noise. For all other issue areas evaluated in the EIR, the cumulative impact analyses rely on the summary of projections approach pursuant to CEQA Guidelines §15130(b), and not the list of development projects listed in Table 4.0-1. DEIR Table 4.0-1 provides a list of cumulative development projects that was obtained from the County of Riverside, City of Moreno Valley, March Joint Powers Authority (JPA), City of Riverside, and City of Perris. Table 4.0-1 identifies the project name and/or case number, description of the proposed land use(s), and expected intensity of land use(s) presented in terms of square footage, acreage, and/or number of residential dwelling units. EIR Figure 4.0-1 depicts the location of each of the cumulative development projects in relation to the Project site. Thus, the County finds that the information provided in Table 4.0-1 and Figure 4.0-1 adequately identifies the location and name of each cumulative development project, while Figure 4.0-1 depicts the distance from the Project site. The information in Table 4.0-1 and Figure 4.0-1 provide the level of detail necessary to evaluate potential cumulatively-considerable impacts to traffic and vehicular-related air quality, greenhouse gas, and noise. Adequate information is provided for meaningful disclosure and no revision to the DEIR is warranted pursuant to this comment.
- B-4 Historical aerial photographs show that areas to the west and south of the Project site have not been used for agricultural production since at least 1938 (refer to Appendix D of EIR Technical Appendix G1, and Appendix D of EIR Technical Appendix G2). Moreover, the Project Applicant expects that the Project would be built out and occupied by 2020. The provisions of County Ordinance No. 625 only apply to agricultural operations that have been established for a minimum of three years, indicating it is unlikely that A-1-1 zoned lands within 300 feet of the Project site, which have not been used for agricultural purposes for at least the past 79 years, would establish agricultural uses in the very near future and trigger the requirements of Ordinance No. 625. Nonetheless, the DEIR acknowledged that, although unlikely, Project compliance with Ordinance No. 625 would be required if agricultural resources were to be established. No revision to the DEIR is warranted pursuant to this comment.



- B-5 Table 3-3 of the Project’s Air Quality Impact Analysis (“AQIA,” EIR Technical Appendix B1) and Table 3-1 of the EIR (FEIR p. 3-34) identify the construction equipment assumptions used in the analysis. While the commenter is correct that construction activities are permitted to occur up to 12 hours per day pursuant to Riverside County Ordinance No. 847, the identified construction equipment would not be used during every hour of the day. Rather, the AQIA, consistent with industry standards and typical construction practices, assumes that each piece of equipment listed in AQIA Table 3-3 and EIR Table 3-1 would operate up to 8 total hours per day, or approximately 2/3 of the period during which construction activities are allowed pursuant to County Ordinance No. 847. For example, during grading operations water trucks would not operate continuously over a 12-hour period, but would instead be used as necessary to minimize fugitive dust. In fact, most pieces of equipment likely would operate for fewer hours per day than indicated in EIR Table 3-1 and AQIA Table 3-3. With respect to weekends and holidays, the South Coast Air Quality Management District (SCAQMD) thresholds of significance are based on daily emissions; thus, air quality effects during weekends and holidays would be the same as during the normal work week. Accordingly, the County finds that the assumptions used in the Project’s AQIA and the EIR properly disclose a reasonable, and likely overstated evaluation of the Project’s potential impacts due to air quality emissions; no revision to the AQIA or DEIR is warranted pursuant to this comment.
- B-6 For construction activity analysis, the Project’s AQIA places receptors at approximately 191 feet from active construction activity (e.g. grading and equipment usage), assuming all pieces of construction equipment were simultaneous operating at that distance, as stated in the AQIA (EIR Technical Appendix B1, p. 44). The 191-foot distance is described as a general average distance from active construction activity where all equipment would be concentrated and operating on a given day. As such, the 191 feet distance used in the EIR is conservative because the analysis assumes that all construction activity is concentrated in one location versus if it were to be spread out across the Project, which is likely and reasonably foreseeable to occur in practice.
- For operational activity (both operational localized impacts and diesel health risk impacts), the analysis places receptors immediately adjacent to the south of the Project’s property line much nearer than the 191 feet-average distance cited in the EIR generally. As illustrated on Exhibit 2-C of the Health Risk Assessment Report (EIR Technical Appendix B2, p. 22), receptors are placed immediately to the south of the Project’s property line at actual structures where a person could reside for a 24-hour period.
- B-7 The delivery dock doors referred to in the comment are proposed as part of the Building E Project, the location of which are analyzed throughout the EIR and in the Health Risk Assessment Report (EIR Technical Appendix B2). The doors are proposed on the building’s east elevation, facing Ellsworth Street and the Building D Site. Redwood Drive is located southeast of the Building E Project site and approximately 300 feet due south of the Building D Site. The Project’s potential air quality impacts on sensitive receivers is disclosed in EIR §§ 4.3, Air Quality and 4.7, Greenhouse Gas Emissions. The technical analyses assume that the Project will operate 365 days per year, 24 hours per day, as disclosed in EIR Subsection 3.5, “Operational Characteristics.” Thus, the EIR provides information regarding the potential impacts to air quality that operational



activities occurring at the Project's delivery dock doors, which could receive and ship deliveries 24 hours per day, 365 days per year, would have on the sensitive receivers. As such, the EIR does provide an accurate representation of all potential air quality impacts that may occur to the surrounding sensitive receptors.

- B-8 The SCAQMD's 2016 Air Quality Management Plan (AQMP) is based, in part, on the General Plan land use designations applied to properties within the South Coast Air Basin (SCAB) by local jurisdictions. As noted in this comment, the western portions of the Project site are currently designated for "Community Development – Business Park (CD-BP)" land uses; thus, the SCAQMD 2016 AQMP would have assumed this portion of the site would be developed with business park land uses. The Project proposes to change the existing CD-BP land use designation to "Community Development – Light Industrial (CD-LI)" to accommodate the Project's proposed high-cube warehouse land uses. As shown in EIR Tables 4.3-6 and 4.3-12, the vast majority of the Project's air quality emissions are due to mobile sources.

For clarity and comparison purposes, the traffic generation for the No Project/ Existing General Plan Alternative has been precisely calculated by Urban Crossroads and revised in EIR § 6.0, Alternatives, under Subsection 6.3.2, No Project/Existing General Plan Designation Alternative. For the areas designed CD-BP by the General Plan, a general light industrial trip rate was applied because it is less traffic intensive than a traditional business park/office use, and light industrial is a land use allowed under the CD-BP designation. The resultant trips would be 5,847 ADT, which is 3,732 more ADT than would be generated by the proposed Project. In addition, the air quality emissions that would occur if the Project site were to be developed under its existing General Plan land use designations have been calculated by Urban Crossroads, Inc., and the discussion has been added to EIR § 6.0, Alternatives, under Subsection 6.3.2, No Project/Existing General Plan Designation Alternative. For reference purposes, these calculations are provided below:



| Operational Activities – Summer Scenario | Emissions (pounds per day) | | | | | |
|---|----------------------------|-----------------|---------------|-----------------|------------------|-------------------|
| | VOC | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
| Area Source | 28.99 | 1.09E-03 | 0.12 | 0.00 | 4.20E-04 | 4.20E-04 |
| Energy Source | 0.58 | 5.31 | 4.46 | 0.03 | 0.40 | 0.40 |
| Mobile (Trucks) | 26.99 | 591.54 | 252.51 | 1.88 | 76.12 | 28.45 |
| Mobile (Passenger Cars) | 10.01 | 13.04 | 179.99 | 0.62 | 58.47 | 15.67 |
| Total Maximum Daily Emissions (No Project) | 66.57 | 609.89 | 437.08 | 2.53 | 134.99 | 44.52 |
| SCAQMD Regional Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| Threshold Exceeded? | YES | YES | NO | NO | NO | NO |

| Operational Activities – Winter Scenario | Emissions (pounds per day) | | | | | |
|---|----------------------------|-----------------|---------------|-----------------|------------------|-------------------|
| | VOC | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
| Area Source | 28.99 | 1.09E-03 | 0.12 | 0.00 | 4.20E-04 | 4.20E-04 |
| Energy Source | 0.58 | 5.31 | 4.46 | 0.03 | 0.40 | 0.40 |
| Mobile (Trucks) | 27.42 | 616.53 | 263.67 | 1.88 | 76.13 | 28.46 |
| Mobile (Passenger Cars) | 9.32 | 13.80 | 151.93 | 0.56 | 58.47 | 15.67 |
| Total Maximum Daily Emissions (No Project) | 66.31 | 635.64 | 420.18 | 2.47 | 135.00 | 44.53 |
| SCAQMD Regional Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| Threshold Exceeded? | YES | YES | NO | NO | NO | NO |

Compared to the air pollutant emissions that would be emitted under the proposed Project, development under the No Project/Existing General Plan Alternative would cause an increased amount of air pollutant emissions in every pollutant category except that VOC emissions would be slightly reduced, as shown in the table below. “DEIR Total” in the table below refers to the Project’s air pollutant emissions disclosed in DEIR Table 4.3.6, with slight differences to the one-tenth decimal point due to re-running the analysis model for purposes of the comparison.

| Operational Activities – Summer Scenario | Emissions (pounds per day) | | | | | |
|---|----------------------------|-----------------|----------------|-----------------|------------------|-------------------|
| | VOC | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
| No Project/Existing General Plan Alternative | 66.57 | 609.89 | 437.08 | 2.53 | 134.99 | 44.52 |
| DEIR Total | 72.01 | 421.51 | 217.01 | 1.39 | 60.09 | 22.14 |
| Variance | -5.44 | +188.38 | +220.07 | +1.14 | +74.9 | +22.38 |
| Operational Activities – Winter Scenario | Emissions (pounds per day) | | | | | |
| | VOC | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
| No Project/Existing General Plan Alternative | 66.31 | 635.64 | 420.18 | 2.47 | 135.00 | 44.53 |
| DEIR Total | 72.16 | 438.40 | 220.83 | 1.38 | 60.09 | 22.15 |
| Variance | -5.85 | +197.24 | +199.35 | +1.09 | +74.91 | +22.38 |

Thus, as identified in EIR § 6.0, Alternatives, Subsection 6.3.2, development of the Project site with high-cube warehouse uses would result in fewer air pollutant emissions as compared to development of the site under its existing General Plan land use designations. Accordingly, the County finds that the EIR’s conclusion that the Project would not conflict with the growth



assumptions used in the SCAQMD 2016 AQMP (which relied on General Plan land use designations) is supported by substantial evidence. Nonetheless, the EIR discloses a significant and unavoidable air quality impact because even with the application of feasible mitigation, the Project's long-term emissions of NO_x would exceed the SCAQMD regional threshold of significance for this pollutant; thus, although the Project would not exceed the growth assumptions of the AQMP, the Project would conflict with the AQMP due to the Project's NO_x emissions. A minor typographical correction has been made in the FEIR under the discussion of Air Quality Threshold a), which incorrectly identified the Project's proposed General Plan land use designation as "CD-IP," which should instead indicate "CD-LI."

- B-9 The EIR and the Project's AQIA (EIR Technical Appendix B1) assume that construction activities would commence in January 2016 and would be completed in November 2017; however, Project construction activities would actually occur at a later date than assumed in the analysis. Notwithstanding, the AQIA used the California Emissions Estimator Model (CalEEMod) modeling inputs that assume construction activities would occur during an earlier time frame than will actually occur. The analysis represents a "worst-case" scenario and overstatement of the Project's actual construction impacts because the CalEEMod outputs would show fewer emissions if construction activities were to occur at a later period (for example, from 2018 to 2019) as compared to the assumption of 2016 to 2017 used in the analysis. This is because the CalEEMod program accounts for increasingly strict regulatory requirements for construction equipment and on-going replacement of older vehicles with newer vehicles over time. Further, Mitigation Measure MM 4.3-1(b) imposes a requirement that all construction equipment must have 2010 or newer engines, which will further reduce air pollutant emissions as compared to the amounts calculated by CalEEMod and disclosed in the EIR. Thus, the County finds that the referenced statement under Threshold B accurately describes the modeling assumptions inherent to the CalEEMod program. No revision to the DEIR or AQIA is warranted pursuant to this comment.
- B-10 Mitigation Measure MM 4.3-1 specifically requires Project contractors to ensure compliance with the notes listed on the grading plans, and further stipulates that contractors must permit inspection of the construction site by County of Riverside staff or its designees to confirm compliance. The required mitigation also specifically requires that the grading plan notes be specified in bid documents issued to prospective construction contractors. Any construction contractor that does not abide by the notes on the grading plan would be in breach of contract, which represents a strong disincentive to violate the identified requirements. Additionally, because Riverside County or its designees must be permitted to monitor these requirements, any identified violation of the grading plan notes could potentially result in a stop-work order on construction activities at the site, which also represents a strong disincentive to violate the requirements. As indicated in the Project's Mitigation Monitoring and Reporting Program (MMRP), provided as EIR Table S-1, the required mitigation would be enforced by the County of Riverside Building & Safety Department. Thus, the required mitigation would be enforceable, an enforcement entity is identified as part of the Project's MMRP, and field verification is specifically accounted for as part of the mitigation. No revision to the DEIR is warranted pursuant to this comment.



- B-11 As indicated in EIR Tables 4.3-8 and 4.3-11, with implementation of Mitigation Measure MM 4.3-1, the Project's construction-related regional and localized emissions of NO_x would be reduced to less-than-significant levels. The Project's localized NO_x concentrations would be a maximum of 0.14 over a 1-hour period whereas the significance threshold is a concentration of 0.18 over a 1-hour period. The SCAQMD's localized thresholds were specifically developed by the SCAQMD to ensure that sensitive receptors are not subjected to excessive construction-related emissions, including as in this case potential odor impacts associated with NO_x emissions that would occur if emissions exceeded the SCAQMD's thresholds during construction. The localized thresholds are based on the state's ambient air quality standards (AAQS) that were specifically developed to protect the young, the old, and those with respiratory ailments from impacts including odors. Odors are further regulated by SCAQMD's Rule 402. Further, as previously stated, the localized modeling (which takes into account local meteorological conditions) indicates that NO₂ emissions do not exceed the applicable AAQS during construction or operational activity and would therefore not result in a significant odor impact. Accordingly, modeling of potential odor impacts is not required for the Project because there are no sources of odors associated with the Project's construction phase that could result in significant odor impacts affecting a substantial number of people. With respect to the EIR's characterization of odors as "temporary, short-term, or intermittent," odors generated during construction activities would only be associated with certain aspects of the construction phase. While some construction activities may result in odors, these odors would not occur for the full duration of Project construction, and the odors would not be present 24 hours per day. The level of construction odors would fluctuate based on the nature of the construction activities occurring on the site, but in any event, would not result in significant impacts for the reasons explained above. No revision to the DEIR is warranted pursuant to this comment.
- B-12 The Habitat Assessment Update for Parcel Map No. 36962 (the Building E Site), prepared by HES and dated February 10, 2017 is included as *Technical Appendix C4* to the EIR. The paniculate tarplant memo pertaining to the Building D Site, dated March 16, 2016, and prepared by HES, is cited in the EIR as "HES, 2016c," listed in EIR § 7.0, References, and included in the public record as part of the County's Administrative Record for the EIR.
- B-13 The word, "disc," is a common term to describe cultivating soil with a disk harrow; discing frequently occurs on vacant properties in Riverside County as required by the Riverside County Fire Department to control the growth of flammable vegetation. In this case, the point is simply that the soil appeared to have been recently tilled, plowed, or disturbed. CEQA Guidelines § 15140 merely requires that the EIR be written in language that is as "clear and simple as reasonably practical." [*San Franciscans for Reasonable Growth v. City and County of San Francisco* (1987) 193 Cal.App.3d 1544, 1549.] It does not require the technical details mentioned by the commenter. [Id. at 1549-1550.] Nonetheless, "disc" is defined by the Merriam-Webster Dictionary as "one of the concave circular steel tools with sharpened edge making up the working part of a disc harrow or plow; also: an implement employing such tools." A "disc harrow" is defined by the Merriam-Webster Dictionary as "a harrow that breaks up plowed or rough land by means of discs arranged at an angle with the line of draft." A "plow" is defined by the Merriam-Webster Dictionary as "an implement used to cut, lift, and turn over soil especially in preparing a seedbed." The definitions



of these terms are readily available to the public, and need not be specifically defined by the EIR. Therefore, the County finds that the EIR's description of the site having been "disced" comprises a plain language discussion of the nature of activities at the site that occurred prior to biological field surveys. Notwithstanding, the aforementioned definitions are part of the FEIR, and no additional revisions or clarifications are warranted pursuant to this comment.

Regarding paniculate tarplant (*Deinandra paniculata*), the species is ranked 4.2 in the CNPS rare plant inventory. Although the Building D site contains suitable habitat for this species, the site is regularly disced for weed abatement purposes. Discing removes the plant; however, the seed bank still exists within the soil. Even if the seed bank exists, given the frequent discing and removal of surface vegetation, the relatively low level CNPS ranking for this species, and the fact that habitat that supports this species is preserved within the MSHCP reserve boundaries, removal of the seed bank on the Project site, if it exists, would be considered less than significant as explained in the FEIR at p. 4.4-3 and p. 4.4-17.

- B-14 At the time the environmental analyses were begun for the EIR, upon issuance of the Notice of Preparation (NOP) on August 31, 2015, SB-32 was not yet enacted. Nevertheless, the EIR identifies and discusses SB-32 and Executive Order B-30-15 and their applicability. See FEIR, pp. 4.7-17 to 4.7-18.

As indicated in CEQA Guidelines § 15064.4, *Determining the Significance of Impacts from Greenhouse Gas Emissions*:

"(b) A lead agency should consider the following factors, among others, when assessing the significance of impacts from greenhouse gas emissions on the environment:

- (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;*
- (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.*
- (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project."*

Riverside County's adopted Climate Action Plan (CAP) represents a "local plan for the reduction or mitigation of greenhouse gas emissions" and the County relies on compliance with its CAP in determining the potential significance of GHG impacts. Based on the guidance provided in the CEQA Guidelines, the EIR correctly evaluates and discloses the Project's anticipated GHG emissions as less than significant following mitigation. The EIR also takes into consideration that



the Project would increase GHGs relative to the existing environmental setting, as disclosed in EIR Table 4.7-5; however, with implementation of Mitigation Measure MM 4.7-1 the proposed Project would be fully consistent with the adopted Riverside County CAP, resulting in a less than significant impact.

With respect to the Project's opening year, and as noted in this comment, if construction commences in 2018, the Project's 23-month construction schedule would result in an opening horizon year of 2020. As noted by the California Association of Environmental Professionals (AEP) in its *"Final White Paper Beyond 2020 and Newhall: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California"* (October 18, 2016):

"The [AEP Climate Change] Committee recommends that GHG emissions impacts should be identified for the project horizon year and lead agencies should consider the project horizon year when applying a threshold of significance..." (AEP, 2016, p. 33).

As further noted by the AEP:

"Since GHG planning has a long horizon, out to 2050 (and beyond), reduction progress will not be a one-step process, but rather a phased set of reductions over time. Thus, the best measure of whether an individual project is providing its fair share of GHG reductions, or its fair share efficiency level, is whether that project supports "substantial progress" toward the statewide reduction targets over time; not whether the project is meeting a milestone target many years in the future, such as for 2050." (AEP, 2016, p. 34).

Based on the guidance from the AEP, the Project's consistency with the County's CAP (following mitigation) demonstrates that the Project would not inhibit the County's ability to achieve the GHG reduction mandates of Assembly Bill (AB) 32. Furthermore, the Project's compliance with the County's CAP demonstrates that the Project supports "substantial progress" towards the County's GHG reduction mandates for year 2030 pursuant to Senate Bill (SB) 32.

SB 32 and Executive Order B-30-15 set a new interim statewide GHG emission reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030. Executive Order B-30-15 directs various state agencies to take certain actions, but whether or how those actions will affect private development projects is not yet known. Executive Order B-30-15 does not impose any direct requirements, guidelines, or standards upon counties or the private sector. SB-32 provides as follows: "In adopting rules and regulations to achieve the maximum technologically feasible and cost-effective greenhouse gas emissions reductions authorized by this division, the [California Air Resources Board] shall ensure that statewide greenhouse gas emissions are reduced to at least 40 percent below the statewide greenhouse gas emissions limit no later than December 31, 2030." As stated in the EIR, construction of the proposed Project is expected to be completed by 2020. Consistency with SB 32 and Executive Order B-30-15 is not chosen as a threshold of significance because: (1) Neither SB 32 nor Executive Order B-30-15 specify any plan or implementation measures that would necessarily be applicable to this Project. (2) The State has no available guidance as to how the 2030 goal translates into specific reduction targets applicable to this Project. SB-32 requires the California Air Resources Board to craft regulations, which may further clarify



the way forward for public agencies to meet the State’s 2030 and 2050 climate goals. The California Air Resources Board has not yet determined what reduction measures are technologically feasible or cost-effective and applicable to facilities such as the Project. (3) There are presently no reliable means of forecasting how future technological developments or state legislative or regulatory actions to reduce GHG emissions may affect future emissions at this Project.

As disclosed in the EIR, a large majority of the Project’s GHG emissions would result from vehicle tail pipe emissions. Pursuant to State law, on-road diesel-fueled trucks are required to comply with various air quality and GHG emissions standards, including but not limited to the type of fuel used, engine model year stipulations, aerodynamic features, and idling time restrictions. Compliance with State law is mandatory and inspections of on-road diesel trucks subject to applicable State laws are regularly conducted by the California Air Resources Board (CARB). Under the Truck and Bus Regulation, adopted by CARB in 2008, all diesel truck fleets operating in California are required to adhere to an aggressive schedule for upgrading and replacing heavy-duty truck engines. Older, more polluting trucks are required to be replaced first, while trucks that already have relatively clean engines are not required to be replaced until later. Pursuant to the Truck and Bus Regulation, all pre-1994 heavy trucks (trucks with a gross vehicle weight rating greater than 26,000 pounds) were to be removed from service on California roads by 2015. Between 2015 and 2020, all pre-2000 heavy trucks are required to be equipped with particulate matter filters and will be upgraded or replaced with an engine that meets 2010 emissions standards. The upgrades/replacements will occur on a rolling basis based on model year. By 2023, all heavy trucks operating on California roads must have engines that meet 2010 emissions standards. Lighter trucks (those with a gross vehicle weight rating of 14,001 to 26,000 pounds) must adhere to a similar schedule and will all be replaced by 2020. The implementation of this State law will result in measurable GHG emission reductions for warehouse projects like the proposed Project for which the primary source of GHG emissions is on-road vehicles.

In terms of GHG emissions attributable to aspects of the buildings’ operation, such as energy and water use, the Project is required to comply with a host of energy efficiency measures required under the California Building Standards Code (CALGreen), as well as the Riverside County’s Water Efficient Landscape Requirements pursuant to County Ordinance No. 859. Further, pursuant to EIR Mitigation Measure MM 4.7-1, the Project Applicant is required to demonstrate that the buildings’ designs comply with the County’s CAP, by installing design features such as but not limited to enhanced insulation, energy-efficient lighting and fixtures, high efficiency HVAC systems, skylights, and other design features that garner points under the Riverside County CAP.

In summary, in compliance with CEQA Guidelines §15064.4(b)(3), the approach taken in the EIR is to demonstrate compliance with a local plan for the reduction or mitigation of GHG emissions, namely, the adopted Riverside County CAP. The proposed Project is required to comply with the CAP. Thus, no revision to the DEIR is warranted pursuant to this comment.

- B-15 CEQA Guidelines § 15126.4 provides: “Formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one



specified way.” Mitigation Measure MM 4.7-1 complies with these standards. Impermissible deferral can only occur when an EIR calls for mitigation measures to be created based on future studies or describes mitigation measures in general terms but the agency fails to commit itself to specific performance standards. In the case of the proposed Project, Mitigation Measure MM 4.7-1 does not require any future studies to determine the appropriate mitigation requirements. Rather, Mitigation Measure MM 4.7-1 identifies 15 specific, verifiable measures that would be required to be shown on all Project building plans, such as enhanced insulation, water efficient toilets/urinals, water efficient faucets, etc. Furthermore, Mitigation Measure MM 4.7-1 does not require compliance with CAP Measures E6.A.3, T1.A.5, W.1.C.3, or ES.A.4. Should any of these measures be proposed by the Project Applicant in lieu of the measures identified in Mitigation Measure MM 4.7-1, it must be demonstrated that any such replacement measures would achieve 100 points pursuant to Appendix F of the CAP, and any such mitigation would therefore provide the same practical effect as the measures identified by Mitigation Measure MM 4.7-1, since the County’s CAP was created specifically that any applicable project, regardless of its size, would help the County meet its climate goals, provided a 100-point or better score was reached through the use of the implementation measures identified in the screening tables. No revision to the DEIR is warranted pursuant to this comment.

- B-16 EIR § 4.10, Land Use and Planning, identifies a significant and unavoidable impact under Land Use Threshold (a), related to the proposed alteration of the Project site’s present land use from mostly vacant land to a developed business park. The five significant and unavoidable impacts identified in the EIR and listed in this comment relate to the use of the land as proposed by the Project and not specifically to its zoning designations. Following the reasoning from the commenter, any significant impact would therefore also create a significant impact as it relates to land use compatibility. The site is already partially zoned as Industrial Park (I-P) and Manufacturing Medium (M-M) as shown on EIR Figures 3-5 and 3-12 under the existing condition. The significant and unavoidable land use impact is properly and clearly identified in the EIR under Land Use Threshold a) and not Planning Thresholds b) and c). No revision to the DEIR is warranted pursuant to this comment.
- B-17 Property to the east of the Building D Site is vacant and planned for the development of industrial uses. The receiver locations used in the EIR’s noise analysis were chosen to represent outdoor areas of frequent human use as outlined by the Federal Highway Administration’s (FHWA) Analysis and Abatement Guidance for noise analysis. The FHWA guidance is outlined as it relates to highway traffic noise analysis; however, it also provides the best practices for the selection of sensitive, outdoor receiver locations in relation to any noise source (e.g., mobile or stationary). Further, FHWA guidance is consistent with the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment guidance on the selection of noise-sensitive receiver locations. FWHA guidance indicates that the following locations should be used when selecting locations for exterior receivers: (1) At or near the highway right-of-way line; (2) At or near a building in residential or commercial areas; or (3) At an area between the right-of-way line and a building where frequent human activity occurs such as a patio, pool, or play area in the yard of a home.



Similarly, FTA guidance indicates that a receiver location may be chosen to represent a “cluster” of noise-sensitive residential homes. Therefore, based on the FHWA and FTA guidance outlined above for receiver locations, the Noise Study (EIR Technical Appendix I) selected an outdoor area of frequent human use (receiver location R6) to represent all of the neighboring residential uses south of the Project site on Redwood Drive. In other words, the area represented by receiver location R6 shares similar shielding, terrain, and a geometric relationship to the operational noise sources at the Project site and represents a location of noise sensitive areas used to calculate the expected future noise and vibration level impacts. This location was also chosen based on the parameters of the analysis, which include both daytime and nighttime operational noise and vibration analysis. As such, the receiver location is based on both outdoor areas typically used during the daytime hours, but also the residential home locations themselves to represent the noise levels experienced closer to the residential homes when people are sleeping during nighttime Project operation. If solely analyzed at the property line as the comment suggests, this would overstate the potential impacts of the Project since it is unlikely that the property line is representative of both FHWA and FTA guidance for outdoor areas of frequent human use, nor the noise levels experienced during sensitive nighttime hours at the residential homes themselves. Finally, the County of Riverside Municipal Code has no requirements in Chapter 9.52, Noise Regulation, which require analysis at the property line; in fact, § 9.52.050 on sound level measurements indicates that noise level measurements can be made “anywhere within the boundaries of an occupied property.” No revision to the DEIR is warranted pursuant to this comment.

- B-18 Mitigation Measure MM 4.11-2 specifically requires Project contractors to ensure compliance with the notes listed on the grading and building plans, and further stipulates that contractors must permit inspection of the construction site by County of Riverside staff or its designees to confirm compliance. The mitigation measure also requires that the grading plan notes be specified in bid documents issued to prospective construction contractors. Any construction contractor that does not abide by the notes on the grading plan would be in breach of contract, which represents a strong disincentive to violate the identified requirements. Additionally, because Riverside County or its designees must be permitted to monitor these requirements, any identified violation of the grading plan notes could potentially result in a stop work order on construction activities at the site, which also represents a strong disincentive to violate the requirements. As indicated in the Project’s MMRP, provided as EIR Table S-1, the required mitigation would be enforced by the County of Riverside Building & Safety Department. Thus, the required mitigation would be enforceable, an enforcement entity is identified as part of the Project’s MMRP, and field verification is specifically accounted for as part of the mitigation. No revision to the DEIR is warranted pursuant to this comment. Nonetheless, as a best practice measure, Mitigation Measure MM 4.11-2(f) has been added to the FEIR to require a durable, legible, weather-proof sign to be posted on the construction site visible from an adjacent public right-of-way during the duration of construction activities that lists a phone number to report legitimate construction-related noise complaints to Riverside County or its enforcement designee.
- B-19 Refer to EIR Technical Appendix M, General Plan Consistency Analysis for Knox Business Park Buildings D and E, for a detailed analysis of Project consistency with applicable General Plan



policies, including Policies C 2.1 and C 2.4 referenced in this comment. Regarding Policy C 1.8, the Complete Streets Act of 2008 addresses transportation facility that are planned, designed, operated, and maintained to provide safe mobility for all users, including bicyclists, pedestrians, transit vehicles, truckers, and motorists, appropriate to the function and context of the facility. According to the California Department of Transportation (Caltrans) Complete Streets website, every complete street looks different, according to its context, community preferences, the types of road users, and their needs. The Project site abuts two public roads: Oleander Road to the north and Ellsworth Street which separates the Building D Site and Building E Site. The Project proposes frontage improvements to these roads in accordance with Riverside County public road standards, as shown in the roadway cross-sections depicted on EIR Figures 3-8 and 3-15 and described in EIR § 3.4.A, Public Roadway Improvements and Dedications. The Project is consistent with General Plan Policy C.1.8, C.2.1, and C.2.4 and no revision to the DEIR is warranted pursuant to this comment.

- B-20 In accordance with CEQA Guidelines §15126.4, an EIR shall describe feasible mitigation measures that minimize significant impacts. Mitigation measures must be fully enforceable, have an essential nexus to a legitimate governmental interest, and be “roughly proportional” to the impacts of the project. Refer to CEQA Guidelines §15126.4(a)(4). The Project Applicant’s payment of fair share fees for transportation improvements is based on the proportionality of the proposed Project’s impact. Requiring the Project Applicant to be 100% responsible for a traffic improvement to which the Project’s impact is only a small percentage (in most cases less than 5%), would violate the legal requirement for rough proportionality. See *Dolan v City of Tigard* (1994) 512 US 374, 114 S Ct 2309. Also, under CEQA Guidelines §15130(a)(3) the Guidelines specifically recognize that the contribution of fair share fees is an appropriate way to mitigate a cumulative impact. No revision to the DEIR is warranted pursuant to this comment.
- B-21 The comment addresses only one of the four factors considered in evaluating whether the Project would create significant irreversible environmental changes. All four of the factors are adequately discussed in § 5.2 of the EIR. Further, as explained in EIR § 5.2, the Project and its resultant environmental effects would not result in irreversible changes to nearby properties. As summarized in Response B-8, development of the Project site in accordance with its existing General Plan land use designations would result in more daily traffic and more resultant air pollutant emissions than would occur under the proposed Project. The EIR analyzed the Project as a 24-hour operation as worst-case disclosure of operational impacts because there is nothing in the County Municipal Code that prohibits 24-hour operations. Similarly, there is nothing in the County Municipal Code that would prohibit 24-hour operation of business park uses under the County’s CD-BP land use designation. Regarding the statement in EIR § 5.3 (FEIR p. 5-5), that the Project would “differ substantially” from the land uses permitted under existing conditions, the remainder of that statement from the EIR, which was omitted from the quote in this comment, goes on to say that “in fact, the Project would develop the Project site at a lower intensity that what is permitted on the Project site under existing conditions.”
- B-22 CEQA Guidelines §15088.5 describes the conditions under which an EIR that was circulated for public review is required to be re-circulated for additional public review and comment. There were



no comments made in this letter or in other letters commenting on the DEIR that necessitates recirculation of the DEIR in compliance with CEQA.

- B-23 The Golden State Environmental and Social Justice Alliance is included on the public notification list regarding the proposed Project and will receive public notices for this Project.

Johnson, Smith & Foy- Letter C

- C-1 Riverside County acknowledges this comment, which summarizes information from EIR §§ 1.0, Introduction, 2.0, Environmental Setting, and 3.0, Project Description.
- C-2 Riverside County acknowledges the comment and the purposes of CEQA as specified in the CEQA Statutes and Guidelines.
- C-3 There are no major flaws in the EIR. The environmental impacts of both proposed Building D and proposed Building E are considered together in this single EIR. The impacts of the Building D and Building E projects are not evaluated in separate EIRs, which would have potentially constituted piecemealing under CEQA. To the contrary, the “Project,” for purposes of this EIR is defined as including both Building D and Building E together, as well as all of their associated planning, construction, and operational activities. See EIR § 1.2 and CEQA Guidelines §15378(a). Although the effects of Building D and Building E on biological and cultural resources and other environmental subject areas are studied in separate technical reports appended to the EIR, all such effects of implementing both building projects are addressed in this single EIR, which addresses the entire Project under CEQA and clearly identifies all of the Project’s direct, indirect, and cumulative impacts, as well as reasonable mitigation. Although the EIR identifies which significance conclusions and mitigation measures apply to which of the building sites, all of the analyses and impact conclusions are based on the assumption that both Building D and Building E would be implemented as a single “Project” as defined under CEQA Guidelines §15378(a). The commenter provides no support for its speculation that if evaluated in separate EIRs and considered jointly the impacts may be more severe or newly significant; therefore, no further response is warranted.
- C-4 The County’s technical experts disagree with the commenter’s assertion that Project traffic would utilize low capacity residential streets rather than the shorter and more direct route to the I-215 Freeway at the Harley Knox Boulevard ramps. The use of Markham Street to access I-215 or the Cajalco Expressway by Project-related truck traffic is not reasonably foreseeable as explained herein. The Project trip distribution patterns were developed by Riverside County and its technical experts based on an understanding of existing travel patterns in the area, geographical location of the site, and the Project site’s proximity to the I-215 Freeway. Harvill Avenue and Harley Knox Boulevard provide the shortest and most direct route to access the I-215 Freeway. Further, it is not practical for Project traffic to travel south on Decker Road / Ellsworth Street to access the I-215 Freeway for the following reasons:
- (1) There are no exits out of either the Building D Site or Building E Site on to Decker Road/ Ellsworth Street.



- (2) Decker Road/Ellsworth Street is unpaved south of the southern boundary of the Project site, and generally very undesirable for attracting passenger car and truck traffic.
- (3) Harley Knox Boulevard, east of the I-215 Freeway is designated as a truck route on the City of Perris truck route map. Although there are no truck routes defined within unincorporated Riverside County, Harley Knox Boulevard and Harvill Avenue within the County are designed to accommodate truck traffic. It is not efficient for trucks to travel south on Decker Road / Ellsworth Street for twice the distance on unpaved and rural roads instead of taking the more direct route with traffic signals to access the I-215 Freeway.
- (4) It is highly unlikely for trucks to traverse and maneuver several narrow and unsignalized intersections in order to access westbound Cajalco Road via Markham Street and Day Street.
- (5) Similarly, it is not practical for trucks to travel northbound on low capacity rural and residential neighborhood streets to access Van Buren Boulevard and Alessandro Boulevard.

As such, the trip distribution used in the traffic analysis is reasonable and is based on substantial evidence. Refer to Responses E-33 and E-34, which explain that the prior truck queuing issue on Harvill Avenue has been resolved; thus, there are no existing or projected congestion conditions on Harvill Avenue that would influence drivers to find an alternate route to or from I-215 such as by traveling more than twice the distance by use of Van Buren or Alessandro Boulevard. Further, if drivers sought out alternative routes to avoid congestion on the regional freeway network, nearly every driver traveling to or from the Project site at the same time would need to enter or exit the freeway in the same location and take the same alternate route to cause a significant impact (more than 50 peak hour trips) at any local road intersection. The chance of this occurring is very remote and out of the rule of reason.

For the reasons stated above, no revision to the DEIR is warranted pursuant to this comment. Nonetheless, as best practice measures, Mitigation Measure MM 4.15-4 has been added to the FEIR to require the developer or successor in interest to install durable, legible, weather-proof signs at exit driveways that prohibit trucks from traveling south on Decker Road/Ellsworth Street, and Mitigation Measure MM 4.15-5 has been added to the FEIR to require information to be provided in building user leases indicating that building users shall designate truck routing away from southbound Decker Road/Ellsworth Street and away from residential neighborhoods.

C-5 Refer to Responses B-6 and B-17.

C-6 The Project's construction characteristics were thoroughly and appropriately evaluated in the EIR. This comment provides no support for its assertion that construction impacts are understated or not properly evaluated. Construction characteristics, including blasting in hard rock areas and the potential use of a rock crusher, are discussed in EIR § 3.0, and associated impacts are discussed in EIR §§ 4.6, 4.8, and 4.11. The EIR and Air Quality Report (Technical Appendix B1) appropriately account for emissions associated with a rock crusher should a crusher be used. As stated on p. 31 of the Air Quality Report (Technical Appendix B1): "An electric rock crusher will further break



down the fragmented rocks and will be powered by a 300-horsepower diesel generator, which will take place during the grading phase of construction activities.” Accordingly, a diesel generator was included in the air quality modeling and is identified on Table 3-3 (Construction Equipment Assumptions) of FIR Technical Appendix B1. As noted in Response C-71, however, the Applicant has since revised its approach to potentially eliminate the use of an on-site rock crusher by instead breaking up rock fragments in place utilizing crushing jaws on an excavator. If this approach is taken, the air emissions associated with running the rock crusher would be eliminated. Regardless, because the use of a rock crusher is still a possibility, no revisions have been made to the DEIR’s analyses which assume the use of a crusher. Construction emissions and other effects from grading/blasting/crushing and other construction activities were analyzed in the Project’s air quality impact analysis, greenhouse gas analysis, and noise (including vibration) impact analyses as noted in EIR §§ 4.3, 4.7. and 4.11. In terms of impacts to biological, geotechnical, cultural, and tribal cultural resources, the EIR analyzed the Project’s maximum ground-disturbance footprint and the potential for indirect impacts as required by CEQA. The Project’s construction traffic also was considered. This comment does not raise any potential construction-related impacts that were not adequately analyzed in the EIR.

- C-7 This comment provides no support for its assertion that the Project’s impacts were not adequately evaluated in the EIR or that feasible mitigation measures were not applied. All of the environmental topics named in this comment are evaluated in sufficient detail in EIR § 4.0; the EIR thoroughly evaluated all of the potential direct, indirect, and cumulatively considerable impacts that may occur due to the proposed Project.
- C-8 CEQA Guidelines §15088.5 describes the conditions under which an EIR that was circulated for public review is required to be re-circulated for additional public review and comment. There were no comments made in this letter or in other letters commenting on the DEIR that necessitates recirculation of the DEIR in compliance with CEQA.
- C-9 Per the Airport Land Use Commission (ALUC) Development Review letter dated May 18, 2017: On May 11, 2017, The Riverside County Airport Land Use Commission (ALUC) found, a proposal to increase the height of Buildings D and E from 44 feet to 55 feet (including an allowance for roof-mounted equipment) consistent with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan. As discussed in the ALUC letter dated May 18, 2017, the 55 feet is not the height of the buildings but is the height allowance above finished grade for roof-mounted equipment. As disclosed in the EIR (FEIR pp. 3-14 and 3-23), Building D and Building E would be constructed to a height of approximately 40 feet above finished grade, not including architectural projections, which would extend to approximately 44 feet. The ALUC conditions are included in EIR § 4.8, Hazards and Hazardous Materials (FEIR pp. 4.8-17 through 4.8-19), as Applicable Regulations and Design Requirements imposed by the Riverside County ALUC on the proposed Project.
- C-10 The number of automobile and truck trailer parking stalls for Building D and Building E is updated in the FEIR, as follows:



The Building D Site would provide approximately 439 automobile parking stalls distributed on the northern, eastern and western sides of the building and approximately 159 truck trailer parking stalls distributed on the western and eastern sides of the building.

Building E would provide approximately 260 automobile parking stalls distributed on the north and west sides of the building and approximately 66 truck trailer parking stalls distributed on the east side of the building.

- C-11 EIR Table 4-11-5, Significance Criteria Summary, addresses noise thresholds for nighttime construction activities, and specifies a significance threshold during such nighttime hours of 45 dBA Leq at sensitive receivers. The Project's construction noise impacts are discussed in detail in the EIR (FEIR pp. 4.11-20 through 4.11-21 and Table 4.11-10). Although noise-generating construction activities are not anticipated to occur at night, Mitigation Measure MM 4.11-2(A) has been added to the FEIR as a best practice measure to require that no construction activities and no construction-related night lighting shall occur within 600 feet of occupied sensitive receivers after 6:00 p.m. and before 6:00 a.m. during the months of June through September or before 7:00 a.m. during the months of October through May. According to the noise level data presented in the Noise Study and EIR Table 4.11-10, a separation of 600 feet combined with the temporary noise barrier required by Mitigation Measure MM 4.11-1 would ensure that, in the event that concrete pouring occurs at night, nighttime noise levels do not exceed 45 dBA Leq at the noise-sensitive residential homes south of the Project site on Redwood Drive. Also, refer to Response B-5 and EIR §4.11.
- C-12 This comment accurately summarizes information in EIR § 3.0, Project Description.
- C-13 The locations and heights of the proposed walls and fences are disclosed in EIR § 3.0, Project Description, pages 3-14 and 3-23, respectively, under the subheadings "Architecture, Walls, and Fences." In summary, for the Building D Site, painted concrete 14-foot tall tilt-up screen walls, with access gates, would be provided on the north and west sides of Building D facing Oleander Avenue and Ellsworth Street, to screen the loading bays and truck parking areas from public view. Eight-foot tall tube steel fencing would be provided along the western perimeter of the Building D Site. In addition, a concrete block retaining wall would be located along the Building D Site's southern and eastern boundaries, ranging from one to 23 feet in height; a tilt up wall also may be provided along the southern boundary for additional screening. For the Building E Site, painted concrete 14-foot tall tilt-up screen walls, with access gates, would be provided on the north side of Building E, facing Oleander Avenue, to screen the loading bays and truck parking areas from public view. Eight-foot tall fencing would be provided along the western and southern perimeter of the Building E Site. In addition, a concrete block retaining wall would be located along the Building E Site's southwestern and eastern boundaries, ranging from one to seven feet in height. Also, a mechanically stabilized earth wall up to 18 feet in height is proposed along the west and south sides of the Building D Site's proposed water quality basin. These walls and fences are an inherent part of the EIR's Project Description and evaluated in applicable portions of the EIR.
- C-14 EIR Figure 4.1-1 depicts the location of the four (4) existing conditions photographs that were collected to document a representative sample of the site's existing visual characteristics. As shown



on Figure 4.1-1, Site Photo 1 was collected along the southern boundary of the site immediately west of and adjacent to the existing residential development. Additional photographs along the southern boundary of the site would have required trespassing on to private property, and any such photos would not differ substantially from what is shown on Site Photo 1 (FEIR Figure 4.1-2). The four existing conditions photos adequately characterize existing views of the Project site from the surrounding area, and it is unclear from this comment how the collection of additional site photographs would change the discussion and analysis of potential Project impacts as disclosed in EIR § 4.1.

As discussed in EIR § 4.1.1.C: *“The Open Space Element defines scenic resources as ‘areas that are visible to the general public and considered visually attractive...including natural landmarks and prominent or unusual features of the landscape’ (Riverside County, 2015c, p. OS-44). Based upon this definition, the Project site does not contain any scenic resources”* (FEIR at p. 4.1-6).

There is no evidence in this comment or in the administrative record for the Project demonstrating that any components of the Project site comprise a scenic resource. On the contrary, the four site photographs demonstrate that the site does not exhibit any scenic resources available from public or private views. As such, the County finds that the EIR properly concludes that potential impacts to scenic resources would be less than significant, and No revision to the DEIR is warranted pursuant to this comment.

- C-15 The sentence from DEIR p. 4.1-12 referenced in this comment has been revised in the FEIR to describe the existing surrounding land uses in more detail, as was done in EIR § 2.0, Environmental Setting. This revision is a restatement of information provided elsewhere in the EIR and does not constitute new information or change the EIR’s significance conclusions.
- C-16 With respect to lighting, EIR § 4.1.4, Mt. Palomar Observatory Threshold a), notes the following: *“Lighting on the Building D Site and Building E Site would be required to comply with the conditions outlined in Riverside County Ordinances Nos. 655 and 915, which provide minimum requirements for outdoor lighting”* (FEIR at p. 4.1-11). County Ordinances No’s. 655 and 915 were explicitly adopted for the purpose of ensuring light trespass impacts associated with new developments do not occur. Any night lighting used for construction activities would be temporary and intermittent, as the only construction activity anticipated to occur at night is the pouring of concrete as addressed in Response C-11. As stated in Response C-11, Mitigation Measure MM 4.11-2(A) has been added to the FEIR as a best practice measure to require that no construction activities and no construction-related night lighting shall occur within 600 feet of occupied sensitive receivers after 6:00 p.m. and before 6:00 a.m. during the months of June through September or before 7:00 a.m. during the months of October through May. Thus, the County finds that the EIR properly concludes that the Project’s potential impacts due to lighting would be less than significant, and No revision to the DEIR is warranted pursuant to this comment.
- C-17 As disclosed on FEIR p. 4.2-10, lands immediately to the west and south of the Building E Site are zoned A-1-1. However, none of the surrounding uses are currently used for agricultural production, with the exception of ancillary agricultural activities such as gardens and animal corrals that occur on off-site rural residential lots for personal use.



- C-18 The fact that the suitable soils are split by Ellsworth Street is only one of several contributing factors as to why the Project would result in a less than significant impact associated with agricultural land conversion. As shown on FEIR Figure 4.2-2, Soils Map, identified in Table 4.2-1, and disclosed on p. 4.2-9, only 18.9% of the Project site has a Storie Index Grade of 1; the remainder of the Project site's soils (81.1%) have Storie Index Grades of 3, 4, and 5, which have severe limitations for agricultural use. Because no evidence exists that the Project site was ever used for agricultural use, the site is not surrounded by lands under active agricultural production, and the vast majority of the Project site is not suitable for productive farmland according to the land capability classification of the USDA Storie Index as evidenced by having 81% of Grade 3, 4, and 5 soil types, the Project has no potential to result in direct or indirect impacts associated with the conversion of farmland to a non-agricultural use. No revision to the DEIR is warranted pursuant to this comment.
- C-19 Refer to Response C-3.
- C-20 No evidence is provided in this comment to support the commenter's assertion that ancillary agricultural uses would be adversely affected by the proposed Project. As indicated on EIR Figure 4.15-9 and explained in Response C-4, the majority of Project-related truck trips would access the I-215 Freeway via Oleander Avenue to Harvill Avenue to the Harley Knox Boulevard ramps, and would not travel south along Decker Road/Ellsworth Street, which is the only portion of the surrounding area where ancillary agricultural uses may occur in association with existing residential uses. Regardless, the comment does not raise any substantive support for why trucks would actually impact any ancillary agricultural uses, even if they did drive on streets that pass by agricultural land uses. As indicated in EIR § 4.11, construction-related noise affecting nearby sensitive receptors (e.g., existing residential uses south and south of and adjacent to the Project site) would be less than significant with implementation of Mitigation Measures MM 4.11-1 and MM 4.11-2. As indicated above in Response C-16, all security lighting associated with the proposed Project would be required to comply with County Ordinances No's. 655 and 915, which would ensure that Project-related lighting does not significantly impact any existing residents or ancillary farm animals that may be present. There are no components of the proposed Project that would preclude ancillary agricultural activities, and none of the issues raised by this comment would significantly impact any such existing or future ancillary agricultural activities. No revision to the DEIR is warranted by this comment.
- C-21 Refer to Response B-4. The presence of agriculturally-zoned land to the west and south of the Project site does not in and of itself represent a significant impact to the environment. Rather, a significant impact would occur if future residents or workers were to complain about noise, dust, or odors associated with existing agricultural activities, and if such complaints were to result in cessation of agricultural activities. Under existing conditions, none of the properties zoned for A-1-1 are used for agricultural purposes, with possible exception of ancillary agricultural activities associated with existing residential uses, which are unlikely to draw complaints from future on-site workers. Moreover, none of the areas zoned for A-1-1 west and south of the Project site have been used for agricultural production since at least 1938 (refer to Appendix D of EIR Technical Appendix G1, and Appendix D of EIR Technical Appendix G2). It is unclear why additional



- mitigation is recommended by this comment; mitigation is only required under CEQA for significant impacts to the environment, and the Project would not result in a significant impact to off-site agriculturally-zoned lands. No revision to the DEIR is warranted pursuant to this comment.
- C-22 Refer to Responses B-4, C-20, and C-21. As noted in those responses, there are no existing agricultural uses on any lands surrounding the Project site, other than potential ancillary agricultural activities that may be associated with the existing residential neighborhood to the south. Potential growth-inducing impacts of the Project are evaluated in EIR § 5.3, which concludes that the Project would not be growth-inducing. The County finds that the EIR correctly concludes that impacts to agriculturally-zoned properties would be less than significant, and no revision to the DEIR is warranted pursuant to this comment.
- C-23 Refer to Response B-6. In addition, for operational activity (both operational localized impacts and diesel health risk impacts), the EIR analyzes receptors placed immediately adjacent to the south of the Project's property line much nearer than the 191 feet-average distance cited in the EIR generally. As illustrated on Exhibit 2-C on page 22 of the Health Risk Assessment Report, receptors are placed immediately to the south of the Project's property line at actual residential structures where a person could reside for a 24-hour period. As such, and contrary to the comment, as a worst-case scenario, the Project's Health Risk Assessment (EIR Technical Appendix B2) actually assumes a person would be exposed continually to these emissions (which is also entirely unrealistic) and thus provides a sufficient analysis of any potential localized air quality emission impacts.
- C-24 Figure 4.4-1, Building D Site Biological Resources, has been removed in the FEIR from its erroneous position between p. 4.3-43 and p. 4.3-44. Figure 4.4-1 remains in its correct position on p. 4.4-30.
- C-25 The EIR and Air Quality Report appropriately account for emissions associated with a rock crusher. As stated on Page 31 of the Air Quality Report (EIR *Technical Appendix B1*): "An electric rock crusher will further break down the fragmented rocks and will be powered by a 300-horsepower diesel generator, which will take place during the grading phase of construction activities." Accordingly, a diesel generator was included in the air quality modeling and is identified on Table 3-3 (Construction Equipment Assumptions) of *Technical Appendix B1*. As noted in Response C-71, however, the Applicant has since revised its approach to potentially eliminate the use of an on-site rock crusher. This revision has been made in the FEIR. Rock fragments that exceed the maximum size for handling and grading (12") would be broken up in place utilizing crushing jaws on an excavator. Fragments less than 12" would be handled and graded in the same manner as soils and utilized along with on-site soils to form the building pad and pavement areas of the proposed development. Therefore, emissions are anticipated to actually be lower than what is reported in the EIR.
- C-26 The EIR and associated Air Quality Report (EIR Technical Appendix B1) account for blasting activity to overlap (on a daily basis) with peak grading activities. Blasting emissions were added to the CalEEMod totals for grading activities, which is the highest producer of emissions during construction; therefore, representing the peak day of construction that could occur. If blasting



theoretically overlapped with other sub-phases of construction, which would have less emissions during grading activities, the impacts would be less than what was disclosed in the EIR because the other sub-phases of construction produce fewer air pollutant emissions than would occur on the peak grading day.

- C-27 Refer to Response B-10 regarding Mitigation Measure MM 4.3-1. The rationale provided in Response B-10 also applies to Mitigation Measure MM 4.3-2. Further, pursuant to Mitigation Measure MM 4.3-2, “where feasible” is specified for only for the use of electric-powered equipment because it is impractical and infeasible for 100 percent of the construction equipment to be powered by electricity at all times. Areas that would receive electricity from power poles during construction would likely include the contractor’s on-site offices and long-term equipment and materials staging areas. However, because the entire Project site would be affected by construction and a majority of the equipment that would be used is mobile with construction occurring on different locations of the Project site from day-to-day, it is infeasible to rely on electricity for 100 percent of the Project’s construction energy needs. Further, given the size of the site, installing the temporary electrical infrastructure needed to power all construction equipment with electricity would result in a voltage drop due to the length of the power cords and thereby reduce the functionality and effectiveness of using all electric-powered equipment. Prior to mitigation, the only construction-related air pollutant emission found to be significant was NO_x, with calculated maximum daily emissions of 264.7 lbs/day without mitigation. With mitigation, NO_x emissions would drop to a calculated maximum of 80.1 lbs/day, due to implementation of MM 4.3-1 which includes a requirement (4.3-1c and 4.3-1d) that all excavators, graders, and rubber-tired dozers shall be CARB Tier 3 Certified or better and all scrapers shall be CARB Tier 4 certified or better.
- C-28 Refer to Response C-4.
- C-29 The modeling input files include a 100-meter receptor spacing grid throughout the modeled project domain. The “2 rows of gridding” that the comment is referring to is the graphical representation in the health risk assessment report (EIR Technical Appendix B2) which represents the point of maximum impact. All other receptors in the 100-meter grid would result in less severe impacts than the level of maximum impact disclosed in the EIR; therefore, there would be no increased analysis or benefits to reporting on emissions that would be further reduced from those provided in the EIR.
- C-30 The primary environmental benefit of using solar-generated energy is reduced fossil fuel usage, which is the traditional source of electricity generation. In the case of the proposed Project, however, the Project’s primary use of fossil fuels is for fueling vehicles traveling to and from the site, and not for powering the buildings with electricity. As indicated in EIR Table 4.3-12, *Summary of Peak Operational Emissions (With Mitigation)*, the Project would result in significant and unavoidable operational air pollutant emissions associated with VOCs and NO_x. A large majority of the NO_x emissions (95.65%) would be generated by mobile sources (i.e., tailpipe emissions from vehicles traveling to and from the Project site). Further, the EIR assumes that all of the Project’s vehicle trips would be new trips and not redistributed trips that would already be traveling on the roadway network. Because the primary source of NO_x emissions is vehicles, the addition of solar arrays to the building roofs will do very little to reduce the Project’s air pollutant impacts. Refer to Response B-14, which explains how compliance with State laws and in particular



the Truck and Bus Regulation adopted by CARB in 2008, is resulting in measurable air pollutant emission reductions for warehouse projects like the proposed Project for which the primary source of air pollutant emissions is on-road vehicles.

The installation of additional solar panels on the building's roof, to power the building would have no proportional nexus to the primary source of the significant and unavoidable NOx impact (vehicle tailpipes). Only 0.13% of the Project's NOx emissions would result from energy sources (EIR Table 4.3-12). Similarly, only 0.08% of the Project's VOC emissions would result from energy sources (EIR Table 4.3-12), so the installation of additional solar panels would do very little to reduce the Project's significant and unavoidable VOC impact (vehicle tailpipes (mobile sources), use of stationary and consumer products (area sources), and use of on-site equipment) which account for 99.92% of the Project's operational VOC emissions. In accordance with CEQA Guidelines §15126.4, EIR § 4.3, Air Quality, specifies feasible mitigation measures that minimize significant impacts and have a proportional nexus to the Project's impacts. Mitigation measures must be "roughly proportional" to the impacts of the project pursuant to CEQA Guidelines §15126.4(a)(4)(B). Mitigation Measure MM 4.3-8 already requires the buildings to accommodate the necessary electrical system and other infrastructure to accommodate larger PV arrays in the future, and the wording in the FEIR has been revised to clarify that the required array size is a minimum of 1KW. The Project Applicant is proposing the Project on a speculative basis (meaning, the occupants of the proposed buildings are not yet known); thus, it is impractical at this point in time to determine the electrical needs of the (yet unknown) future occupants and the specific size of a solar array that would be appropriate as a building design feature.

- C-31 Although CEQA does not require the CEQA lead agency to analyze a list of every imaginable mitigation measure, Responses C-31(1) through C-31 (19) address the feasibility and practicality of each suggestion made by the commenter. The responses also note which of the commenter's suggestions are duplicative of mandatory regulatory requirements or of mitigation measures already included in the EIR. In summary, the mitigation measures specified in the EIR will mitigate the Project's construction emissions to below the thresholds of significance. See EIR § 4.3.8. Therefore, no additional mitigation is required. Refer to CEQA Guidelines §15091(a)(1).
- C-31(1) The commenter's suggested mitigation measure is not necessary because, as detailed in EIR § 4.3.8, implementation of Mitigation Measures MM 4.3-1 and MM 4.3-2, combined with mandatory compliance with SCAQMD Rule 403 and California Air Resources Board, Title 13, Chapter 10, § 2485, Division 3 of the California Code of Regulations, would reduce emissions during Project construction to below the SCAQMD's localized significance thresholds. Mitigation Measure MM 4.3-1 already requires that horsepower hours per day be limited, that CARB Tier 3 or better equipment be used for excavators, graders, and rubber-tired dozers, and that all scrapers be CARB Tier 4 or better.
- C-31(2) Refer to Response C-31(1). Regardless, Mitigation Measure MM 4.3-1 has been supplemented in the FEIR to prohibit the use of diesel-powered generators during construction.
- C-31(3) Refer to Response C-31(1). Further, Mitigation Measure MM 4.3-1 already requires that horsepower hours per day be limited, and the list of regulatory requirements (at FEIR p. 4.3-35



- to 4.3-36) already discloses that Project construction activities are required to comply with the California Manual on Uniform Traffic Control Devices, which requires that temporary traffic controls be provided during construction.
- C-31(4) Refer to Response C-31(1). Regardless, Mitigation Measure MM 4.3-1 has been supplemented in the FEIR to require the Project's construction contractors to notify their workers about Riverside County's Rideshare Program.
- C-31(5) Refer to Response C-31(1). Riverside County has no ability to enforce the attachment of high pressure injectors on construction equipment by equipment fleet owners. Regardless, Mitigation Measure MM 4.3-1 has been supplemented in the FEIR as a best practice measure to encourage the Project's construction contractors to select equipment with pollution control devices such as high-pressure injectors.
- C-31(6) Refer to Response C-31(1). As stated in the list of regulatory requirements (at FEIR p. 4.3-36), diesel-fueled vehicles at the Project site are required to comply with the California Air Resources Board (CARB) idling restriction requirements, which currently restrict vehicles from idling for more than 5 minutes. As a best practice measure and in an effort to further reduce idling, Mitigation Measure MM 4.3-2(A) has been added to the FEIR that requires signs to be posted on the site during construction activities that instruct operators to turn off equipment when not in use and limit idling to 3 minutes. As stated in the Applicable County Regulations and Design Requirements (at FEIR p. 4.3-36), diesel-fueled vehicles at the Project site are required to comply with the California Air Resources Board (CARB) idling restriction requirements, which currently restrict vehicles from idling for more than 5 minutes. As a best practice measure and in an effort to further reduce idling, Mitigation Measure MM 4.3-4 has been revised in the FEIR to require signs to be posted on the site which specify that trucks shall not idle by more than 3 minutes (instead of 5 minutes).
- C-31(7) Refer to Response C-31(1).
- C-31(8) Refer to Responses C-27 and C-31(1).
- C-31(9) Refer to Responses C-27, C-31(1) and C-31(2). Mitigation Measure MM 4.3-2 already requires the use of electric-powered construction equipment when feasible; thus, the suggested mitigation measure to use alternative fuels has not been imposed.
- C-31(10) Refer to Response C-31(1). Riverside County has no ability to enforce the attachment of catalytic convertors on construction equipment by equipment fleet owners. Regardless, Mitigation Measure MM 4.3-1 has been supplemented in the FEIR as a best practice measure to encourage the Project's construction contractors to select equipment with pollution control devices such as catalytic converters.
- C-31(11) Refer to Responses C-31(1) and C-31(9).
- C-31(12) Refer to Response C-31(1). Regardless, Mitigation Measure MM 4.3-1 has been supplemented in the FEIR to require the temporary suspension of construction activities during Stage 2 Smog Alerts issued by the South Coast Air Quality Management District.



- C-31(13) Refer to Responses C-31(1). Mitigation Measure MM 4.3-2 already requires the maintenance of construction equipment according to manufacturer specifications and the keeping of maintenance records.
- C-31(14) Refer to Response C-31(1) and C-31(13).
- C-31(15) Refer to Response C-31(1). Mitigation Measure MM 4.11-12(c) already requires the construction contractor to locate equipment staging in the north-central portions of the Project site (in the vicinity of the future Ellsworth Street / Oleander Road intersection to maximize the distance between construction-related noise sources and noise-sensitive receivers nearest the Project site. This noise mitigation measure will achieve the same result as the proposed mitigation pursuant to this comment.
- C-31(16) Refer to Response C-31(1). Mitigation Measure MM 4.3-1 already requires Heavy-Heavy Duty Haul Trucks (HHD) accessing the Project site to use year 2010 or newer engines during all construction activities to the extent such HHD are commercially available.
- C-31(17) Refer to Response C-31(1) and B-10. Mitigation Measure MM 4.3-2 already requires construction contractors to keep construction equipment maintenance records and data sheets of equipment design specifications, subject to inspection by the County of Riverside.
- C-31(18) Refer to Response C-31(1). Mitigation Measures MM 4.3-1 and MM 4.3-2 already require and encourage the use of Best Available Control Technologies (BACTs).
- C-31(19) Refer to Response C-31(1). The suggested measure is not feasible because, according to the Project Applicant's construction experts, the additives used in cement mixes depend on weather conditions to produce the best concrete (Holdridge, 2017). Also, according to the Project Applicant's construction experts, the use of fly ash has the potential to reduce structural integrity and quality of concrete (Holdridge, 2017). For these reasons, the suggested mitigation measure has not been imposed.
- C-32 Suggesting that Riverside County require more stringent truck engine controls than the federal government or State of California require is neither practical nor feasible for Riverside County to effectively enforce. CEQA Guidelines §15091 provides that mitigation measures must be within the responsibility and jurisdiction of the Lead Agency in order to be implemented. Riverside County has no ability to enforce a requirement that "cleaner" trucks travel to and from the Project site than are otherwise allowed to travel on public streets in the State of California and Riverside County.

As documented in the EIR (at FEIR pp. 4.3-7 to 4.3-14), air quality in the South Coast Air Basin is improving and a continued improvement in air quality is expected to occur throughout the Air Basin through the ongoing implementation of federal, State, and SCAQMD regulations including but not limited to California's low carbon fuel (Pavley) requirements, low sulfur diesel fuel programs, and renewable electricity standards. In particular, the CARB Truck and Bus Regulation requires that diesel trucks and buses be upgraded with newer engines to reduce emissions. The regulation applies to nearly all privately and federally-owned diesel fueled trucks and buses with a gross vehicle



weight rating (GVWR) greater than 14,000 pounds. Refer to Response B-14, which explains how compliance with State laws and in particular the Truck and Bus Regulation adopted by CARB in 2008, is resulting in the mandatory on-road operation of less-polluting diesel trucks and measurable air pollutant emission reductions for warehouse projects like the proposed Project for which the primary source of air pollutant emissions is on-road vehicles. Vehicles accessing the Project site are required by law to comply with this requirement and the myriad of engine requirements and tailpipe emission regulations enforced at the federal and State levels.

Further, voluntary programs like the federal SmartWay Program are also resulting in air quality improvements by increasing fuel efficiency and thereby reducing tailpipe emissions associated with motor vehicle operation. Due to the realized improvements in fuel efficiency (ability to drive more miles per gallon of fuel), many truck operators are voluntarily opting in to the SmartWay Program to save on gas costs. The US EPA's SmartWay Program is a voluntary public-private program developed in 2004, which amount other things reduces freight transportation-related tailpipe emissions by accelerating the use of advanced fuel-saving technologies such as the addition of simple aerodynamic features on trucks that result in the truck traveling greater distances per gallon of fuel. This program is supported by major transportation industry associations, environmental groups, state and local governments, international agencies, and the corporate community. (EPA, n.d.) The federal EPA reports that with the addition of aerodynamic devices, there is at least a 5% fuel savings and with the installation of two or more devices, there is at least a 9% fuel savings (refer to www.epa.gov/verified-diesel-tech/smartway-designated-tractors-and-trailers). Lower fuel use directly translates to reductions in tailpipe-emitted NOx and other air pollutants.

C-33 These quotes from the SCAG's RTP/SCS are noted. Refer to Response C-32.

C-34 Refer to Response C-32. Also, the commenter has not provided any evidence to support their assertion that trucks that use near-zero or zero-emission truck are readily available and feasible for the trucking fleet that would service the Project's future building users, either now or in any specific future timeframe. In fact, the commercial availability of zero- or near-zero emission heavy duty trucks is limited. Based on a recent article in the LA Times dated July 19, 2017, (<http://www.latimes.com/local/lanow/la-me-ports-clean-air-20170719-story.html>), fleets of short-haul heavy-duty trucks that are capable of servicing the Port of LA and Port of Long Beach (and thereby the geographic area to and from which goods associated with the Ports are transported by truck) do not exist. As reported, approximately 96% of all trucks servicing the Ports are currently fueled by diesel, and the implementation of zero-emission heavy-duty trucks to service the Ports is projected to cost approximately \$14 billion in public and private funds, and will take around two decades to implement.

Given that private businesses, such as those that would occupy the Project site, operate on a much smaller level than that of the Ports of LA and Long Beach, the cost and time invested into implementing zero-emission heavy-duty trucks at the Project site is not feasible. If it would require twenty years for the Ports of LA and Long Beach to implement the use of zero-emission heavy-duty trucks, it is not feasible to expect the Project to implement zero-emission heavy-duty trucks into fleets by 2025. In addition, the projects that the Ports undertake are not funded by a single private enterprise like the proposed Project. As stated above, the implementation of zero-emission



heavy-duty trucks to service the Ports is projected to cost approximately \$14 billion that would be partially funded by levying taxes upon loaded containers delivered to the Ports. The size, scale, and funding of Port projects are massive in scale compared to the Knox Business Park Buildings D and E Project proposed in the County of Riverside. For these reasons, it is not reasonable for Riverside County to require and enforce the use of near-zero and zero-emission trucks at the Project site. Such a requirement would be technologically and economically infeasible.

- C-35 Although CEQA does not require the CEQA lead agency to analyze a list of every imaginable mitigation measure, Responses C-35(1) through C-35(14) address the feasibility and practicality of each suggestion made by the commenter. The responses also note which of the commenter's suggestions are duplicative of mandatory regulatory requirements or of mitigation measures already included in the EIR. In summary, the mitigation measures specified in the EIR will not fully mitigate the Project's VOC and NOx emissions to less than significant levels, because a majority of the emissions would be produced by mobile sources (vehicle tailpipe emissions) regulated by State and federal governments and the regulation of vehicle engines and fuel types are outside of the jurisdictional authority of Riverside County. Refer to CEQA Guidelines §15091(a)(1). Feasible mitigation is specified in EIR § 4.3.8.
- C-35(1) Most yard trucks operate on propane fuel, not diesel. Nonetheless, Mitigation Measure MM 4.3-11 has been added to the FEIR that requires the Project developer and all successors to stipulate in building leases that yard trucks shall not be fueled with diesel.
- C-35(2) Refer to Response C-32. For the reasons specified, the suggested mitigation measure has not been imposed.
- C-35(3) Refer to Response C-32. For the reasons specified, the suggested mitigation measure has not been imposed.
- C-35(4) Refer to Response C-32. For the reasons specified, the suggested mitigation measure has not been imposed.
- C-35(5) Refer to Response C-31(10). Furthermore, the Project is proposed on a speculative basis, meaning that future users of the Building D and Building E are not known at this time. Most users of warehouse buildings such as proposed Building D and Building E are serviced by independent equipment companies, independent trucking companies, and individual and truck owners/drivers. Few warehouse building users control or own their own trucking fleets. As such, neither the County, Project developer, building owner, nor building user would have the ability to effectively monitor or enforce a requirement that every truck accessing the buildings, which would otherwise be permitted to legally operate on public roads in California and in Riverside County, be equipped with a catalytic convertor. Pursuant to CEQA Guidelines §15126.4(a)(2), mitigation measures must be fully enforceable; thus, the suggested mitigation measure has not been imposed.
- C-35(6) As indicated in EIR Table 4.3-12, *Summary of Peak Operational Emissions (With Mitigation)*, a large majority of the Project's significant and unavoidable air pollutant emissions (NOx and VOC) and the Project's GHG emissions would be generated by mobile sources (i.e., tailpipe



emissions from vehicles traveling to and from the Project site). Emissions from the periodic operation of landscape maintenance equipment on the Project site would be extremely minimal and any air pollutant emissions gained by using electric-powered landscape maintenance equipment would be nearly immeasurable and have no substantive reduction in NO_x or VOC emissions. Thus, restrictions on landscape maintenance equipment would have no proportional nexus to the Project's level of air pollutant impacts. Mitigation measures must be "roughly proportional" to the impacts of the project pursuant to CEQA Guidelines §15126.4(a)(4)(B). Also, Riverside County has no ability or legal authority to enforce the use of electric-powered landscape maintenance equipment on privately owned property such as the Project site. Pursuant to CEQA Guidelines §15126.4(a)(2), mitigation measures must be fully enforceable. For these reasons, the suggested mitigation measure has not been imposed.

- C-35(7) As stated in the list of regulatory requirements at FEIR p. 4.3-35, diesel-fueled vehicles at the Project site are required to comply with the California Air Resources Board (CARB) idling restriction requirements, which currently restrict vehicles from idling for more than 5 minutes. As a best practice measure and in an effort to further reduce idling, Mitigation Measure MM 4.3-4 has been revised in the FEIR to require signs to be posted on the site which specify that trucks shall not idle by more than 3 minutes (instead of 5 minutes).
- C-35(8) As indicated in EIR Table 4.3-12, *Summary of Peak Operational Emissions (With Mitigation)*, a large majority of the Project's significant and unavoidable air pollutant emissions (NO_x and VOC) and GHG emissions would be generated by mobile sources (i.e., tailpipe emissions from vehicles traveling to and from the Project site), not solar heat gain. To address heat gain, the Project's landscaping plans are required to comply with Riverside County Ordinance No. 348, which mandates shading percentages for parking lots. Per Ordinance No. 348 Section 8.12 "Off-Street Vehicular Parking," 50% minimum shading is required for off-street parking areas that provide more than 50 spaces, 40% minimum shading is required for parking areas that provide 25-49 spaces, and 30% minimum shading is required for parking areas that provide 5-24 spaces. The Project's landscaping plans show sufficient trees covering the Project's passenger car parking lots (excluding truck courts where trees cannot be planted due to interference with truck maneuvering) so that at least 50% of the parking lots' areas will be shaded, per County requirements.
- C-35(9) As indicated in EIR Table 4.3-12, *Summary of Peak Operational Emissions (With Mitigation)*, a large majority of the Project's significant and unavoidable air pollutant emissions (NO_x and VOC) and the Project's GHG emissions would be generated by mobile sources (i.e., tailpipe emissions from vehicles traveling to and from the Project site). Planting of low-ozone forming trees would have no proportional nexus to the Project's level of air pollutant and GHG impacts. Mitigation measures must be "roughly proportional" to the impacts of the project pursuant to CEQA Guidelines §15126.4(a)(4)(B). As discussed in Response C35(8), the Project's landscaping plans are required by County Ordinance No. 348 to meet shading requirements for the Project's passenger car parking lots. As mandated by Ordinance No. 348, the shade tree species are required to be selected from the "Riverside County Guide to Trees, Shrubs and Ground Covers." The County has reviewed the plant palette specified on the Project's



landscaping plans and has verified that a majority of tree species proposed to be planted have low ozone forming characteristics, including: Chitalpa (*Chitalpa taskentensis*), Italian cypress (*Cupressus sempervirens*), Toyon (*Heteromeles arbutifolia*), Crape myrtle (*Lagerstroemia i Muskogee*) and African sumac (*Rhus iancra*).

- C-35(10) As indicated in EIR Table 4.3-12, *Summary of Peak Operational Emissions (With Mitigation)*, a large majority of the Project's significant and unavoidable air pollutant emissions (NOx and VOC) and GHG emissions would be generated by mobile sources (i.e., tailpipe emissions from vehicles traveling to and from the Project site) and not solar heat gain. Nonetheless, the Project Applicant is proposing, as a best practice measure to reduce heat gain to construct the Project's on-site parking areas, truck drives, and truck courts with concrete surfaces. A note is included on the Building E Site and Building D Site Plot Plan exhibits that call out the requirements for concrete surfaces. Concrete surfaces reflect sunlight instead of absorbing it, thereby lowering solar heat gain. Concrete is also less prone to rutting and potholes, thereby lowering noise that can be caused by driving over uneven surfaces.
- C-35(11) This comment provides no basis to find that that the offering of shuttle service to off-site food and commercial services would substantially reduce the Project's significant and unavoidable NOx or VOC air pollutant emissions or the Project's GHG emissions. Additionally, there is no guarantee that the shuttles, even if provided, would be used frequently enough to reduce air quality and GHG emissions. Mitigation Measure MM 4.3-7 already requires that the building owner users and future tenants participate in Riverside County's Rideshare Program and advertise public transportation information to employees of the building tenants.
- C-35(12) As indicated in EIR Table 4.3-12, *Summary of Peak Operational Emissions (With Mitigation)*, a large majority of the Project's significant and unavoidable air pollutant emissions (NOx and VOC) and GHG emissions would be generated by mobile sources (i.e., tailpipe emissions from vehicles traveling to and from the Project site), and not solar heat gain. Nonetheless, as a best practice measure to reduce heat gain, Mitigation Measure MM 4.3-12 has been added to the FEIR that will require the Project's building plans to require the installation of a primary roofing material that has a solar reflective index (SRI) value of at least 39 percent.
- C-35(13) As specified in the list of regulatory requirements at FEIR p. 4.3-36, the Project is required to comply with the California Green Building Standards Code (CALGreen), including all Nonresidential Mandatory Measures, which includes requirements for hot water tanks. The provisions of CALGreen reduce energy use and fossil fuel use associated with building operations, which reduce air pollutant emissions. As indicated in EIR Table 4.3-12, *Summary of Peak Operational Emissions (With Mitigation)*, a large majority of the Project's significant and unavoidable air pollutant emissions (NOx and VOC) and GHG emissions would be generated by mobile sources (i.e., tailpipe emissions from vehicles traveling to and from the Project site), not the use of hot water inside the building. Given that CALGreen already has mandatory measures that apply to water tanks, the suggested mitigation measure has not been imposed.



- C-35(14) Emergency generators are typically needed as part of the infrastructure system for large warehouse buildings such as the proposed Project. These generators service the building with power when there is a loss of electricity. Electric powered generators would thus defeat the purpose of having a generator, because it would not operate if there was an electrical power disruption. Diesel power generators are by far the most reliable in an emergency situation, especially to service large buildings. According to information available from generator manufacturers that service large commercial and industrial standby applications, power density as well as capital cost advantages favor diesel for standby power, and diesel is by far the norm in the generator market. However, Riverside County recognizes that clean burning gaseous fueled (natural gas fueled) generators and generators bi-fueled by diesel and natural gas are evolving in their technology and becoming more powerful and reliable. Regardless of fuel type, both types of generators emit air pollutant emissions. For these reasons, and the fact that emissions from generators would only occur during short periods during loss of electrical power, the County finds that there would not be a substantial air quality benefit to prohibiting diesel fueled generators as the emergency back-up system for the proposed building.
- C-36 Although CEQA does not require the CEQA lead agency to analyze a list of every imaginable mitigation measure, Responses C-36(1) through C-36(9) address the feasibility and practicality of each suggestion made by the commenter. The responses also note which of the commenter's suggestions are duplicative of mandatory regulatory requirements or of mitigation measures already included in the EIR. In summary, the EIR (at FEIR pp. 4.3-29 to 4.3-31) concludes that health risk impacts would be less than significant and, therefore, mitigation measures are not required. Refer to CEQA Guidelines §15091(a)(1).
- C-36(1) Refer to Response C-4 for a detailed explanation about why it is highly unlikely that truck traffic would use Ellsworth Street/Decker Road. The installation of physical barriers to block this Riverside County public roadway are unnecessary and would have the potential to present safety issues resulting from the blockage of a public road.
- C-36(2) Refer to Response C-4, which indicates that Mitigation Measure MM 4.15-4 has been added to the FEIR to require the developer or successor in interest to install durable, legible, weather-proof signs at exit driveways that prohibit trucks from heading south on Decker Road/Ellsworth Street, and Mitigation Measure MM 4.15-5 has been added to the FEIR to require information to be provided in building user leases indicating that building users shall designate truck routing away from southbound Decker Road/Ellsworth Street and away from residential neighborhoods.
- C-36(3) Refer to Response C-35(11).
- C-36(4) This comment provides no basis to find that that the provision of on-site showers would substantially reduce the Project's air pollutant emissions and associated level of health risk. Also, the County has uncovered no evidence in professional literature to indicate that the provision of on-site showers in an industrial warehouse in a contextual setting similar to the proposed Project's would incentivize employees to bike or walk to work and reduce air pollutant emissions and associated health risks associated with workers commuting by motorized vehicle. Thus, the County finds no proportional nexus to the Project's less-than-significant health risk



impact to require the imposition of this recommendation as a requirement. Additionally, there is no guarantee that showers, even if provided, would be used frequently enough to reduce air quality emissions and associated health risk impacts. Therefore, the suggested mitigation measure has not been imposed.

- C-36(5) As stated in the list of regulatory requirements at FEIR p. 4.3-36, diesel-fueled vehicles at the Project site are required to comply with the California Air Resources Board (CARB) idling restriction requirements, which currently restrict vehicles from idling for more than 5 minutes. The provision of electric hook-ups would be unnecessary and this suggested mitigation measure is not imposed; because of the mandatory 5-minute idling restriction, idling time for main engines is already limited. Further, refer to Response C-31(6) which indicates that as a best practice measure, and in an effort to further reduce idling, Mitigation Measure MM 4.3-4 has been revised in the FEIR to require signs to be posted on the site which specify that trucks shall not idle by more than 3 minutes (instead of 5 minutes).
- C-36(6) Mitigation Measure MM 4.3-3 already requires that, within six months of building occupancy, signs shall be posted at the buildings informing truck drivers about the health effects of diesel particulates, the California Air Resources Board diesel-fueled vehicle idling regulations, and the importance of being a good neighbor by not parking in residential areas. The provision of a pamphlet with this same information would be duplicative and thus has not been imposed as an additional mitigation measure.
- C-36(7) Mitigation Measure MM 4.3-4 already requires that, within six months of building occupancy, signs be posted in all dock and delivery areas displaying the telephone numbers of the building facilities manager and the California Air Resources Board to report violations.
- C-36(8) Refer to the proposed Project's application materials and the exhibits included in EIR § 3.0, Project Description. Drive isles that allow for on-site truck-stacking are proposed as part of the Project's design.
- C-36(9): The EIR (at FEIR pp. 4.3-29 to 4.3-31) concludes that health risk impacts would be less than significant and, therefore, there are no sensitive receptors that would be significantly impacted and that would require mitigation. Refer to CEQA Guidelines §15091(a)(1).
- C-37 As part of proposed grading activities, blasting in hard rock areas would consist of small charges that produce less-than-significant noise and vibration impacts as documented in the EIR (at FEIR pp. 4.11-20 to 4.11-21). Considering the proposed method of blasting, the noise would be perceived as a thump and not an explosive event that could potentially result in significant direct or indirect impacts to off-site wildlife. Because the entire Project site would be disturbed by grading and development, there would be no greater impact to on-site wildlife species associated with blasting as compared to the impacts that would occur from other aspects of the Project construction process.
- C-38 Refer to Response C-3.



- C-39 The conclusions drawn by the EIR before and after the application of mitigation measures assume that the Building D Site and Building E Site are a single “Project” as defined by CEQA. Refer to Response C-3. All impacts related to burrowing owls has been appropriately evaluated in the EIR.
- C-40 Focused burrowing owl (*Athene cunicularia*) (BUOW) surveys were conducted in accordance with the Burrowing Owl Survey Instructions for the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) area, and during the BUOW breeding season. The survey areas included suitable habitat located within the Project sites and a 150-meter (500-foot) buffer area around the sites, as required by both the Western Riverside County MSHCP and the California Department of Fish and Game 2012 Staff Report on Burrowing Owl Mitigation. Refer to Response C-37 which concludes that effects of blasting would be less than significant to wildlife species.
- C-41 As indicated in EIR § 4.4, the Project site is not located within the MSHCP Criteria Area, indicating that the Project site is not targeted for conservation under the MSHCP. Pursuant to Conservation Objective 5 for the burrowing owl, for areas outside the MSHCP Criteria Area that support fewer than three (3) pairs of burrowing owls, the on-site burrowing owls will be passively or actively relocated following accepted protocols (Riverside County, 2003, p. B-65). Four focused surveys were conducted by Cadre on August 28, August 29, August 30, and August 31, 2014 on the Building D Site. Cadre observed a single (1) adult, burrowing owl foraging and utilizing a network of burrow sites within the Building D Site. Four focused surveys also were conducted by HES on March 29, April 9, April 19, and April 28, 2015 on the Building E Site. A single burrowing owl was observed outside of its burrow in the north central portion of the Building E Site and there was evidence that the species uses the site to forage. Thus, and pursuant to Conservation Objective 5, because the Project site contains fewer than three pairs of burrowing owls, only active or passive relocation of burrowing owl individuals would be required to demonstrate compliance with the MSHCP. EIR Mitigation Measure MM 4.4-1, which was imposed on the Project to address potentially significant impacts to the burrowing owl, requires preconstruction surveys for the burrowing owl; prohibits disturbances to any active burrowing owl nest; and requires active relocation of burrowing owl individuals outside of the nesting season. Additionally, and as noted by this comment, the Project would be required to contribute MSHCP fees pursuant to Ordinance No. 810, which would assist the Western Riverside County Regional Conservation Authority (RCA) in establishing the MSHCP Reserve System. Once established, the MSHCP Reserve System will provide adequate foraging and nesting habitats for the burrowing owl. Accordingly, the County finds that the EIR properly concludes that with payment of MSHCP fees, preconstruction surveys, and relocation of any individual burrowing owls that may be present, the Project is fully consistent with the MSHCP Conservation Objectives for the burrowing owl. No revision to the EIR is warranted pursuant to this comment.
- C-42 Mitigation Measure MM 4.4-1 has been revised in the FEIR for clarity and to mimic the wording contained in the County’s Conditions of Approval for the Project. MM 4.4-1 requires that a survey for burrowing owl occur within 30 days of issuing a grading permit. If the species is present, and it is during the nesting season, avoidance of nests and a 300-foot buffer around the nests is required. If it is not the nesting season, relocation of the burrowing owls is required to occur under the



direction of the Riverside County Biologist, Environmental Programs Department, CDFW, USFWS, and RCA.

- C-43 Riverside County acknowledges these excerpts from the Western Riverside County MSHCP and the County Biologist, Environmental Programs Department, is required to comply with all applicable objectives, including Objective 5 when providing direction for the relocation of burrowing owls, as well as compliance with Objective 6 and 7. Also refer to Response C-42. Compliance with such objectives is required for the proposed Project via mandatory MSHCP compliance and therefore it is not required to also be included as a mitigation measure.
- C-44 As documented in the EIR, the only potentially significant impacts to biological resources are impacts on an ephemeral drainage located on the Building D Site and Building E Site, the potential for western burrowing owl to be present when construction activities commence, and the potential for migratory birds to be nesting at the site if construction occurs during the nesting season. See EIR, §§ 4.4.4 and 4.4.6. The EIR at § 4.4.7 identifies three regulations and four mitigation measures that will be applicable to eliminate or substantially lessen the Project's impacts on these resources. Mitigation Measures MM 4.4-3 and 4.4-4 are intended to mitigate the Project's impacts on the ephemeral drainage only. The Riverside Corona Resource Conservation District (RCRCD) has an in-lieu-fee agreement with the regulatory agencies to provide mitigation for the loss of wetland and waters habitats due to land development. The in-lieu fee program is used to mitigate for loss of habitat taking place in either waters of the State or waters of the United States. RCRCD is authorized to sell mitigation "credits" to project proponents, and the funds are utilized to restore waters and riparian habitats. To mitigate for permanent impacts to onsite drainage features, the Project will pay into the Riverside Corona Resource Conservation District in-lieu fee program at a 2:1 ratio. This is suitable mitigation pursuant to CEQA.
- C-45 As the EIR explains, in March, 2016, professional biologists from the firm Hernandez Environmental Services (HES) visited the site specifically to look for the paniculate tarplant identified by Cadre Environmental during its 2014 evaluation, but did not observe any paniculate tarplant. The EIR concludes that the Project's potential impact on the paniculate tarplant species, should the seed bank be present, will be less than significant for several reasons as explained in EIR §§ 4.4.1(B)(1) and 4.4.4(A). This conclusion is further supported by a technical memorandum from HES dated March 2016, which concludes that the Project's impacts to this plant should be considered less than significant based on the high degree of weed abatement that goes on at the Project site, the relatively low level of CNPS listing for the species, and the fact that habitat for this species has been preserved within the MSHCP boundaries. (HES, 2016c). Also refer to Response B-13. Therefore, the EIR and associated technical reports provide significant detail as to how and why the impact is less than significant, beyond the commenter's attempt to classify the analysis as mere discussion as to whether or not the Project would "threaten the species as a whole."
- C-46 Comment acknowledged, which repeats information presented in the EIR, § 4.5.
- C-47 The EIR does not discount Tribal knowledge; however, to date, no Tribal Cultural Resources (TCRs) have been identified within the Project's area of potential impact (APE). To make this determination, the County considered evidence from multiple sources, including the Tribe's



information and evidence from others including the professional archaeologist's studies based on research, field surveys, and a pollen and residue analysis (refer to EIR *Technical Appendices D1 and D2*). In some respects, the information and opinions of the Tribe, and professional archaeologist, and the County Archaeologist differed. While the Tribe made numerous assertions regarding these matters, they did not provide compelling enough information to substantiate the assertions. Further, as documented in FEIR § 4.18, due to the lack of cultural materials, temporal placement, and physical connection between each known on-site archaeological resource, there is not sufficient evidence to conclude that the Project site is part of a cultural landscape that is geographically defined in terms of its size and scope, and CEQA Statute § 21074 requires such geographic definition to qualify as a tribal cultural resource under CEQA.

- C-48 Refer to Response C-3. Again, the commenter attempts to inaccurately conclude that the EIR somehow piecemealed the discussion and analysis under CEQA. Instead, while various technical reports evaluated Building D and Building E separately in sections, the entire analysis within the EIR evaluated the entire Project as if both buildings were built, including all direct, indirect, and cumulatively considerable impacts that may occur from the construction and operation of both buildings.
- C-49 Contrary to the assertion made by this comment, there is not sufficient evidence to conclude that the Project site contains tribal cultural resources. Refer to FEIR § 4.18, Tribal Cultural Resources, for a detailed discussion. Also refer to Response C-47.
- C-50 The comment correctly summarizes the proposed Project's plans for grading and manufactured slopes. Also refer to Response C-13.
- C-51 The EIR (at FEIR pp. 4.6-13, and 4.6-15 through 4.6-16) disclose that the proposed manufactured slopes would be engineered for long-term stability and would be required to be constructed in accordance with the site-specific recommendations contained within the Building D and Building E Site geotechnical reports (EIR Technical Appendices E1 through E4). In addition, the EIR (at FEIR p. 4.6-15) discloses that the Project would be required to comply with the site-specific recommendations contained in the geotechnical reports prepared for the Building D Site and the Building E Site, including recommendations related to site preparation, soil compaction, and manufactured slope design that would minimize potential hazards associated with manufactured slopes. Also, the slopes would be landscaped and comply with the recommendations of the Building D and Building E geotechnical reports. There is no substantial evidence provided in this comment or in the Project's administrative record to indicate that there is a landslide hazard on or adjacent to the site, that the Project would cause or exacerbate a landslide hazard, or that the proposed Project's manufactured slopes and retaining walls would exacerbate, cause, or be subject to landslide hazard.

The EIR states (at FEIR p. 4.6-12) that the Project is required by law to comply with the California Building Standards Code and the County of Riverside Building Code, which address construction standards including those related to geologic and soil conditions. Further, the EIR states (at FEIR pp. 4.6-15 and 4.6-16), that as a standard condition of Project approval, the Project would be required to comply with the site-specific recommendations contained in the geotechnical reports



prepared for the Building D Site and the Building E Site, included as EIR Technical Appendices E1 through E4. The mandatory obligation to comply with these requirements has been added to the FEIR, under § 4.6.6, Mitigation.

- C-52 Refer to Response C-51.
- C-53 With implementation of Mitigation Measure MM 4.7-1 the proposed Project would be fully consistent with the Riverside County Climate Action Plan (CAP). See CEQA Guidelines § 15064.4(b) for a list of items that a lead agency should consider the following when evaluating the potential impacts of a proposed project's GHG emissions, one of which is "(3), The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions." Riverside County's adopted Climate Action Plan (CAP) represents a "local plan for the reduction or mitigation of greenhouse gas emissions." Additionally, the County relies on compliance with its CAP as its threshold for determining the potential significance of GHG emissions under CEQA. Although the Project would result in new GHG emissions within the County, as disclosed in EIR Table 4.7-5, the County finds that the EIR accurately evaluates and discloses as less than significant (following mitigation) the Project's anticipated GHG emissions in accordance with CEQA Guidelines § 15064.4(b). No revision to the DEIR is warranted pursuant to this comment.
- C-54 Refer to Responses B-14 and B-15. As discussed in detail in those responses, SB 32 and Executive Order B-30-15 set a new interim statewide GHG emission reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030. However, neither SB 32 nor Executive Order B-30-15 specify any plan or implementation measures that would necessarily be applicable to this Project. SB-32 requires CARB to craft regulations, which may further clarify the way forward for public agencies to meet the State's 2030 and 2050 climate goals, but CARB has not yet determined what reduction measures are technologically feasible or cost-effective and applicable to facilities such as the Project. As disclosed in the EIR, a large majority of the Project's GHG emissions would result from vehicle tail pipe emissions. Pursuant to State law, on-road diesel-fueled trucks are required to comply with various air quality and GHG emissions standards, including but not limited to the type of fuel used, engine model year stipulations, aerodynamic features, and idling time restrictions. Compliance with State law is mandatory and inspections of on-road diesel trucks subject to applicable State laws are regularly conducted by the CARB. Under the Truck and Bus Regulation, adopted by CARB in 2008, all diesel truck fleets operating in California are required to adhere to an aggressive schedule for upgrading and replacing heavy-duty truck engines. By 2023, all heavy trucks operating on California roads must have engines that meet 2010 emissions standards. In terms of GHG emissions attributable to aspects of the buildings' operation, such as energy and water use, the Project is required to comply with a host of energy efficiency measures required under the California Building Standards Code (CALGreen), as well as the Riverside County's Water Efficient Landscape Requirements pursuant to County Ordinance No. 859. Further, pursuant to Mitigation Measure MM 4.7-1, the Project Applicant is required to demonstrate that the buildings' designs comply with the County's CAP, by installing design features such as but not limited to enhanced insulation, energy-efficient lighting and fixtures, high efficiency HVAC systems, skylights, and other design features that garner points under the



- Riverside County CAP. Compliance with mandatory regulatory requirements and the County’s CAP demonstrates that the Project supports “substantial progress” towards the County’s GHG reduction mandates for years beyond 2020. As such, no revision to the DEIR is warranted pursuant to this comment.
- C-55 Refer Responses B-14 and B-15. This comment is primarily a legal argument and does not comment on environmental issues in the EIR directly. Accordingly, no further response is required. See CEQA Guidelines, §15088(a). The commenter’s legal conclusions are noted, although this response does not agree or disagree with those legal conclusions. The County has adopted consistency with its Climate Action Plan as the threshold of significance, and this is appropriate under CEQA Guidelines § 15064.4. No revisions to the DEIR are warranted pursuant to this comment.
- C-56 Refer Responses B-14 and B-15 for an explanation of why the Project’s GHG emissions would be less than significant with implementation of Mitigation Measure MM 4.7-1. Compliance with the County’s CAP is an effective performance measure and the application of additional mitigation measures is not warranted pursuant to CEQA Guidelines § 15126.4(a). Further, the Project is required to comply with the California Green Building Standards Code (CALGreen), including all Nonresidential Mandatory Measures, including but not limited to requirements for bicycle parking, parking for clean air vehicles, charging stations for passenger cars, lighting, water conservation, waste reduction, and building maintenance. The provisions of CALGreen reduce energy use and fossil fuel use, which reduce GHG emissions.
- C-57 Refer to Response C-9.
- C-58 The Project as proposed on the Building D Site and the Building E Site was subject to review by the Riverside County Airport Land Use Commission (ALUC) on May 11, 2017, which concluded that the Project is conditionally consistent with the March Air Reserve Base/Inland Port Land Use Compatibility Plan. The County acknowledges the typographic error citing only the Building D Site. The sentence has been revised in the FEIR (at FEIR page 4.8-13) to also reference the Building E Site.
- C-59 The comment refers to ammonium nitrate/fuel oil (ANFO). Ammonium Nitrate Fuel Oil, commonly identified as ANFO is the blasting agent used for construction projects of this type. ANFO is a “blasting agent” and not a high explosive. Under Federal Regulation (49 CFR Chapter I, Subchapter C – Hazardous Materials Regulations, Part 171-177) ANFO is classified as a Hazard Class 1 Explosive with a hazard class of 1.5D. As discussed in EIR §4.8, Hazards and Hazardous Materials, during construction of the Project, rock blasting would occur on portions of the Project site. The rock blasting would utilize small, highly controlled explosive charges to fragment hard rocks into smaller, crushable pieces. The charges will be made up of ANFO which consists of 94% ammonium nitrate and 6% diesel fuel. As discussed in EIR § 4.8, during Project construction and operation, mandatory compliance to federal, State, and local regulations would ensure that the Project as proposed on the Building D Site and the Building E Site would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. A discussion of Federal Regulation (49 CFR Chapter I, Subchapter C – Hazardous



Materials Regulations, Part 171-177) regarding ANFO as classified as a Hazard Class 1 Explosive with a hazard class of 1.5D has been added to the FEIR.

- C-60 Refer to Responses C-9, C-58 and C-59. Additionally, and as discussed in EIR § 4.13, although demand would be increased and the Riverside County Fire Department (RCFD) response time goal of 4:00 minutes would not be met to the Project site, the RCFD's existing fire stations have adequate physical capacity to service the Project. Fire hydrants are proposed on the Project site and an Early Suppression, Fast Response (ESFR) fire sprinkler system is proposed to be installed in each building. These measures would reduce any potential fire hazards and would ensure that any fires that may affect on-site buildings would not create a fire hazard to surrounding areas. Additionally, increased demand, unless it results in some form of a physical environmental impact, is not an environmental effect under CEQA. No revision to the DEIR is warranted pursuant to this comment.
- C-61 The drainage feature is an isolated, remnant feature which receives no hydrologic flow and does not provide any downstream biological resource benefits. It consists of a shallow feature in the landscape that may convey water across upland areas during and following storm events. The drainage feature is not a tributary and does not have a significant nexus (biological, chemical, or physical connection) to a traditional navigable "waters of the United States" and does not provide any downstream benefits to biological resources (e.g., riparian habitat).
- C-62 Under CEQA, impacts due to a proposed change in the planned land uses for a site only would be significant if it were to result in physical impacts to the environment. In the case of the proposed Project, the conversion of the site's existing "Community Development – Business Park (CD-BP)" land use designation to "Community Development – Light Industrial (CD-LI)" represents a substantial reduction in the amount of traffic generated by the site. For clarity and comparison purposes, the traffic generation for the No Project/Existing General Plan Alternative has been precisely calculated by Urban Crossroads and revised in EIR § 6.0, Alternatives, under Subsection 6.3.2, No Project/Existing General Plan Designation Alternative. For the areas designed CD-BP by the General Plan, a general light industrial trip rate was applied because it is less traffic intensive than a traditional business park/office use, and light industrial is a land use allowed under the CD-BP designation. The resultant trips would be 5,847 ADT, which is 3,732 more ADT than would be generated by the proposed Project. Thus, the proposed land use change would result in reduced impacts associated with traffic, vehicular-related air quality, vehicular-related GHG emissions, and vehicular-related noise impacts as compared to buildout of portions of the site with CD-BP land uses. Refer to Response B-8 for additional discussion on this topic. All other environmental effects would be similar regardless as to whether the site is developed with a mixture of CD-BP and CD-LI uses or is developed as proposed with all CD-LI land uses. Thus, the County finds that the EIR's conclusion that impacts due to a conflict with planned land uses would be less than significant is supported by substantial evidence. Additionally, it should be noted that the EIR identifies a significant and unavoidable land use impact due to the proposed alteration of the site from a primarily vacant, undeveloped property to a developed property containing two warehouse buildings because such a change would result in significant and unavoidable impact to the subject areas of air quality, noise, and traffic; these are the very impacts that would be reduced with



development of the site with all CD-IL land uses instead of the planned CD-BP and CD-LI land uses. No revision to the DEIR is warranted pursuant to this comment.

- C-63 Refer to Response B-16. The EIR correctly concludes that the proposed Project would not expose the adjacent rural residential and light agriculture zoned areas located south and west of the Project site to substantial adverse environmental effects during construction or long-term operation. That conclusion is supported by the discussion in § 4.0 of the EIR. The commenter does not provide any specific basis for its disagreement with that conclusion. Moreover, the EIR's conclusion that the Project would be compatible with existing surrounding zoning is supported by other factors discussed in § 4.10.3, under Threshold (b), such as the Project incorporates design features such as landscaped manufactured slopes, screen walls/noise barriers and landscaping buffers to provide physical separation and buffers between the Project and the rural residential zoning designation to the south of the Project site and rural residential and light agriculture zoning designations to the west. Furthermore, the Project would not result in any substantial adverse effects to the rural residential areas and light agriculture zoned areas to the south and west of the Project site after the application of mandatory regulatory requirements and the inclusion of the mitigation measures required by the EIR. Cross-sections showing the physical relationship of the proposed Project and off-site areas to the immediate south are included in the County's administrative record for this project and are provided herein following Response E-91.
- C-64 Refer to EIR Technical Appendix M, "General Plan Consistency Analysis for Knox Business Park Buildings D and E for a detailed analysis of Project consistency with applicable General Plan policies, including applicable policies from the Healthy Communities (HC) Element" As analyzed in EIR Technical Appendix M for General Plan Policies HC 2.1 and HC 14.2, the EIR addresses air quality, including a health risk assessment (EIR Technical Appendix B2, Mobile Source Health Risk Assessment) and the Project's impacts to human health were determined through quantitative analysis to be less than significant. The Project also is consistent with General Plan Policies HC 2.1 and HC 14.2 because, although the Project is not responsible for fostering overall health and well-being of Riverside County residents, the EIR addresses air quality, including a health risk assessment (EIR Technical Appendix B2, Mobile Source Health Risk Assessment); the Project's impacts to human health were determined through quantitative analysis to be less than significant. A consistency analysis for Policy HC 1.1 mirrors the Project's consistency with General Plan Policies HC 2.1 and HC 14.2. As discussed in EIR § 4.14, the Project does not propose any type of residential use or other land use that would generate a population which would increase the use of recreation facilities or existing neighborhood or regional parks. Therefore, parks would not physically be affected by the Project. Also, the Project does not propose any type of residential use and is not located within a Community Service Area (CSA) or recreation and park district within a Community Parks and Recreation Plan (Quimby fees). The Project would not physically impact an existing recreational trail. The Project would provide easements for community trail segments along Oleander Avenue and Ellsworth Street, as called for by the Mead Valley Area Plan. Environmental effects resulting from ground disturbance in the trail easement areas is evaluated as an inherent part of the Project throughout the EIR and in no cases are significant effects identified specifically related to the trail easements. Therefore, a consistency analysis with open space, rural, rural community and agricultural land use policies and parks, trails and open space policies such



as those cited by the commenter (HC-4.1, 10.1 and 10.2) is not required. As specified in the Technical Appendix M for General Plan Policy HC 6.4, the proposed Tentative Parcel Maps for the Building D Site and the Building E Site designate a 14-foot wide trail easement paralleling Oleander Avenue along the Project site's frontage. Similarly, the proposed Building D Site Tentative Parcel Map designates a 14-foot wide trail easement paralleling the east side of Ellsworth Street along the Building D Site's frontage. Thus, the Project is consistent with Policy HC 6.4. A consistency statement for HC 10.2 (d) requiring that development of parks, trails, and open space facilities occur concurrently with other development has been added to the EIR's Technical Appendix M to mirror the consistency analysis already in the EIR for HC 6.4. t.

- C-65 Refer to Response C-64. The term "environmental justice" does not appear in the CEQA Statutes or Guidelines. According to the State of California Department of Justice, "environmental justice" means the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies. Further, California Government Code § 65040.12(e) states that fairness in this context means that the benefits of a healthy environment should be available to everyone, and the burdens of pollution should not be focused on sensitive populations or on communities that already are experiencing its adverse effects. The EIR considers the Project site's context in all of its applicable evaluations and concludes that the Project would not result in any significant and unavoidable adverse impacts to surrounding properties.
- C-66 The WRCOG document referenced in this comment was published in 2005 as an informational guide to land use issues focused on community health; it does not set policies, regulations, or impose any requirements. WRCOG acknowledges in the guidance document, Introduction Section, that the recommendations provided in the document are only advisory. Further, this guidance document was published in 2005 and since that time the federal and State governments, California Air Resources Board (CARB) and South Coast Air Quality Management District (AQMD) have been working with various entities to reduce air pollutant emissions from various sources including diesel fueled trucks. As evidenced at FEIR pp. 4.3-7 to 4.3-13, air quality is improving across the South Coast Air Basin and is projected to continue improving as regulations become more stringent over time. Both the Building D Site and Building E Site are designed to include check-in gates with adequate stacking distance per Riverside County standards. Implementation of the proposed Project would not result in a minimum buffer zone of 300 meters between on-site truck courts and existing sensitive receptors. However, no loading docks would be oriented to face south and screen walls, manufactured slopes, and landscaping occur along the south boundaries of the proposed Building D Site and Building E Site directly facing residential areas. As analyzed and documented in EIR Technical Appendix B2 "Mobile Source Health Risk Assessment" and set forth in "Air Quality; Impact Analysis" Threshold d) (at FEIR pp. 4.3-29 to 4.3-31), the proposed Project would result in less-than-significant human health impacts to sensitive receiver locations during Project operation, including emissions from truck traffic. Accordingly, there is no basis under CEQA to impose a 300-meter buffer, as no mitigation is required to avoid significant health impacts to sensitive receptors.
- C-67 The erroneously placed Figure 4.11-1 has been replaced at p. 4.11-2 in the FEIR.



- C-68 As previously indicated in Response B-17, receiver locations were selected based on FHWA and FTA guidance for noise analysis. Similarly, the long-term noise level measurements were positioned as close to the nearest sensitive receiver locations as possible to assess the existing ambient noise levels surrounding the Project site. Both Caltrans and the FTA recognize that it is not reasonable to collect noise level measurements that can fully represent every part of a private yard, patio, deck, or balcony normally used for human activity when estimating impacts for new development projects. This is demonstrated in the Caltrans general site location guidelines which indicate that, “sites must be free of noise contamination by sources other than sources of interest. Avoid sites located near sources such as barking dogs, lawnmowers, pool pumps, and air conditioners unless it is the express intent of the analyst to measure these sources.” Further, FTA guidance states, “that it is not necessary nor recommended that existing noise exposure be determined by measuring at every noise-sensitive location in the project area. Rather, the recommended approach is to characterize the noise environment for clusters of sites based on measurements or estimates at representative locations in the community.” Therefore, based on recommendations of Caltrans and the FTA, it is not necessary to collect measurements at each individual building or residence, because each receiver measurement represents a group of buildings that share acoustical equivalence.
- C-69 The Noise Study (EIR Technical Appendix I) was prepared consistent with the Project construction schedule and includes the typical equipment proposed for use by the Project Applicant and identified in EIR Table 3-1. While rock drills may represent an additional piece of Project construction equipment, similar noise-generating construction equipment used during grading is already analyzed in the Noise Study and the EIR as identified in EIR Table 3-1. The construction noise analysis includes similar noise-generating construction equipment and is shown to result in less than significant noise level impacts with mitigation. For example, dozer activity is shown to approach 85.5 dBA Lmax at 50 feet, and therefore, rock drills or other equipment generating noise levels above 80 dBA Lmax at 50 feet, as the comment suggests, would result in the impacts consistent with those outlined in the Noise Study, and would be further reduced with the temporary noise barrier mitigation identified in the EIR as Mitigation Measure MM 4.11-1.
- C-70 Pre- and post-blast horn signals are for safety purposes during blasting activities at construction sites to alert both construction workers and people in the immediate area of forthcoming blasts. Further, noise levels generated by pre- and post-blast horn signals represent short-term, single events which, when applied to the Leq noise criteria for construction used in the Noise Study (EIR Technical Appendix I), do not represent noise levels high enough to increase the overall energy average (Leq) noise levels to exceed the hourly 65 dBA Leq threshold at residential uses. Further, worst-case blasting noise levels are analyzed as a part of the construction noise analysis which would exceed those generated by an air horn because the air horn will likely be located further from the sensitive receiver locations than the actual blast locations. As such, the results of the construction noise analysis would not change and the impacts will remain less than significant with the mitigation identified in the EIR. Refer to Mitigation Measure MM 4.11-4 for blasting-specific procedures that will require notification to nearby noise-sensitive residential property owners prior to blasting activity on-site.



- C-71 The rock crushing activity described in EIR § 3.0, Project Description, and analyzed throughout the EIR assumed a mechanical rock crusher. However, the Applicant has since revised its approach to potentially eliminate the use of an on-site rock crusher. The use of a rock crusher remains to be evaluated in the FEIR, however, because the potential still exists that one will be used. However, should the Applicant's alternative approach be implemented, rock fragments that exceed the maximum size for handling and grading (12"-), which is expected to be approximately 5% of the material, would be broken up in place utilizing crushing jaws on an excavator (Holdridge, 2017). Fragments less than 12" would be handled and graded in the same manner as soils and utilized along with on-site soils to form the building pad and pavement areas of the proposed development.

As previously stated in Response C-69, typical construction equipment was analyzed in the Noise Study (EIR Technical Appendix I) consistent with the equipment list for the Project presented in EIR Table 3-1. This includes reference noise levels capable of generating similar noise levels (85.5 dBA Lmax at 50 feet) exceeding those identified in this comment. Further, the analysis assumes Project construction equipment will operate at the closest point on the Project site to a sensitive receptor based on reference noise level measurements during peak activity, when in reality, these noise levels will vary during the day as construction equipment moves throughout the Project site. The additional construction equipment which the comment suggests, would therefore, result in the same construction noise impacts identified in the Noise Study and EIR, and would be further reduced by the temporary noise barrier mitigation identified in the EIR as Mitigation Measure MM 4.11-1.

- C-72 The blasting noise level threshold used in the Noise Study (EIR Technical Appendix I) is based on the lowest of the air blast limits identified by the Office of Surface Mining and Reclamation and Enforcement (OSMRE) and the Code of Federal Regulations (CFR). Further, the air blast thresholds identified by the OSMRE are identified for mining activities which typically require larger blasts than those planned at the Project site, and therefore, the lowest of the air blast limits identified by the OSMRE and CFR is used in the Noise Study to present a conservative evaluation of potential impacts at adjacent residences. In addition, pre- and post-blast inspections will be required as specified at FEIR p. 4.11-30. The Caltrans Transportation and Construction Vibration Guidance Manual that the commenter references includes the following related to the perception of blasting, in addition to a reiteration of the OSMRE regulation discussion found in the Noise Study:

Although residential structures may not be as strongly constructed as engineered structures, it is unusual to find damage to them from blast vibration. In numerous instances, vibration levels far greater than the maximum levels recommended by the U.S. Bureau of Mines (USBM) or Office of Surface Mining and Reclamation Enforcement (OSMRE) failed to cause damage. With regard to residences, the main issue with blast vibration is the perception of some residents that, because they could hear and feel the blast vibration, the vibration must have caused some damage to their residence. It is not unusual for a homeowner to be unaware of cracks or other defects in his or her residence that have developed slowly because of settlement or thermal strains. When a nearby blast is



detonated and the homeowner examines his or her structure more closely, it is not surprising that defects are attributed to the event.

Further, the potential of blasting and air overpressures is based on human perception which varies by individual. Accordingly, the analysis is based on A-weighted Lmax noise levels since the A-weighted curve approximates the subjective response of the human ear. The ability of a blast to startle someone will vary depending on the time of the event, health of the individual, orientation of the person in relation to the blast, and the perceived importance of the blasting activities themselves (Caltrans, Transportation and Construction Vibration Guidance Manual). Therefore, by using the more conservative, quantifiable OSMRE and CFR threshold, this analysis determines impacts based on the short-term noise event Lmax noise levels at sensitive receivers which are shown in EIR § 4.11 to result in less-than-significant impacts.

- C-73 As previously indicated in Response C-72, the 129 dBA Lmax noise level threshold used in the Noise Study (EIR Technical Appendix I) and the EIR is based on guidance from OSMRE, CFR, and Caltrans, and uses the lowest of the air blast thresholds identified by the OSMRE to assess potential impacts at nearby sensitive receiver locations and present a conservative analysis.
- C-74 Riverside County has already imposed conditions of approval on the Project (listed at FEIR p. 4.11-30) that require the developer to offer pre-blasting inspections and documentation of existing structures within 200 feet of blasting, as well as post-blasting inspections. Because blasting impacts would be less than significant, the commenter's additional proposed mitigation is not required. Refer to CEQA Guidelines §15091(a)(1). Regardless, the proposed Project's blasting contractor would be required by the conditions of approval to determine the conditions that exist prior to commencement of blasting, as well as designing the blast in the least obtrusive way, which will be required to be done prior to blasting in proximity to any sensitive receptor locations.
- C-75 Just like with noise from blasting, the methodologies used in the Noise Study (EIR Technical Appendix I) and EIR § 4.11 vary depending on the type of noise and vibration events being evaluated. This is largely due to the nature of blasts which will only occur over a few seconds depending on the size of each blast. Thresholds of significance used in the Noise Study and EIR for blasting vibration events are based on instantaneous vibration levels (peak particle velocities) capable of building damage, which are not entirely perceptible by average humans. Alternatively, typical construction noise levels which occur over longer duration are evaluated based on a human perception (root-mean-square) vibration level thresholds identified by the County of Riverside. Riverside County General Plan Policy N 16.3 prohibits exposure of residential dwelling to perceptible ground vibration from passing trains. Based on this policy, the short-term typical construction equipment vibration analysis relies on the County of Riverside acceptable vibration standard of 0.01 in/sec (RMS) at sensitive receiver locations. Riverside County does not identify any specific vibration thresholds due to blasting. Therefore, the analysis relies on the Caltrans (Transportation and Construction Vibration Guidance Manual) building damage threshold of 3.0 in/sec (PPV) at nearby sensitive receiver locations. Therefore, it is not appropriate to simply utilize the County's 0.01 in/sec. (RMS) standard for blasting activities.



- C-76 Refer to Response B-17 and C-68 regarding the selection of receiver locations consistent with FHWA and FTA guidance for noise analysis.
- C-77 EIR § 4.11.4 addresses noise thresholds for construction activities, including those that “[o]ccur at any time other than [between] the permitted hours of 6:00 a.m. and 6:00 p.m., during the months of June through September, and 7:00 a.m. and 6:00 p.m., during the months of October through May . . .” (see FEIR, p. 4.11-18). The EIR specifies a significance threshold during such nighttime hours of 45 dBA Leq at sensitive receivers. The Project’s construction noise impacts are discussed in detail in the EIR (at FEIR pp. 4.11-20 through 4.11-21), and in Table 4.11-10. Although noise-generating construction activities are not anticipated to occur at night, in the event that construction activities would occur at night such as concrete pouring as suggested by this comment, Mitigation Measure MM 4.11-2A has been added to the FEIR as a best practice to require that no construction activities shall occur within 600 feet of occupied sensitive receivers after 6:00 p.m. and before 6:00 a.m. during the months of June through September or before 7:00 a.m. during the months of October through May (Wolfe, 2017). According to the noise level data presented in the Noise Study and EIR Table 4.11-10, a separation of 600 feet combined with the temporary noise barrier required by Mitigation Measure MM 4.11-1 would ensure that nighttime noise levels do not exceed 45 dBA Leq at the noise-sensitive residential homes south of the Project site on Redwood Drive.
- C-78 It is not reasonably foreseeable that construction traffic would use residential streets south of the Project site. Refer to Response C-4 as well as the updated Mitigation Measure MM 4.15-4.
- C-79 The comment incorrectly states that the Noise Study (EIR Technical Appendix I) and EIR did not consider the existing ambient noise environment in the operational noise analysis. § 9.6.2 of the Noise Study specifically analyzes the Project’s operational noise level contributions to the daytime and nighttime existing ambient noise levels in the Project study area as measured by the noise experts at Urban Crossroads. Further, this analysis includes an evaluation of the cumulative development impacts without the Project on the existing ambient noise environment. The results of this analysis show that the Project operational noise level contributions will range from 0.0 to 0.6 dBA Leq at the noise-sensitive receiver locations and represent less-than-significant contributions to the existing ambient noise environment.
- C-80 Refer to Response B-17 regarding the selection of receiver locations. As previously indicated, the County of Riverside Municipal Code has no requirements in Chapter 9.52 Noise Regulation which require analysis at the property line, instead, § 9.52.050 on sound level measurements indicates that noise level measurements can be made “anywhere within the boundaries of an occupied property.” Further, if the EIR utilized the commenter’s position of analysis from “property line to property line,” the analysis would inaccurately inflate the potential noise impacts beyond what is reasonably related to the impacts caused by the Project, which does nothing to further the meaningful review and informed decision-making pursuant to CEQA.
- C-81 Refer to Response B-17 and C-80 regarding the selection of receiver locations discussion. The comment identifies a reference noise level of 97 to 112 decibels for truck back-up beepers but does not indicate at what reference distance or what noise level metric is being referenced. Upon further review of the commenter’s Wikipedia source article, the 97-112 decibel noise level is based on the



source at the link below which indicates that truck back-up beepers have “a typical volume of 97-112 decibels (dB) at the source”:

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3018517/#!po=4.54545>

Further, the comment does not appropriately compare their cited backup beeper reference noise level with the reference noise levels used in the Noise Study since these two noise levels are based on two different metrics for describing noise levels. The comment’s backup beeper noise level “at the source” represents a sound power level which is independent of time and atmospheric effects, often provided based on laboratory noise measurements for manufacturer specifications. A comparison, therefore, cannot be made without a one-to-one comparison of the reference noise levels using the same metric (e.g., Leq) at the same reference distance, or a comparison of sound power levels of each source. For the purpose of this response, the reference noise level used in the Noise Study of 67.2 dBA Leq at 30 feet equates to a sound power level (PWL) of approximately a 98 dBA. This is consistent with the range of sound power levels of backup beepers identified by the comment. Further, the operational reference noise levels used in the Noise Study represent all activities associated with the planned use of the Project, including idling trucks, delivery truck activities, parking, backup alarms, as well as loading and unloading of dry goods all operating simultaneously. In addition, the operational noise analysis assumes 24-hour operation of the Project with operational activities occurring simultaneously for all 60 minutes of each hour of operation. Impacts based on this worst-case approach to operational noise levels are shown in the Noise Study and reported in the EIR to be less than significant with mitigation during both daytime and nighttime hours.

- C-82 The installation of the sound barrier wall along the Building D Site’s southern boundary is calculated to provide 11 dBA of sound attenuation, and bring the Project’s noise levels to within the County’s ordinance requirements. Thus, any perceived inconsistency with General Plan Policy N6.3 would be mitigated due to this 11 dBA noise reduction. The EIR does not use consistency with the General Plan Policy N6.3 as a threshold of significance, however.
- C-83 EIR § 4.11 correctly states throughout the section that attenuation would be provided by the 8-foot high noise barrier proposed along the portions of the southern boundary of the Building D Site where truck courts and loading docks would be positioned nearest the southern boundary and the closest sensitive receiver to the site, R6 (see EIR Figure 4.11-3, Operational Noise Source Locations, for the location of the 8-foot noise barrier). Text on FEIR p. 4.11-21 has been revised to clarify that the 8-foot high noise barrier is only required along the portions of the southern boundary of the Building D Site.
- C-84 The exact positioning of the noise barrier will be determined by the Riverside County Building and Safety Department in conjunction with their review of final building plans for the Building D Site as indicated in EIR Table S-1. As indicated in Mitigation Measure MM 4.11-3, the barrier must be located along the southwestern and southeastern corners of the Building D Site, adjacent to the truck yard and parking areas. The locations of these 8-foot-high walls are shown on Exhibit 9-A of the Noise Study (EIR Technical Appendix I).



- C-85 Refer to Response C-4. The off-site traffic noise level analysis is based on the trip distribution found in the Traffic Impact Analysis, which shows that no Project-related traffic will travel on Decker Road south of the Project site.
- C-86 The comment fails to consider whether cumulative developments and ambient growth would cause off-site traffic-related noise levels to exceed the General Plan criteria without the Project. Further, the General Plan thresholds identified in the comment are for noise compatibility, and the off-site traffic noise level contours identified in the Noise Study (EIR Technical Appendix I) are unmitigated in that they do not account for any existing noise barriers or mitigation that is required for all noise-sensitive uses (prior to development) consistent with the General Plan criteria. The analysis in the Noise Study and EIR, therefore, takes into consideration whether or not the Project contribution is significant as it relates to the cumulative increase without the Project. Further, the FICON thresholds identified in the Noise Study are based on different conditions of the ambient environment (below 60 dBA CNEL, between 60 to 65 dBA CNEL, and above 65 dBA CNEL) in order to appropriately evaluate Project-related increases depending on “without Project” conditions. The off-site traffic noise analysis provided in the Noise Study and EIR shows that the Project’s contribution to the without-Project noise environment under Existing, Year 2017, and Horizon Year 2035 conditions is less than significant.
- C-87 Caltrans research shows that rubberized asphalt can provide potential noise attenuation of approximately 4 dBA. However, the effectiveness of reducing traffic noise levels through the application of rubberized asphalt is higher on roadways with low percentages of heavy trucks, because heavy truck engine and exhaust noise is not affected by rubberized alternative pavement. This is due to the truck height or the height at which truck engines and exhaust systems sit above the pavement. Therefore, the use of rubberized asphalt would not be effective at measurably reducing the Project’s traffic-related noise impact, which is caused by truck travel.

As stated in the EIR (at FEIR p. 4.11-33), the only way to reduce the near-term noise impacts along the Oleander Road segments west of Harvell Avenue and east of the Project’s Driveway #6 under Existing + Project and Year 2017 conditions, would be to surround the front yards of the existing parcels adjacent to the affected Oleander Road segments with a solid wall, which is not feasible because it would restrict access to these parcels. Furthermore, the noise levels along the affected segments of Oleander Road would not exceed 65 dBA CNEL during either the Existing + Project or the Year 2017 noise scenarios. The parcels adjacent to the affected Oleander Road segments currently occupied by non-conforming residential uses are designated by the Riverside County General Plan for “Business Park” land uses. Business Park land uses are not considered to be noise sensitive uses. Further, even if the parcels were to remain as non-conforming residential uses, by the Year 2035, the Project’s contribution of transportation-related noise along the impacted segments of Oleander Road would be reduced to less-than-significant levels, as ambient traffic volumes increase along the roadway and the Project’s overall percentage of the noise levels would diminish.

- C-88 As described in EIR § 3.0, Project Description, the proposed Project accommodates a trail easement along Ellsworth Street and a trail easement along Oleander Avenue to comply with Riverside County’s Mead Valley Area Plan Trails and Bikeway System Plan, depicted at EIR Figure 4.14-2



(FEIR p. 4.14-3). The Project does not propose any driveway connections to Ellsworth Street and Project truck traffic would not use Ellsworth Street as discussed in Response C-4; thus, there would be no potential safety concerns with the County's plan to establish a community trail along Ellsworth Street. Regarding the trail easement on Oleander Avenue, the trail will be required to comply with Riverside County specifications to ensure public safety. The County's General Plan Circulation Element includes several policies that the County will comply with when the trail is installed. The Project is not installing the trail; it is only required to provide an easement to the County for the future trail. Specifically, Chapter 4, Section C 16.7 (p. C-46) of the General Plan requires the following, which will be implemented by Riverside County at the time it installs the trail: "[a]ll trails along roadways shall be appropriately signed to identify safety hazards, and shall incorporate equestrian crossing signals, mileage markers, and other safety features, as appropriate."

- C-89 EIR § 4.3 and the Air Quality Study (EIR Technical Appendix B-1) evaluate criteria pollutant impacts to nearby sensitive receptors associated with Project operations. Any health risks to periodic users of recreational trails and recreational areas would be less than or equal to the long-term exposures identified for the nearest sensitive receptors for operational activity at FEIR pp. 4.3-29 to 4.3-31. Thus, potential impacts to trail users from diesel particulate matter sources would be less than significant. Risks associated with diesel particulate matter exposure is based on long-term averaging times and exposure durations (FEIR pp. 4.3-23, "Methodology for Calculating Project Operational Emissions, (3) Diesel Particulate Emissions"). Short-term exposures at a trail or recreational area would be less than the impacts identified for long-term exposures at the nearest residential land uses and therefore less than significant.
- C-90 Refer to Response C-4 which explains that Project-related trucks will not use Ellsworth Street/Decker Road. Riverside County is requiring the Project Applicant to allow for trail easements along Ellsworth Street and Oleander Road to enable Riverside County to construct the County's trail system, as shown in its Mead Valley Area Plan, Trails and Bikeway System exhibit, depicted at EIR Figure 4.14-2 (FEIR p. 4.14-3). The EIR does not identify any Project-related significant impacts to potential users of the trail system, so mitigation is not required nor appropriate.
- C-91 The Existing plus Project traffic volume should be 5,034 and was input correctly in the Freeway Segment Analysis. There was a typo in Table 4.15-5 which has been corrected in the FEIR. There are no changes to results of the analysis or impact conclusions.
- C-92 Refer to Response C-4. Ellsworth Street/Decker Road is maintained by the County of Riverside and the Project's developer does not have authority to restrict access to a public roadway. However, as indicated in Response C-4, as best practice measures, Mitigation Measure MM 4.15-4 has been added to the FEIR to require the developer or successor in interest to install durable, legible, weather-proof signs at exit driveways that prohibit trucks from heading south on Decker Road/Ellsworth Street, and Mitigation Measure MM 4.15-5 has been added to the FEIR to require information to be provided in building user leases indicating that building users shall designate truck routing away from southbound Decker Road/Ellsworth Street and away from residential neighborhoods.



- C-93 As previously stated in Response C-85, the off-site traffic noise level analysis is based on the trip distribution found in the Traffic Impact Analysis which shows that no Project traffic will travel on Decker Road south of the Project site.
- C-94 Refer to Response C-4. For the reasons stated in that response, the trip distribution used in the traffic analysis is reasonable and is based on substantial evidence. As such, an evaluation of Cajalco Road is not required because there is no evidence that Cajalco Road would carry more than 50 peak hour trips generated by the Project. Cajalco Road west of I-215 is currently a two-lane road with no passing lanes and cross-traffic, which are characteristics that deter truck traffic. The County is planning a Cajalco Road widening project to widen the road from two lanes to four lanes between Temescal Canyon Road to the west and I-215 to the east, but that project is not yet approved and does not yet have its permits and environmental clearances. According to an information pamphlet published by the County Transportation Department in July 2017, should the project be approved and funded, construction would not begin until after year 2022, which is well beyond the opening year of the proposed Project. The CEQA compliance document prepared for the Cajalco Road project would be required to study any reasonably foreseeable transportation pattern changes associated with widening of the road.
- C-95 Refer to Response C-4. As stated in that response, if drivers traveling to or from the Project site sought out alternative routes to avoid congestion on the regional freeway network, nearly every driver traveling to or from the Project site at the same time would need to enter or exit the freeway in the same location and take the same alternate route to cause a significant impact (more than 50 peak hour trips) at any local road intersection or State highway facility. The chance of this occurring is very remote and out of the rule of reason. In reality, if any driver(s) were to pursue a cut-through route, the act of doing so would dissipate the Project's traffic volumes at other locations, thereby dispersing peak hour volumes and lessening the Project's proportional impact at intersections in the Project's study area.
- C-96 Truck stacking that was occurring on Harvill Avenue was not due to roadway design or the proposed Project; it was due to the operational characteristics of another existing building. As a result of this comment, that building's property management team was contacted in July 2017 and asked to rectify the stacking issue so that the stacking of trucks on Harvill Avenue does not occur. To the County's knowledge, the stacking issue has been resolved as the result of this notification. Photographs are included in the County's administrative record dated August 15, 2017, September 12, 2017, and February 2, 2018, which show that the stacking issue was no longer occurring on Harvill Avenue (TCC, 2017a-i). The proposed Building D and Building E Plot Plans are designed such that trucks accessing the buildings have sufficient room to stack on the site in front of the check-in gates and will not stack onto Oleander Avenue or Harvill Avenue. The Citrus Hills High School is located at the intersections of Markham Street and Wood Road. As detailed in the Traffic Impact Study (EIR Technical Appendix J1), the Project would not contribute substantial trips to this location that would create any hazard impacts to school drop-off and commuter traffic to Citrus Hills High School.
- C-97 Refer to Response C-3. Under CEQA, impermissible deferral can occur when an EIR calls for mitigation measures to be created based on future studies or describes mitigation measures in



general terms but the agency fails to commit itself to specific performance standards. In the case of the proposed Project, Mitigation Measure MM 4.17-1 was created based on two separate site-specific paleontological resources studies (refer to EIR Technical Appendices D3 and D4) and the preparation of separate technical studies does not constitute piecemealing. Additionally, Mitigation Measure MM 4.17-1 commits the Applicant to preparing a Paleontological Resource Impact Mitigation Program (PRIMP) that must be reviewed and approved by the County of Riverside prior to the issuance of a grading permit for the Building D Site. The measure further specifies measures to be included in the report, specifically by requiring monitoring by a qualified paleontologist; implementation of protocols as directed by the Project's qualified paleontologist; and proper identification and treatment of any resources such that no paleontological resources, site, or unique geologic feature is destroyed. Thus, the County finds that Mitigation Measure MM 4.17-1 does not constitute impermissible deferral under CEQA, but rather provides a performance-based mitigation requirement that would be implemented prior to issuance of grading permits and during grading activities in the northeast portion of the Building D Site. No revision to the DEIR is warranted pursuant to this comment.

- C-98 Refer to Response C-30. As explained in that response, the primary environmental benefit of using solar-generated energy is reduced fossil fuel usage. In the case of the proposed Project, however, the Project's primary use of fossil fuels is for fueling vehicles traveling to and from the site, and not for powering the buildings with electricity. A detailed Energy Analysis Report is included as Technical Appendix L to the EIR, which concludes that the proposed Project would not result in the wasteful use of energy. In addition, construction of the Project is required to comply with the California Green Building Standards Code (CALGreen), which was developed to (1) reduce greenhouse gas emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the environmental directives of the State administration (California Building Standards Commission, 2016, p. viii, available at:

<https://www.documents.dgs.ca.gov/bsc/CALGreen/CALGreen-Guide-2016-FINAL.pdf>).

Regardless, because the primary source of the Project's air pollutant emissions from fossil fuel use is NO_x emissions resulting from vehicle exhaust, the addition of solar arrays to the building roofs will do very little to reduce the Project's air pollutant impacts. Refer to Response B-14, which explains how compliance with State laws and in particular the Truck and Bus Regulation adopted by CARB in 2008, is resulting in measurable air pollutant emission reductions for warehouse projects like the proposed Project for which the primary source of air pollutant emissions is on-road vehicles. For these reasons, there is no proportional nexus between the Project's impacts and the suggestion to add solar panels above 1KW. No revision to the DEIR is warranted pursuant to this comment.

- C-99 As clearly described in EIR § 6.1.2: "For analysis purposes, the areas designated 'Community Development-Light Industrial (CD-LI)' under existing conditions are assumed to be developed with one 558,000 s.f. general warehouse building with surface parking lot on approximately 1,224,171 s.f. of building area (28.1 acres) for a FAR of 0.46. The areas designated 'Community Development-Business Park (CD-BP)' are assumed to be developed with four buildings comprised



of approximately 550,000 s.f. of building area and surface parking lots on approximately 1,353,275 s.f. of building area (31.0 acres) to house employee intensive uses such as allowed by the ‘Community Development-Business Park (CD-BP)’ land use designation for a FAR of 0.41.”

Nowhere in this description does it indicate that the “No Project/Existing General Plan Designation Alternative” assumes “development would occur as similar general warehouse and industrial park.” In fact, the description clearly indicates that a general warehouse building would be constructed in the CD-LI areas, while “employee intensive uses” consistent with the CD-BP land use designation are assumed for the western portions of the site that are proposed by the Project for development with high-cube warehouse uses. For example, the analysis of the No Project/Existing General Plan Designation Alternative identifies increases in traffic-related impacts, including vehicular-related air quality impacts, GHG impacts, and noise impacts, due to the fact that CD-BP land uses are associated with higher amounts of traffic; refer to Response B-8 for additional analytical detail. Accordingly, no revisions to the EIR are warranted pursuant to this comment.

C-100 Refer to Response C-99.

C-101 This comment does not identify any potential impacts to the environment that may result from a reduction in the estimated number of employees. The calculation of the number of jobs is based on the Riverside County General Plan, Appendix E, Table ES-5; thus, the estimated number of jobs is consistent with the County General Plan. There are no identified users for the Project’s proposed buildings and the calculation of jobs is based on a reasonable assumption per the County’s General Plan. No revision to the DEIR is warranted pursuant to this comment.

C-102 Refer above to Responses C-1 through C-101. For the reasons discussed in those responses, the County finds that none of the comments or revisions made in the FEIR meet the conditions listed in CEQA Guidelines § 15088.5(a). Specifically, there are no new significant impacts identified as a result of public comments or revisions to the DEIR. Additionally, the comments and associated revisions made in the FEIR do not result in the identification of an increase in the severity of any environmental effect that was disclosed in the DEIR. Comments on the DEIR did not identify any feasible Project alternatives or mitigation measures considerably different from others analyzed in the DEIR that would clearly lessen the environmental effects of the proposed Project. Furthermore, the County finds that the DEIR was fundamentally and basically adequate, was not conclusory in nature, and that meaningful public review and comment was not precluded. Accordingly, recirculation of the DEIR for an additional public review period is not required under the CEQA Statutes or Guidelines. No further response is needed.

C-103 The County acknowledges and appreciates the commenter’s comments on the DEIR, and these comments will become part of the administrative record for the proposed Project.

C-104 References cited in this comment letter are acknowledged; no response is necessary.

Lozeau Drury- Letter D

D-1 The Project’s description contained in this comment has some inaccuracies. As disclosed in the EIR (at FEIR page 3-1), the Project site is approximately 58.6 gross acres. The Building D Site,



located south of Oleander Avenue and east of Ellsworth Street (also referred to as “Decker Road” throughout the EIR), would contain one business park warehouse building with a maximum of 702,645 s.f. of building space. The Building E Site located south of Oleander Avenue and west of Ellsworth Street, would contain one business park warehouse building with a maximum of 410,982 s.f. of building space. As disclosed in the EIR (at FEIR p.3-33), the EIR assumes that the proposed Project would be constructed in one phase over the course of approximately 23 months.

- D-2 There were no comments made in this letter or in other letters commenting on the DEIR that necessitates recirculation of the DEIR in compliance with CEQA. This comment provides no basis to find that that the DEIR fails to comply with CEQA or fails to include the required content of an EIR. The County finds that the DEIR was fundamentally and basically adequate, was not conclusory in nature, and that meaningful public review and comment was not precluded. Accordingly, recirculation of the DEIR for an additional public review period is not required under the CEQA Statutes or Guidelines. The County has added LiUNA to the notification list for this Project.

Rural Association of Mead Valley- Letter E

- E-1 The County acknowledges the Rural Association of Mead Valley’s (RAMV.org) opposition to the proposed Project.
- E-2 The County acknowledges the Rural Association of Mead Valley’s (RAMV.org) preference for no development on the Project site or for development under the No Project Alternative, as described in EIR § 6.0, Alternatives.
- E-3 As summarized in EIR Table 6-1, pursuant to the Institute of Traffic Engineers (ITE) Trip Generation Manual (9th edition), high-cube warehouse uses (as proposed by the Project) generate less traffic per square foot of building space than do business park uses. For clarity and comparison purposes, the traffic generation for the No Project/ Existing General Plan Alternative has been precisely calculated by Urban Crossroads and revised in EIR § 6.0, Alternatives, under Subsection 6.3.2, No Project/Existing General Plan Designation Alternative. For the areas designed CD-BP by the General Plan, a general light industrial trip rate was applied because it is less traffic intensive than a traditional business park/office use, and light industrial is a land use allowed under the CD-BP designation. The resultant trips would be 5,847 ADT, which is 3,732 more ADT than would be generated by the proposed Project. In addition, the air quality emissions that would occur if the Project site were to be developed under its existing General Plan land use designations have been calculated by Urban Crossroads, Inc., and the discussion has been added to FEIR § 6.0, Alternatives, under Subsection 6.3.2, No Project/Existing General Plan Designation Alternative. All other environmental effects would be similar regardless as to whether the site is developed with a mixture of Business Park (CD-BP) and Light Industrial (CD-LI) uses or is developed as proposed by the Project with all CD-LI land uses.

Exhibits that show the physical relationship/buffer from the Project’s proposed on-site buildings and other physical features to off-site Redwood Drive to the south have been added to the County’s administrative record and are shown herein following Response E-91.



Cross-sections for the southern boundary of the Building D Site are shown on Page FEIR-216. Building D is designed such that all truck courts and loading docks would occur on the east and west sides of the building. No loading bays would face south toward off-site residentially-zoned properties. As shown by the cross-sections presented Page FEIR-216, Building D would be set back 70 feet from the southern property boundary, and within the 70 feet would be a 36-foot-wide drive aisle adjacent to the building and a 34-foot-wide landscaped area adjacent to the south property boundary. A 14-foot-high sound attenuation wall would be positioned between the drive aisle and the landscaped area. As noted by Mitigation Measure MM 4.11-3, only an 8-foot-high wall is necessary to attenuate operational noise to below a level of significance, so the higher wall is a design feature that would reduce noise to an even greater extent than required. The landscaped area would be densely planted with trees, shrubs, and ground cover per the Building D Site's conceptual landscaping plan (see EIR Figure 3-10), and have an undulating slope. To the south of the Building D Site, existing habitable structures are located at least approximately 150 feet south of the property line.

Cross-sections for the southern boundary of the Building E Site are shown on Page FEIR-217. Building E is designed such that all truck courts and loading docks would occur on the east side of the building. No loading bays would face south or west toward off-site residentially-zoned properties. As shown by the cross-sections presented Page FEIR-217, Building E would be set back 68 feet from the southern property boundary, and within the 68 feet would be a 38-foot-wide drive aisle adjacent to the building and a 30-foot-wide landscaped area adjacent to the south property boundary. An 8-foot high metal fence would be positioned between the drive aisle and the landscaped area. According to the Building D Site Noise Study (EIR Technical Appendix I), noise attenuation is not needed in this area. The landscaped area would be densely planted with trees, shrubs, and ground cover per the Building E Site's conceptual landscaping plan (see EIR Figure 3-17), and have an undulating slope. The landscaped area would be sloped toward Building E Site at the western property boundary and level out to a flat condition at the southeastern corner of the site at Ellsworth Street (Decker Road). To the south of the Building E Site is a 34-foot-wide EMWD private access road that services an existing water tank, with existing habitable structures located at least approximately 500 feet south of the property line.

- E -4 These excerpts from the County's General Plan are acknowledged. Refer to EIR Technical Appendix M, General Plan Consistency Analysis for Knox Business Park Buildings D and E.
- E -5 These land use designation descriptions from the County's General Plan are acknowledged. It is unclear as to how they relate, however, to the proposed Project or to any physical environmental impacts caused by the Project. No further response is necessary.
- E -6 The comment correctly summarizes information from the project description as included in EIR § 3.0, Project Description.
- E -7 Health and safety concerns are addressed throughout the EIR. This comment provides no basis to conclude that the EIR is flawed.
- E -8 Refer to Response C-96.



- E-9 The EIR clearly states that the future building occupants (plural, emphasis added) and users (plural, emphasis added) that would occupy the Building D Site and the Building E Site are not known at this time. Even if a reader of the EIR was under the misconception that there could be only one building user, the analysis presented in the EIR is based on the anticipated operating characteristics of the building in terms of hours of operation and traffic and employment generation, regardless if the buildings were occupied by user or several users. As discussed in EIR § 4.15, vehicle trip generation represents the amount of traffic that is both attracted to and produced by a development project. The vehicle trip generation rates utilized to calculate the amount of traffic that would be generated by the proposed Project are based on the land use type and the size of the building, not the number of building occupants. Due to the size and proposed use of Buildings D and E, both buildings are evaluated as high cube warehouses (ITE Land Use Code 152). Operational impacts for transportation, air quality, greenhouse gas, and noise are all based in part on the number of vehicle trips generated by the proposed project and not by the number of tenants. The number of tenants has no bearing on the number of trips generated by the proposed Project. No revision to the DEIR is warranted pursuant to this comment.
- E-10 Pursuant to CEQA Guidelines § 15125(a), “[a]n EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced...” The Notice of Preparation (NOP) for the proposed Project was released for public review on August 31, 2015; thus, for purposes of analysis within the EIR, impacts of the proposed Project must be evaluated against the physical environmental conditions that existed as of August 2015. The traffic counts for the proposed Project were collected in April 2015, and the County finds that the existing traffic volumes and list of cumulative projects used in the Traffic Impact Analysis (TIA, EIR Technical Appendix J1) reflect the physical environmental conditions that existed at the time the NOP was circulated for public review. The 2017 supplemental analysis to the Traffic Study was prepared to consider the Applicant’s proposed reduction in the size of the Building E Site and the size of the proposed building on the Building E Site (as stated at FEIR p. 1-6 generally). The EIR (at FEIR p. 4.15-1) describes the purpose of the 2017 supplement. Because the Applicant is proposing a smaller Building E Site with a smaller building that would generate less traffic than the larger building studied in the 2015 Traffic Study, the supplemental analysis confirmed that the currently proposed, smaller Building E would not generate any additional or more severe traffic impacts than are disclosed in the 2015 Traffic Study. Refer to Response C-96 regarding the truck stacking that occurs under existing conditions on Harvill Avenue.
- E -11 Oleander Avenue will be constructed as an Industrial Collector (78-foot right-of-way) consistent with County of Riverside standards. The standard cross-sections for an Industrial Collector along the Project’s frontage consists of a half width of 22-foot wide pavement with a 12-foot wide painted median to provide adequate separation between opposing traffic. Due to the typical wide turning radius of large trucks, a truck turning template was overlaid on the Project’s proposed design at each applicable Project driveway anticipated to be utilized by heavy trucks in order to determine appropriate curb radii and to verify that trucks will have sufficient space to execute turning maneuvers. Exhibit 1-4 of the Traffic Study (EIR Technical Appendix J1) illustrates that Project driveways would provide adequate curb radius on the southeast corner of each Project driveway to



accommodate the ingress and egress of WB-67 trucks (interstate semi-trailers) or smaller. Refer to C-96 for a discussion of truck stacking.

- E -12 Comment noted.
- E -13 Refer to Response C-4. Mitigation Measure MM 4.15-4 has been added to the FEIR to require the developer to install durable, legible, weather-proof signs at exit driveways that prohibit trucks from heading south of Decker Road/Ellsworth Street, and Mitigation Measure MM 4.15-5 has been added to the FEIR to require information to be provided in buildings user leases indicating that building users shall designate truck routing away from residential neighborhoods.
- E -14 Refer to Response E-10. Notwithstanding, if existing traffic counts were updated to Year 2017, then the Project’s mitigation obligation would likely be reduced because as more background traffic is accounted for within the Project’s study area, the Project’s percentage of total traffic would be reduced, thereby also reducing the fair-share payments required by Mitigation Measures MM 4.15-1 through MM 4.15-3. Accordingly, the County finds that updated traffic counts are not required for the proposed Project because they would not represent the physical environmental conditions as they existed at the time the environmental baseline for the EIR’s analysis was set, in August 2015, as explained in Response E-10. No revisions to the Traffic Study or DEIR are warranted pursuant to this comment.
- E -15 Refer to Response C-4 and C-96.
- E -16 Refer to Response E-11.
- E -17 Refer to Responses C-96 and E-9.
- E -18 Refer to Response C-3. This comment incorrectly characterizes the meaning of “piecemealing” or “segmentation” under CEQA. Under CEQA, piecemealing or segmentation of a project occurs when it is broken into smaller pieces to avoid disclosure of the environmental effects of the project as a whole. In the case of the proposed Project, although Buildings D and E have independent utility in that either building could be developed separately and independently from the other and construction of one building is not a foreseeable consequence of constructing the other, the Building D Site and Building E Site are adjacent sites proposed for development by the same Project Applicant. Thus, in order to avoid claims of piecemealing or segmentation, the EIR evaluates both Building D and Building E as a single project, as this reflects the “whole of the action” sought by the Project Applicant. No revision to the DEIR is warranted pursuant to this comment.
- E -19 Refer to the Response E-18. The County finds that the EIR accounts for all activities and facilities necessary for operation of the Project, including activities needed to achieve the Project’s objectives. The EIR also accounts for all reasonably foreseeable consequences of Project approval throughout the analysis of potential environmental effects. As indicated in EIR § 3.9 and Table 3-2, the EIR also accounts for all components of the Project that would require review or approval by responsible and trustee agencies. All phases of the Project have been evaluated in the EIR – including the construction and operation of Buildings D and E – and there are no other phases of the Project that are a reasonably foreseeable consequence of the proposed Project that would require



additional review under CEQA. Aside from the commenter's incorrect interpretation of "piecemealing" and "segmentation" under CEQA (refer to Response E-18), this comment does not identify any components of the proposed Project that have not been addressed or accounted for by the EIR. Accordingly, no revision to the DEIR is warranted pursuant to this comment.

- E -20 The comment regarding future Trammell Crow phases for warehouses within the Knox Business Park is unclear. At the time of the NOP issuance for the EIR (August 2015) (and currently), there are no applications for future Trammell Crow phases for warehouses within the Knox Business Park. The cumulative impacts analysis contained within the EIR evaluates cumulative traffic and vehicular-related air quality, greenhouse gas, and noise impacts using the list approach authorized in the CEQA Guidelines, §15130. The EIR evaluates 103 other past, present, and reasonably foreseeable projects within the study area. See EIR § 4.0.2, Figure 4.0-1, and Table 4.0-1. Other cumulative environmental impacts are evaluated using the summary of projections approach. See EIR § 4.0.2. Therefore, the EIR provides a substantial evaluation of all direct indirect, and cumulative impacts that may be caused by the proposed Project, which is all that is required under CEQA.

The remainder of this comment asserts legal principles that apply to the concept of segmentation under CEQA generally, and does not comment on environmental issues in the EIR directly. Accordingly, as the proposed Project provided an appropriate evaluation of the Project under CEQA and no piecemealing or segmenting of the Project has occurred, no further response is required. See CEQA Guidelines, §15088(a). The commenter's legal conclusions are noted, although this response does not agree or disagree with those legal conclusions.

- E -21 There is no evidence in this comment letter or in the administrative record for the Project demonstrating that the development of the Project site with high-cube warehouse land uses would result in changes to the General Plan land use designations of properties to the west and northwest of the Project site from "Community Development – Business Park (CD-BP)" to "Community Development – Light Industrial (CD-LI)." Furthermore, applications for non-foundation component GPAs within the County are not unprecedented, and are in fact fairly common with larger development sites. In the event property owners to the west and northwest do seek GPAs, there is no evidence to suggest that such applications would be induced by the proposed Project. Development proposals for these off-site properties are not a reasonably foreseeable consequence of the proposed Project, nor would future GPAs for these properties be a reasonably foreseeable consequence of the Project. Accordingly, no revision to the DEIR is warranted pursuant to this comment.
- E -22 The comment does not identify any specific inaccuracies or discrepancies in the project description, and the County is not aware of any, except as addressed in this response. The Project description is neither inaccurate, inconsistent, nor unstable and provides sufficient detail regarding the Project for meaningful public review and informed decision-making. Simply citing to a case that found an EIR insufficient does not mean the proposed Project's description or analysis is inaccurate or insufficient. The Project Description is consistently applied throughout the EIR. For clarification to what this comment alludes to, it is acknowledged that the proposed Project evaluated in the EIR consists of a smaller-sized Building E Site and smaller proposed building on the Building E Site



than was originally proposed by the Applicant, and some of the technical reports that support the EIR discuss the originally-proposed, larger Building E Site. In every case, the technical reports supporting the EIR were analyzed for applicability to the currently proposed Building E Site, and in several cases supplemental analyses was conducted to confirm that the currently proposed Project would not result in any new or more severe impacts than were determined in the technical studies originally prepared for the larger Building E Site. Those supplements are contained as part of Technical Appendices B1, B2, E4, and J1. With regard to the approval by the ALUC, Refer to Response C-9.

- E -23 This Mead Valley Area Plan policy is noted. This EIR was prepared for the proposed project in compliance with CEQA, including impacts to air quality, traffic, and noise.
- E -24 The County acknowledges the comment. Air quality, including the health risk assessment of diesel particulates, and impacts, including cumulative impacts to sensitive receivers are disclosed in EIR § 4.3, Air Quality and § 4.7, Greenhouse Gas Emissions. Truck traffic and noise impacts, including cumulative impacts, is disclosed in EIR § 4.11, Noise. Traffic impacts, including cumulative impacts are disclosed in EIR § 4.15, Transportation. This comment provides no basis for the assertion that these analyses are inadequate. Refer to Response C-4, which explains that it is not reasonably foreseeable that Project-related truck traffic would use Ellsworth Street/Decker Road.
- E -25 Refer to Responses C-62 and C-63. Also, refer to Response C-83, C-96, and E-3 regarding project design in relation to adjacent land uses. There is no preferred analysis to suggest that the proposed mitigation will be ineffective for their intended purposes, Regardless, where significant impacts cannot be mitigated to less than significant, the EIR acknowledges those impacts and a statement of overriding considerations would be required pursuant to CEQA should the Project be approved at a later date.
- E -26 The comments are acknowledged describing the County's General Plan and state requirements that require zoning designations to be consistent with the General Plan. No further response is necessary. The comment is acknowledged citing the Riverside County General Plan Vision Statement; no response is necessary.
- E-27 Comment acknowledged.
- E -28 EIR Air Quality Threshold d, EIR § 4.3, discloses the potential for the Project to expose sensitive receptors which are located within 1.0 mile of the Project site to health effects and concludes based on substantial evidence that the impacts would be less than significant. Also refer to Responses C-62 and C-63.
- E -29 The EIR and Technical Appendices B1, B2, I, and J1 evaluate the proposed Project's construction and operational activity (including exhaust, road dust, break wear, tire wear, etc.). The health standards (ambient air quality standards and risk profiles) used in the EIR § 4.3 are health-protective in nature and were developed specifically by the California Air Resources Board to protect children, the elderly, and people with respiratory illness. The EIR finds a less than significant impact with respect to sensitive receptors (at FEIR pp. 4.3-29 to 4.3-31) based on substantial evidence, as such



no additional mitigation buffer is necessary or required. Refer to Response C-4 for discussion of the use of Harvill Avenue.

E -30 Refer to Responses C-62, C-63, E-23, and E-29. Note that for the proposed Project, an EIR was prepared that assessed in detail air quality, health risks associated with diesel particulate, impacts to sensitive receptors, truck traffic, noise, and cumulative impacts of other reasonably foreseeable future projects including foreseeable warehouse developments – all of which is required under CEQA.

E-31 Refer to Responses C-62, C-63, C-66, E-23, and E-29. The WRCOG’s and SCAQMD’s recommended buffer of 300 meters (1,000 feet), which is based on the CARB Land Use Handbook (“Handbook,” April 2005), acknowledges that the 1,000-foot buffer distance is an advisory, only, recommendation. To determine the actual risk near a particular facility, CARB recommends that additional analysis be conducted. For the proposed Project, additional analysis was conducted and contained in EIR Technical Appendix B2, Mobile Source Health Risk Assessment (HRA). The Handbook further states that “these recommendations [for a 300-meter buffer] are designed to fill a gap where information about existing facilities may not be readily available and are not designed to substitute for more specific information if it exists.”

The EIR and its technical studies – which includes an air quality impact analysis and a HRA - are explicitly consistent with the CARB Handbook. The EIR includes a site-specific health risk assessment based on the geospatial location of the proposed Project and existing sensitive land uses in the vicinity of the Project site and the truck travel routes that are expected to be utilized. As disclosed in the EIR, the Project would not pose a significant health risk associated with diesel particulate matter (DPM) to sensitive receptors in the surrounding area (refer to EIR § 4.3, Air Quality). Therefore, a wider buffer is not necessary to alleviate any significant and unavoidable impacts of the Project.

E-32 Refer to Responses C-26, C-37, C-40, C-70, C-72, C-74, and C-75. EIR §4.11 provides the Riverside County condition of approval for blasting activities at the Project site which includes the requirement that property owners within at least 200 feet of the blast site shall be notified on the construction site at least 24 hours before the occurrence of major construction-related noise and vibration impacts (such as grading and rock blasting) which may affect them.

E-33 Refer to Response C-92, C-96, E-9, and E-11.

E-34 Vehicle trips generated by the proposed Project have been calculated based on rates provided for High Cube Warehouse in Institute of Transportation Engineers (ITE) Trip Generation Manual (9th Edition), as detailed in EIR Technical Appendix J1. The studies conducted by ITE included both single and multiple tenant uses. Even during the peak period, fewer than 20 heavy trucks would enter the site (for both buildings) per hour. There are more than adequate stacking distances and on-site facilities to accommodate the trucks to avoid any truck stacking or blockage on the public roadway.

E-35 Refer to Responses C-4 and C-96. It is not reasonably foreseeable that Project-related trucks would use Markham Street and local roads. All Project driveways are designed to connect to Oleander



Avenue and signs will be posted at the Project's exit driveways stating that truck traffic shall not travel south on Ellsworth Street (Decker Road). From Oleander Avenue, Harvill Avenue and Harley Knox Boulevard provide the shortest and most direct route to access the I-215 Freeway. Further, it is not practical for Project traffic to travel south on Ellsworth Street (Decker Road) to Markham Street to access I-215 because Ellsworth Street (Decker Road) is unpaved south of the southern boundary of the Project site, and generally very undesirable for attracting passenger car and truck traffic. Although there are no truck routes defined within unincorporated Riverside County, Harley Knox Boulevard east of I-215 is designated as a truck route on the City of Perris truck route map and Harley Knox Boulevard and Harvill Avenue within the County are designed to accommodate truck traffic. It is not efficient for trucks to travel south on Ellsworth Street (Decker Road) for twice the distance on unpaved and rural roads instead of taking the more direct route with traffic signals to access I-215.

- E-36 Refer to Responses C-4 and C-85. The commenter's assertion that Project traffic would utilize low capacity residential streets rather than shorter and direct route to the I-215 Freeway is incorrect and not reasonably foreseeable. As documented throughout the EIR and in the project's traffic impact analysis, the Project is proposed to have access on Oleander Avenue via Driveways 1 through 6. All Project access points are assumed to have full access. Driveways 1 and 4 are proposed for truck access only, Driveways 2 and 5 are proposed for passenger car access only, and Driveways 3 and 6 are proposed to allow access for both trucks and passenger cars.
- E-37 Refer to Responses C-4 and C-85. The commenter's assertion that Project traffic would utilize low capacity residential streets rather than shorter and direct route to the I-215 Freeway is incorrect and not reasonably foreseeable.
- E-38 Refer to Responses C-4 and C-85. The commenter's assertion that Project traffic would utilize low capacity residential streets rather than shorter and direct route to the I-215 Freeway is incorrect and not reasonably foreseeable. Note it is unclear as to what he provided photos are meant to represent as they do not address any of the EIR's provided analysis or represent any potential physical environmental impacts. No further response is necessary.
- E-39 Refer to Responses C-4 and C-85. The commenter's assertion that Project traffic would utilize low capacity residential streets rather than shorter and direct route to the I-215 Freeway is incorrect and not reasonably foreseeable. Note it is unclear as to what he provided photos are meant to represent as they do not address any of the EIR's provided analysis or represent any potential physical environmental impacts. No further response is necessary.
- E-40 Refer to Responses C-4 and C-85. The commenter's assertion that Project traffic would utilize low capacity residential streets rather than shorter and direct route to the I-215 Freeway is incorrect and not reasonably foreseeable. Note it is unclear as to what he provided photos are meant to represent as they do not address any of the EIR's provided analysis or represent any potential physical environmental impacts. No further response is necessary.
- E-41 A traffic signal warrant has been evaluated for the intersection of Decker Road and Oleander Avenue in the Traffic Study (EIR Technical Appendix J1). The intersection does not meet signal



warrants for near-term conditions, but will meet signal warrants for Horizon Year conditions both without and with Project-related traffic (See Technical Appendix J1 § 8.5 Traffic Signal Warrant Analysis). The Project will be required to pay its fair-share towards the installation of traffic signal to mitigate its contribution to the cumulative impact as specified in Mitigation Measure MM 4.15-1. The cumulative analysis includes traffic from future projects in the vicinity and completion of Oleander Avenue to full width. The Project will not contribute significant trips to Decker Road at Markham Street, Markham Street at Day Street or Cajalco Road at Day Street as explained in Response C-4.

- E-42 Refer to Responses C-4 and C-92. There is no evidence in the record that significant numbers of trucks will utilize less direct transportation routes than what was evaluated in the EIR.
- E-43 The EIR § 4.3 and technical Health Risk Assessment (EIR Technical Appendix B2) identify the maximum impact to any school in the vicinity of the Project site (which are nearest to the idling sources on-site which have the greatest exposure potential). The analysis concludes that impacts would be less than significant based on substantial evidence. Any impacts to other schools in the vicinity of the Project (further away from on-site idling sources) would be less than what has already been disclosed in the EIR and therefore impacts - despite the lack of evidence that significant numbers of trucks would utilize Cajalco – would continue to remain less than significant.
- E-44 Refer to Response C-31(6). As stated in the list of regulatory requirements at FEIR p. 4.3-36, diesel-fueled vehicles at the Project site are required to comply with the California Air Resources Board (CARB) idling restriction requirements, which currently restrict vehicles from idling for more than 5 minutes. As a best practice measure and in an effort to further reduce idling, Mitigation Measure MM 4.3-2A has been added to the FEIR that requires signs to be posted on the site during construction activities that instruct operators to turn off equipment when not in use and limit idling to 3 minutes. Comparatively, the analysis presented in the EIR assumes that trucks would idle for 15 minutes (at FEIR p. 4.3-22), which results in a substantial overstatement of impacts in the EIR. Refer to Response C-96 regarding the stacking of trucks on Harvill Avenue as a result of other developments, which is no longer occurring. The proposed Building D and Building E Plot Plans are designed such that trucks accessing the buildings have sufficient room to stack on the site in front of the check-in gates and will not stack onto Oleander Avenue or Harvill Avenue.
- E-45 Refer to Responses E-9 and E-34.
- E-46 In addition to the Project’s potential impacts to freeway mainlines, ramp junctions and off-ramps at the I-215 Freeway and Harley Knox Boulevard interchange evaluated in Technical Appendix J1, an expanded analysis of Project’s contribution to cumulative impacts to wider regional Freeway network was included in “Knox Business Park Supplemental Basic Freeway Segment Analysis” (dated June 8, 2015), which is included as Technical Appendix J2 to the EIR (Urban Crossroads, 2015b). A total of 24 freeway mainline segments were assessed for the following scenarios:
- Existing (2015) Conditions
 - Existing plus Project Conditions (E+P)



- Existing plus Ambient Growth plus Project (2017) Conditions (EAP)
- Existing plus Ambient Growth plus Project plus Cumulative (2017) Conditions (EAPC)
- Horizon Year (2035) Without Project Conditions
- Horizon Year (2035) With Project Conditions

It is disclosed in the analysis that no segments of the SR-91 Freeway west of the I-215 Freeway, I-215 Freeway north of the SR-60/SR-91 Freeways, SR-60 Freeway east of the I-215 Freeway, or the I-215 Freeway south of Ramona Expressway are anticipated to receive 50 or more peak hour trips from the Project. Additionally, the proposed Project is calculated to result in a less-than-significant traffic impacts on the SR-60/I-215 Freeway and I-215 Freeway segments where the Project is anticipated to contribute 50 or more peak hour trips for E+P traffic conditions. EAPC (2017) and Horizon Year (2035) traffic growth along the I-215 Freeway are anticipated to exceed the capacity of existing lanes, and would thus result in a deficient level of service (LOS) for select freeway mainline segments under both EAPC (2017) traffic conditions and Horizon Year (2035) traffic conditions. Mitigation Measure MM 4.15-3 addresses the Project's impacts to the state highway system and the EIR conservatively concludes that because Riverside County does not have the authority to ensure the implementation of improvements to the state highway system, the Project's impacts would be significant and unavoidable (FEIR pp. 4.15-57 to 4.15-58).

- E-47 Refer to Responses C-62, C-63, C-66, E-23, and E-29. As concluded in the EIR § 4.11, Noise, the Project would have a less-than-significant operational noise impact on sensitive receptors with mitigation. Cross-sections of the physical relationship of the proposed Project and off-site property to the south are included in the County's administrative record and provided herein for reference following Response E-91. Detailed descriptions of the cross-sections are provided in Response E-3.

The WRCOG's and SCAQMD's recommended buffer of 300 meters (1,000 feet) is presumed to be based on the CARB Land Use Handbook ("Handbook," April 2005) which recommends a buffer distance of at least 1,000 feet between land uses that will generate/attract 100 or more trucks per day. However, CARB's guidance acknowledges that the 1,000-foot buffer distance is an advisory, only, and to determine the actual risk near a particular facility additional analysis should be conducted. The Handbook further states that "these recommendations are designed to fill a gap where information about existing facilities may not be readily available and are not designed to substitute for more specific information if it exists."

The EIR and its technical studies – which includes an air quality impact analysis and a HRA - are explicitly consistent with the CARB handbook. The EIR includes a site-specific health risk assessment based on the geospatial location of the proposed Project and existing sensitive land uses in the vicinity of the Project site and the truck travel routes that are expected to be utilized. As disclosed in the EIR, the Project would not pose a significant health risk associated with diesel particulate matter (DPM) to sensitive receptors in the Project vicinity (refer to EIR § 4.3, Air Quality). Therefore, a wider buffer is not necessary to alleviate any significant and unavoidable impacts of the Project.



- E-48 The County acknowledges the comment which describes the general definition of a noise barrier, substances of noise barriers, and effectiveness of noise barriers. The noise barriers identified on Technical Appendix I Exhibit 9-A for receiver location R6 are located in the analysis based on the existing and planned topography of the Project study area, and the analysis includes an evaluation of whether or not the barrier blocks the line-of-sight of the receiver to the noise source. The findings of the Noise Study and EIR indicate that no exterior noise mitigation is required other than the barriers identified on Exhibit 9-A of the Noise Study for the residential homes at receiver location R6 adjacent to Project loading areas. While residential homes located west of the Project site sit at a higher elevation and may have a direct line-of-sight to the operational noise sources within the Project loading areas, the analysis shows that the operational noise levels would be considered less than significant at all receiver locations. The locations and heights of the proposed walls and fences are disclosed in EIR § 3.0, Project Description, pages 3-14 and 3-23, respectively, under the subheadings “Architecture, Walls, and Fences.” Regarding noise attenuation, a concrete block retaining wall would be located along the Building D Site’s southern and eastern boundaries, ranging from one to 23 feet in height. In addition, a concrete block retaining wall would be located along the Building E Site’s southwestern and eastern boundaries, ranging from one to seven feet in height.
- E-49 All barriers shown on the conceptual grading plan are required by Riverside County to be designed to account for safety, including the recommendations of a site-specific geotechnical report (EIR Technical Appendices E1, E2, E3, and E4), meeting the latest building codes, and as reviewed and approved by Riverside County prior to construction.
- E-50 The County acknowledges the comment and agrees that aesthetic design barriers are important. EIR § 4.1 concludes based on substantial evidence that the Project would have less-than-significant aesthetic impacts. Refer to Responses C-13 and E-48. Also, refer to the cross-sections provided herein following Response E-91 and the detailed descriptions of the cross-sections provided in Response E-3. As shown on the exhibits provided on pages FEIR-216 and FEIR-217, a 30-foot-wide landscaped area planted with trees, shrubs, and groundcover would be provided on the south side of the Building E Site and a 36-foot-wide landscaped area planted with trees, shrubs, and groundcover would be provided on the south side of the Building E Site. The landscaping would provide an aesthetic improvement along the Project site’s south property boundary and effective screening.
- E-51 The analysis in the Noise Study (EIR Technical Appendix I) is based on the source-path-receiver concept, as outlined in Section 2 of the Noise Study, which considers the attenuation due to distance from the source to receiver. Any potential mitigation measures are then applied, if needed, at any of the three points in the source-path-receiver relationship to provide the best possible attenuation, which is typically at the source. The noise barriers identified on Technical Appendix Exhibit 9-A for receiver location R6 are located in the analysis based on the existing and planned topography of the Project study area, and the analysis includes an evaluation of whether or not the barrier blocks the line-of-sight of the receiver to the noise source. The comment suggests that “no protection” is provided for rural residents in the Project study area, however, the findings of the Noise Study and EIR indicate that no exterior noise mitigation is required other than the barriers identified on Exhibit



9-A of the Noise Study for the residential homes at receiver location R6 adjacent to Project loading areas. It is important to note that the Noise Study identifies the minimum required noise barriers to demonstrate less-than-significant noise level impacts. Higher barriers at the Project site may provide additional attenuation if the barriers block the line-of-sight to the receiver locations. While residential homes located west of the Project site sit at a higher elevation and may have a direct line-of-sight to the operational noise sources within the Project loading areas, the analysis shows that the operational noise levels are considered less than significant at all receiver locations. Further, the analysis at receiver locations without a noise barrier is based on unmitigated, worst-case operational noise levels with all Project operational activities (idling trucks, delivery truck activities, parking, backup alarms, as well as loading and unloading of dry goods) operating simultaneously. The Federal Guidelines identified in the comment are based on Federal Highway Administration guidance which was developed to reduce highway traffic noise levels associated with high speed automobile and truck traffic movements. In contrast, the operational noise sources at the Project site represent stationary/area-sources that will be traveling at low speeds while on-site and as such, the FHWA highway traffic noise barrier design guidelines are not directly applicable to the barriers identified for the Project. In addition, the noise barrier locations identified in the Noise Study (Exhibit 9-A) and heights specified are shown to satisfy the noise criteria at the closest sensitive receiver locations based on the worst-case operational noise analysis.

Additionally, the operational noise analysis includes all noise sources associated with the Project land use such as backup alarms and truck unloading and docking activity, including trucks with a stack height of 11.5 feet as the commenter points out. Based on distance attenuation, which provides 6 dBA of attenuation per doubling of distance from a stationary/area-source such as Project unloading/docking activity, the Project will generate operational noise levels approaching 35.4 dBA Leq at the closest receiver location west of the Project site, R4. Tables 9-6 and 9-7 of the Noise Study (duplicated as EIR Tables 4.11-18 and 4.11-19) show that receiver locations west of the Project site will not experience any Project-related ambient noise level increases during daytime or nighttime hours when compared to the existing ambient noise levels approaching 58.2 dBA Leq (daytime) and 51.7 dBA Leq (nighttime). The analysis shows that the existing ambient noise levels already exceed the expected noise level impacts associated with the Project by over 10 dBA, which means the ambient would be typically perceived as twice as loud as the Project operational noise levels. Therefore, the impacts related to Project operational noise levels will remain less than significant based on the quantifiable thresholds identified in the Noise Study and EIR. In addition, the Noise Study and EIR make no claims regarding audibility of Project noise sources, but rather evaluates Project operational noise levels with local noise level regulations per CEQA guidance. Also, refer to Responses C-72, E-51, I-2, and J-2 regarding potential noise impacts. Refer to Responses I-2, J-2, K-15, and M-1 for information regarding potential air quality impacts. Refer to Responses C-16 and C-20 regarding potential impacts associated with light trespass.

- E-52 The comment accurately summarizes the text on FEIR p. 3-19, describing earthwork and grading for the Building E Site.



- E-53 Refer to Response E-51. The only barrier attenuation included in the analysis is that from the 8-foot high noise barrier as specified as Mitigation Measure MM 4.11-3. No barrier attenuation due to retaining walls is included in the analysis. Further, the operational noise analysis contained in the Noise Study (EIR Technical Appendix I) and EIR § 4.11 shows that the impacts related to Project operational noise levels will be less than significant when all Project operational noise sources are operating simultaneously, including idling trucks, delivery truck activities, parking, backup alarms, as well as loading and unloading of dry goods. A discussion of the Project's potential hydrological impacts area addressed in EIR § 4.9, Hydrology and Water Quality.
- E-54 Refer to Response E-22. As explained in the EIR (at FEIR p. 4.5-1), Technical Appendix D2 was prepared prior to the Project Applicant's decision to reduce the size of the Building E Site to its current configuration; therefore, the report covers additional acreage (12.1 acres west of the Building E Site) that is no longer in the Project site boundary and is not applicable to the discussion in the EIR. Also, as additionally explained in the EIR (at FEIR p. 4.5-1), additional information regarding cultural resources that pertains to written and oral communications between Native American tribes and the County is considered confidential in respect to places that have tribal cultural significance (Gov. Code § 65352.4), and although relied upon in part to inform the DEIR and FEIR, these confidential materials are not available for public review. Also see Cal. Code Regs. § 15120(d).
- E-55 The commenter's personal conversation from approximately 1997 is noted and does not change the significance conclusions reached by the EIR, which are based on all materials contained in the County's administrative record for the proposed Project.
- E-56 As part of proposed grading activities, blasting in hard rock areas would consist of small charges that produce less-than-significant noise and vibration impacts as documented at FEIR pp. 4.11-20 to 4.11-21. According to the County's cultural resource experts, and considering the proposed method of blasting, the noise would be perceived as a thump and not an explosive event that could potentially result in indirect impacts to significant cultural resources. Because the entire Project site would be disturbed by grading and development, there would be no greater impact to cultural resources associated with blasting as compared to the impacts that would occur from other aspects of the Project's construction process.
- E-57 The biological field surveys conducted on the Project site (refer to EIR § 4.4 and Technical Appendices C1 through C8) documented all animal species that were present on the Project site including species with the potential to occur on the site, which may include the species listed in the comment (burrowing owls, blacktailed rabbits, quail, hawks, and roadrunners). Potential impacts to endangered or threatened species and any species identified as a candidate, sensitive, or special status species are disclosed in EIR § 4.4 (at FEIR pp. 4.4-13 to 4.24). In addition, EIR § 4.4 (at FEIR pp. 4.4-26 to 4.4-28) provides Applicable County Regulations and Design Requirements and feasible mitigation measures to which the Project is required to comply, including Mitigation Measures MM 4.4-1 and MM 4.4-2 that would ensure that pre-construction surveys are conducted and appropriate actions are taken to avoid significant impacts to burrowing owl. Specific to the burrowing owl, focused surveys were conducted in accordance with the Burrowing Owl Survey Instructions for the Western Riverside County Multiple Species Habitat Conservation Plan Area



(MSHCP) during the breeding season. The survey areas included suitable habitat located within the Project sites and a 150-meter (500-foot) buffer area around the sites, as required by both the Western Riverside County MSHCP and the California Department of Fish and Game 2012 Staff Report on Burrowing Owl Mitigation. The surveys resulted in the finding of the species, so submission of the photographs in this comment are consistent with the biological field survey results reported in the EIR. Also refer to Responses C-37 and C-40. Note there is no support, particularly in light of the MSHCP that burrowing owls will become “extinct in Riverside county in just a few years” as stated in the comment.

- E-58 Refer to Responses C-26, C-37, C-40, C-70, C-72, C-74, and C-75.
- E-59 Refer to Responses C-37, C-40, and E-57. As specified as Mitigation Measure MM 4.4-1, a pre-construction survey is required for the burrowing owl, and if the species is present, actions would be take pursuant to the Western Riverside County MSHCP to ensure protection of the species as identified in MM 4.4-1.
- E-60 The Project site is surrounded by human activity to the north, south, and west in the form of residences, warehouses, an EMWD water tank, and Interstate 215 approximately 2,300 feet to the east. The majority of the habitat on the Project site and adjacent lands consists of disturbed habitat that is not a sensitive habitat community. Further, the habitat assessments prepared for the Project (see Technical Appendices C1 through C8) found that the Project site has the potential to support one sensitive wildlife species, burrowing owl. According to Mitigation Measure MM 4.4-1, an MSHCP pre-construction survey is required to be conducted within 30 days prior to the start of grading/construction activities to identify the locations of active BUOW and burrows located adjacent to or within the Project site. If BUOWs are identified on or adjacent to the project sites, avoidance measures will be developed in compliance with the MSHCP and in coordination with the CDFW and/or the Western Riverside County Regional Conservation Authority (RCA). No additional impacts to sensitive wildlife species are expected to occur due to nighttime construction activities.
- E-61 Refer to Response E-9. The Project does not propose cold storage, and the proposed buildings are not designed to house a cold storage occupant, so cold storage is not required to be evaluated in the EIR. This fact is clearly described in EIR § 3.5, Operational Characteristics.
- E-62 The comment correctly summarizes Mitigation Measure MM 4.4-3 of the EIR.
- E-63 Mitigation Measure MM 4.3-3 requires the posting of signs at the building informing truck drivers about the health effects of diesel particulates, the California Air Resources Board diesel-fueled vehicle idling regulations, and the importance of being a good neighbor by not parking in residential areas. Mitigation Measure MM 4.3-3 further requires the developer and its successors to include this obligation in all leases of the project, so tenants will perform this requirement. The commenter alleges that these measures are not being performed at another distribution center within the vicinity, and asks for a mechanism to enforce these mitigation measures. CEQA Guidelines § 15097 requires that the lead agency adopt a mitigation monitoring and reporting program to ensure that the mitigation measures are implemented. CEQA Guidelines, §15097(a). A mitigation



monitoring and reporting program will be adopted for this Project (see FEIR, pp. S-11 through S-75). Upon adoption by the County of the Project's mitigation monitoring and reporting program, Code Enforcement becomes the responsible entity to ensure compliance with the mitigation monitoring and reporting program. If such non-compliance with Project conditions of approval and mitigation measures are identified through local Code Enforcement, appropriate penalties will be remedied by the County to enforce compliance.

- E-64 The County of Riverside and the Riverside County Fire Department (RCFD) considers fire access as part of its review of the design of the proposed Project. In addition, as disclosed in the EIR (at FEIR p. 4.13-7), a number of California regulations, including Public Resources Code (PRC) §§ 4290-4299 and California Government Code (CGC) § 51178, would apply to the proposed Project and would address fire safety. In particular, these mandatory requirements impose minimum state-wide fire safety standards pertaining to: roads for fire equipment access; signage for identifying streets, roads, and buildings; minimum private water supply reserves for emergency fire use; and, fire fuel breaks. In addition, the regulations set fire safety standards for all buildings and structures in, or adjoining, mountainous areas, or forest-, brush- or grass-covered lands or any land covered with flammable material to protect property from wildland fires. In addition, to ensure adequate fire protection for all residents of Riverside County, the Riverside County Department of Building and Safety and the RCFD enforce fire standards as they review building plans and conduct building inspections. This includes a review for compliance with Riverside County Ordinance No. 787 (Riverside County, 2014), which requires, among other measures, the County to review all future building plans to ensure that every building is positioned in a way that allows adequate access for emergency vehicles and has adequate fire hydrant placement and fire flows. As disclosed in the EIR (at FEIR p. 4.8-11), the Project is required to comply with all applicable federal, State, and local regulations to ensure the proper transport, use or disposal of hazardous substances.
- E-65 Refer to Response C-101. This comment does not identify any potential physical environmental impacts to the environment that may result from a reduction in the estimated number of employees. In fact, by studying a higher number of jobs, the EIR evaluates a "worst case" scenario of future worker-related environmental effects. Additionally, the calculation of the number of jobs is based on the Riverside County General Plan, Appendix E, Table ES-5; thus, the estimated of the number of jobs is consistent with the County General Plan. Furthermore, the automation of industrial/high-cube warehouse jobs is not a reasonably foreseeable consequence of the proposed Project, and the degree to which automation would occur would be speculative in the absence of identified building users (CEQA Guidelines § 15145). No revision to the DEIR is warranted pursuant to this comment.
- E-66 The County acknowledges the comment. MSHCP Habitat Assessments, Jurisdictional Delineations, and Determination of Biologically Equivalent or Superior Preservation (DBESPs) were conducted for the Building D Site and the Building E Site (EIR Technical Appendices C1, C3, C4, C6, and C7). As disclosed in the EIR (at FEIR pp. 4.4-19 and 4.4-20), HES determined that the Project site contains no wetlands or vernal pools as defined by the 1987 Corps of Engineers Wetland Delineation Manual. In addition, HES concluded that the Building D Site and the Building E site contain no "waters of the United States" under federal jurisdiction and no "waters of the State" under California Department of Fish and Wildlife jurisdiction. The drainage feature is an



isolated, remnant feature which receives no hydrologic flow and does not provide any downstream biological resource benefits. It consists of a shallow feature in the landscape that may convey water across upland areas during and following storm events. The drainage feature is not a tributary and does not have a significant nexus (biological, chemical, or physical connection) to a traditional navigable “waters of the United States” Or “waters of the State.”

- E-67 The comment correctly summarizes Erosion Threshold a, (at FEIR pp. S-43 and S-44).
- E-68 Refer to Responses C-62, C-63, C-66, E-23, and E-29.
- E-69 Refer to Response C-92, C-96, E-9, E-11, and E-47. As explained in Response E-47, the WRCOG’s and SCAQMD’s recommended buffer of 300 meters (1,000 feet) is presumed to be based on the CARB Land Use Handbook (CARB, 2005). However, CARB’s guidance acknowledges that the 1,000-foot buffer distance is an advisory, only, and to determine the actual risk near a particular facility additional analysis should be conducted. The EIR and its technical studies – which includes an air quality impact analysis and a HRA - are explicitly consistent with the CARB Handbook by the conduct of analysis. As disclosed in the EIR, the Project would not pose a significant health risk associated with diesel particulate matter (DPM) to sensitive receptors in the Project vicinity (refer to EIR § 4.3, Air Quality). Therefore, a wider buffer is not necessary to alleviate any significant and unavoidable impacts of the Project. As discussed in Response C-96, truck stacking that was occurring on Harvill Avenue was not due to roadway design or the proposed Project; it was due to the operational characteristics of another existing building. To the County’s knowledge, the stacking issue has been resolved and photographs are included in the County’s administrative record dated September 12, 2017, which show that the stacking issue was no longer occurring on Harvill Avenue. The proposed Building D and Building E Plot Plans are designed such that trucks accessing the buildings have sufficient room to stack on the site in front of the check-in gates and will not stack onto Oleander Avenue or Harvill Avenue.
- E-70 Refer to Response C-96 and E-47, which also applies to the SCAQMD guidance.
- E-71 Refer to Responses C-4 and C-92.
- E-72 Refer to Responses E-29, G-8, K-15, K-41, Q-9, Q-11 and Q-12. Any health risks to periodic users of the area, including the church, would be less than or equal to the long-term exposures identified for the nearest sensitive receptors for operational activity (see FEIR pp. 4.3-29 to 4.3-31). Thus, potential impacts from diesel particulate matter sources would be less than significant. Risks associated with diesel particulate matter exposure is based on long-term averaging times and exposure durations (at FEIR pp. 4.3-21 to 4.3-22, “Methodology for Calculating Project Operational Emissions, (3) Diesel Particulate Emissions”). Short-term exposures would be less than the impacts identified for long-term exposures at the nearest residential land uses and therefore less than significant.
- E-73 The comment is noted. The objectives of the project include, among others: (A) developing vacant and underutilized property; (B) making efficient use of a property in Mead Valley by maximizing its buildout potential for employment-generating uses; (C) to attract new employment-generating businesses along the I-215 corridor thereby growing the economy and providing a more equal jobs-



housing balance that will reduce the need for members of the local workforce to commute outside the area for employment. The property is currently vacant and generating little or no economic activity. The economic activity generated by the project is projected to improve Mead Valley's current economic conditions.

The Mead Valley Area Plan, which is the County's long-range plan for the community, states on p. 7: "A major thrust of the Riverside County General Plan is to attract new businesses that can provide jobs for the extensive local labor force that now, in significant numbers, must commute to Orange and Los Angeles Counties. A substantial industrial strip covers almost the entire eastern edge of Mead Valley [where the Project site is located], which provides outstanding rail and freeway access. This not only leverages the Employment Center immediately adjacent to it, but focuses more intensive activities where multiple transportation modes converge." While the Project proposes to change the land use designation on a portion of the site from "Business Park" to a "Light Industrial," as explained in Response B-8, the result of doing so would be the generation of less traffic and less air pollutant emissions because business parks generate more traffic than do high-cube warehouses. As discussed in EIR §4.11, Noise, perimeter walls that serve as sound attenuation barriers would be constructed to shield all off-site properties from significant noise impacts. Also, as discussed in EIR § 4.3, Air Quality, the Project would not cause any significant health impacts to nearby sensitive receptors. Assuming that a person stayed in their home for a 30-year residency (365 days per year, 24 hours per day) or 70-year lifetime, the Project is calculated to increase carcinogenic risk by 6.19 persons in one million at the maximally exposed sensitive residential receiver, whereas the SCAQMD has an established significance threshold of 10 persons in one million. For the reasons stated above, and considering all of the information in the Project's administrative record in file with Riverside County, there is no evidence that operation of the proposed Project would significantly impact nearby residents under CEQA.

Nonetheless, refer to Response C-65 for a response about environmental justice. Environmental justice is a social issue not required to be addressed in the EIR. Neither the act nor the CEQA Guidelines make any reference to the topic of environmental justice. A project's economic and social effects, unless they are somehow tied to a physical environmental impact or physical change, need not be evaluated in an EIR (State CEQA Guidelines section 15131(a): *City of Hayward v. Board of Trustees of Cal. State Univ.* (2015) 242 Cal. App. 4th 833, 843. CEQA analysis is directed toward identifying any substantial adverse changes in physical conditions, and any physical changes, not economic or social effects of a project. See e.g., *National Parks & Conservation Ass'n v. County of Riverside* (1999) 71 Cal.App.4th 1341; *City of Redlands v. County of San Bernardino* (2002) 96 Cal.App.4th 398.

- E-74 The County acknowledges the comment. The EIR adequately analyzed the proposed Project in relation to the Riverside County Vision and the Mead Valley Area Plan and concludes at EIR § 4.10 that impacts would be less than significant. Also refer to EIR Technical Appendix M, "General Plan Consistency Analysis for Knox Business Park Buildings D and E."
- E-75 The County acknowledges the comment discussing natural slopes and hillsides in Riverside County. Refer to EIR Technical Appendix M, "General Plan Consistency Analysis for Knox Business Park Buildings D and E" for analysis of Project consistency with County General Plan



policies. Also, EIR § 4.1, Aesthetics, adequately analyzes and provides applicable County Regulations and Design Requirements in regard to aesthetic resources pertinent to landforms. EIR § 4.6, Geology and Soils, addresses slope stability. In all cases, the EIR concludes that impacts would be less than significant.

- E-76 Refer to the Responses E-18 and E-19. As noted, this comment incorrectly characterizes “piecemealing” and “segmentation” under CEQA. The EIR evaluates the Project as a whole, including two separate warehouse buildings and associated improvements, and provides detailed analysis as to any direct, indirect, or cumulative impacts based on both buildings’ construction and operations. In fact, following the commenter’s reasoning, the Project’s EIR would instead be two separate individual EIRs likely with each EIR reporting a lower level of impacts under CEQA. No further response is necessary.
- E-77 On October 19, 2016, the Riverside County Planning Commission held a hearing on the Applicant’s application for a General Plan Foundation Component Amendment (FGPA) to accommodate the Project as then- proposed. Some members of the public, including this commenter, opposed the FGPA, and spoke in opposition at that hearing. In response to the public opposition, the Applicant modified the Building E Site component of the Project to reduce its size and avoid the sensitive parcels that previously required a FGPA. The Project as now proposed is smaller than was originally proposed, and will have lesser impacts on traffic, air quality, greenhouse gas emissions, cultural resources, biological resources and other environmental factors. The appropriate technical studies and EIR reflect these changes.

Regarding any perceived differing elevation height, refer to Response C-9. The 55-foot ALUC approval was made to allow rooftop equipment to extend up to 55 feet above ground level. That is consistent with the discussion of “Applicable County Regulations and Design Requirements” in § 4.8.6 of the EIR (see FEIR pp. 4.8-17 to 4.8-19). The height of the building is not changing from the description in § 3.3.2 (FEIR pp. 3-14, 3-23). In § 4.15.5 (at FEIR p. 4.15-45), the EIR states that the tallest features on the project site would not exceed a height of 45 feet above finished grade. That statement has been changed to indicate 55 feet above finished grade in the FEIR consistent with the ALUC approval to allow for the height of roof-mounted mechanical units.

Except as addressed above, the comment does not identify any specific inaccuracies or discrepancies in the project description, and the County is not aware of any, except as addressed in this response. Refer to Response E-22.

- E-78 Refer to Response E-20. The comment regarding future Trammell Crow phases for warehouses within the Knox Business Park is unclear. At the time of the NOP (and currently), there are no applications for future Trammell Crow phases for warehouses within the Knox Business Park. The cumulative impacts analysis contained within the EIR evaluates cumulative traffic and vehicular-related air quality, greenhouse gas, and noise impacts using the list approach authorized in the CEQA Guidelines, §15130. The EIR evaluates 103 other past, present, and reasonably foreseeable projects within the study area as required pursuant to CEQA. See EIR, §4.0.2, Figure 4.0-1, Table 4.0-1. Other cumulative environmental impacts are evaluated using the summary of projections approach. See EIR, §4.0.2.



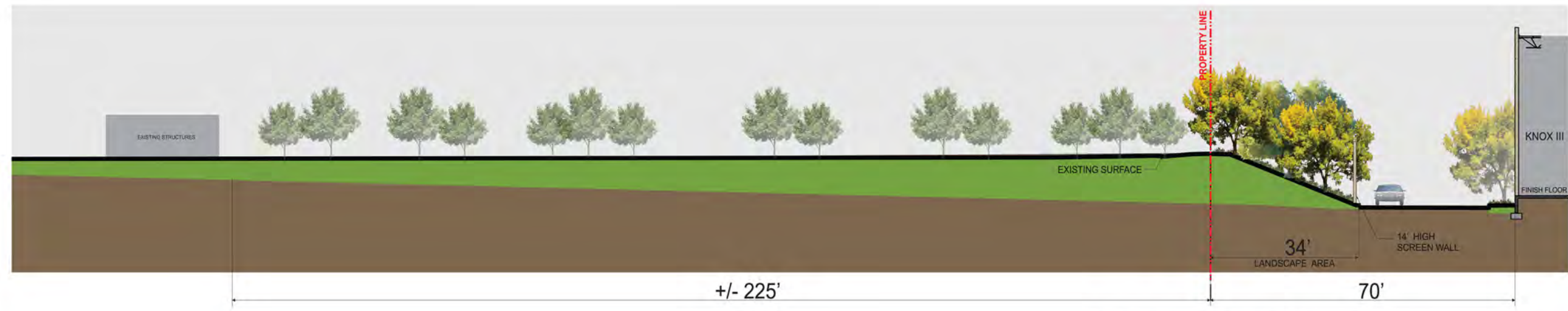
- E-79 Refer to Response E-28.
- E-80 Refer to Responses C-96 and E-9.
- E-81 Refer to Responses C-4 and C-92.
- E-82 Refer to Responses C-4 and C-92.
- E-83 Refer to Responses C-4 and C-92.
- E-84 Refer to Response C-96.
- E-85 This comment does not provide basis for its assertion that the EIR contains inconsistencies. Refer to Responses C-4 and C-85. The commenter’s assertion that Project traffic would utilize low capacity residential streets rather than shorter and direct route to the I-215 Freeway is incorrect and not reasonably foreseeable.
- E-86 Refer to Response E-66.
- E-87 Refer to Responses C-26, C-37, C-40, C-70, C-72, C-74, and C-75.
- E-88 As depicted on EIR Figures 3-4, 3-5, 3-11, and 3-12, under existing conditions the site’s “Rural Residential (R-R)” and “Rural Residential ½ acre lots (RR-1/2)” zoning designations are inconsistent with the site’s General Plan land use designation of CD-BP. Under state law, zoning designations must be consistent with General Plan land use designations (California Government Code § 65860). Thus, even if the Project were to implement CD-BP land uses in the western portions of the site, a change of zone still would be required to allow for the construction and operation of business park land uses. Regardless, the EIR in § 4.10 under the analysis of Threshold a) discloses a significant and unavoidable land use impact due to the Project’s proposal to substantially alter the site’s present land use. Community character, including rural character, is not the type of issue that CEQA is concerned with per se, as the character of an area is a perceived “psychological, social, and economic—not environmental” issue as discussed in *Preserve Poway v. City of Poway* (Harry A. Rogers, et al., Real Parties in Interest) 245 Cal.App.4th 560, 2016.
- Project-related impacts due to traffic, noise, and air quality are evaluated in EIR §§ 4.15, 4.11, and 4.3, respectively. These impacts would be exacerbated should the western portion of the Project site be developed with CD-BP land uses in lieu of high-cube warehouse land uses, as discussed in Responses C-62 and C-99. Regarding blasting, refer to Responses C-26, C-37, C-40, C-70, C-72, C-74, and C-75. Finally, refer to Responses E-54 through E-60 for an explanation as to why the County finds that the EIR adequately addresses and mitigates potential impacts to cultural and biological resources in full compliance with CEQA.
- E-89 As disclosed in the EIR (at FEIR p. 4.1-6), the County of Riverside General Plan Land Use Element and Open Space Element contains policies to ensure that unincorporated portions of Riverside County are developed with aesthetically pleasing features and that the existing scenic resources are maintained and preserved. To illustrate the existing visual conditions of the Project site, EIR § 4.1, Aesthetics, includes a photographic inventory that includes vantage point photographs from



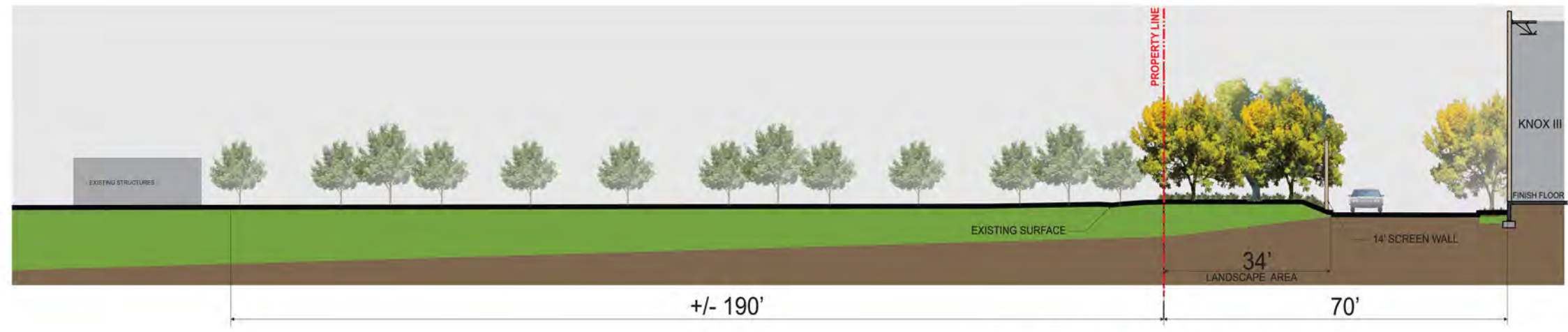
public viewing areas. The EIR concludes (at FEIR pp. 4.1-8 through 4.1-10) based on substantial evidence that the Project's potential to substantially damage scenic resources would be less than significant.

- E-90 Refer to Responses E-1 through E-89. Based on careful consideration of the issues raised in this comment letter, the County finds that none of the comments or revisions to the DEIR made as part of the FEIR meet the conditions listed in CEQA Guidelines § 15088.5(a) requiring recirculation of the DEIR for additional public review. Specifically, there are no new significant impacts identified as a result of public comments or revisions to the EIR beyond what was disclosed in the DEIR. Additionally, the comments and associated revisions did not result in the identification of an increase in the severity of any environmental effect that was disclosed in the DEIR. Comments on the DEIR did not identify any feasible Project alternatives or mitigation measures considerably different from others analyzed in the DEIR that would clearly lessen the environmental effects of the proposed Project. Furthermore, the County finds that the DEIR was not fundamentally and basically inadequate and conclusory in nature such that meaningful public review and comment were precluded. Recirculation of the DEIR for an additional public review period is not required under the CEQA statutes or guidelines. No further response is needed.
- E-91 Comment is acknowledged that the Rural Association of Mead Valley opposes the proposed Project. These concerns will be considered by the Riverside County Planning Commission and Board of Supervisors in their decision whether to approve, approve with modifications, or deny approval of the proposed Project.

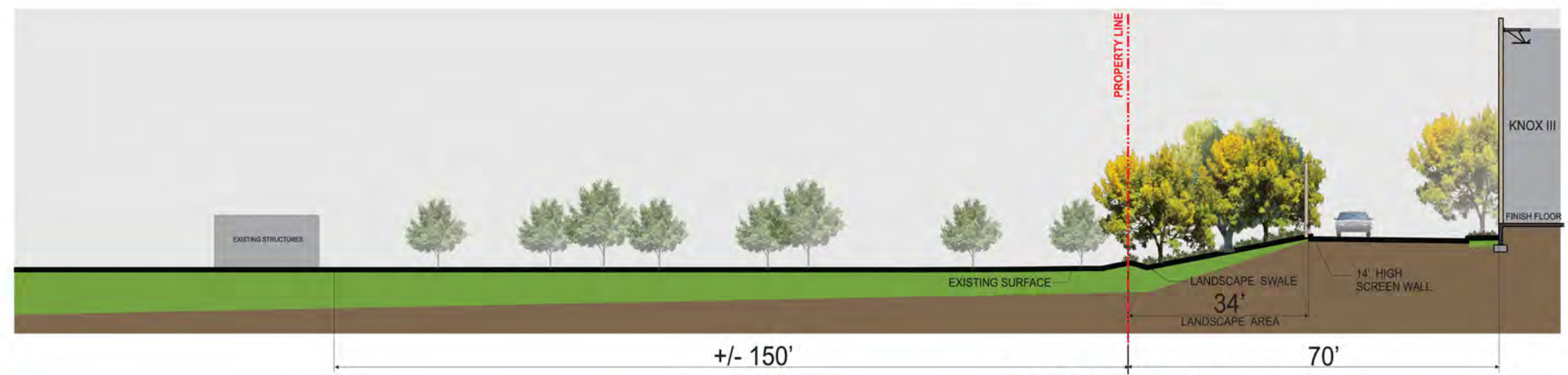
Provided on the following pages are exhibits provided by the Project Applicant's architect, HPA Architecture, that illustrate cross-sections from the Building D Site's and Building E Site's south property boundaries.



WEST SECTION - KNOX BUILDING D **A**



MIDPOINT SECTION - KNOX BUILDING D **B**

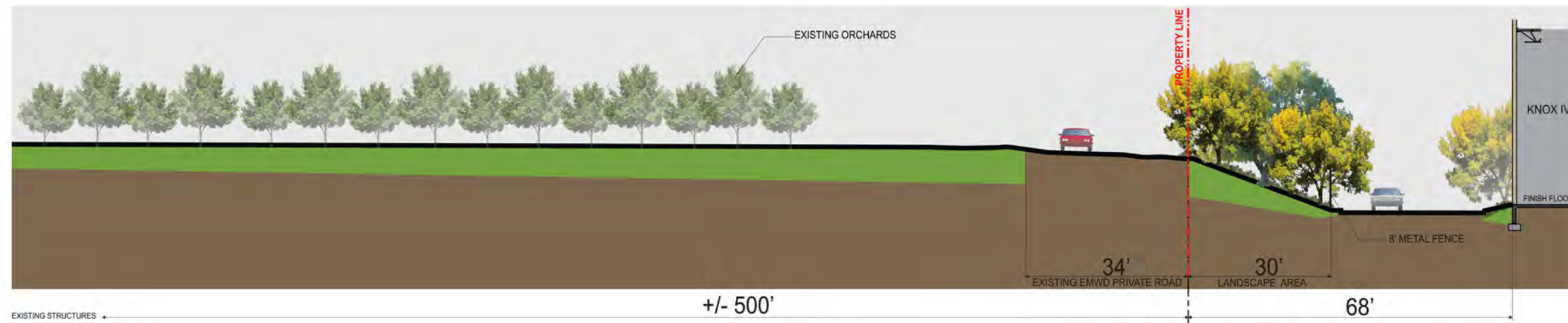


EAST SECTION - KNOX BUILDING D **C**

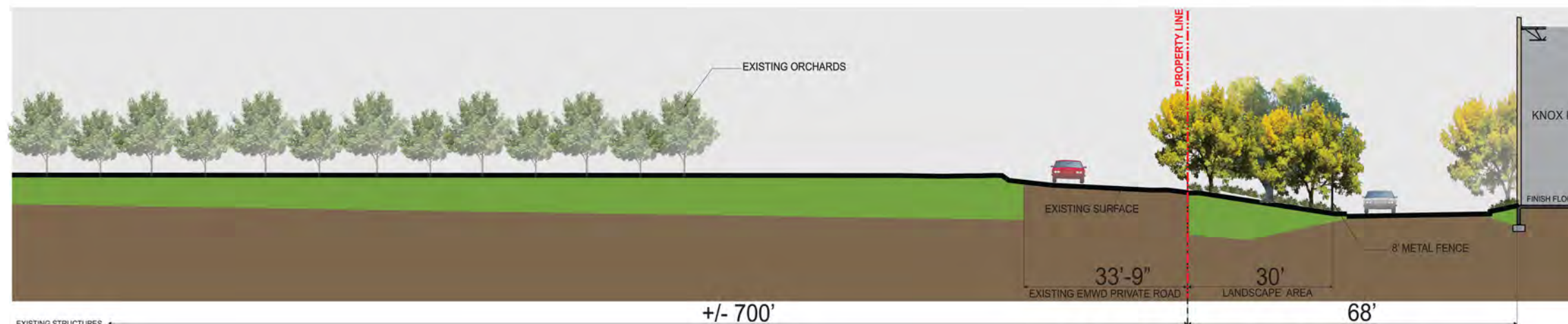


Conceptual Section Exhibit
KNOX BUSINESS PARK - BUILDING D

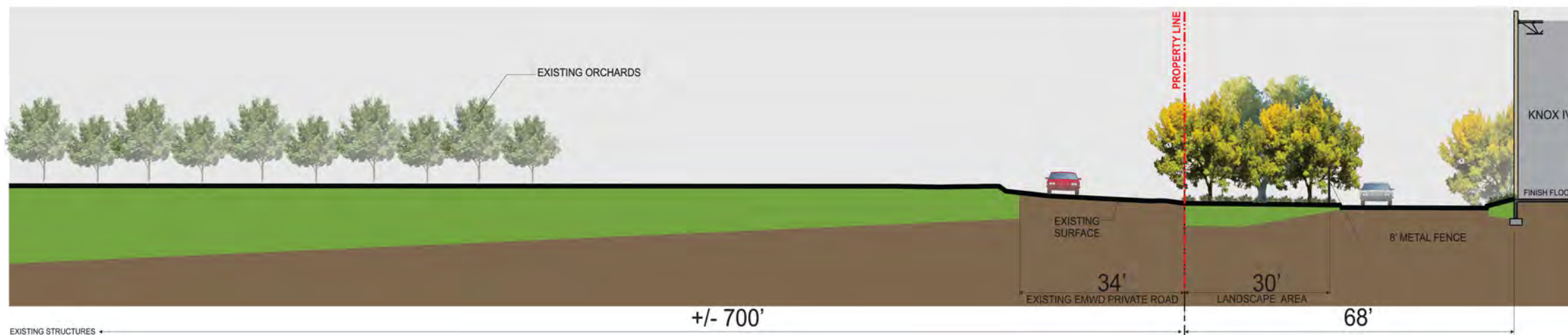




WEST SECTION - KNOX BUILDING E **A**



MIDPOINT SECTION - KNOX BUILDING E **B**



EAST SECTION - KNOX BUILDING E **C**



Conceptual Section Exhibit
KNOX BUSINESS PARK - BUILDING E





Anjanette Anzaldi- Letter F

F-1 The County acknowledges the commenter's opposition to rezoning, the desire to keep the area rural, and the concern that the roads cannot handle the influx of traffic. The EIR considers all of these potential impacts and provides Applicable County Regulations and Design Requirements and mitigation measures to reduce and mitigate the Project's potential environmental effects to the extent feasible.

Blum Collins- Letter G

G-1 The County of Riverside acknowledges receipt of the comments provided by Blum Collins LLP on behalf of the Golden State Environmental & Social Justice Alliance and the comments and modeling files of Soil Water Air Protection Enterprises (SWAPE).

G-2 The County has added Blum Collins LLP to the notification list for this Project.

G-3 This comment is summarizing the description of the Project in the EIR. No substantive comment on the DEIR is made.

G-4 This comment generally asserts that the EIR fails to adequately evaluate the Project's local and regional air quality and health risk impacts. No specific comment on an inadequacy is mentioned here. This comment appears to be an introduction to subsequent comments made.

G-5 The commenter asserts that a Health Risk Assessment (HRA) is recommended by the South Coast Air Quality Management District (SCAQMD) and the Office of Environmental Health Hazard Assessment (OEHHA). The commenter states that based on a screening-level health risk assessment prepared by SWAPE, the project's construction and operational diesel particulate matter emissions may result in a potentially significant health risk and states that a refined health risk assessment should be required.

For the benefit of the commenter, a HRA analyzing the project's construction emissions of diesel particulate matter is not warranted. The primary purpose of an HRA is to determine long-term health risks, such as cancer risks over, for example, a 30-year residency or 70-year lifetime. As discussed in the EIR, construction of the project would take less than 2 years and exposure of such duration would not create long-term health effects to adjacent receptors (EIR § 4.3). Additionally, the County selected to follow SCAQMD's published guidance for air quality analysis in the EIR because it addresses the types of air pollutants that would be emitted by operation of the Project and conservative exposure durations that would result in reasonable if not overstated human health impacts. SCAQMD's published Health Risk Assessment (HRA) procedures recommend evaluating risk from extended exposures measured across several years and not for short term construction exposures or for infrequent operational exposure to diesel truck deliveries or trash hauling.

The SCAQMD uses HRAs for compliance with AB2588, SCAQMD Rule 1401 and Rule 1402, which regulate facility emissions.² The SCAQMD's Procedures for Rules 1401 and 212 includes guidance for short-term project HRAs (Tier 2 analysis); however, these recommendations are for emissions from such sources as portable equipment, like generators, or air pollution control



equipment used for soil remediation projects, not for short-term construction projects. The SCAQMD has also adopted guidance on the use of HRAs for analyzing mobile source emissions. However, this guidance refers to emissions associated with facilities such as truck stops and distribution centers that attract large volumes of daily heavy-duty diesel truck trips, creating a long-term emission source. Therefore, the HRA guidance for mobile source emissions is not relevant for the Project's short-term construction activities.

Notwithstanding, the EIR does include a HRA for operational emissions associated with heavy-duty diesel trucks accessing the Project site, contained as EIR Technical Appendix B2. Results of the HRA are less than significant as identified in the EIR and no further evaluation is necessary.

- G-6 Refer to Response G-5. The commenter is incorrect in their assessment that the EIR needs to include an HRA related and isolated to construction impacts. The EIR did include an operational HRA for the proposed Project (supported by a detailed technical analysis contained in Technical Appendix B2), which determined that all localized impacts would remain less than significant, and construction emissions were amortized over the Project's operation. A construction-related-only HRA would only evaluate short-term exposures and not illustrate any greater impacts than was disclosed by the EIR for long-term exposures. Thus, the EIR disclosed the Project's maximum impact as required by CEQA, which includes amortized construction-related air pollutant emissions. G-7 Refer to Response G-5. As stated, the EIR included a detailed HRA based on the long-term operational impacts caused by the proposed Project. A construction-related-only HRA would only evaluate short-term exposures and not illustrate any greater impacts than was provided by the EIR for long-term exposures. Thus, the EIR disclosed the Project's maximum impact as required by CEQA, which includes amortized construction-related air pollutant emissions.
- G-8 Refer to Response G-5. Additionally, with respect to the 2015 OEHHA guidance, the County's air quality experts reviewed the 2015 OEHHA guidance to determine applicability of the use of early life exposure adjustments to identified carcinogens. For risk assessments conducted under the auspices of The Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB2588), OEHHA applies specific adjustment factors to all carcinogens regardless of purported mechanism of action. However, the 2015 OEHHA guidance relied upon U.S. EPA guidance relating to the use of early life exposure adjustment factors (Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens, EPA/630/R-003F) whereby adjustment factors are only considered when carcinogens act "through the mutagenic mode of action." A mutagen is a physical or chemical agent that changes genetic material, such as DNA, increasing the frequency of mutations to produce carcinogenic effects. The use of adjustment factors is recommended to account for the susceptibility of producing adverse health effects during early life stages from exposure to these mutagenic compounds. None of the carcinogens considered in the study for this Project elicit a mutagenic mode of action and, therefore, the use of age specific adjustment factors is not warranted. The study correctly used a lifetime exposure adjustment factor of 1.0.

By way of background, the Air Toxics "Hot Spots" Information and Assessment Act requires certain stationary sources (facilities) to report the type and quantity of substances they routinely release into the air. The regulation is not applicable to the proposed Project because the Project does not propose a stationary source of air pollutants regulated by this Act, which requires that



toxic air emissions from certain facilities be quantified and compiled into an inventory according to criteria and guidelines developed by CARB, that each facility be prioritized to determine whether a risk assessment is conducted, that risk assessments be conducted according to methods developed by OEHHA and that the public be notified of significant risks. Please note that OEHHA clarifies its risk assessment's applicability by stating that "roadways are not part of the Hot Spots program because the program only addresses stationary sources."

It should be noted that neither the South Coast Air Quality Management District (SCAQMD) nor any other air agency in the Southern California region has adopted guidance on the applicability/use of Age Sensitivity Factors (ASFs) under CEQA.

At the June 5, 2015 SCAQMD Board Meeting, the SCAQMD adopted the 2015 OEHHA guidelines for use in their permitting process. Notwithstanding, the SCAQMD acknowledged in their response to comments received on the revised permitting rules that:

"The Proposed Amended Rules are separate from the CEQA significance thresholds. The SCAQMD staff is currently evaluating how to implement the Revised OEHHA Guidelines under CEQA. The SCAQMD staff will evaluate a variety of options on how to evaluate health risks under the Revised OEHHA Guidelines under CEQA. The SCAQMD staff will conduct public workshops to gather input before bringing recommendations to the Governing Board. In the interim, staff will continue to use the previous guidelines for CEQA determinations."

Further at a June 18, 2015 Association of Environmental Professionals Meeting, the SCAQMD staff (Ms. Jillian Wong, Ph.D.) stated that any new guidance regarding ASFs under CEQA for projects where SCAQMD is not the lead agency, will not be adopted until there is completion of a public process. At this time, no such process has commenced and no formal guidance has been adopted.

Given that there is no available guidance that has been adopted by SCAQMD for CEQA purposes and the fact that the Project does not emit any pollutants that elicit a primary mutagenic mode of action, the use of the 2015 OEHHA guidelines would not be appropriate and therefore was not undertaken in the EIR.

- G-9 Page 9 of the SWAPE attachment to the Blum Collins letter identifies the emissions rates that were considered in SWAPE's screening health risk assessment. The County's air quality experts have determined that SWAPE's modeling assumptions are incorrect and seriously flawed in order to obtain a desired outcome. First, SWAPE inappropriately averages the DPM from construction-related activity over a 24-hour period. Actual construction activities will not occur 24-hours per day during any phase of construction. Second, SWAPE uses a screening dispersion model in lieu of a more appropriate and refined dispersion model (discussed further below).

In the opinion of the County's air quality experts, such screening health risk assessment from construction activity is not warranted due to the relative short-term duration of exposure as discussed in Response G-5. The commenter used the AERSCREEN model to perform a screening health risk calculation for construction activities – which is not the appropriate modeling tool that



should have been used if a HRA was warranted; unlike AERSCREEN, AERMOD estimates the air quality impacts of single or multiple sources using actual meteorological conditions and therefore, provides more precise results than AERSCREEN. It should be noted that the EIR and Technical Appendix B2 appropriately utilized the AERMOD dispersion model in the HRA for operational activities.

- G-10 Refer to Response G-8. As stated, the County’s air quality experts reviewed the 2015 OEHHA guidance to determine applicability of the use of early life exposure adjustments to identified carcinogens. The 2015 OEHHA guidance relies upon U.S. EPA guidance relating to the use of early life exposure adjustment factors (Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens, EPA/630/R-003F) whereby adjustment factors are only considered when carcinogens act “through the mutagenic mode of action.” A mutagen is a physical or chemical agent that changes genetic material, such as DNA, increasing the frequency of mutations to produce carcinogenic effects. The use of adjustment factors is recommended to account for the susceptibility of producing adverse health effects during early life stages from exposure to these mutagenic compounds. None of the carcinogens considered in the study for this Project elicit a mutagenic mode of action and, therefore, the use of age specific adjustment factors is not warranted. The Project’s HRA (EIR Technical Appendix B2) correctly used a lifetime exposure adjustment factor of 1.0.
- G-11 Refer to Responses G-5, G-8, G-9, and G-10. The analysis presented in this comment is based on the 2015 OEHHA guidance, which relies upon U.S. EPA guidance relating to the use of early life exposure adjustment factors (Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens, EPA/630/R-003F) whereby adjustment factors are only considered when carcinogens act “through the mutagenic mode of action.” A mutagen is a physical or chemical agent that changes genetic material, such as DNA, increasing the frequency of mutations to produce carcinogenic effects. The use of adjustment factors is recommended to account for the susceptibility of producing adverse health effects during early life stages from exposure to these mutagenic compounds. None of the carcinogens considered in the study for this Project elicit a mutagenic mode of action and, therefore, the use of age specific adjustment factors as was done in the analysis presented in this comment is not appropriate. The Project’s HRA (EIR Technical Appendix B2) appropriately presents the analytical calculations of Project-related impacts and concludes that impacts would be less than significant.
- G-12 Refer to Response G-9. As stated in this comment, the analysis provided in comment G-11 is very “conservative;” and, in the professional opinion of the County’s air quality expert, the analysis provided in comment G-11 is not appropriately applied to the Project because none of the carcinogens considered in the study for this Project elicit a mutagenic mode of action. Further, the analysis provided in the Project’s HRA (EIR Technical Appendix B2) is conservative in itself, because it is based on several assumptions that would overstate the Project’s actual impacts, including but not limited to the analysis of 15-minute on-site truck idling times whereas State law restricts idling to 5 minutes and Mitigation Measure MM 4.3-4 in the EIR that requires signs to be posted on the site which specify that trucks shall not idle by more than 3 minutes (instead of 5



minutes). The EIR adequately evaluated the Project's health risks and a new study as suggested in this comment is not warranted.

Robin Chaney- Letter H

H-1 The County acknowledges the commenter's opposition to General Plan Amendment 1151 and 1152. Concerns about the merits of the proposed Project will be considered by the Riverside County Planning Commission and Board of Supervisors in their decision whether to approve, approve with modifications, or deny approval of the proposed Project. Project-related impacts to traffic and air quality are addressed in EIR §§ 4.15 and 4.3, respectively.

Erika Gonzalez- Letter I

I-1 The County acknowledges that the commenter opposes the proposed Project. Concerns about the merits of the proposed Project will be considered by the Riverside County Planning Commission and Board of Supervisors in their decision whether to approve, approve with modifications, or deny approval of the proposed Project.

I-2 Comments are acknowledged. Project-related impacts to traffic, air quality, and biological resources are addressed in EIR §§ 4.15, 4.3, and 4.4, respectively. As indicated in EIR § 4.4, with mitigation, the Project's impacts to biological resources, including sensitive vegetation communities, plants, and animal species, would be reduced to less-than-significant levels. The EIR imposes three mitigation measures to reduce to the maximum feasible extent the Project's cumulatively-considerable impacts to study area intersections and state highway facilities through payment of fair share fees and payment of DIF and TUMF fees; however, and as acknowledged in EIR § 4.15.9, impacts would remain significant and unavoidable because either the timing of funded improvements are not known, or because no fee program currently identifies funding for needed improvements. With respect to air quality, and as disclosed in EIR § 4.3, the Project would result in significant and unavoidable impacts due to a conflict with the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP), and because of long-term emissions of volatile organic compounds (VOCs) and oxides of nitrogen (NO_x) that violate the SCAQMD regional thresholds of significance. However, it should be noted that these impacts would occur at a regional scale, as localized air quality impacts that could directly affect nearby sensitive receptors (i.e., residents), including emissions of diesel particulate matter (DPM), were shown to be less than significant. Regardless, the commenter's concerns about the Project's environmental effects will be considered by the Riverside County Planning Commission and Board of Supervisors in their decision whether to approve, approve with modifications, or deny approval of the proposed Project.

I-3 In conformance with CEQA, each subject area evaluated in the EIR contains a cumulative impact analysis that takes into consideration past, present, and reasonably foreseeable developments both within unincorporated Riverside County and nearby cities. With respect to the General Plan, growth management is discussed only in relation to the Southern California Association of Governments (SCAG) Regional Growth Management Plan (General Plan Policy AQ 1.2). This policy merely encourages support of the Regional Growth Management Plan by developing



intergovernmental agreements with appropriate governmental entities such as the Western Riverside Council of Governments (WRCOG), the Coachella Valley Association of Governments (CVAG), sanitation districts, water districts, and those subregional entities identified in the Regional Growth Management Plan. Thus, the intergovernmental agreements required by General Plan Policy AQ 1.2 would occur at the County level and are not applicable to individual development proposals such as the proposed Project.

- I-4 Potential Project-related impacts to the Cajalco Expressway are not evaluated in the Project's EIR or Traffic Impact Analysis (TIA) because it is expected that the Project would contribute fewer than 50 peak hour trips to this facility, which is considered the threshold for when a Project may or may not result in potential direct or cumulatively-considerable impacts pursuant to the County's Traffic Impact Analysis Preparation Guide. Regardless, the Cajalco Expressway is a facility that is eligible for funding of improvements via Development Impact Fees (DIF) and/or Transportation Uniform Mitigation Fee (TUMF), and the Project Applicant would be required to contribute appropriate DIF and TUMF fees prior to the issuance of building permits. Additionally, while the County acknowledges that there are existing and planned elementary schools and secondary schools within a five-mile radius of the Project site, these existing and planned schools have been accounted for by the Project's TIA and the EIR's analysis of potential impacts to traffic (refer to EIR § 4.15). Furthermore, traffic associated with the proposed high-cube warehouse uses is unlikely to contribute to traffic congestion around any existing or planned schools because most vehicular trips associated with high-cube warehouse uses would occur on major roadway facilities, such as I-215 and SR-91, and there are no existing or proposed schools along local roadways that would be used by Project-related traffic to access I-215. No revision to the DEIR is warranted pursuant to this comment.
- I-5 Historical aerial photographs show that the Project site and surrounding areas have not been used for agricultural production since at least 1938 (refer to Appendix D of EIR Technical Appendix G1, and Appendix D of EIR Technical Appendix G2). Furthermore, agricultural uses would not be consistent with a majority of the site's existing General Plan land use designations.
- I-6 The County acknowledges the commenter's opposition to the proposed Project. As noted above, these concerns will be considered by the Riverside County Planning Commission and Board of Supervisors in their decision whether to approve, approve with modifications, or deny approval of the proposed Project.

Margaret Lindou- Letter J

- J-1 The County acknowledges that the commenter opposes the proposed Project. Concerns about the merits of the proposed Project will be considered by the Riverside County Planning Commission and Board of Supervisors in their decision whether to approve, approve with modifications, or deny approval of the proposed Project.
- J-2 The County acknowledges that the Project proposes high-cube warehouse uses in close proximity to existing rural residential uses. However, significant impacts of the proposed Project have been fully evaluated in the EIR and mitigated to the maximum feasible extent.



Specific to the issues raised by this comment, EIR § 4.11 evaluates the Project’s potential for noise impacts, and concludes that the Project would result in significant and unavoidable near-term traffic-related noise impacts to the Oleander Road segments west of Harvill Avenue and east of proposed Driveway #6 under both near-term construction and near-term operation of the proposed Project; however, these segments of Oleander Road occur within areas that are designated by the General Plan for “Community Development – Light Industrial (CD-LI)” land uses. Ultimately, this area is expected to be developed with light industrial land uses, which are not noise-sensitive land uses. The EIR’s analysis of operational- and traffic-related noise demonstrates that the Project would not expose areas south of the Project site, including the existing rural residential land uses, to noise levels that exceed the County’s standards.

With respect to air quality, the EIR’s analysis demonstrates that while significant and unavoidable regional air quality impacts would occur, localized air quality impacts that could directly impact nearby rural residences would be less than significant. Additionally, diesel particulate matter (DPM) impacts affecting nearby sensitive receptors would be less than significant pursuant to the thresholds of significance adopted by the South Coast Air Quality Management District (SCAQMD).

With respect to potential lighting impacts, EIR § 4.1.4, notes the following:

“Lighting on the Building D Site and Building E Site would be required to comply with the conditions outlined in Riverside County Ordinances Nos. 655 and 915, which provide minimum requirements for outdoor lighting in order to reduce light trespass and to protect the health, property, and well-being of residents. Plans submitted to Riverside County for future implementing permits and approvals (i.e., building permits) would be required to demonstrate compliance with these standards. Accordingly, mandatory compliance with County Ordinances No. 655 and 915 would ensure that neither Building D nor Building E create a new source of substantial light or glare which would adversely affect day or nighttime views or expose residential properties to unacceptable light levels” (FEIR at p. 4.1-11).

All security and exterior lighting associated with the proposed Project also would be required to comply with County Ordinances 655 and 915, both of which were explicitly adopted for the purpose of ensuring light trespass impacts associated with new developments do not occur. Lighting on site would further be reduced by the proposed 10-foot high landscape shrub screening proposed along the Project’s southern boundary; trees planned along the western boundary of the site; and 8-foot high noise attenuation barriers along the southwestern and southeastern boundaries of Building Site D. Thus, although new lighting sources would be introduced to the site with Project implementation, such lighting elements would not expose residential properties to unacceptable light levels.

- J-3 As stated in the list of regulatory requirements at FEIR p. 4.3-36, diesel-fueled vehicles at the Project site are required to comply with the California Air Resources Board (CARB) idling restriction requirements, which currently restrict vehicles from idling for more than 5 minutes. As a best practice measure and in an effort to further reduce idling, Mitigation Measure MM 4.3-4 has



been revised in the FEIR that requires signs to be posted on the site which specify that trucks shall not idle by more than 3 minutes (instead of 5 minutes).

With respect to large trucks utilizing residential streets, all areas between the Project site and on- and off-ramps for the I-215 are currently developed with or are planned for light industrial land uses. Thus, Project-related truck trips would not utilize residential streets to access the freeway. Additionally, the Project Applicant would be required to contribute fees to the County's Development Impact Fee (DIF) program and Transportation Uniform Mitigation Fee (TUMF) program, both of which allocate money for improvements throughout the County, including the Project area. Additionally, Mitigation Measures MM 4.15-1 and MM 4.15-2 require the Project Applicant to contribute fair-share contributions to the TUMF and DIF towards two intersections shown to be cumulatively impacted by the Project, while Mitigation Measure MM 4.15-3 obligates the Project Applicant to contribute fair-share funds for cumulatively-considerable impacts to state highway segments in the event a fee program is established by CalTrans.

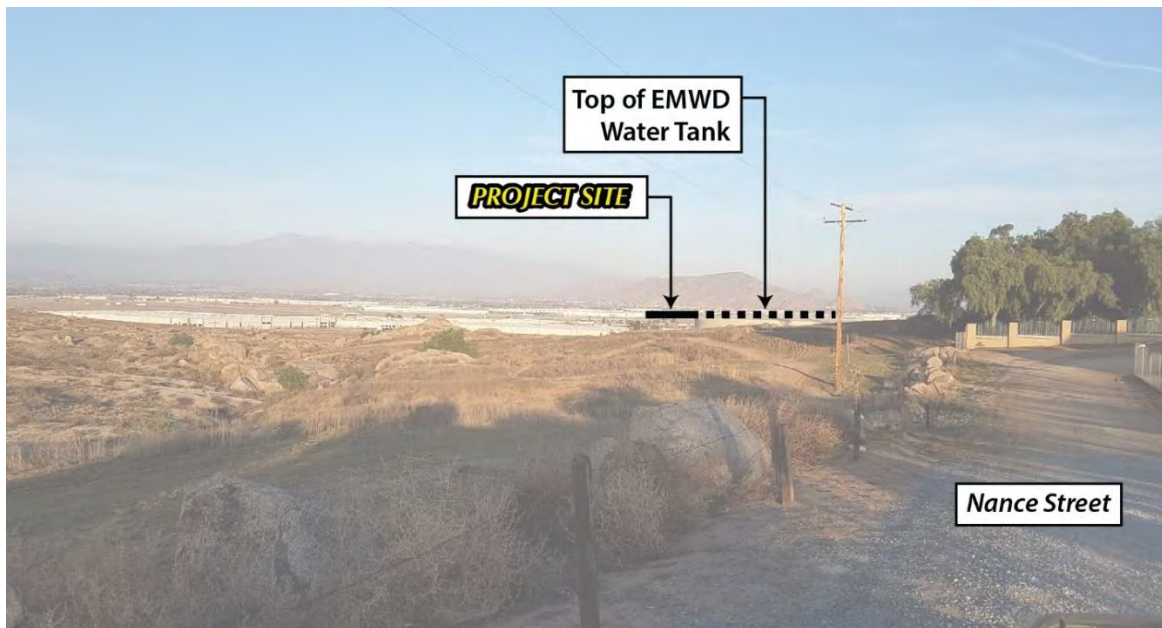
- J-4 Potential impacts to biological resources, including the burrowing owl, are addressed in EIR § 4.4. Mitigation Measure MM 4.4-1, which was imposed on the Project to address potentially significant impacts to the burrowing owl, requires preconstruction surveys for the burrowing owl; prohibits disturbances to any active burrowing owl nest; and requires relocation of burrowing owl individuals outside of the nesting season. Additionally, the Project would be required to contribute MSHCP fees pursuant to Ordinance No. 810, which would assist the Western Riverside County Regional Conservation Authority (RCA) in establishing the MSHCP Reserve System, which ultimately will provide adequate foraging and nesting habitats for the burrowing owl. As concluded in EIR § 4.4.8, with the implementation of mitigation measures all of the Project's potentially significant impacts to biological resources would be reduced to less-than-significant levels.
- J-5 The EIR's analysis of potential adverse effects of the Project on infrastructure are evaluated in EIR §§ 4.9, Hydrology and Water Quality, 4.13, Public Services, 4.15, Transportation, and 4.16, Utilities and Service Systems. In each case, impacts due to inadequate infrastructure were found to be less than significant, or mitigation measures were imposed to reduce impacts to less-than-significant levels. The remaining comments regarding merits of the proposed Project will be considered by the Riverside County Planning Commission and Board of Supervisors in their decision whether to approve, approve with modifications, or deny approval of the proposed Project.

C. Ray Miller and Peggy Miller- Letter K

- K-1 The County acknowledges the commenter's opposition to the proposed Project. There is no evidence in this comment or in the administrative record for the Project demonstrating that any components of the Project site comprise a scenic resource. On the contrary, the four site photographs provided in EIR § 4.1, Aesthetics, demonstrate that the site does not exhibit any scenic resources available from public or private views. The EIR (at FEIR at p. 4.1-6) acknowledges that Box Springs Mountains, Reche Canyon, and the Russell Mountains are visually prominent and scenic. However, the EIR accurately states that the Project site is not a part of these scenic resources and does not contribute to the scenic views. An additional photograph, taken from Nance Street southwest of the Project site, which is positioned at a higher elevation than the Project site, is shown



below. From this view, the top of the EMWD water tank is visible. Views of the Project site are not prominent from this location and as shown, the Project sits at a much lower ground elevation than the topographic landforms that are visible in the background. The ground elevation of the water tank pad is 1,667 feet above mean sea level (amsl), whereas the finished grade of the Building E Site (closest to the water tank and west of Decker Road/Ellsworth Street) is proposed at a grade of 1,615 feet amsl. Considering that the Project's maximum building height, including any rooftop projections is 55 feet, the maximum top elevation of the building would be 1,670 feet amsl, which is only three feet higher than the very bottom of the water tank. As shown in the photograph provided below, the top of the water tank is visible from this location on Nance Street, not the bottom of the tank. Thus, the Project's buildings, which will be lower in elevation than the water tank, have no potential to block a scenic view from this location. The landforms visible in the background of this photograph will continue to be visible and the Project would not present any obstruction of scenic views.



- K-2 The County acknowledges the commenter's opposition to the proposed Project. Refer to Responses E-88 and E-89, which explain that community character is not a subject of CEQA, and that based on substantial evidence presented in the EIR and County's administrative record for the Project, impacts to scenic resources would be less than significant under CEQA. Refer to Response K-1, which explains that the Project would not obstruct a scenic view. Potential growth-inducing impacts of the Project are evaluated in EIR § 5.3, which concludes that the Project would not be growth-inducing.
- K-3 The use proposed by the Project is a permitted use under the County's Industrial Park (IP) zoning designation and the Riverside County General Plan's Community Development – Light Industrial



(CD-LI) land use designation. These designations already apply to portions of the Project site and the Project Applicant is seeking re-designations through General Plan Amendment and Change of Zone applications for other portions of the Project site so that the entirety of the site is designated CD-LI and zoned IP. Land use and zoning designation changes are not considered to be significant impacts to the environment unless the result of changing the designations would manifest into adverse physical environmental effects. The Mead Valley Area Plan, which is the County's long-range plan for the community, states on p. 7: "A major thrust of the Riverside County General Plan is to attract new businesses that can provide jobs for the extensive local labor force that now, in significant numbers, must commute to Orange and Los Angeles Counties. A substantial industrial strip covers almost the entire eastern edge of Mead Valley [where the Project site is located], which provides outstanding rail and freeway access. This not only leverages the Employment Center immediately adjacent to it, but focuses more intensive activities where multiple transportation modes converge." While the Project proposes to change the land use designation on a portion of the site from "Business Park" to a "Light Industrial," as explained in Response B-8, the result of doing so would actually result in fewer adverse environmental effects, primarily due to the fact that the high-cube warehouses proposed as part of the Project are calculated to generate less traffic, and thereby generating less air pollutant emissions than would occur if the site were to be developed under its existing General Plan designations.

- K-4 There are no major flaws in the EIR. There were no comments made in this letter or in other letters commenting on the DEIR that necessitates recirculation of the DEIR in compliance with CEQA.
- K-5 The commenter's preference for the No Project Alternative is noted. As discussed in EIR § 6.3.1, selection of the "No Project/No Development Alternative" would result in no development on the Project site. Wildlife movement corridors link together areas of suitable habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbances. The Building D Site and Building E Site were evaluated for their function as a wildlife corridor such that species would use to move between wildlife habitat zones. The Project site is surrounded by human activity in the form of residences, agricultural use, warehouses, and Interstate 215 approximately 2,300 feet to the east. Further, the Project site does not contain mountain canyons or riparian corridors that are typically used by wildlife as corridors. The ephemeral drainage that occurs on the property does not contain riparian habitat. Further, the Project site is not identified for long-term conservation as a habitat core or linkage by the Western Riverside County MSHCP. As discussed in EIR § 4.4.5, The MSCHP is an adopted habitat conservation plan (HCP) that establishes conservation areas and linkages for long-term preservation across western Riverside County to achieve several goals that specifically support wildlife movement. No wildlife movement corridors were found to be present on or adjacent to the Project site (FEIR pp. 4.4-18 to 4.4-24).
- K-6 This comment refers to the "No Project/Existing General Plan Designation Alternative," which is discussed in EIR § 6.3.2. The EIR analyzed the proposed Project as a 24-hour operation as worst-case disclosure of operational impacts because there is nothing in the County Municipal Code that prohibits 24-hour operations. Similarly, there is nothing in the County Municipal Code that would prohibit 24-hour operation of business park uses under the County's CD-BP land use designation. As discussed in Response B-8, the traffic generation for the No Project/ Existing General Plan



Alternative was calculated by Urban Crossroads and revised in EIR § 6.3.2. The resultant trips would be 5,847 ADT, which is 3,732 more ADT than would be generated by the proposed Project. In addition, the air quality emissions that would occur if the Project site were to be developed under its existing General Plan land use designations have been calculated by Urban Crossroads, Inc., and the discussion has been added to EIR § 6.3.2, which indicates that the Project would produce fewer air quality pollutants than would occur under the No Project/Existing General Plan Designation Alternative. Also refer to Response B-8 regarding this topic.

Regarding the WRCOG 1,000-foot buffer recommendation, the WRCOG's recommended buffer of 300 meters (1,000 feet) is presumed to be based on the CARB Land Use Handbook ("Handbook," April 2005) which recommends a buffer distance of at least 1,000 feet between land uses that will generate/attract 100 or more trucks per day. However, CARB's guidance acknowledges that the 1,000-foot buffer distance is an advisory, only, and to determine the actual risk near a particular facility additional analysis should be conducted. The Handbook further states that "these recommendations are designed to fill a gap where information about existing facilities may not be readily available and are not designed to substitute for more specific information if it exists." The EIR and its technical studies – which includes an air quality impact analysis and a HRA - are explicitly consistent with the CARB handbook. The EIR includes a site-specific health risk assessment based on the geospatial location of the proposed Project and existing sensitive land uses in the vicinity of the Project site and the truck travel routes that are expected to be utilized. As disclosed in the EIR, the Project would not pose a significant health risk associated with diesel particulate matter (DPM) to sensitive receptors in the Project vicinity (refer to EIR § 4.3, Air Quality). Therefore, a wider buffer is not necessary to alleviate any significant and unavoidable impacts of the Project.

- K-7 The Air Quality Report (EIR Technical Appendix B1) accounts for elevations and terrain data via the dispersion modeling performed. Refer to Response K-15.
- K-8 The operational noise level analysis at residential homes located west of the Project site, at higher elevations than the Project, is based on worst-case operational noise levels that only account for attenuation due to distance from the Project activities. Further, the analysis is based on hard-site conditions, and does not account for any hillside vegetation or soft site conditions which would provide additional noise attenuation over distance, and therefore, represents a conservative analysis unaffected by the 'amphitheater' effects identified in the comment. In addition, the Noise Study (EIR Technical Appendix I) makes no claims regarding audibility of Project noise sources, but rather evaluates Project operational noise levels with local noise level regulations per CEQA guidance. Further, the operational noise analysis shows that the impacts related to Project operational noise levels will be less than significant when all Project operational noise sources are operating simultaneously, including idling trucks, delivery truck activities, parking, backup alarms, as well as loading and unloading of dry goods.
- K-9 Potential impacts to humans associated with noise, noise vibration, air pollution, and diesel particulate matter (DPM) that may occur as a result of the proposed Project are disclosed in EIR §§ 4.11, Noise, 4.3, Air Quality, and 4.7, Greenhouse Gas Emissions. There is no information supplied



in this comment or comment letter or in the County's administrative record to substantiate the commenter's assertion that these topics were not adequately analyzed.

- K-10 Refer to Responses C-26, C-37, C-40, C-70, C-72, C-74, and C-75 regarding blasting. In addition, the construction noise level thresholds identified in the Noise Study (EIR Technical Appendix I) are based on the adopted thresholds of the County of Riverside, Office of Surface Mining and Reclamation and Enforcement (OSMRE), and the Code of Federal Regulations (CFR) for the purposes of analysis under CEQA guidelines. These guidelines are identified for noise-sensitive receiver locations such as the residential homes in the Project study area and represent appropriate thresholds for CEQA impact analysis. Further, periodic exposure to high noise levels in short duration, such as Project construction and blasting, is typically considered an annoyance and not impactful to human health unless regularly exposed to high noise levels over periods of years. Per guidance on hearing loss from the Center for Disease Control, it would take several years of exposure to high noise levels to result in hearing impairment. Lastly, the Air Quality Report (EIR Technical Appendix B1) and EIR § 4.3 appropriately evaluates impacts associated with blasting activities. The results of the analysis indicate that there are less-than-significant impacts to air quality and human health as a result of blasting.
- K-11 Riverside County Ordinance No. 625 is discussed in EIR § 4.2, Agriculture & Forest Resources. Specifically, as discussed under Threshold c) in EIR § 4.2.4:

“In the unlikely event that agricultural activity commences on the properties immediately to the west and south of the Project site that are zoned A-1-1, and continues for at least three years before the Project site is developed, the proposed Project would be required to comply with Riverside County Ordinance No. 625 (Riverside County Right-to-Farm Ordinance) (Riverside County, 1994).”

Thus, the EIR explicitly acknowledges the Project's obligations relative to Ordinance No. 625, and the requirements of Ordinance No. 625 would apply to any established (i.e., more than three years) agricultural uses within 300 feet of the Project boundaries. With respect to horses, the analysis in EIR § 4.11, Noise, concludes that all noise impacts associated with the Project would be less than significant with mitigation incorporated, with exception of near-term construction and near-term operational noise along Oleander Avenue between Driveway #6 and Harvell Avenue; however, the affected segment does not abut any areas that are zoned for agricultural use, and occurs in an area that is planned for light industrial land uses.

- K-12 The County acknowledges that A-1-1 Light Agriculture zoning is applied to property located to the southwest and west of the Project site. As shown on EIR Figure 3-5, p. 3-9 and Figure 3-12, p. 3-18, zoning designations surrounding the Project site include the following: “Industrial Park (I-P)” and “Manufacturing-Medium (M-M)” to the north; “I-P” and “Manufacturing-Service Commercial (M-SC)” to the east; “Light Agriculture (A-1),” “Rural-Residential (R-R),” and “I-P” to the south; and “A-1” and “Rural Residential 1/2-Acre Lot Sizes (R-R-1/2)” to the west.
- K-13 Potential impacts associated with air pollution, diesel particulate matter (DPM), noise, and noise vibration, that may occur as a result of the proposed Project are disclosed in EIR §§ 4.3, Air Quality,



4.7, Greenhouse Gas Emissions, and 4.11, Noise. Also refer to Responses B-7, B-17, B-21, C-4, C-30, C-37, C-72, C-75, C-92, E-32, E-56, J-2I, K-14, K-18, and M-1.

K-14 Refer to Responses C-4 and C-92.

K-15 Potential impacts associated with air pollution, diesel particulate matter (DPM), noise, and traffic, that may occur as a result of the proposed Project are disclosed in EIR §§ 4.3, Air Quality, 4.11, Noise, and 4.15, Transportation. The commenter notes that trucks would have to travel slow down at a number of stop signs, travel up and down hills on local roads and intersections not designed for wide turns by large trucks in order to travel south on Decker Road/Ellsworth Street from the Project. As previously discussed in Response C-4, these are precisely the reasons which make these routes highly unattractive for trucks, especially when there is a shorter, direct route to the I-215 Freeway via Harvill Avenue and Harley Knox Boulevard. Nonetheless, as best practice measures, Mitigation Measure MM 4.15-4 is added to the FEIR to require the developer to install durable, legible, weather-proof signs at exit driveways that prohibit trucks from heading south on Decker Road/Ellsworth Street, and Mitigation Measure MM 4.15-5 is added to the FEIR to require information to be provided in building user leases indicating that building users shall designate truck routing away from southbound Decker Road/Ellsworth Street and away from residential neighborhoods.

Potential air pollution and diesel particulates that may result from the proposed Project are evaluated in the Air Quality Impact Analysis prepared for the Project and appended to the EIR as Technical Appendix B1, the Mobile Source Health Risk Assessment prepared for the Project and appended to the EIR as Technical Appendix B2, and the Greenhouse Gas Analysis prepared for the Project and appended to the EIR as Technical Appendix F. EIR §§ 4.3, Air Quality and 4.7, Greenhouse Gas Emissions, analyze the potential impacts associated with air pollution and diesel particulates that may result from the proposed Project and provide Applicable County Regulations and Design Requirements and Mitigation Measures to reduce or eliminate potential impacts associated with air pollution and diesel particulates to the maximum feasible extent.

K-16 Refer to Response C-96.

K-17 Refer to Responses E-11 and E-34. The trip generation rates for High-Cube warehouse published by the Institute of Transportation Engineers (ITE) are based on more than 50 studies (57 studies for daily rate, 67 studies for AM peak hour rate and 70 studies for PM peak hour rate). In addition, Riverside County and Caltrans traffic study guidelines require use of the ITE Trip Generation Manual for the TIA. The commenter offers no basis or support for their opinion that the ITE rates for high-cube warehouse are unduly low. The ITE Trip Generation Manual is used nationwide as a standard source for trip generation estimates. As such, the commenter's opinion that the EIR is flawed in the number of cars and trucks it is reasonably estimated to generate is incorrect.

K-18 Potential impacts associated with traffic generation are fully evaluated in EIR § 4.15, Transportation, as well as EIR §§ 4.3, Air Quality, 4.7, Greenhouse Gas Emissions, and 4.11, Noise. Also refer to Response C-4.



- K-19 This excerpt from the Mead Valley Area Plan is acknowledged. The EIR that is the subject of this comment letter complies with CEQA as required.
- K-20 Refer to Responses K-4 and K-18.
- K-21 Refer to Response C-7. There is no information supplied in this comment or comment letter or in the County's administrative record to substantiate the commenter's assertion that these topics were not adequately analyzed.
- K-22 Refer to Response E-44 which discusses that signs will be posted to limit idling to 3 minutes (instead of 5 minutes). The EIR and health risk assessment (EIR Technical Appendix B2) appropriately evaluate potential impacts associated with idling trucks from the Project. As stated in the EIR, the analysis conservatively estimates that each truck would idle on-site for 15 minutes, which is three times the state's 5-minute idling rule. Furthermore, the health risk assessment (EIR Technical Appendix B2 and EIR §4.3, pp. 4.3-29 to 4.3-34) also includes a robust cumulative health risk analysis.
- K-23 This does not appear to be a comment on the Project, rather a statement based on a newspaper article. Notwithstanding, it appears as though the commenter cites one year of data to insinuate that air quality may be getting worse. As evidenced in the comment – and data presented in the EIR (at FEIR pp. 4.3-7 to 4.3-14) the overall trend in air quality is actually improving.
- K-24 This comment appears to be a series of statements related to potential negative effects caused by air quality emissions, as opposed to specific issues raised regarding the proposed Project or the EIR's analysis. Refer to Response E-29.
- K-25 The comment regarding future Trammell Crow phases for warehouses within the Knox Business Park is unclear. At the time of the NOP (August 2015) and currently, there are no applications for future Trammell Crow phases for warehouses within the Knox Business Park. The cumulative impacts analyses contained within the EIR evaluates cumulative traffic and vehicular-related air quality, greenhouse gas, and noise impacts using the list approach authorized in the CEQA Guidelines, §15130. The EIR evaluates 103 other past, present, and reasonably foreseeable projects within the study area. See EIR, §4.0.2, Figure 4.0-1, Table 4.0-1. Other cumulative environmental impacts are evaluated using the summary of projections approach. See EIR, §4.0.2.
- The remainder of this comment asserts legal principles and does not comment on environmental issues in the EIR directly. Accordingly, no further response is required. See CEQA Guidelines, §15088(a). The commenter's legal conclusions are noted, although this response does not agree or disagree with those legal conclusions.
- K-26 The EIR fully addresses the Project's impacts on the ephemeral drainage at the site (see EIR, §§ 4.4.1 and 4.4.4), as well as the Project's potential impacts to tribal cultural resources (see FEIR § 4.18). Refer to Responses A-4, C-44, C-47, C-49, C-61, E-66, K-57, and L-3 through L-14.
- K-27 The comment does not identify any specific inaccuracies or discrepancies in the project description, and the County is not aware of any, except as addressed in this response. Refer to Response C-9. In summary, the 55 feet approved by the ALUC is not the height of the buildings but is the height



allowance above finished grade for roof-mounted equipment. As disclosed in the EIR (at FEIR pp. 3-14 and 3-23), Building D and Building E would be constructed to a height of approximately 40 feet above finished grade, with architectural projections up to approximately 44 feet. The ALUC conditions are included in EIR § 4.8, Hazards and Hazardous Materials (at FEIR pp. 4.18-16 to 4.18-19), as Applicable Regulations and Design Requirements imposed by the Riverside County ALUC on the proposed Project. In EIR § 4.15.5 (at FEIR p. 4.15-46), the DEIR stated that the tallest features on the Project site would not exceed a height of 45 feet above finished grade. That has been changed to 55 feet above finished grade in the FEIR.

- K-28 This comment is identical to comment K-19. Refer to Response K-19.
- K-29 Commenter is referred to Responses C-4, C-62, C-63, and K-7. Also, refer to EIR §§ 4.3, 4.11, and 4.15 for a discussion of the Project’s potential impacts to air quality, noise, and transportation (respectively).
- K-30 Refer to Response C-4. The County’s General Plan Circulation Element map is shown as Figure 4.15-2 (at FEIR p. 4.15-158).
- K-31 Comments regarding merits of the proposed Project are acknowledged and will be considered by the Riverside County Planning Commission and Board of Supervisors in their decision whether to approve, approve with modifications, or deny approval of the proposed Project. With respect to the adequacy of the EIR, refer to Responses K-1 through K-30 and Responses K-32 through K-67. For the reasons discussed in those responses, the County finds that none of the comments on or revisions made to the EIR as part of the FEIR meet the conditions listed in CEQA Guidelines § 15088.5(a) requiring recirculation of the DEIR for additional public review. Also refer to Response K-4.
- K-32 EIR §§ 4.11, Noise, and 4.3, Air Quality disclose the potential impacts associated with noise and air quality that may occur as a result of the proposed Project. The County acknowledges the commenter’s opinion of what is not aesthetically pleasing. EIR § 4.1, Aesthetics, discloses the aesthetic qualities and visual resources present on the Project site and in the site’s vicinity and evaluates the potential effects that the Project may have on these resources. The EIR concludes that impacts to aesthetics would be less than significant. Also, refer to Responses C-83, C-96, and E-3 and the cross-section exhibits provided following Response E-91 regarding the Project design in relation to adjacent land uses. Detailed descriptions of the exhibits shown on pages FEIR-216 and FEIR-217 are provided in Response E-3.
- K-33 These comments concern another project and not the proposed Project. CEQA Guidelines § 15097 requires that the lead agency adopt a mitigation monitoring and reporting program to ensure that the mitigation measures are implemented. CEQA Guidelines, §15097(a). A mitigation monitoring and reporting program will be adopted for this Project based on EIR Table S-1, “Mitigation Monitoring and Reporting Program.” See FEIR, pp. S-11 through S-65.
- K-34 Refer to Response E-34.
- K-35 Refer to Response C-96 (2).



- K-36 Refer to Responses C-4, C-85, and C-92.
- K-37 Refer to Responses C-4, C-85, and C-92.
- K-38 Refer to Response E-41.
- K-39 Refer to Responses C-4 and C-92.
- K-40 EIR § 4.3 and the Air Quality Study (EIR Technical Appendix B1) evaluate short-term impacts associated with Project construction and operations adjacent to the Project site. Any impacts to other schools or public facilities would be substantially less than the exposure identified for the nearest sensitive receptors for operational activity, which is less than significant. Furthermore, as discussed in prior responses, there is no credible evidence that trucks would be using to any significant degree, Cajalco Road as discussed in detail in Response C-94.
- K-41 Refer to Response E-44 which discusses that signs will be posted to limit idling to 3 minutes (instead of 5 minutes). EIR § 4.3 and the Health Risk Assessment (EIR Technical Appendix B2) evaluate idling from Project trucks accessing the site. As noted in the EIR, it is conservatively estimated that all trucks accessing the site would idle for 15 minutes. This is conservative and assumes idling would occur for 5 minutes upon arrival, 5 minutes upon loading/unloading, and 5 minutes upon exit – consistent with the CARB anti-idling rules that the Project would be subject to. There is no basis to assume that multiple tenants would require additional idling, this suggestion is not supported by any material fact.
- K-42 The Noise Study (EIR Technical Appendix I) was prepared consistent with Federal, State, and local noise guidelines. The Federal Transportation Guidelines identified in the comment are based on Federal Highway Administration guidance which was developed to reduce highway traffic noise levels associated with high speed automobile and truck traffic movements. In contrast, the operational noise sources at the Project site represent stationary/area-sources that will be traveling at low speeds while on-site and as such, the FHWA highway traffic noise barrier design guidelines are not directly applicable. In addition, the noise barrier locations identified in the Noise Study (Exhibit 9-A) and heights specified on the exhibit and in Mitigation Measure MM 4.11-3 are to satisfy the noise criteria at the closest sensitive receiver locations based on the worst-case operational noise analysis. The Noise Study and EIR conclude that the impacts related to Project operational noise levels will be less than significant when all Project operational noise sources are operating simultaneously, including idling trucks, delivery truck activities, parking, backup alarms, as well as loading and unloading of dry goods. Further, the operational noise analysis assumes all activity will occur for the entire 60 minutes of every hour for 24 hours at the Project site, when in reality, these activities will vary throughout the day in both intensity and location within the site. Thus, the maximum noise levels reported by the EIR are overstated compared to likely real-world conditions, and Mitigation Measures MM 4.11-3 and MM 4.11-4 will provide necessary noise mitigation, based on the calculated and likely overstated operational noise levels.
- K-43 Refer to Response C-66.



- K-44 The County acknowledges this information obtained from the Federal Highway Administration website regarding noise barriers. EIR §4.11 and the Noise Study (EIR Technical Appendix I) have been prepared consistent with Federal, State, and local noise guidelines. The Federal Transportation Guidelines identified in the comment are based on Federal Highway Administration guidance which was developed to reduce highway traffic noise levels associated with high speed automobile and truck traffic movements. In contrast, the operational noise sources at the Project site represent stationary/area-sources that will be traveling at low speeds while on-site and as such, the FHWA highway traffic noise barrier design guidelines are not directly applicable. In addition, the noise barrier locations identified in the Noise Study (Exhibit 9-A) and heights specified are shown to satisfy the noise criteria at the closest sensitive receiver locations based on the worst-case operational noise analysis. The Noise Study shows that the impacts related to Project operational noise levels will be less than significant when all Project operational noise sources are operating simultaneously, including idling trucks, delivery truck activities, parking, backup alarms, as well as loading and unloading of dry goods. Further, the operational noise analysis assumes all activity will occur for the entire 60 minutes of every hour for 24 hours at the Project site, when in reality, these activities will vary throughout the day in both intensity and location within the site.
- K-45 Refer to Response E-50.
- K-46 As previously stated in Response K-7, no barrier attenuation is included in the analysis for homes that sit at higher elevations west of the Project site to present worst-case conditions. As indicated above in response to comments K-42 and K-44, the comment incorrectly applies FHWA highway barrier design guidelines to the stationary/area-source noise levels generated by on-site Project operational activities. Further, the analysis in the EIR and Noise Study (EIR Technical Appendix I) is based on hard-site conditions which means the noise levels propagate at a greater rate than soft site conditions, to represents a conservative approach.

While residential homes located west of the Project site sit at a higher elevation and may have line-of-sight to the operational noise sources within the Project site, the analysis shows that the operational noise levels will remain less than significant at all receiver locations. Further, the analysis at receiver locations without a noise barrier (R1 to R5, R7, and R8) is based on unmitigated, worst-case operational noise levels at that do not include any additional barrier attenuation.

Based on distance attenuation, which provides 6 dBA of attenuation per doubling of distance from a stationary/area-source such as Project unloading/docking activity, the Project will generate operational noise levels approaching 35.4 dBA Leq at the closest receiver location west of the Project site, R4. Tables 9-6 and 9-7 of the Noise Study (repeated as Tables 4.11-18 and 4.11-19 in the EIR) show that receiver locations west of the Project site will not experience any Project-related ambient noise level increases during daytime or nighttime hours. Therefore, the impacts related to Project operational noise levels will remain less than significant based on the quantifiable thresholds identified in the Noise Study and EIR at the homes west of the Project site.

Also refer to Responses I-2, J-2, K-15, and M-1 for responses regarding potential air quality impacts. Refer to Responses C-16, C-20, and J-2 for responses regarding potential impacts



associated with light trespass. Refer to Responses B-13, C-37, C-72, C-78, E-32, E-96, K-9, K-13, K-51, K-52, and K-66 for responses regarding potential vibration impacts.

- K-47 Refer to Response C-51. As for construction of the mechanically stabilized earth (MSE) retaining wall, the MSE wall is required to be constructed under the supervision of the geotechnical engineer of record and the Riverside County Building Inspector. Furthermore, similar to comments related to queuing from other projects, referencing another project and appropriate slope stability from a layperson and comparing it to the currently proposed Project is inapplicable to potential physical environmental impacts as they relate to the specific Project.
- K-48 Refer to Responses K-7, E-51 and E-53. No retaining wall barrier attenuation is included in the analysis. The EIR and Noise Study (EIR Technical Appendix I) findings indicate that operational noise level impacts will be less than significant at all receiver locations. See FEIR pp. 4.11-21 to 4.11-25.
- K-49 Refer to Response C-13.
- K-50 This comment is consistent with information presented in the EIR. As documented in the EIR, the only potentially significant impacts to biological resources are impacts on an ephemeral drainage located on the Building D Site and Building E Site, the potential for western burrowing owl to be present when construction activities commence, and the potential for migratory birds to be nesting at the site if construction occurs during the nesting season. See EIR §§ 4.4.4 and 4.4.6.
- K-51 As part of proposed grading activities, blasting in hard rock areas would consist of small charges that produce less-than-significant noise and vibration impacts as documented in the EIR (at FEIR pp. 4.11-20 to 4.11-21). According to the County's cultural resource experts, and considering the proposed method of blasting, the noise would be perceived as a thump and not an explosive event that could potentially result in indirect impacts to significant cultural resources. Because the entire Project site would be disturbed by grading and development, there would be no greater impact to cultural resources associated with blasting as compared to the impacts that would occur from other aspects of the Project's construction process. Further, as the sites within the Area of Potential Effect (APE) have been determined to be not significant in accordance with the California Environmental Quality Act (CEQA), no significant impacts will result as a consequence of blasting for the project.
- K-52 The blasting process is designed to minimize noise and vibration to the adjacent properties, and to avoid any damage to those properties. See EIR §§ 4.6.3 (FEIR p. 4.6-13), 4.8.3 (FEIR p. 4.8-11), 4.11.2 (FEIR p. 4.11-9), 4.11.3 (FEIR pp. 4.11-10 through 4.11-12), and 4.11.5 (FEIR pp. 4.11-21, 4.11-25). A blasting noise and vibration monitoring and abatement plan must be prepared and approved by the County prior to issuance of grading permits. See EIR §4.11.8 (FEIR p. 4.11-30). Also refer to Responses C-26, C-37, C-40, C-70, C-72, C-74, and C-75. The blasting process for construction activities is fairly common in Riverside County and is highly controlled and limited to the exact location as needed for each blast; there will be no impacts related to gas leaks, water leaks, broken windows, electrical lines, broken wiring, or other similar impacts.
- K-53 Refer to Responses E-59, C-37, C-40, and E-57.



- K-54 Refer to Response C-96.
- K-55 Refer to Responses C-101 and E-55.
- K-56 A Developed Condition Hydrology Map is included as part of the EIR as Figure 4.9-4 (at FEIR p. 4.9-17), which shows that drainage from the area west of the Building E shall be designed to be collected by a series of inlet structures and underground storm drain system. As such, Sub-Areas A1 through A10 shown on EIR Figure 4.9-4, which have a total peak surface run-off of 85 cubic feet per second (cfs) for a 100-year storm will be conveyed via an underground storm drain system to Lateral F-4, while Areas B-1 and B-2 shown on EIR Figure 4.9-4 have a total peak surface run-off of 13-cfs for a 100-year storm being conveyed to Lateral F-3. The proposed drainage concept is required to be reviewed and approved by Riverside County Flood & Water Conservation District prior to construction.
- K-57 As indicated in the EIR (at FEIR pp. 4.4-19 to 4.4-20), jurisdictional delineations were conducted on the Project site, and neither the Building D Site or the Building E Site contain waters of the United States under jurisdiction of the U.S. Army Corps of Engineers. The drainage located on the Project site is an ephemeral drainage and Mitigation Measures MM 4.4-3 and 4.4-4 are identified to mitigate the Project's impacts on the ephemeral drainage to below a level of significance.
- K-58 Refer to Response C-96.
- K-59 Refer to Response C-96, which also applies to the SCAQMD guidance.
- K-60 Refer to Response E-29.
- K-61 Refer to the Responses C-3 and E-18. As noted, this comment incorrectly characterizes "piecemealing" and "segmentation" under CEQA. The EIR evaluates the Project as a whole, including two separate warehouse buildings and associated improvements. No further response is necessary.
- K-62 Refer to Response E-22.
- K-63 Refer to Responses E-20 and K-25.
- K-64 Potential impacts associated with air pollution, diesel particulate matter (DPM), noise, and traffic, that may occur as a result of the proposed Project are disclosed in EIR §§ 4.3, Air Quality, 4.11, Noise, and 4.15, Transportation. Also refer to Responses C-62, C-63, and C-64.
- K-65 Refer to Responses C-4, C-92 and C-96(1).
- K-66 Refer to Response C-72. The blasting noise and vibration analysis shows less than significant impacts based on adopted thresholds of the OSMRE, CFR, and Caltrans. Blast events will occur over a few seconds and do not represent constant activity at the Project site. Also refer to Responses C-26, C-37, C-40, C-70, C-72, C-74, and C-75.
- K-67 Refer above to the responses to Comments K-1 through K-66. For the reasons discussed in those responses, the County finds that none of the comments or revisions to the DEIR meet the conditions



listed in CEQA Guidelines § 15088.5(a) requiring recirculation of the DEIR for a second public review period. Specifically, there are no new significant impacts identified as a result of public comments or revisions to the EIR beyond what was disclosed in the DEIR. Additionally, the comments and associated revisions did not result in the identification of an increase in the severity of any environmental effect that was disclosed in the DEIR. Comments on the DEIR did not identify any feasible Project alternatives or mitigation measures considerably different from others analyzed in the DEIR that would clearly lessen the environmental effects of the proposed Project. Furthermore, the County finds that the DEIR was supported by substantial evidence, was fundamentally and basically adequate, and was not conclusory in nature such that meaningful public review and comment were precluded. Accordingly, recirculation of the DEIR for a second public review period is not required under CEQA Statutes or Guidelines. No further response is needed.

Pechanga Tribal Historic Preservation Office - Letter L

- L-1 Riverside County (County) acknowledges receipt of this letter and the request to be added the public interest list pertaining to the proposed Project and its CEQA compliance process. The Pechanga Tribal Historic Preservation Office is confirmed to be on the County's notification list and will receive notices at the mailing address given in this comment letter.
- L-2 The County acknowledges and appreciates the Tribe's participation in the AB-52 consultation process for this Project.
- L-3 The July 12, 2016 letter to the County of Riverside is confirmed to be part of the County's administrative record for this FEIR. The information presented in the July 12, 2016 letter was reviewed and considered by the County in its determination that there are no tribal cultural resources on the Project site as discussed in FEIR § 4.18. The National Register of Historic Places (NRHP) criteria do not apply to non-federal projects and are not utilized as part of the definition of a tribal cultural resource pursuant to Public Resources Code § 21074 and CEQA Guidelines § 15064.5. Further, NRHP criteria do not recognize the term "Tribal Cultural Resource."
- L-4 Information provided by the Pechanga Tribe (Tribe), both in writing and during the AB 52 consultation process, was important to the County's deliberative process and was taken into consideration by the County when determining the potential significance of the on-site resources, and in determining the significance of the proposed Project's impacts to these resources. See FEIR, § 4.18. The presence of archaeological resources of concern to the Tribe west of the currently-proposed western boundary of the Building E Site was a contributing factor to the Project Applicant's decision to reduce the size of the Building E Site (by 12.1 acres) compared to the size of the Building E Site studied in Technical Appendix D2, and the building was reduced in size directly as a direct result of the Tribe's desire for avoidance of the area of interest. See FEIR, §4.18.
- L-5 The topic of tribal cultural resources was presented in DEIR § 4.5, Cultural Resources, which contained information and analysis of potential impacts to tribal cultural resources, and specifically at pp. 4.5-15 to 4.15-16 and 4.15-21 to 4.15-24 under Thresholds d) and e). In response to this



comment, the FEIR separates the topics of historical and archaeological resources from tribal cultural resources by the provision of FEIR § 4.18, Tribal Cultural Resources. Regardless of its location in the FEIR, DEIR § 4.5, Cultural Resources, fully analyzed the topic. FEIR § 4.18, Tribal Cultural Resources, clearly presents this topic independently from the topic of archaeological resources.

L-6 Refer to Responses L-5 and L-7. The County recognizes that the Tribe is an expert in its culture. As discussed in Response L-5, the FEIR separates the topics of historical and archaeological resources from tribal cultural resources by the provision of FEIR § 4.18, Tribal Cultural Resources. The County received substantial input from the Tribe as listed in Response L-8.

L-7 The FEIR's conclusions regarding tribal cultural resources (see FEIR § 4.18, Tribal Cultural Resources) were derived by considering multiple sources of information, including information provided by the Tribe, as well as information derived from other tribes and the archaeological studies (FEIR Technical Appendices D1 and D2). The Tribe's information and values were indeed considered by the County. Information provided by the Tribe, both in writing and during the consultation process, was important to the County's deliberative process and was absolutely taken into consideration by the County when determining the potential significance of the on-site resources, and in determining the significance of the proposed Project's impacts to these resources. See FEIR § 4.18. The presence of archaeological resources of concern to the Tribe west of the currently-proposed western boundary of the Building E Site was the primary factor in the Project Applicant's decision to reduce the size of the Building E Site (by 12.1 acres) compared to the size of the Building E Site as currently proposed, described in EIR's Project Description at EIR § 3.0 and analyzed throughout the EIR. Moreover, as part of the evaluation of archaeological resources, Mitigation Measure MM 4.5-1 requires a monitoring agreement with the Pechanga and Soboba tribes), Mitigation Measures MM 4.5-2 and MM 4.5-3 require relocation of bedrock milling features in accordance with a relocation plan that has been reviewed with Tribe representatives), Mitigation Measure MM 4.5-5 requires cultural sensitivity training to be provided to grading contractors by a representative designated by the Tribe, as well as controlled grading around the bedrock milling features), and other mitigation measures calculated to protect any cultural resources, including those of concern to the Tribe, which might be discovered during excavation.

In this case the County had multiple sources of information; information provided by the Pechanga and other Tribes, as well as information from archaeological studies performed by a professional archaeologist based on documentary research, field surveys, and a pollen and residue analysis. In most respects, the Tribe's information supports and confirms the archaeologist's opinions; and, in some respects, the information and opinions of the professional archaeologists and Tribe conflicted and as required under CEQA, the County exercised its independent judgement taking into consideration all information in the County's administrative record including information obtained during the AB 52 consultation process to reach a conclusion that the Project site does not contain resources that meet the definition of a tribal cultural resource.

L-8 Riverside County engaged in extensive government-to-government consultation with Native American Tribes regarding the proposed Project over an approximate 24-month period, beginning in July 2015. Also, the Project Applicant began coordination with the Pechanga Band of Luiseño



Indians in June 2015, prior to the effective date of AB 52. Also refer to Response A-3. Riverside County, acting in good faith and with sufficient information and evidence for this Project, has closed the AB 52 consultation process.

A summary of the consultation process is provided below.

In compliance with Senate Bill 18 (SB18) concerning proposed General Plan Amendment GPA 01151 (Building D Site), the County requested a list from the Native American Heritage Commission (NAHC) of tribes whose historical extent includes the project area. Based on the November 12, 2015 list provided by NAHC, Riverside County sent project notices on November 16, 2015 to 18 Native American Tribal representatives. A response was received from the Pala Tribal Historic Preservation Office dated January 11, 2016 deferring to closer Tribes. A response was received from the Rincon Band of Luiseno Indians dated December 1, 2016 deferring to either the Pechanga Band or the Soboba Band. The Pauma Band of Luiseno Indians responded on December 1, 2015 stating that they were not aware of any cultural sites or resources on the project property. SB 18 consultation was requested by the Morongo Cultural Heritage Program in a letter dated December 2, 2015. Consultation with Morongo took place on December 02, 2015. Morongo requested the cultural report for the project which was provided to them on December 10, 2015.

In compliance with Senate Bill 18 (SB18) concerning proposed General Plan Amendment GPA 01152 (Building E Site), the County requested a list from the NAHC of tribes whose historical extent includes the project area. Based on the November 12, 2015 list provided by NAHC, the County sent project notices on November 16, 2015 to 18 Native American Tribal representatives. A response was received from the Pala Tribal Historic Preservation Office dated January 11, 2016 deferring to closer Tribes. The Pauma Band of Luiseno Indians responded on December 1, 2015 and stating that they were not aware of any cultural sites or resources on the project property. A response was received from Agua Caliente dated November 16, 2015 deferring to Soboba. A response requesting consultation was received from Soboba dated January 19, 2016 and from Morongo dated December 2, 2015. Consultation was held with Morongo on December 2, 2015 at which time Mr. Haute requested the tribe be provided with the cultural report, which the County sent to him on December 10, 2015. At that time, the County requested to be contacted if the Tribe had any further comments or concerns.

In compliance with Assembly Bill 52 (AB52) concerning proposed GPA 01151 and related actions (Building D Site), the County mailed notices regarding this project to the Soboba Band of Luiseno Indians, the Pechanga Band of Luiseno Mission Indians, the Agua Caliente Band of Cahuilla Indians and to the Rincon Band of Luiseno Indians on July 13, 2015. A notice was sent to the San Manuel Band of Mission Indians on October 20, 2015. A response requesting consultation was received from Soboba dated August 13, 2015. A response dated July 20, 2015 deferring to Soboba or Pechanga was received from Rincon. San Manuel provided a response dated October 29, 2015, in which they thanked County Planning for the opportunity to review and respond and recommended contacting tribes with ancestral territory claims in the Perris area and declined consultation. A request to consult was received from Pechanga dated August 18, 2015. Prior to this, a site visit was held with Pechanga tribal representatives on June 30, 2015. On September 2, 2015, County Planning provided the Pechanga tribe with the cultural report for the project. The



County attended consultation meetings to discuss the project with Pechanga on March 23, 2016, April 27, 2016, June 2, 2016, October 31, 2016, and March 03, 2017. The County's final draft of the related conditions of approval were provided to the Pechanga Tribe on March 15, 2017.

In compliance with Assembly Bill 52 (AB52) concerning proposed GPA 01152 and related actions (Building E Site), the County mailed notices regarding this project to the Soboba Band of Luiseno Indians, the Pechanga Band of Luiseno Mission Indians, the Agua Caliente Band of Cahuilla Indians and the Rincon Band of Luiseno Indians on July 13, 2015. A notice was sent to the San Manuel Band of Mission Indians on October 20, 2015. San Manuel provided a response dated October 29, 2015, in which they thanked County Planning for the opportunity to review and respond and recommended contacting tribes with ancestral territory claims in the Perris area and declined consultation. A response dated August 28, 2015 deferring to Soboba or Pechanga was received from Rincon. Soboba responded in a letter dated August 13, 2015 and a consultation meeting was held on August 19, 2015. A subsequent meeting was then held between Soboba and the Applicant. On August 12, 2016, the County sent an email to Soboba asking if they had any further comments or concerns. Soboba replied that with the standard conditions for Tribal monitoring and artifact disposition applied to the project, they would formally conclude consultation. A request to consult was received from Pechanga dated September 9, 2015. Prior to this, a site visit was held with Pechanga tribal representatives on June 30, 2015. The County held consultation meetings Pechanga to discuss the project on April 27, 2016, June 2, 2016, October 31, 2016, March 03, 2017, and March 23, 2017. The County's draft conditions of approval were provided to the Pechanga Tribe on March 15, 2017.

In addition, the meetings held and listed above, a summary of written correspondence that occurred during the SB18 and AB52 consultation periods is listed below.

| | | | |
|--------|-----------|-------------------------|---|
| letter | 1/11/2015 | Pala to County | SB18 deferral GPA01152 |
| letter | 7/10/2015 | Pechanga to BFSA | Request for information Decker I (Building D Site) |
| letter | 7/10/2015 | Pechanga to BFSA | Request for information Decker II (Building E Site) |
| letter | 7/13/2015 | County to Pechanga | GPA01151 AB52 notification |
| letter | 7/13/2015 | County to Soboba | GPA01151 AB52 notification |
| letter | 7/13/2015 | County to Agua Caliente | GPA01151 AB52 notification |
| letter | 7/13/2015 | County to Rincon | GPA01151 AB52 notification |
| letter | 7/13/2015 | County to Soboba | GPA01152 AB52 notification |
| letter | 7/13/2015 | County to Agua Caliente | GPA01152 AB52 notification |
| letter | 7/13/2015 | County to Rincon | GPA01152 AB52 notification |
| letter | 8/10/2015 | County to Pechanga | GPA01152 AB52 notification |
| letter | 8/12/2015 | Applicant to County | Letter regarding draft mitigation measures |
| letter | 8/13/2015 | Soboba to County | AB52 request to consult GPA01151 |
| letter | 8/18/2015 | Pechanga to County | AB52 Request to consult GPA01151 |
| letter | 8/18/2015 | Pechanga to County | AB52 request to consult GPA01151 |
| letter | 8/28/2015 | Rincon to County | Deferring consultation on GPA01152 |
| letter | 8/28/2015 | Rincon to County | Deferring consultation on GPA01151 |
| email | 9/2/2015 | County to Pechanga | Sent cultural reports |



| | | | |
|--------|------------|-----------------------|---|
| letter | 9/9/2015 | Pechanga to County | AB52 request to consult GPA01152 |
| email | 9/22/2015 | Soboba to Planning | Will have monitor provide report |
| email | 9/22/2015 | County to Soboba | Resent both AB52 notifications as requested by Soboba |
| letter | 10/20/2015 | County to San Manuel | GPA01151 AB52 notification |
| letter | 10/20/2015 | County to San Manuel | GPA01152 AB52 notification |
| letter | 10/26/2015 | County to NAHC | SB18 list request GPA01151 |
| letter | 10/26/2015 | County to NAHC | SB18 list request GPA01152 |
| email | 10/29/2015 | San Manuel to County | AB52 response GPA01151 deferring |
| email | 10/29/2015 | San Manuel to County | AB52 response GPA01152 deferring |
| letter | 11/12/2015 | NAHC to County | SB18 list GPA01151 |
| letter | 11/12/2015 | NAHC to County | response SB18 list GPA01152 |
| letter | 11/16/2015 | County to all Tribes | SB18 notification GPA01151 |
| letter | 11/16/2015 | Agua to County | SB18 deferral to Soboba GPA01152 |
| letter | 11/16/2015 | County to all Tribes | SB18 notification GPA01152 |
| email | 12/1/2015 | Pauma to County | Not aware of any sites GAP01151 |
| email | 12/1/2015 | Pauma to County | Not aware of any sites GPA01152 |
| letter | 12/2/2015 | Morongo to County | Request to consult GPA01151 SB18 |
| letter | 12/2/2015 | Morongo to County | SB18 consultation request GPA01152 |
| letter | 12/10/2015 | County to Morongo | Sent reports |
| letter | 1/11/2016 | Pala to County | Defers SB18 |
| letter | 1/19/2016 | Soboba to County | SB18 consultation request GPA01152 |
| email | 5/18/2016 | County to Pechanga | Sent updated reports |
| email | 6/3/2016 | Applicant to Pechanga | Revised exhibits |
| email | 6/6/2016 | Planning to Pechanga | Requested identification of TCR's, asked if the landscape is documented, and how the landscape if present is being impacted |
| email | 6/10/2016 | Pechanga to all | Working on mitigation measures |
| email | 6/10/2016 | Applicant to Pechanga | Requested expedited review of mitigation measures |
| email | 6/29/2016 | Applicant to Pechanga | When can expect letter? |
| email | 7/5/2016 | Pechanga to all | Working on letter |
| letter | 7/12/2016 | Pechanga to County | TCR/MM/TCL information |
| email | 8/12/2016 | County to Soboba | Asking if tribe had comments or concerns |
| email | 8/12/2016 | Soboba to County | Add standard monitoring and disposition and will conclude |
| email | 3/6/2017 | County to Pechanga | Sent revised project description and exhibits |
| email | 3/15/2017 | County to Pechanga | Sent final draft of conditions of approval (COAs) |
| email | 4/4/2017 | County to Soboba | Sent final draft of COAs |
| letter | 5/30/2017 | NAHC to County | DEIR comments |
| letter | 7/6/2017 | Pechanga to County | DEIR comments |
| letter | 7/6/2017 | Soboba to County | DEIR comments |
| letter | 7/14/2017 | Rincon to County | DEIR comments |

L-9 According to the Project's professional archaeologist, no theories are presented, only hypotheses. There are many varied hypotheses for the region, which is the reason for illustrating the variety of cultural chronologies in the EIR and cultural resources documents including EIR Technical Appendices D1 and D2.



- L-10 The reference sources and information cited in this comment are acknowledged and included in the County's administrative record for this Project. The County considered all of the information in its administrative record to reach the conclusions documented in the DEIR and FEIR.
- L-11 A milling feature represents only one aspect of the entire food preparation process for a relatively narrow range of food packages. The milling features within the APE stand alone, and as is evidenced by the testing conducted, no other material that would be associated with "kitchen" tools, storage containers, fire hearths, etc. were identified within the APE based upon the evidence provided to the County. The presence of a particular plant phytolith or pollen does not necessarily equate to its frequency within the surrounding environment.

Contrary to the comment, a total of 81 shovel test pits (STPs) and two test units were excavated across the APE. The STPs were terminated in compact subsoil or directly in bedrock with no evidence of cultural materials present within the strata. Many of the STPs stretched to 50 centimeters deep; however, the majority of the STPs terminated in bedrock, as indicated in the Project's archaeological report(s). Even though the site has experienced disturbances, evidence of archaeological materials would still remain if they were present, as materials shift both horizontally and vertically across a property when it is disturbed. Therefore, resources would still be detectable by archaeological testing, regardless of previous plow zone impacts.

From an archaeological standpoint, the evaluation of the sites is based upon whether or not each site meets the criteria for significance outlined in CEQA. For cultural resources identified within the APE, this is based upon the material culture (artifacts/features) present at each site. Given that no significant archaeological deposits were identified, and only milling features remain, the sites do not qualify as significant resources and do not meet the criteria for listing on the CRHR (PRC SS5024.1, Title 14, § 4852) based upon the substantial evidence provided to the County to date. Further, with regard to the results of the residue analyses, the data generated from these analyses served only to confirm what the written archaeological record shows about the types of materials that were processed in milling features in this region. Based upon submitted reports, it was determined the materials encountered at this site were not significant for the purpose of making a significance conclusion under CEQA.

- L-12 As indicated in Response L-4, information provided by the Tribe and other tribes both in writing and during the AB 52 consultation process, was important to the County's deliberative process and was absolutely taken into consideration by the County when determining the potential significance of the on-site resources, and in determining the significance of the proposed Project's impacts to these resources. As an example of the Tribe's influence on the Project's design over the course of the AB 52 consultation process, the presence of archaeological resources of concern to the Tribe west of the currently-proposed western boundary of the Building E Site was the primary factor to the Project Applicant's decision to reduce the size of the Building E Site (by 12.1 acres) compared to the size of the Building E Site studied in Technical Appendix D2. Building E was substantially reduced in size as a direct result of the Pechanga Tribe's desire for avoidance of the area of interest. It is unclear how additional phytolith/pollen and protein residue analyses of the milling features on the Project site would provide any additional information that would be substantially different from the information gained from the analysis already conducted and substantive enough to alter the



County's conclusion that the Project site does not contain resources that meet the definition of a tribal cultural resource. In consideration of the extensive government-to-government consultation that occurred as part of the AB 52 consultation process, the County has adequate information about this site. It is the County's opinion that no new information of substantial importance would be derived from more phytolith/pollen analyses or further protein residue studies. The results of the phytolith/pollen analyses confirm, first and foremost, that the environment represented is strongly influenced by historic changes based upon farming and ranching. The phytolith/pollen and protein residue analysis already conducted resulted in the extraction of environmental and prehistoric exploitation patterns already established and well documented for milling technology within the region.

- L-13 Refer to Response L-7. CEQA provides that the CEQA lead agency has discretion to determine whether a resource constitutes a tribal cultural resource. Pub. Res. Code, §21074(a)(2). In this case the lead agency has considered all of the information available on the issue of tribal cultural resources, including the extensive information provided by the Tribe, as well as the extensive information provided by the professional archaeologist based on documentary research, multiple field surveys, and a pollen and residue analysis. The lead agency's conclusions are supported by substantial evidence and were made in consideration of the significance of the resources to the Tribe and other tribes. The features requested by the Tribe to be avoided, have been avoided by the Project Applicant's decision to reduce the size of the Building E Site by 12.1 acres, thereby removing that area from the Project site altogether. Although the features in the 12.1-acre area were determined to be not significant under CEQA, they are nonetheless being avoided by the Project by virtue of the Project Applicant substantially reducing the size of the Building E Site project to entirely avoid those resources.
- L-14 FEIR § 4.18, Tribal Cultural Resources, discloses the consultation process with the Native American tribes, including the Pechanga Band of Luiseño Indians. The County considered all consultation with the Pechanga Band of Luiseño Indians, including the suggestions for mitigation provided in Comments L-15 through 22.
- L-15 No revisions to Mitigation Measure MM 4.5-1 are suggested in this comment.
- L-16 No revisions to Mitigation Measure MM 4.5-2 are suggested in this comment.
- L-17 No revisions to Mitigation Measure MM 4.5-3 are suggested in this comment.
- L-18 Mitigation Measure MM 4.5-4 has been revised in the FEIR as suggested in this comment.
- L-19 Mitigation Measure MM 4.5-5 has been revised in the FEIR as suggested in this comment.
- L-20 No revisions to Mitigation Measure MM 4.5-6 are suggested in this comment.
- L-21 The Western Science Center located in Hemet, California is a facility that meets federal standards. It has a receiving bay, curation lab, collections repository, and research and teaching laboratory. No revision to Mitigation Measure MM 4.5-7 is warranted.
- L-22 No revisions to Mitigation Measure MM 4.5-8 are suggested in this comment.



L-23 Refer to Responses L-1 and L-8.

Lindsay Robinson- Letter M

M-1 The County acknowledges that the commenter opposes the proposed Project. Concerns about the merits of the proposed Project will be considered by the Riverside County Planning Commission and Board of Supervisors in their decision whether to approve, approve with modifications, or deny approval of the proposed Project.

With respect to the specific issues raised by this comment, the Project site is currently designated by the General Plan for “Community Development – Business Park (CD-BP)” and “Community Development – Light Industrial (CD-LI).” Although portions of the Project site are designated for “Rural Residential (R-R)” and “Rural Residential – ½ Acre Minimum (R-R-1/2),” these zoning designations are not consistent with the existing CD-BP and CD-IP General Plan land use designations. Under state law, zoning designations must be consistent with the underlying General Plan land use designation (California Government Code § 65860). Thus, even if the proposed Project did not require a General Plan Amendment to change the CD-BP land use designation to CD-LI, a rezone still would be required to ensure consistency between the site’s zoning and the CD-BP and CD-LI land use designations applied to the site.

EIR § 4.10, Land Use and Planning, identifies a significant and unavoidable impact due to proposed change in the site’s existing land use (primarily vacant land) to two warehouse buildings and associated site improvements, which in turn would result in significant and unavoidable impacts under the subject areas of air quality, noise, and traffic, even with adherence to mandatory regulatory requirements and the application of feasible mitigation measures identified in the EIR. However, it should be noted that none of the Project’s significant and unavoidable impacts to the environment would directly impact rural residential uses to the west and south of the Project site. Specifically, and as shown in EIR Tables 4.3-8 and 4.3-9, with implementation of the required mitigation the Project would not result in any localized air quality impacts affecting adjacent existing or future residential uses. The maximum incremental cancer risk attributable to Project Diesel Particulate Matter (DPM) source emissions is calculated to be 6.19 in 1,000,000 (assuming the resident(s) would stay at their home 24 hours a day, 350 days per year for 70 years), which is less than the SCAQMD cancer risk threshold of 10 in 1,000,000. As indicated in EIR Tables 4.11-13, 4.11-15, and 4.11-16, the Project would not expose existing or future residential uses to the south or southwest of the Project site to excessive noise levels that exceed the County’s thresholds of significance. Additionally, while the Project would result in significant unavoidable impacts to transportation/traffic due to the timing of necessary improvements and/or because there is not an established fee program for cumulatively-considerable impacts, these unavoidable impacts would not occur within the rural residential areas to the south and southwest of the Project site.

M-2 The County acknowledges that the commenter opposes the proposed Project; refer to the response to Comment M-1.

M-3 This comment does not identify any way in which the traffic data is flawed. The EIR discloses all of the Project’s potential significant effects to the environment and imposes feasible mitigation



measures to reduce significant impacts to less-than-significant levels when possible. EIR § 4.13 evaluates the Project's potential impacts to the Riverside County Sheriff Department response times and facilities and concludes that with the payment of Development Impact Fees (DIF), impacts would be less than significant. This comment letter does not identify any specific ways in which the EIR is flawed; accordingly, no revision to the EIR has been made pursuant to this comment.

- M-4 The County acknowledges that the commenter opposes the proposed Project. Concerns about the merits of the proposed Project will be considered by the Riverside County Planning Commission and Board of Supervisors in their decision whether to approve, approve with modifications, or deny approval of the proposed Project.

Dr. Krystle Rowe- Letter N

- N-1 The County acknowledges that the commenter opposes the proposed Project. Concerns about the merits of the proposed Project will be considered by the Riverside County Planning Commission and Board of Supervisors in their decision whether to approve, approve with modifications, or deny approval of the proposed Project.

Charlene Skog- Letter O

- O-1 The County acknowledges that the commenter opposes the proposed Project. Concerns about the merits of the proposed Project will be considered by the Riverside County Planning Commission and Board of Supervisors in their decision whether to approve, approve with modifications, or deny approval of the proposed Project. With respect to air quality and traffic, please refer to EIR §§ 4.3 and 4.15, which evaluates and discloses the Project's potential impacts and imposes mitigation to reduce the Project's significant environmental effects to below a level of significance, where feasible. No further response is necessary.

Soboba Band of Luiseno Indians- Letter P

- P-1 The County acknowledges the commenter's disagreement. Refer to Response C-3. In addition, the cultural resource sites were analyzed separately rather than as a village site or landscape because there was no observable connection between the sites other than that they all contained milling features. Each site is spatially distinct from the next and no additional archaeological material was available to connect these features in time and space; as a result, the occupational history and how and when the resources were exploited remains unknown. It cannot be determined if the sites were contemporaneous or if the sites were used during different periods of occupation. Further, no additional cultural remains were present that indicate that the sites comprise a village. This would include midden deposits, a high frequency of cultural materials, and subsurface features typical of village sites (shelters, ceremonial objects, pictographs, etc.). From a practical perspective, each site must be treated separately unless a connection can be made between individual sites (such as resources that were moved from one site to another), which provides a foundation to treat the sites as contemporary and linked. Finally, although Soboba claims that a place name exists for this group of sites, no place name has been offered that is tied to these specific sites within the APE.



- P-2 Also refer to Responses L-4 to L-12. In addition, and as previously stated in Response P-1, due to the lack of cultural materials, temporal placement, and physical connection between each site, a formal landscape analysis is not warranted based upon the scale of the current Project and the extent of agricultural disturbance of the site, as well as recent development of the surrounding area. The two principal archaeologists involved in the project have over 70 years of experience working as professional archaeologists and conducted their work in a culturally sensitive manner while considering the evidence presented by the archaeological resources within the Project site. Information provided by the tribes, both in writing and during the consultation process, was exceedingly important to the County's deliberative process and was taken into consideration by the County when determining the potential significance of the on-site resources, and in determining the significance of the proposed Project's impacts to these resources. See FEIR § 4.18. The presence of archaeological resources of concern to the Tribe west of the currently-proposed western boundary of the Building E Site was the main contributing factor to the Project Applicant's decision to reduce the size of the Building E Site (by 12.1 acres) compared to the size of the Building E Site studied in Technical Appendix D2, and the building was reduced in size directly as a result of a stated Tribal desire for avoidance of the area of interest. See FEIR, § 4.18.
- P-3 As a commenting party on the DEIR, Mr. Ontiveros will receive responses to the submitted comments.

South Coast Air Quality Management District- Letter Q

- Q-1 The County acknowledges the SCAQMD's comments that are meant for guidance for the Lead Agency and incorporation into the FEIR. The County acknowledges the comment regarding SCAQMD's 2016 Air Quality Management Plan (AQMP) and its status, purposes, and challenges in the South Coast Air Basin (SCAB).
- Q-2 This summary of the proposed Project is noted. To clarify the description of surrounding land uses, EIR Figure 2-1, Surrounding Land Uses and Development, depicts the existing land uses in the immediate vicinity of the Project site. As illustrated in Figure 2-1, lands north of the Project site are largely undeveloped, with exception of a recently constructed industrial warehouse building located north of Oleander Road and east of Harvill Avenue. To the south of the Project site are scattered, rural residences and business ventures, and undeveloped land. Southwest of the Building E Site is a water tank owned by the Eastern Municipal Water District (EMWD). To the west of the Project site are undeveloped lands, beyond which are single-family homes. To the east of the Project site are undeveloped lands, several scattered single-family residences and an industrial warehouse building located along the eastern edge of Harvill Avenue. Approximately 0.4 miles to the east is I-215, beyond which are the March Air Reserve Base (MARB) and an area of the City of Moreno Valley mostly developed with industrial warehouse buildings.
- Q-3 This comment accurately summarizes information from the EIR.
- Q-4 Refer to Responses Q-5 through Q-11. Regarding truck trips, the comment does not specify any specific discrepancy and the County can find no discrepancy in the EIR. Regarding health risk, the FEIR does not understate the Project's health risk impacts, and use of the OEHHA methodology



suggested in Comments Q-9 and Q-10 would, in fact, overstate the Project's impacts. The County's air quality experts reviewed the 2015 OEHHA guidance to determine applicability of the use of early life exposure adjustments to identified carcinogens. The 2015 OEHHA guidance relies upon U.S. EPA guidance relating to the use of early life exposure adjustment factors (Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens, EPA/630/R-003F) whereby adjustment factors are only considered when carcinogens act "through the mutagenic mode of action." A mutagen is a physical or chemical agent that changes genetic material, such as DNA, increasing the frequency of mutations to produce carcinogenic effects. The use of adjustment factors is recommended to account for the susceptibility of producing adverse health effects during early life stages from exposure to these mutagenic compounds. None of the carcinogens considered in the study for this Project elicit a mutagenic mode of action and, therefore, the use of age specific adjustment factors as suggested by this comment is not warranted. The Project's HRA (EIR Technical Appendix B2) correctly used a lifetime exposure adjustment factor of 1.0.

- Q-5 Refer to Responses Q-12 through Q-15.
- Q-6 As a commenting party on the DEIR, the SCAQMD will receive responses to the submitted comments.
- Q-7 The County acknowledges receipt of the contact information for SCAQMD's Air Quality Specialist.
- Q-8 The truck rates utilized in EIR Technical Appendix B1 for the Air Quality Impact Analysis and Technical Appendix B2 for the Health Risk Assessment rely on the ITE Manual, 9th Edition, which is industry standard. The comment does not specify any specific discrepancy and without such detail, the County is unable to determine what value may be inaccurate related to the truck trip rates. It should be noted that Technical Appendix B1 and B2 present truck information differently since Technical Appendix B1 relies on CalEEMod and Technical Appendix B2 relies on EMFAC2014 – as recommended by the SCAQMD.
- Q-9 The County's air quality experts at Urban Crossroads reviewed the 2015 Office of Environmental Health Hazard Assessment (OEHHA) guidance to determine applicability of the use of early life exposure adjustments to identified carcinogens. For risk assessments conducted under the auspices of The Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB2588), OEHHA applies specific adjustment factors to all carcinogens regardless of purported mechanism of action. However, the 2015 OEHHA guidance relied upon U.S. EPA guidance relating to the use of early life exposure adjustment factors (Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens, EPA/630/R-003F) whereby adjustment factors are only considered when carcinogens act "through the mutagenic mode of action." A mutagen is a physical or chemical agent that changes genetic material, such as DNA, increasing the frequency of mutations to produce carcinogenic effects. The use of adjustment factors is recommended to account for the susceptibility of producing adverse health effects during early life stages from exposure to these mutagenic compounds. None of the carcinogens considered in the study for this Project elicit a mutagenic



mode of action and, therefore, the use of age specific adjustment factors is not warranted. The study correctly used a lifetime exposure adjustment factor of 1.0.

By way of background, the Air Toxics "Hot Spots" Information and Assessment Act requires stationary sources (facilities) to report the type and quantity of substances they routinely release into the air. The regulation requires that toxic air emissions from facilities be quantified and compiled into an inventory according to criteria and guidelines developed by CARB, that each facility be prioritized to determine whether a risk assessment is conducted, that risk assessments be conducted according to methods developed by OEHHA and that the public be notified of significant risks. Please note that OEHHA clarifies its risk assessment's applicability by stating that "roadways are not part of the Hot Spots program because the program only addresses stationary sources."

It should be noted that neither the South Coast Air Quality Management District (SCAQMD) nor any other air agency in the Southern California region has adopted guidance on the applicability/use of Age Sensitivity Factors (ASFs) under CEQA.

At the June 5, 2015 SCAQMD Board Meeting, the SCAQMD adopted the 2015 OEHHA guidelines for use in their permitting process. Notwithstanding, the SCAQMD acknowledged in their response to comments received on the revised permitting rules that:

"The Proposed Amended Rules are separate from the CEQA significance thresholds. The SCAQMD staff is currently evaluating how to implement the Revised OEHHA Guidelines under CEQA. The SCAQMD staff will evaluate a variety of options on how to evaluate health risks under the Revised OEHHA Guidelines under CEQA. The SCAQMD staff will conduct public workshops to gather input before bringing recommendations to the Governing Board. In the interim, staff will continue to use the previous guidelines for CEQA determinations."

Further at a June 18, 2015 Association of Environmental Professionals Meeting, the SCAQMD staff (Ms. Jillian Wong, Ph.D.) stated that any new guidance regarding ASFs under CEQA for projects where SCAQMD is not the lead agency, will not be adopted until there is completion of a public process. At this time, no such process has commenced and no formal guidance has been adopted.

Lastly, as previously noted the SCAQMD is in the process of evaluating how the Revised OEHHA Guidelines will be applied to CEQA projects under their jurisdiction and currently recommends continued use of previous guidelines for CEQA determinations. In the rulemaking activity for the 2015 OEHHA guidelines as they apply to permitting projects, the SCAQMD also recommends use of the previous version of the OEHHA guidelines for spray booths and retail gasoline stations.

Similarly, the San Joaquin Valley Air Pollution Control District (SJVAPCD) has actually adopted a new significance threshold in conjunction with the 2015 OEHHA guidelines. More specifically, in recognition of the impact that the 2015 OEHHA guidelines would have on CEQA, SJVAPCD has actually adopted a new maximally exposed individual risk numeric significance threshold of 20 in one million which is two times the prior SJVAPCD threshold of 10 in one million. It should



be noted that the SJVAPCD's adoption of the 2015 OEHHA guidelines for CEQA was part of a public process.

Given that there is no available guidance that has been adopted by SCAQMD for CEQA purposes and the fact that the Project does not emit any pollutants that elicit a primary mutagenic mode of action, the use of the 2015 OEHHA guidelines would not be appropriate and therefore was not undertaken for this analysis.

- Q-10 Refer to See Response Q-9.
- Q-11 The SCAQMD Air Quality and Land Use Planning Handbook an informational guide to land use issues focused on community health; it does not set policies, regulations, or impose any requirements. As evidenced in FEIR pp. 4.3-7 to 4.3-13, air quality is improving across the South Coast Air Basin and is projected to continue improving as regulations become more stringent over time. Implementation of the proposed Project would not result in a 1,000-foot distance separation between on-site truck courts and existing sensitive receptors. However, no loading docks would be oriented to face south and screen walls, manufactured slopes, and landscaping would occur along the south boundaries of the proposed Building D Site and Building E Site between the proposed buildings and residential uses to the south. As analyzed and documented in EIR Technical Appendix B2 "Mobile Source Health Risk Assessment" and set forth in "Air Quality; Impact Analysis" Threshold d) FEIR pp. 4.3-29 to 4.3-31, the proposed Project would result in less-than-significant human health impacts to sensitive receiver locations during Project operation, including emissions from truck traffic. Accordingly, there is no basis under CEQA to impose a 1,000-foot buffer, as no mitigation is required to avoid significant health impacts to sensitive receptors.
- Q-12 As analyzed and documented in EIR Technical Appendix B2 "Mobile Source Health Risk Assessment" and set forth in "Air Quality; Impact Analysis" Threshold d) FEIR pp. 4.3-29 to 4.3-31, the proposed Project would result in less-than-significant human health impacts to sensitive receiver locations during Project operation. Accordingly, no mitigation is required because significant health impacts to sensitive receptors would not occur.
- Q-13 Refer to Response C-35(1).
- Q-14 Refer to Responses C-32.
- Q-15 Based on the expected building occupant type (high cube distribution warehouse), it is not anticipated that trucks will spend enough time on-site to connect to a charging station and recharge a battery. Regardless, the Project will be conditioned to install an adequately-sized electrical panel to accommodate plugs-ins to power auxiliary equipment at the loading docks.

Doug and Chris Tenney- Letter R

- R-1 The County acknowledges that the commenter opposes the proposed Project. Concerns about the merits of the proposed Project will be considered by the Riverside County Planning Commission and Board of Supervisors in their decision whether to approve, approve with modifications, or deny approval of the proposed Project. With respect to air quality and traffic, please refer to EIR §§ 4.3



and 4.15, which evaluates and discloses the Project's potential impacts and imposes mitigation to reduce the Project's significant environmental effects to below a level of significance, where feasible. With respect to road maintenance, it is expected that the taxes generated by operation of high-cube warehouses would offset any incremental increase in the need for road maintenance; thus, the Project's incremental increase in the need for road maintenance would not result in any significant environmental effects. Moreover, the majority of Project-related traffic would occur along Oleander Avenue east of the Project site, Harvill Avenue north of Oleander Avenue, and Harley Knox Boulevard east of Harvill Avenue; all of these road segments occur in areas that are planned for business park or light industrial uses.

Mary Tithof- Letter S

- S-1 The County acknowledges the commenter's opposition to the proposed Project.
- S-2 The County acknowledges the comment. The topic of aesthetics is addressed by EIR § 4.2, which concludes that aesthetic impacts would be less than significant under CEQA.
- S-3 Refer to Responses E-88 and K-5.
- S-4 The County acknowledges the comments. Potential impacts associated with air pollution and traffic, that may occur as a result of the proposed Project are disclosed in EIR §§ 4.3, Air Quality, and 4.15, Transportation.

Rincon Band of Luiseño- Letter T

- T-1 This letter was submitted after the close of the FEIR public review period. Nonetheless, responses are provided below. The County thanks the commenter for introducing herself and providing his contact information for the County's records.
- T-2 Refer to Responses A-3. Riverside County engaged in extensive government-to-government consultation with Native American Tribes regarding the proposed Project over an approximate 24-month period, beginning in July 2015. All information provided by consulting tribes, both in writing and during the AB 52 consultation process, was highly informative to the County's deliberative process and was taken into consideration by the County when determining the potential significance of the on-site resources, and in determining the significance of the proposed Project's impacts to these resources. The County appreciates the Tribe's participation and revisions have been made to the Project's Conditions of Approval in response the comments contained in this letter and indicated below in Responses T-11 to T-52.
- T-3 Refer to Responses L-4 and L-7.
- T-4 Under AB 52, if a TCR has not been previously included or determined to be eligible for inclusion in the CRHR, or included in a local register of historical resources, as defined in Subdivision (k) of § 5020.1, a resource must be determined to be a TCR by the lead agency, in its discretion and supported by substantial evidence, pursuant to Subdivision (c) of § 5024.1. Information provided by the Tribes as part of the Project's AB 52 consultation process, in addition to all other information contained in the County's administrative record for this Project, did not provide the County with



the substantial evidence necessary to conclude that the site contains or is part of a tribal cultural resource.

- T-5 Through the AB 52 consultation process, interested tribal parties have opportunities to provide the CEQA lead agency with data that helps lead agencies determine if a TCR is present within a property. For the current Project, an ethnographic study was not provided, and it is not the responsibility of the lead agency to compel the provision of such a study. The County carefully considered all of the information it received as part of consultation process to draw the conclusion that the Project site does not contain, nor is it a part of, a tribal cultural resource.
- T-6 To the contrary, information provided by the tribes was important to the County’s deliberative process and was taken into consideration by the County when determining the potential significance of the on-site resources, and in determining the significance of the proposed Project’s impacts to these resources. As concluded by the EIR § 4.5, the sites do not meet the definition of a significant historic resource, as listed in PRC § 5024.1, and as a result, it was determined that the resources to be impacted were not eligible for listing on the CRHR. Therefore, based upon the criteria listed in CEQA § 15064.5, the Project, as proposed, would not alter or destroy a known, unique archaeological site or cause a substantial adverse change in the significance of a unique archaeological resource. The term “scientifically significant,” as employed by Rincon, is not recognized under CEQA. Rather, a historic resource is considered significant if it meets any of the criteria listed in PRC § 5024.1. Tribal information was clearly not ignored within the FEIR, as evidenced by the multiple meetings and review of tribal concerns and documents by the lead agency; however, the information provided by the Tribe(s) was not substantial enough to provide a TCR designation for the sites within the APE, as determined by the lead agency.
- T-7 In order to qualify, the TCR must be: “On or eligible for the California Register of Historical Places (CRHR) or a local historic register, OR the lead agency, at its discretion, chooses to treat the resource as a TCR” [See: Public Resources Code (PRC) 21074 (a)(1)(A)-(B)]. To date, the resources located on the Project site have not been listed on the CRHR or local register and the lead agency does not recognize the sites as TCRs after the consideration of all available information, including information supplied by the Native American tribes.
- T-8 The presence of archaeological resources of concern to the Pechanga Tribe west of the currently-proposed western boundary of the Building E Site was a primary contributing factor to the Project Applicant’s decision to reduce the size of the Building E Site (by 12.1 acres) compared to the size of the Building E Site originally proposed by the Project Applicant. The 12.1 acres are no longer part of the proposed Project and are not under the control of the Project Applicant. Thus, the County has no authority to impose protective measures on the property located to the west of the Project site. The County is not aware of any development plans proposed for that property at this time. For the resources that occur within the Project site and are under the control of the Project Applicant, the mitigation measures presented in EIR § 4.5, Cultural Resources, require the relocation and preservation of several milling features as a condition of the Project’s grading permits. Further, the Applicant is required to enter into a monitoring agreement with the Pechanga and Soboba Tribes and is required to have a professional archaeological monitor and Tribal monitor



present during ground-disturbing construction activities to enable the identification and appropriate treatment of any resources that may be unearthed.

- T-9 Refer to Responses T-10 through T-52.
- T-10 The monitoring agreements that the Project Applicant will enter into with the Pechanga and Soboba Tribes, as required by Mitigation Measure MM 4.5-1, will specify the details of the monitoring requirements. One or both Tribes may have monitors on the Project site at any given time. No revision has been made.
- T-11 Mitigation Measure MM 4.5-2 has been revised in the FEIR as suggested in this comment.
- T-12 Mitigation Measure MM 4.5-3 has been revised in the FEIR as suggested in this comment.
- T-13 Mitigation Measure MM 4.5-4 has been revised in the FEIR to require that, if a breach in the fence occurs it shall be immediately repaired by on-site personnel; archaeological monitors shall be notified by the construction contractor within 24-hours to verify that the breach has been repaired and no impacts beyond the fence have resulted as a result of the breach.
- T-14 Mitigation Measure MM 4.5-5 has been revised in the FEIR as suggested in this comment. No revision has been made in the FEIR.
- T-15 Mitigation Measure MM 4.5-6 has been revised in the FEIR as suggested in this comment.
- T-16 No revisions to Mitigation Measures MM 4.5-7 and MM 4.5-8 are suggested in this comment.
- T-17 This condition will be revised to match Mitigation Measure MM 4.5-6.
- T-18 No revisions to these conditions are suggested.
- T-19 Refer to Response T-10. No revision has been made.
- T-20 This condition will be revised to match Mitigation Measure MM 4.5-2.
- T-21 Refer to Response T-14. No revision has been made.
- T-22 No revisions to this condition are suggested.
- T-23 Refer to Response T-14. No revision has been made.
- T-24 This condition will be revised to match Mitigation Measure MM 4.5-8.
- T-25 No revisions to these conditions are suggested.
- T-26 This condition will be revised to match Mitigation Measure MM 4.5-6.
- T-27 Refer to Response T-14. No revision has been made.
- T-28 Refer to Response T-13. This condition will be revised to match Mitigation Measure MM 4.5-4.
- T-29 Refer to Response T-10. No revision has been made.



- T-30 No revisions to this condition is suggested.
- T-31 Refer to Response T-14. No revision has been made.
- T-32 This condition will be revised to match Mitigation Measure MM 4.5-3.
- T-33 No revisions to this condition is suggested.
- T-34 This condition will be added to match Mitigation Measure MM 4.5-8.
- T-35 Regardless of the wording of this condition, full compliance with California Health and Safety Code §7050.5 and § 5097.98(b) is required. Any additional details will be addressed in the agreement(s) pursuant to Mitigation Measure MM 4.5-1.
- T-36 This condition will be revised to match Mitigation Measure MM 4.5-6.
- T-37 No revisions to this condition is suggested.
- T-38 Refer to Response T-10. No revision has been made.
- T-39 Refer to Response T-14. No revision has been made.
- T-40 This condition will be revised to match Mitigation Measure MM 4.5-3.
- T-41 This condition will be added to match Mitigation Measure MM 4.5-8.
- T-42 No revisions to this condition is suggested.
- T-43 This suggested condition has not been added because the details of any pre-construction meetings with contractors will be addressed in the monitoring agreement(s) with the Pechanga and Soboba Tribes pursuant to Mitigation Measure MM 4.5-1.
- T-44 This condition will be revised to match Mitigation Measure MM 4.5-6.
- T-45 No revisions to these conditions are suggested.
- T-46 Refer to Response T-10. No revision has been made.
- T-47 This condition will be revised to match Mitigation Measure MM 4.5-2.
- T-48 Refer to Response T-14. No revision has been made.
- T-49 No revisions to this condition is suggested.
- T-50 Refer to Response T-14. No revision has been made.
- T-51 This condition will be added to match Mitigation Measure MM 4.5-8.
- T-52 No revisions to this condition is suggested.



F.3 ADDITIONS, CORRECTIONS, AND REVISIONS TO THE DRAFT EIR

Since the time the Draft EIR was circulated for public review, the County requested minor revisions to the parking lot striping plans shown on proposed Plot Plan No. 25837 (Building D Site) and Plot Plan No. 25838 (Building E Site). In response, the number of proposed parking spaces on each Plot Plan was adjusted as follows: For Building D, the number of automobile parking stalls increased from 243 to 439 and the number of truck trailer parking stalls decreased from 251 to 159 stalls. For Building E, the number of automobile parking stalls increased from 229 to 260 stalls and the number of truck trailer parking stalls decreased from 80 to 60 stalls.

In addition, a note was added to Plot Plan No. 25387 and Plot Plan No. 25838 to require the use of concrete as the surface material for on-site parking lots, truck courts, and drive isles. The revised plot plans are included as Figure F-1, *Plot Plan No. 25838 (Building D Site (Revised))* and Figure F-2, *Plot Plan No. 25837 (Building E Site) (Revised)*. The revised plot plans do not alter any environmental impact significance conclusions as disclosed in the Draft EIR. The proposed revisions to Plot Plan No. 25837 and Plot Plan No. 25838 are not considered substantial new information requiring recirculation or additional environmental review under State CEQA Guidelines §15088.5.

Substantive changes made to the text, tables and/or exhibits of the DEIR in response to public comments on the DEIR are itemized in Table F-2, *Errata Table of Additions, Corrections, and Revisions*. Additions are shown throughout the DEIR underline text and deletions are shown as ~~stricken~~ text. A page number index for these revisions is provided as part of Table F-2, of No corrections or additions made to the DEIR are considered substantial new information requiring recirculation or additional environmental review under CEQA Guidelines §15088.5.

SITE PLAN KEYNOTES

- 1 HEAVY BROOM FINISH CONC. PAVEMENT.
- 2 ASPHALT CONCRETE PAVING.
- 3 CONCRETE RAMP W/ 4" 42" HIGH CONCRETE TILT-UP GUARD WALL ON BOTH SIDES OF RAMP.
- 4 DRIVEWAY APPROX TO BE CONSTRUCTED PER "I" DRAWINGS.
- 5 2"-4"x3"-6"x6" MIN. THICK CONCRETE EXTERIOR LANDING PAD TYP. AT ALL EXTERIOR MAIN DOORS TO LANDSCAPED AREAS. FINISH TO BE MEDIUM BROOM FINISH. SLOPE TO BE 1/4" 12" MAX. PROVIDE WALK TO PUBLIC WAY OR DRIVE WAY W/ 120 MAX. AS REC. BY CITY INSPECTOR.
- 6 CONCRETE TILT-UP SCREEN WALL.
- 7 METAL ELECTRICAL GATE W/ KNOCK-PAD. PROVIDE RAPID ENTRY SYSTEM. LOCK PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY.
- 8 TRASH ENCLOSURE.
- 9 EXTERIOR CONCRETE STAIR.
- 10 12"x14" KNOCK OUT PANEL FOR FUTURE USE.
- 11 CONCRETE FILLED GUARD POST 6" DIA. U.N.O. 42" H. BY SHADDED PATTERNS.
- 12 HANDICAP ENTRY SIGN.
- 13 HANDICAP PARKING STALL SIGN.
- 14 APPROXIMATE LOCATION OF THE TRANSFORMER AND GENERATOR.
- 15 EXTERIOR DOWNSPOUT WITH 2 OVERFLOW SCUPPERS.
- 16 RETAINING WALL.
- 17 METAL FENCE.
- 18 GUARD SHACK WITH MEDIAN.
- 19 CONCRETE WALKWAY.
- 20 BIKE RACK.

SITE LEGEND

- LANDSCAPED AREA
- CONCRETE PAVING SEE "I" DWGS FOR THICKNESS
- STANDARD PARKING STALL (9' X 18')
- HANDICAP PARKING STALL (9' X 18')
- PATH OF TRAVEL
- PROPERTY LINE

SITE PLAN GENERAL NOTES

1. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE U.N.O.
2. SEE CIVIL PLANS FOR ALL CONCRETE CURBS, GUTTERS AND DRAINS.
3. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM PRIOR TO INSTALLATION & AT LEAST 60 DAYS BEFORE BLDG. COMPLETION.
4. SEE CIVIL DRAWINGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS.
5. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. SEE CIVIL DRAWINGS.
6. CONTRACTOR TO REFER TO CIVIL DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS.
7. SEE CIVIL DRAWINGS FOR FINISH GRADE ELEVATIONS.
8. CONCRETE SIDEWALKS TO BE A MINIMUM OF 4" THICK W/ TOOLED JOINTS AT 6' O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12' O.C. MAX W/ 120 MAX. SLOPE. EXPANSION JOINTS TO HAVE COMPRESSIVE EXPANSION FILLER MATERIAL OF 1/4". SEE LANDSCAPE DRAWINGS FOR FINISH.
9. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY CHICAGO FIRE DEPARTMENT STANDARDS (I-101).
10. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
11. PRIOR TO FINAL CITY INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLETION TO PUBLIC FACILITIES DEVELOPMENT.
12. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT CITY STANDARDS AS LISTED IN GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT.
13. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB.
14. APPROVED CONCEPTUAL LANDSCAPE PLAN PRIOR TO GRADING PERMIT.
15. PROVIDE RECESSED KNOCK BOX AT ALL MAIN ENTRY DOORS.

AERIAL MAP



PROJECT INFORMATION

Applicant: TRANSLUCID, CDM COMPANY
 3501 JAMAREZ ROAD
 NEWPORT BEACH, CA 92660
 TEL: (949) 477-4731
 CONTACT: JANE WANG

Owner: PARCEL 3 (APN: 314-040-001)
 DON FAVORE
 4320 FLORES DR, TEMECULA, CA 92592
 TEL: (951) 383-0975

Architect: BILL THOMAS
 P.O. BOX 127
 CHESTERVILLE, MO 64644
 TEL: (373) 743-6125

Landscaper: HPA, INC.
 19521 BERGEN AVE, SUITE #110
 IRVING, CA 92612
 TEL: (949) 862-2114
 CONTACT: HOON KEUN PARK

Landscaping Architect: HEATHER LANDSCAPE
 3000 TILDER ST, RIVERSIDE, CA 92503
 TEL: (951) 805-1310

Civil Engineer: DAVID EVANS AND ASSOCIATES, INC.
 4200 CONDORIS, SUITE 150
 OAKLAND, CA 94704
 TEL: (510) 481-5700
 CONTACT: GLEN CHANG

Land Use & Zoning: EXISTING LAND USE: VACANT
 PROPOSED LAND USE: INDUSTRIAL
 EXISTING ZONING: RURAL RESIDENTIAL (R-R)
 MANUFACTURING MEDIUM (M-M)
 INDUSTRIAL PARK (I-P)
 PROPOSED ZONING: INDUSTRIAL PARK (I-P)

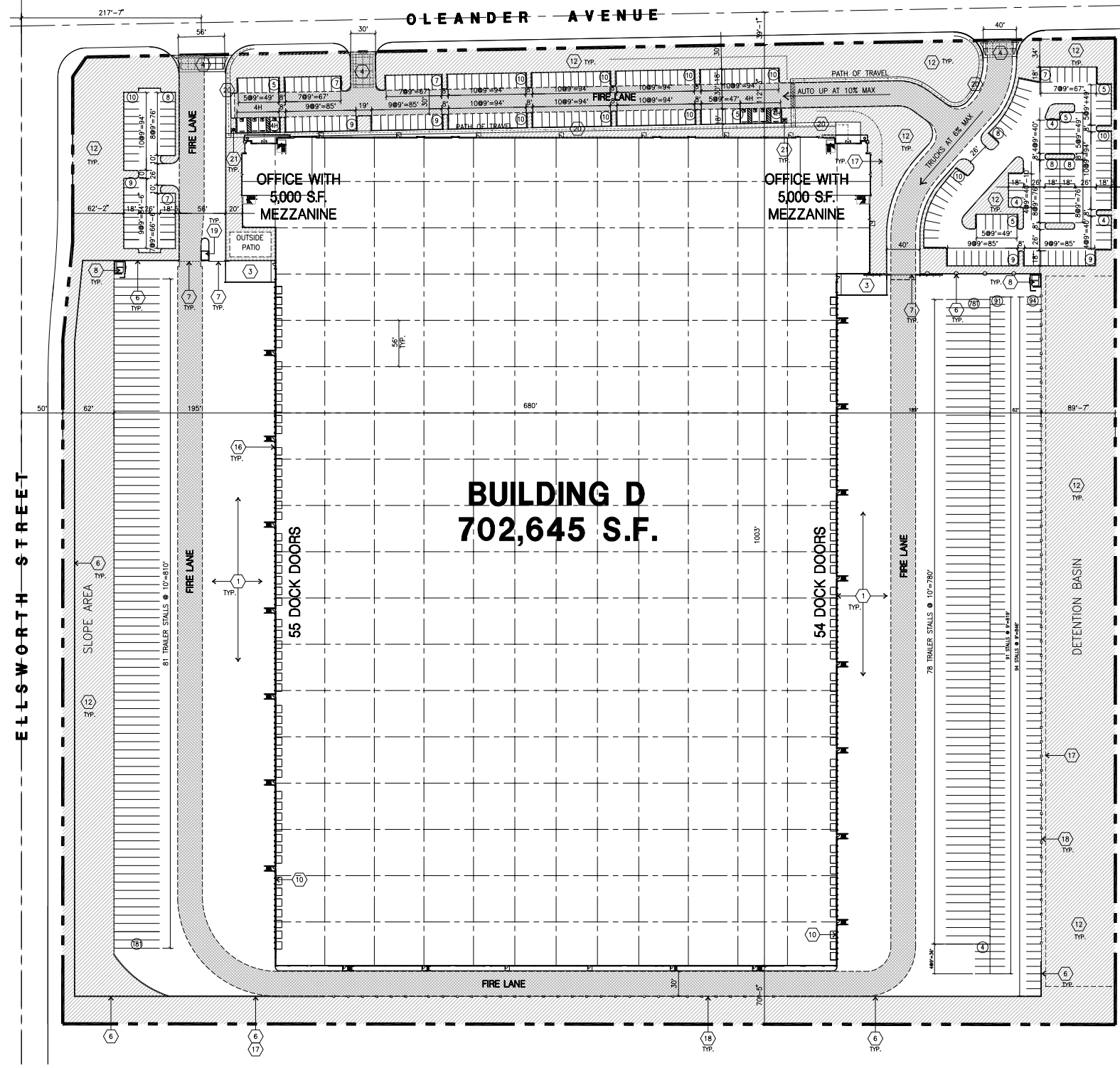
Assessor's Parcel Number: APN 314-040-001
 APN 314-040-002
 APN 314-040-003
 APN 314-040-004

Construction Type: BUILDING: II-B

Legal Description:
 CHICAGO TITLE COMPANY, ORDER NO. 00023898-001-P/S, DATED SEPTEMBER 16, 2014.
 THE REAL PROPERTY IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:
 PARCEL 1: APN 314-040-001
 THE NORTH HALF OF THE NORTHWEST QUARTER OF THE NORTHWEST QUARTER OF SECTION 2, TOWNSHIP 4 SOUTH, RANGE 4 WEST, SAN BERNARDINO AND MERIDIAN OF SAO COUNTY.
 PARCEL 2: APN 314-040-002
 THE SOUTH QUARTER OF THE NORTHWEST QUARTER OF THE NORTHWEST QUARTER OF SECTION 2, TOWNSHIP 4 SOUTH, RANGE 4 WEST, SAN BERNARDINO AND MERIDIAN OF SAO COUNTY.
 CHICAGO TITLE COMPANY, ORDER NO. 00023897-001-P/S, DATED SEPTEMBER 12, 2014.
 THE REAL PROPERTY IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:
 APN 314-040-002
 THE SOUTH HALF OF THE SOUTHQUARTER OF THE NORTHWEST QUARTER OF THE NORTHWEST QUARTER OF SECTION 2, TOWNSHIP 4 SOUTH, RANGE 4 WEST, SAN BERNARDINO AND MERIDIAN OF SAO COUNTY.
 CHICAGO TITLE COMPANY, ORDER NO. 00023901-001-P/S, DATED SEPTEMBER 12, 2014.
 THE REAL PROPERTY IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:
 APN 314-040-003
 THE NORTH HALF OF THE SOUTHQUARTER OF THE NORTHWEST QUARTER OF THE NORTHWEST QUARTER OF SECTION 2, TOWNSHIP 4 SOUTH, RANGE 4 WEST, SAN BERNARDINO AND MERIDIAN OF SAO COUNTY.

TABULATION

| SITE AREA | BUILDING D |
|---|----------------|
| in sq. ft. | 1,504,851 s.f. |
| in acres | 34.5 ac |
| BUILDING AREA | |
| Office | 15,000 s.f. |
| Mezzanine | 10,000 s.f. |
| Warehouse | 677,645 s.f. |
| Total | 702,645 s.f. |
| COVERAGE | 46.7% |
| AUTO PARKING REQUIRED | |
| Office @ 1/250 s.f. | 60 stalls |
| Mezzanine @ 1/250 s.f. | 40 stalls |
| Whse @ 1/2,000 s.f. | 338 stalls |
| TOTAL | 439 stalls |
| HANDICAP PARKING STALLS REQUIRED | 8 stalls |
| AUTO PARKING PROVIDED | |
| Standard (9x18') | 431 stalls |
| Handicap (9x18') | 8 stalls |
| TOTAL | 439 stalls |
| TRAILER PARKING PROVIDED | |
| Trailer (10'x53') | 159 stalls |
| ZONING ORDINANCE FOR CITY | |
| Current Zoning Designation: | |
| Rural Residential (R-R) | |
| Manufacturing Medium (M-M) | |
| Industrial Park (I-P) | |
| Proposed Zoning: | |
| Industrial Park (I-P) | |
| MAXIMUM FLOOR AREA RATIO | F.A.R. 60 |
| BUILDING HEIGHT ALLOWED | Height - 50' |
| SETBACKS | |
| Street Side = 25' | |
| Side = 5' | |
| Rear = 5' | |
| Abuts Residential/commercial zone = 50' | |



Source(s): HPA (07-22-2016)

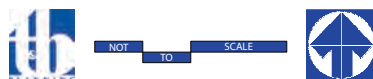


Figure F-1

PLOT PLAN NO. 25838 (BUILDING D SITE) (REVISED)

SITE PLAN KEYNOTES

- 1) HEAVY BROOM FINISH CONC. PAVEMENT.
- 2) ASPHALT CONCRETE PAVING.
- 3) CONCRETE RAMP W/ 4" HIGH CONCRETE TILT-UP GUARD WALL ON BOTH SIDES OF RAMP.
- 4) DRIVEWAY APPROXNS TO BE CONSTRUCTED PER "I" DRAWINGS.
- 5) 5'-0" x 2'-0" x 4" MIN. THICK CONCRETE EXTERIOR LANDING PAD TYP. AT ALL EXTERIOR MAIN DOORS TO LANDSCAPED AREAS. FINISH TO BE MEDIUM BROOM FINISH. SLOPE TO BE 1/4" / 12" MAX. PROVIDE WALK TO PUBLIC WAY OR DRIVE WAY W/ 1:20 MAX. AS REQ. BY CITY INSPECTOR.
- 6) CONCRETE TILT-UP SCREEN WALL.
- 7) METAL ELECTRICAL GATE W/ KNOX-PAD. PROVIDE RAPID ENTRY SYSTEM. LOOK PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY.
- 8) TRASH ENCLOSURE.
- 9) EXTERIOR CONCRETE STAIR.
- 10) 12"x14" KNOCK OUT PANEL FOR FUTURE USE.
- 11) CONCRETE FILLED GUARD POST 4" DIA. U.N.D. 42" H. LANDSCAPE. SEE "L" DWGS. LANDSCAPE AREAS INDICATED BY SHADDED PATTERN.
- 12) HANDICAP ENTRY SIGN.
- 13) HANDICAP PARKING SIGN.
- 14) HANDICAP PARKING STALL SIGN.
- 15) APPROXIMATE LOCATION OF THE TRANSFORMER AND GENERATOR.
- 16) EXTERIOR DOWNSPOUT WITH 2 OVERFLOW SCUPPERS.
- 17) RETAINING WALL.
- 18) METAL FENCE.
- 19) GUARD SHACK WITH MEDIAN.
- 20) CONCRETE WALKWAY.
- 21) BIKE RACK.

SITE LEGEND

- LANDSCAPED AREA
- CONCRETE PAVING SEE "C" DWGS. FOR THICKNESS
- STANDARD PARKING STALL (9' X 18')
- HANDICAP PARKING STALL (9' X 18')
- PATH OF TRAVEL

TABULATION

| SITE AREA | | BUILDING E | |
|---|--|----------------|---------------|
| Net Site Area | | | |
| in sq. ft. | | 849,404 | s.f. |
| in acres | | 19.5 | ac |
| BUILDING AREA | | | |
| Office | | 15,000 | s.f. |
| Warehouse | | 395,350 | s.f. |
| Total | | 410,350 | s.f. |
| COVERAGE | | | |
| | | 48.3% | |
| AUTO PARKING STALLS REQUIRED | | | |
| Office @ 1/250 s.f. | | 60 | stalls |
| Whse @ 1/2,000 s.f. | | 198 | stalls |
| TOTAL | | 258 | stalls |
| HANDICAP PARKING STALLS REQUIRED | | | |
| | | 7 | stalls |
| AUTO PARKING PROVIDED | | | |
| Standard (9'x16' w/ 2' overhang) | | 253 | stalls |
| Handicapp (9'x16' w/ 2' overhang) | | 7 | stalls |
| TOTAL | | 260 | stalls |
| TRAILER PARKING PROVIDED | | | |
| Trailer (10'x53') | | 66 | stalls |
| ZONING ORDINANCE FOR CITY | | | |
| Current Zoning Designation : | | | |
| Industrial Park (I-P) | | | |
| Rural Residential 1/2 - Acre Lot Sizes (R-R1/2) | | | |
| Proposed Zoning: | | | |
| Industrial Park (I-P) | | | |
| MAXIMUM FLOOR AREA RATIO | | | |
| F.A.R. 60 | | | |
| BUILDING HEIGHT ALLOWED | | | |
| Height - 50' | | | |
| SETBACKS | | | |
| Street Side = 25' | | | |
| Side = 5' | | | |
| Rear = 5' | | | |
| Abuts Residential/commercial zone = 50' | | | |
| LANDSCAPE REQUIREMENT | | | |
| in sq. ft. | | 127,411 | s.f. |
| Percentage - | | 15% | |
| LANDSCAPE PROVIDED | | | |
| in sq. ft. | | 166,849 | s.f. |
| Percentage - | | 19.6% | |

PROJECT INFORMATION

Applicant
 TRAMMELL CREE COMPANY
 3001 ANNEBORO ROAD
 NEWPORT BEACH, CA 92660
 TEL: (949) 477-4721
 CONTACT: GREG DAVINE

Owner
 C. R. COLLING INC./
 HARRY AND BOY MURANAKA
 PO BOX 8360, PORTER RANCH, CA 91327
 TEL: (951) 491-0428

Architect
 JPL, INC.
 18821 BARKDEN AVE. SUITE #100
 IRVINE, CA 92612
 TEL: (949) 862-2116
 W/ 1:20 MAX. AS REQ. BY CITY INSPECTOR.
 CONTACT: HOON KESUN PARK

Civil Engineer
 DAVID CHANG AND ASSOCIATES, INC.
 4200 CONCOURSE, SUITE 150
 COSTA MESA, CA 92626
 TEL: (949) 481-5750
 CONTACT: GLENN CHANG

Land Use & Zoning
 EXISTING LAND USE: VACANT
 PROPOSED LAND USE: INDUSTRIAL
 EXISTING ZONING: INDUSTRIAL PARK (I-P)
 PROPOSED ZONING: RURAL RESIDENTIAL 1/2 - ACRE LOT SIZES (R-R 1/2)
 INDUSTRIAL PARK (I-P)

Assessor's Parcel Number
 APN 314-020-010
 APN 314-020-017

Construction Type
 BUILDING

Legal Description
 PARCEL 1: APN 314-020-010
 FROM THE PRELIMINARY TITLE REPORT ORDER NO. 00029422-001-PS
 THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:
 PARCEL 2 OF PARCEL MAP NO. 3042, COUNTY RIVERSIDE, STATE OF CALIFORNIA, AS PER MAP FILED IN BOOK 8, PAGE 84 OF PARCEL MAPS IN OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.
 PARCEL 3 OF PARCEL MAP NO. 3042, COUNTY RIVERSIDE, STATE OF CALIFORNIA, AS PER MAP FILED IN BOOK 8, PAGE 84 OF PARCEL MAPS IN OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.
 ADDITIONAL PARCEL: PORTION OF APN 314-040-019
 FROM THE PRELIMINARY TITLE REPORT ORDER NO. 00029416-001-PS
 THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:
 A PORTION OF PARCEL 4 AS SHOWN ON PARCEL MAP 3042, IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, ON FILE IN BOOK 8 PAGE 84 OF PARCEL MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA.
 EXCEPTING THEREFROM THAT PORTION CONVEYED TO THE COUNTY OF RIVERSIDE BY DEED RECORDED APRIL 26, 1993 AS INSTRUMENT NO. 139450, OFFICIAL RECORDS.
 ADDITIONAL PARCEL: PORTION OF APN 314-040-019
 FROM THE PRELIMINARY TITLE REPORT ORDER NO. 00029416-001-PS
 THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:
 A PORTION OF PARCEL 4 AS SHOWN ON PARCEL MAP 3042, IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, ON FILE IN BOOK 8 PAGE 84 OF PARCEL MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA.
 EXCEPTING THEREFROM THAT PORTION CONVEYED TO THE COUNTY OF RIVERSIDE BY FINAL ORDER OF CONFIRMATION RECORDED NOVEMBER 04, 1993 AS INSTRUMENT NO. 93-50284A, OF OFFICIAL RECORDS.

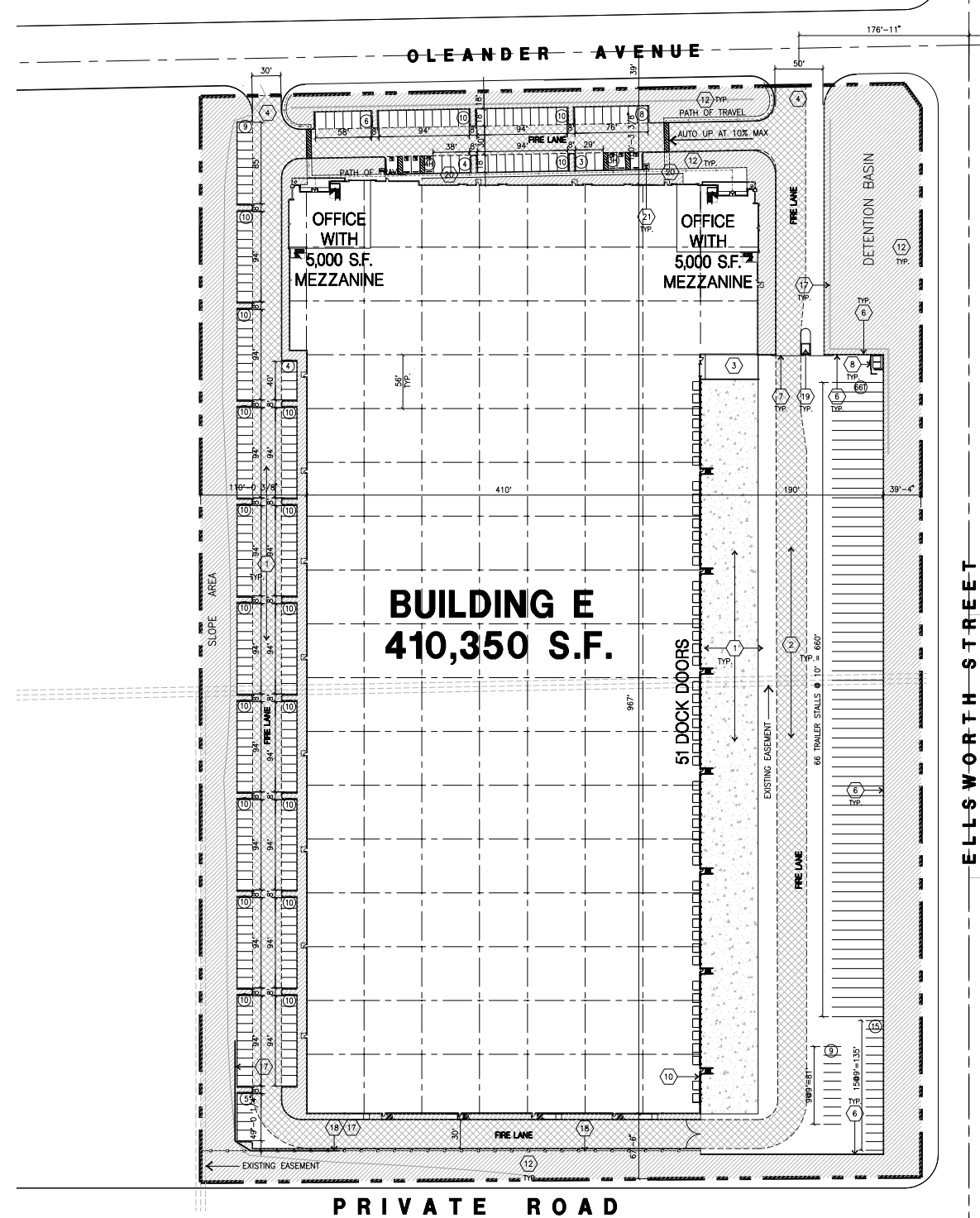
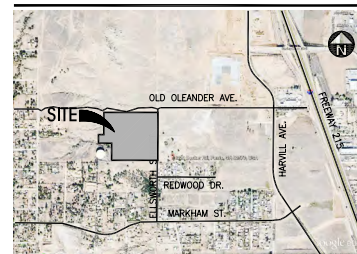
Legal Description

Legal Description
 PARCEL 1: APN 314-020-010
 FROM THE PRELIMINARY TITLE REPORT ORDER NO. 00029422-001-PS
 THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:
 PARCEL 2 OF PARCEL MAP NO. 3042, COUNTY RIVERSIDE, STATE OF CALIFORNIA, AS PER MAP FILED IN BOOK 8, PAGE 84 OF PARCEL MAPS IN OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.
 PARCEL 3 OF PARCEL MAP NO. 3042, COUNTY RIVERSIDE, STATE OF CALIFORNIA, AS PER MAP FILED IN BOOK 8, PAGE 84 OF PARCEL MAPS IN OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.
 ADDITIONAL PARCEL: PORTION OF APN 314-040-019
 FROM THE PRELIMINARY TITLE REPORT ORDER NO. 00029416-001-PS
 THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:
 A PORTION OF PARCEL 4 AS SHOWN ON PARCEL MAP 3042, IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, ON FILE IN BOOK 8 PAGE 84 OF PARCEL MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA.
 EXCEPTING THEREFROM THAT PORTION CONVEYED TO THE COUNTY OF RIVERSIDE BY FINAL ORDER OF CONFIRMATION RECORDED NOVEMBER 04, 1993 AS INSTRUMENT NO. 93-50284A, OF OFFICIAL RECORDS.

SITE PLAN GENERAL NOTES

1. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE U.N.D.
2. SEE CIVIL PLANS FOR ALL CONCRETE CURBS, GUTTERS AND SWALES.
3. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM. PRIOR TO INSTALLATION & AT LEAST 60 DAYS BEFORE BLDG. COMPLETION.
4. SEE CIVIL DRAWINGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS.
5. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. SEE CIVIL DRAWINGS.
6. CONTRACTOR TO REFER TO CIVIL DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS.
7. SEE CIVIL DRAWINGS FOR FRESH DRAIN ELEVATIONS.
8. CONCRETE SCHEDULES TO BE A MINIMUM OF 4" THICK W/ TOOLED JOINTS AT 8" O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12" O.A. MAY W/ 1:20 MAX. SLOPE. EXPANSION JOINTS TO HAVE COMPRESSIVE EXPANSION FILLER MATERIAL OF 1/4". SEE LANDSCAPE DRAWINGS FOR FINISH.
9. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LINES AS REQUIRED BY ONTARIO FIRE DEPARTMENT STANDARD B-001.
10. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
11. PRIOR TO FINAL CITY INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLETION TO PUBLIC FACILITIES DEVELOPMENT.
12. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT CITY STANDARDS AS LISTED IN GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT.
13. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB.
14. APPROVED CONCEPTUAL LANDSCAPE PLAN PRIOR TO GRADING PERMIT.
15. PROVIDE RECESSED KNOX BOX AT ALL MAIN ENTRY DOORS.

AERIAL MAP



Source(s): HPA (02-14-2017)

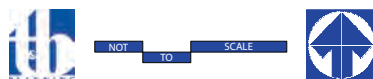


Figure F-2

PLOT PLAN NO. 25837 (BUILDING E SITE) REVISED



Table F-2 Errata Table of Additions, Corrections, and Revisions

| PAGE(S) | SECTION | ADDITIONS, CORRECTIONS, AND REVISIONS |
|-------------------------------|---|--|
| Numerous | <i>Table of Contents</i> | The Table of Contents is updated to reflect updated page numbers as a result of additions, corrections, and revisions to the DEIR. |
| S-1, S-2 | <i>S.O, Executive Summary</i> | An addition is made to include Tribal Cultural Resources as an environmental issue area evaluated in the EIR. |
| Table S-0 | <i>S.O, Executive Summary</i> | Tribal Cultural Resources is added as an environmental issue area to Table S-1 to reflect the new stand-alone EIR Section 4.18. |
| 1-6 | <i>1.0, Introduction</i> | An addition is made to include Tribal Cultural Resources as an environmental issue area evaluated in the EIR. |
| 1-11 | <i>1.0, Introduction</i> | An addition is made to include the Paleontological Resources Impact Mitigation Program as <i>Technical Appendix D5</i> . |
| 3-12 | <i>3.0, Project Description</i> | A revision is made to the number of automobile and truck trailer parking stalls for the Building D Site. |
| 3-23 | <i>3.0, Project Description</i> | A revision is made to the number of automobile and truck trailer parking stalls for the Building E Site. |
| 3-33 and 3-34 | <i>3.0, Project Description</i> | An addition is made to describe an option to eliminate the use of an on-site rock crusher. |
| 4.0-1 | <i>4.0, Environmental Analysis</i> | An addition is made to update the environmental subject areas to include Tribal Cultural Resources. |
| 4.1-12 | <i>4.1, Aesthetics</i> | An addition is made to include a description of the surrounding land uses and development, as discussed previously in Section 2.0, <i>Environmental Setting</i> . |
| 4.1-14; Table S-1 | <i>4.1, Aesthetics; S.O, Executive Summary</i> | An addition is made to reference Mitigation Measure (MM) 4.11-2(A) from Subsection 4.11, <i>Noise</i> . |
| 4.3-27 | <i>4.3, Air Quality</i> | Revisions are made for a clearer comparison between CD-BP and CD-IP land uses and to correct typographical errors. |
| 4.3-37; Table S-1 | <i>4.3, Air Quality; S.O, Executive Summary</i> | A revision is made to MM 4.3-1 to include MM 4.3-1 (f, g, h, i, j, k). |
| 4.3-37, 4.3-38; and Table S-1 | <i>4.3, Air Quality; S.O Executive Summary</i> | MM 4.3-2 is supplemented with MM.4.3-2(A). |
| 4.3-38; Table S-1 | <i>4.3, Air Quality; S.O, Executive Summary</i> | A revision is made to MM 4.3-4. |
| 4.3-39; Table S-1 | <i>4.3, Air Quality; S.O., Executive Summary</i> | A revision is made to MM 4.3-8. |
| 4.3-39; Table S-1 | <i>4.3, Air Quality; S.O., Executive Summary</i> | MM 4.3-11 is added to the Final EIR. |
| 4.3-39; Table S-1 | <i>4.3, Air Quality; S.O., Executive Summary</i> | MM 4.3-12 is added to the Final EIR. |
| 4.3-39 | <i>4.3, Air Quality</i> | Table 4.3-13 is added to the Final EIR. |
| 4.4-27, 4.4-28; Table S-1 | <i>4.4, Biological Resources; S.O., Executive Summary</i> | A revision is made to MM 4.4-1. |
| 4.5-28; | <i>4.5, Cultural Resources; S.O, Executive Summary</i> | The tribal cultural resources evaluation previously included in DEIR Subsection 4.5, <i>Cultural Resources</i> , is moved into the stand-alone EIR Subsection 4.18, <i>Tribal Cultural Resources</i> . |



Table F-2 Errata Table of Additions, Corrections, and Revisions

| PAGE(S) | SECTION | ADDITIONS, CORRECTIONS, AND REVISIONS |
|---------------------------|---|--|
| 4.5-28; Table S-1 | 4.5, <i>Cultural Resources; S.O., Executive Summary</i> | Revisions are made to MM 4.5-2. |
| 4.5-28, 4.5-29; Table S-1 | 4.5, <i>Cultural Resources; S.O., Executive Summary</i> | Revisions are made to MM4.5-3. |
| 4.5-29, 4.5-30; Table S-1 | 4.5, <i>Cultural Resource; S.O., Executive Summary</i> | Revisions are made to MM 4.5-4. |
| 4.5-30, 4.5-31; Table S-0 | 4.5, <i>Cultural Resource; S.O., Executive Summary</i> | Revisions are made to MM 4.5-5 |
| 4.6-23; Table S-1 | 4.6, <i>Geology and Soils; S.0 Executive Summary</i> | An Applicable County Regulation and Design Requirement is added to list mandatory compliance with the California Building Standards Code. |
| 4.7-17 | 4.7, <i>Greenhouse Gas Emissions</i> | A revision is made to reflect the adoption of Executive Order B-30-15. |
| 4.8-6, 4.8-7 | 4.8, <i>Hazards and Hazardous Materials</i> | An addition is made to include a description of 49 CFR Chapter 1, Subchapter C – Hazardous Materials Regulations, Part 171-177. |
| 4.8-13 | 4.8, <i>Hazards and Hazardous Materials</i> | A revision is made to correct a typographical error. |
| 4.8-15 | 4.8, <i>Hazards and Hazardous Materials</i> | A revision is made to correct a typographical error. |
| 4.11-32; Table S-1 | 4.11, <i>Noise; S.O., Executive Summary</i> | A revision is made to MM 4.11-2 |
| 4.11-32; Table S-1 | 4.11, <i>Noise; S.O., Executive Summary</i> | MM 4.11-2 is supplemented with MM 4.11-2(A). |
| 4.15-7 | 4.15, <i>Transportation</i> | A typographical error is corrected in Table 4.15-5. |
| 4.15-46 | 4.15, <i>Transportation</i> | A revision is made to cite the height of the tallest features permitted on the Project site, at 55 feet above final grade. |
| 4.15-52 | 4.15, <i>Transportation</i> | An addition is made to include recommended best practice measures. |
| 4.15-53; Table S-1 | 4.15, <i>Transportation; S.O., Executive Summary</i> | MM 4.15-4 is added to the Final EIR. |
| 4.15-53; Table S-1 | 4.15, <i>Transportation; S.O., Executive Summary</i> | MM 4.15-5 is added to the Final EIR. |
| 4.17-1 | 4.17, <i>Paleontological Resources</i> | An addition is made to reference the Paleontological Resource Impact Mitigation Program (PRIMP) as <i>Technical Appendix D5</i> . |
| 4.17-5; Table S-1 | 4.17, <i>Paleontological Resource; S.0. Executive Summary</i> | A revision is made to MM 4.17-1 to reflect that a Paleontological Resource Impact Mitigation Program (PRIMP) was prepared for the Building D Site. |
| 4.17-5 | 4.17, <i>Paleontological Resource</i> | A revision is made to reflect the information in the Project’s Paleontological Resource Impact Mitigation Program (PRIMP). |



Table F-2 Errata Table of Additions, Corrections, and Revisions

| PAGE(S) | SECTION | ADDITIONS, CORRECTIONS, AND REVISIONS |
|------------------------|--|--|
| 4.18-1 through 4.18-18 | 4.18, <i>Tribal Cultural Resources</i> | The tribal cultural resources evaluation previously included in DEIR Subsection 4.5, <i>Cultural Resources</i> , is moved into the stand-alone EIR Subsection 4.18, <i>Tribal Cultural Resources</i> . |
| 6-19 to 6-25 | 6.0, <i>Alternatives</i> | Three tables (6-1, 6-2, and 6-3) are added to the evaluation of the No Project/Existing General Plan Designation Alternative to quantify the alternative's air pollutant emissions and traffic generation. Associated text additions and revisions are made. |
| Numerous | 6.0, <i>Alternatives</i> | Tribal Cultural Resources was added to the Alternatives comparison analysis. |
| Numerous | 7.0, <i>References</i> | References are added. |



F.4 NO RECIRCULATION OF THE DRAFT ENVIRONMENTAL IMPACT REPORT REQUIRED

CEQA Guidelines §15088.5 describes the conditions under which a DEIR that was circulated for public review is required to be re-circulated for additional public review and comment. CEQA Guidelines §15088.5 states that new information added to a DEIR is not significant unless the DEIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation includes, for example, a disclosure showing that:

- a. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- b. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- c. A feasible project alternative or mitigation measure considerably different from the others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
- d. The DEIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

As summarized in Table F-2, *Errata Table of Additions, Corrections, and Revisions*, and based on the comment letters and responses presented in the Responses to Comments (above), there were no public comments or changes to the text or analysis contained in the DEIR that resulted in the identification of any new significant environmental effect or a substantial increase in the severity of an environmental effects that were disclosed in the DEIR. Based on comments received on the DEIR, no revisions to the Project's mitigation measures were necessary. Additionally, the DEIR was fundamentally and basically adequate, and all conclusions within the DEIR were supported by evidence provided within the DEIR or the administrative record for the proposed Project. Furthermore, public comment letters on the DEIR did not identify any alternatives to the proposed Project.

Based on the foregoing, additional recirculation of the DEIR is not warranted according to the guidance set forth in §15088.5 of the CEQA Guidelines.



S.0 EXECUTIVE SUMMARY

S.1 INTRODUCTION

The California Environmental Quality Act (CEQA), Public Resources Code § 21000, et seq. requires that before a public agency makes a decision to approve a project that could have one or more adverse effects on the physical environment, the agency must inform itself about the project's potential environmental impacts, give the public an opportunity to comment on the environmental issues, and take feasible measures to avoid or reduce potential harm to the physical environment.

The Project evaluated by this EIR encompasses two separate, independent projects, referred to herein as Knox Business Park Building D and Knox Business Park Building E. Because these projects are adjacent and are proposed by the same Project Applicant, CEQA requires that they be evaluated as a single project. CEQA prohibits piecemeal environmental review of projects with related impacts that could be considered a single project. Thus, this Environmental Impact Report (EIR), having California State Clearinghouse (SCH) No. 2015081081 was prepared in accordance with CEQA Guidelines Article 9, § 15120 to § 15132, to evaluate the potential environmental impacts associated with planning, constructing, and operating the proposed Knox Business Park Buildings D and E projects (collectively hereafter, the "Project" or "proposed Project"). This EIR does not recommend approval, approval with modification, or denial of the proposed Project; rather, this EIR is a source of impartial information regarding potential impacts that the Project may cause to the physical environment. The Draft EIR will be available for public review for a minimum period of 45 days. After consideration of public comment, the County of Riverside will consider certifying the Final EIR and adopting required findings in conjunction with Project approval. In the case that there are any adverse environmental impacts that cannot be fully mitigated, the County of Riverside must adopt a Statement of Overriding Considerations, stating why the County is taking action to approve the Project with or without modification despite its unavoidable impacts.

This Executive Summary complies with CEQA Guidelines § 15123, "Summary." This EIR document includes a description of the proposed Project and evaluates the physical environmental effects that could result from Project implementation. The County of Riverside determined that the scope of this EIR should cover 18 ~~47~~ subject areas. The scope was determined through the completion of an Initial Study accepted by the County of Riverside's independent judgment pursuant to CEQA Guidelines § 15063, and in consideration of public comment received by the County in response to this EIR's Notice of Preparation (NOP). The Initial Study, NOP, and written comments received by the County in response to the NOP, are attached to this EIR as *Technical Appendix A*. As determined by the Initial Study and in consideration of public comment on the NOP, the 18 ~~47~~ environmental subject areas that could be reasonably and significantly affected by planning, constructing, and/or operating the proposed Project are analyzed herein, including:

1. Aesthetics
2. Agriculture and Forest Resources



3. Air Quality
4. Biological Resources
5. Cultural Resources
6. Geology and Soils
7. Greenhouse Gas Emissions
8. Hazards and Hazardous Materials
9. Hydrology and Water Quality
10. Land Use and Planning
11. Noise
12. Population and Housing
13. Public Services
14. Recreation
15. Transportation and Traffic
16. Utilities and Service Systems
17. Paleontological Resources
18. Tribal Cultural Resources

Refer to EIR Section 4.0, *Environmental Analysis*, for a full account and analysis of the subject matters listed above. As mentioned, the scope of this EIR includes these ~~47~~ 18 subject areas as determined through the completion of an Initial Study pursuant to CEQA Guidelines § 15063, and in consideration of public comment to this EIR's NOP. Subject areas for which the Initial Study concluded that impacts would be clearly less than significant and that do not warrant further analysis in this EIR are addressed in EIR Section 5.0, *Other CEQA Considerations*. For each of the ~~47~~ 18 subject areas analyzed in detail in Section 4.0, this EIR describes: 1) the physical conditions that existed at the approximate time this EIR's NOP was filed with the California State Clearinghouse (August 31, 2015); 2) discloses the type and magnitude of potential environmental impacts resulting from Project planning, construction, and operation; and 3) if warranted, recommends feasible mitigation measures that have a proportional nexus to the Projects' impacts and that would reduce or avoid significant adverse environmental impacts that the proposed Project may cause. A summary of the proposed Project's significant environmental impacts and the mitigation measures imposed by the County of Riverside on the Project to lessen or avoid those impacts is included in this *Executive Summary* as Table S-1, *Mitigation Monitoring and Reporting Program*.

This EIR also discusses alternatives to the proposed Project. Alternatives are described that would attain most of the Projects' objectives while avoiding or substantially lessening the proposed Projects' significant adverse environmental effects. A full discussion of Project alternatives is found in EIR Section 6.0, *Alternatives*.



S.2 PROJECT OVERVIEW

S.2.1 LOCATION AND REGIONAL SETTING

The approximately 58.6 gross-acre Project site is located in the unincorporated community of Mead Valley, in western Riverside County, California. Western Riverside County abuts San Bernardino County to the northeast, Orange County to the west, and San Diego County to the south. Los Angeles County is located further to the northwest. Figure 3-1, *Regional Map*, in EIR Section 3.0, *Project Description*, depicts the Project site's location in a regional context. The Project site is located west of the cities of Moreno Valley and Perris and southeast of the City of Riverside. Specifically, the Project site is located approximately 0.4-mile west of Interstate 215 (I-215) and the City of Perris, 1.5 miles west of the City of Moreno Valley, 5.8 miles south of State Route 60 (SR-60), and 2.5 miles southeast of the City of Riverside.

At the local scale, the Project site is located south of Oleander Avenue, north of Redwood Drive, east of Day Street, and west of Harvill Avenue. Ellsworth Street (also referred to as "Decker Road" throughout this EIR and the EIR's Technical Appendices) transects the Project site in a north to south direction. The approximately 37.1-acre portion of the Project site located east of Ellsworth Street is referred to within this EIR as the "Building D Site." The approximately 21.5-acre portion of the Project site located west of Ellsworth Street is referred to within this EIR as the "Building E Site." Figure 3-2, *Vicinity Map*, in EIR Section 3.0, *Project Description*, identifies the location of the Project site and illustrates the relationship between the Building D Site and the Building E Site. The Project site lies within the northeastern portion of Section 2, Township 4 South, Range 4 West (San Bernardino Baseline and Meridian). The Building D Site occupies Assessor Parcel Number (APN) 314-040-001, 314-040-002, 314-040-003, and 314-040-008. The Building E Site occupies APN 314-020-017, and a portion of 314-020-010.

S.2.2 PROJECT OBJECTIVES

The County's primary objective and underlying purpose of the Project is to entitle property in the Mead Valley community for commerce and employment-generating purposes, in order to bring new business and jobs to the area. The objectives pertinent to the proposed Project are as follows:

- A. To develop vacant or underutilized property in Mead Valley in close proximity to I-215 with business park warehouse buildings offering loading bays that can be used as part of the Southern California goods movement network.
- B. To make efficient use of a property in Mead Valley by maximizing its buildout potential for employment-generating uses.
- C. To attract new employment-generating businesses along the I-215 corridor thereby growing the economy and providing a more equal jobs-housing balance in the Riverside County/Inland



Empire area that will reduce the need for members of the local workforce to commute outside the area for employment.

- D. To develop Class A business park warehouse buildings in Mead Valley that meet industry standards for modern, operational design criteria and can accommodate a wide variety of users.
- E. To develop vacant or underutilized property in Mead Valley with structures that have architectural design and operational characteristics that complement other new developments in the immediate vicinity.
- F. To develop business park warehouse buildings that are economically competitive with similar buildings in the local area and region.

S.3 PROJECT DESCRIPTION SUMMARY

The Project Applicant proposes to develop two business park warehouse buildings, Building D and Building E, on approximately 58.6 gross acres in the Mead Valley area of unincorporated Riverside County. The principal discretionary actions required of Riverside County to implement the Project are summarized below and described in more detail in EIR Section 3.0, *Project Description*.

S.3.1 BUILDING D APPLICATIONS

A. General Plan Amendment No. 1151 (GPA 1151)

The Building D Site is designated “Community Development-Light Industrial (CD-LI)” and “Community Development-Business Park (CD-BP)” by the Riverside County General Plan under existing conditions. GPA 1151 would change the land use designation of the portion of the property designated CD-BP to CD-LI so that the entire Building D Site is designated CD-LI.

B. Change of Zone No. 7872 (CZ 7872)

The Building D Site is zoned “Manufacturing – Medium (M-M)”, “Industrial Park (I-P)”, and “Rural Residential (R-R)” under existing conditions. CZ 7872 would change the zoning designations of the portions of the property zoned M-M and R-R to I-P, so that the entire Building D Site is zoned I-P.

C. Tentative Parcel Map No. 36950 (PM 36950)

Tentative Parcel Map No. 36950 (PM 36950) proposes to consolidate the four parcels on the Building D Site into one, approximately 34.5-net-acre parcel. In addition, 2.6 acres would be dedicated as public right-of-way (i.e., frontage improvements to Ellsworth Street and Oleander Avenue). PM 36950 also identifies the earthwork and grading and infrastructure improvements needed on the Building D Site to support proposed development.



D. Plot Plan No. 25838 (PP 25838)

Proposed Building D would provide for the development of one business park warehouse building containing 702,645 s.f. of building space (677,645 s.f. of warehouse floor space, 15,000 s.f. of ground floor office space, and 10,000 s.f. of mezzanine office space). PP 25838 includes a site plan, architectural plans, and landscape design for the Building D Site.

S.3.2 BUILDING E APPLICATIONS

A. General Plan Amendment No. 1152 (GPA 1152)

The Building E Site is designated “Community Development-Business Park (CD-BP)” by the Riverside County General Plan under existing conditions. GPA 1152 would change the land use designation from CD-BP to “Community Development-Light Industrial (CD-LI).”

B. Change of Zone No. 7873 (CZ 7873)

The Building E Site is zoned “Rural Residential ½-Acre Lot Sizes (R-R-1/2)” and “Industrial Park (I-P).” CZ 7873 would change the zoning designation of the portion of the property zoned R-R-½ to I-P so that the entire Building E Site is zoned I-P.

C. Tentative Parcel Map No. 36962 (PM 36962)

Tentative Parcel Map No. 36962 (PM 36962) would combine the property’s three existing parcels into a single, approximately 19.5-net-acre parcel and would dedicate approximately 2.0 acres to the County of Riverside as public right-of-way (i.e., frontage improvements to Ellsworth Street and Oleander Avenue). In addition, PM 36962 identifies the earthwork and grading and infrastructure improvements needed on the Building E Site to support proposed development.

D. Plot Plan No. 25837

PP 25837 would provide for the development of one industrial business park building containing 410,982 s.f. of building space (395,982 s.f. of warehouse floor space and 15,000 s.f. of ground floor office space). PP 25837 includes a site plan, architectural plans, and landscape design for the Building E Site.

S.4 EIR PROCESS

As a first step in complying with the procedural requirements of CEQA for an EIR, an Initial Study was prepared by the County of Riverside to determine whether any aspect of the proposed Project, either individually or cumulatively, may cause a significant adverse effect on the physical environment (refer to EIR *Technical Appendix A* for a copy of the Initial Study). For this Project, the Initial Study indicated that this EIR should focus on ~~17~~ 18 environmental subject areas listed above in Subsection S.1. After completion of the Initial Study, the County filed a NOP with the California Office of Planning and Research (State Clearinghouse) to indicate that an EIR would be prepared. In turn, the Initial Study and NOP were distributed for a 30-day public review period, which began on August 31,



2015. The County of Riverside received written comments on the scope of the EIR during those 30 days, which were considered by the County during the preparation of this EIR. In addition, and pursuant to CEQA Guidelines § 15082(c)(1), an advertised public meeting (called a scoping session) was held at the Riverside County Administrative Building on September 14, 2015.

This EIR is being circulated for review and comment by the public and other interested parties, agencies, and organizations for a 45-day review period. During the 45-day public review period, public notices announcing availability of the Draft EIR will be mailed to interested parties, an advertisement will be published in the Press Enterprise (newspaper of general circulation in the Project area), and copies of the Draft EIR and its Technical Appendices will be available for review at the locations indicated in the public notices.

After the close of the 45-day Draft EIR public comment period, the County will prepare and publish responses to written comments it received on the environmental effects of the proposed Projects. The Final EIR will then be considered by the County of Riverside Planning Commission, which will issue recommendations to the Riverside County Board of Supervisors. The County Board of Supervisors must certify this EIR before making a decision to approve, or approve with modification, either of the proposed Projects. After the EIR is certified, the County Board of Supervisors will have the discretion to take action on the proposed Knox Business Park Building D Project and the proposed Knox Business Park Building E Project concurrently at the same hearing, or sequentially at separate hearings. Approval of the proposed Projects would be accompanied by the adoption of written findings and a statement of overriding considerations for any significant unavoidable environmental impacts identified in the Final EIR. In addition, the County must adopt a Mitigation, Monitoring, and Reporting Program (MMRP), which describes the process to ensure implementation of the mitigation measures identified in the Final EIR. The MMRP will ensure CEQA compliance during construction and operation of the Project. The MMRP identifies which mitigation measures apply to the Building D Site and which mitigation measures apply to the Building E Site. Many of the mitigation measures apply to both sites, but a few apply to only one or the other.

S.5 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

CEQA Guidelines § 15123(b)(2) requires that areas of controversy known to the Lead Agency (County of Riverside) be identified in the EIR's *Executive Summary*. The Lead Agency has identified one issue of controversy associated with the operation of warehouse buildings, which is air pollutant emissions associated with the operation of diesel-fueled vehicles.

Regarding issues to be resolved, this EIR addresses the environmental issues that are known by the County, that are identified in the Initial Study prepared for the Projects, and that were identified in the comment letters that the County of Riverside received on this EIR's NOP (refer to *Technical Appendix A* of this EIR). Environmental topics raised in written comment to the NOP are summarized in Table 1-1, *Summary of NOP Comments*, in Section 1.0 of this EIR, and include but are not limited to the



topics of air quality, biological resources, hazards and hazardous materials, hydrology and water quality, land use and planning, and transportation and traffic.

S.6 ALTERNATIVES TO THE PROPOSED PROJECT

In compliance with CEQA Guidelines § 15126.6, an EIR must describe a range of reasonable alternatives to the Project or to the location of the Project. Each alternative must be able to feasibly attain most of the Project's objectives and avoid or substantially lessen the Project's significant effects on the environment. A detailed description of each alternative evaluated in this EIR, as well as an analysis of the potential environmental impacts associated with each alternative, is provided in EIR Section 6.0, *Alternatives to the Proposed Project*. Also, described in Section 6.0 is a list of alternatives that were considered but rejected from further analysis. Refer to EIR Table 6-1 for a comparison of each alternative's environmental impacts to the proposed Project's level of impacts.

S.6.1 NO PROJECT/NO DEVELOPMENT ALTERNATIVE

The No Project/No Development Alternative would result in no physical environmental impacts to the Project site beyond those that have already occurred on the property and ongoing, required weed abatement. All significant effects of the Project would be avoided or lessened by the selection of the No Project/No Development Alternative. The No Project/No Development Alternative would fail to meet all of the Project's objectives. This alternative is, however, considered to be environmentally superior to the proposed Project.

S.6.2 NO PROJECT / EXISTING GENERAL PLAN DESIGNATION ALTERNATIVE

The No Project/Existing General Plan Alternative considers development of the Project site with a mixture of uses that are in conformance with the Project site's existing Riverside County General Plan and Mead Valley Area Plan land use designation and applicable policies. For analysis purposes, this alternative considers development of the Project site with 588,000 s.f. of industrial park buildings, and 550,000 s.f. of general warehouse buildings. The selection of the No Project/Existing General Plan Designation Alternative would achieve a few of Project's objectives, and also would not have any environmental advantages. Because this alternative would generate approximately ~~3-7~~ 3.5 times more traffic than the proposed Project, it would result in more severe significant impacts to air quality, greenhouse gas emissions, noise, and transportation. This alternative is not considered to be environmentally superior to the proposed Project.

S.6.3 BUILDING D ONLY ALTERNATIVE – THE ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Under this alternative, the Building D Site would be developed as proposed by the Project, with a 702,645 s.f. industrial business park building. The Building E Site would remain vacant and would be regularly maintained for weed abatement and wildfire suppression purposes. Oleander Road and Ellsworth Street would be improved along the frontage of the Building D Site; no roadway frontage improvements would occur abutting the Building E Site. Selection of the Building D Only Alternative would reduce, but not avoid the Project's significant unavoidable impacts to air quality, land use and



planning, noise, and transportation. Because this Alternative would attain some of the basic objectives of the Project with reduced environmental impacts, it is considered to be environmentally superior to the proposed Project and the environmentally superior alternative as defined by CEQA.

S.6.4 REDUCED PROJECT / TRUCK TRAILER STORAGE ALTERNATIVE

Under this alternative, the Building D Site would be developed as proposed by the Project, with a 702,645 s.f. industrial business park building. The Building E Site would be developed as a truck trailer parking yard to service the building constructed on the Building D Site. Selection of the Reduced Project/Truck Trailer Storage Alternative would reduce, but not avoid the Project's significant unavoidable impacts to air quality, land use and planning, noise, and transportation. The Reduced Project/Truck Trailer Storage Alternative would meet some of the Project's objectives but to a lesser degree. Because this alternative would attain the basic objectives of the Project with reduced environmental impacts, it is considered to be environmentally superior to the proposed Project.

S.6.5 REDUCED PROJECT / LARGER BUILDING ALTERNATIVE

Under this alternative, a 1,250,000 s.f. high cube warehouse building would be constructed on the Building D Site and the Building E Site, spanning the two areas. The segment of Ellsworth Street that segregates the two Sites would be vacated as a public right-of-way to allow for construction of the building. Selection of the Larger Building Alternative would result in similar if not identical impacts as would occur under the proposed Project under all environmental topics with the exception of air quality and operational traffic. Construction-related air quality impacts would increase because more construction activity would occur on a daily basis. Operational-related DPM exposure to off-site populations may increase because the building's loading docks and truck courts would be located closer to sensitive receivers. Also, the loss of the Ellsworth Street segment through the center of the property would cause other local roads to carry a greater volume of traffic. The Larger Building Alternative would meet all of the Project's objectives, but would not have any environmental advantages. Because this alternative would result in greater impacts to air quality and transportation, it is not considered to be environmentally superior to the proposed Project.

S.7 SUMMARY OF IMPACTS, MITIGATION MEASURES, AND CONCLUSIONS

S.7.1 EFFECTS FOUND NOT TO BE SIGNIFICANT

The scope of this EIR includes 47 18 subject areas determined through the completion of an Initial Study prepared by the County of Riverside pursuant to CEQA Guidelines § 15063 and CEQA Statute § 21002(e), as well as consideration of public comments received by the County on this EIR's NOP and during the September 14, 2015 public scoping session. The Initial Study, NOP, and public comments received in response to the NOP, are attached to this EIR as *Technical Appendix A*. There was one subject areas for which the County concluded that impacts clearly would be less than significant and that does not warrant further analysis in this EIR: Mineral Resources. This EIR addresses the topic of Mineral Resources in EIR Subsection 5.0, *Other CEQA Considerations*.



S.7.2 IMPACTS OF THE PROPOSED PROJECT

Table S-1, *Mitigation Monitoring and Reporting Program*, provides a summary of the proposed Project's environmental impacts, as required by CEQA Guidelines § 15123(a). Also presented are the mitigation measures imposed on the Project by the County of Riverside to further avoid adverse environmental impacts or to reduce their level of significance. After the application of all feasible mitigation measures, the Project would result in five significant and unavoidable environmental effects, as summarized below.

- Air Quality - Significant and Unavoidable Direct and Cumulatively Considerable Impact. There are no feasible mitigation measures to eliminate or offset the Project's near-term inconsistency with SCAQMD's 2012 AQMP due to exceedance of the SCAQMD emissions thresholds.
- Air Quality - Significant and Unavoidable Direct and Cumulatively Considerable Impact. Even after the application of feasible mitigation measures, the Project's VOCs and NO_x daily operational emissions would exceed the SCAQMD's significance thresholds. Emissions of NO_x are primarily a result of mobile source emissions (i.e., vehicles traveling to and from the Project site), which are regulated by state and federal emissions and fuel use standards, and beyond the direct control of the Project Applicant and/or future users of the Project site's buildings.
- Land Use and Planning – Significant and Unavoidable Direct and Cumulatively Considerable Impact. The Project would develop the subject property with two business park warehouse buildings and associated site improvements, including, but not limited to, surface parking areas, vehicle drive aisles, truck courts, utility infrastructure, landscaping, exterior lighting, signage, walls and fencing, and water quality/detention basins. The changes to the Project site proposed by the Project represent a substantial alteration to the site's present land use, construction and operation of which would result in significant effects to the environment that cannot be reduced to less-than-significant levels through the application of feasible mitigation.
- Noise (Traffic Related) – Significant and Unavoidable Direct Impact. No feasible mitigation measures are available to reduce the Project's transportation-related noise impacts along the Oleander Avenue segments west of Harvill Avenue and east of the Project's Driveway #6 under Existing + Project and Project Opening Year conditions. Although noise levels along the affected segments of Oleander Avenue would not exceed the County's 65 dBA CNEL standard for noise-sensitive uses, the Project's contribution to existing noise levels would represent a substantial noise increase over existing conditions, and residential structures would be affected. The affected residential parcels are non-conforming and designated by the Riverside County General Plan for "Business Park" land uses. By the Year 2035 (Buildout Year), the Project's contribution of transportation-



- related noise along the above-listed segments of Oleander Avenue would be reduced to less than significant levels, because as ambient traffic volumes increase on the road, the Project's overall percentage of the noise contribution would diminish. Although the Project's impact would be significant and unavoidable, by Year 2035, the impact would be less than significant.
- Transportation (Local Roadway System) - Significant and Unavoidable Cumulatively Considerable Impact. The Project Applicant would pay development impact fees and participate in fair share funding programs to mitigate the Project's direct and cumulative impacts to the local roadway network. However, several of the needed transportation improvements are either funded by existing mitigation funding programs (including TUMF) with no timetable for construction (meaning the necessary improvements may not be in place when the Project becomes operational and starts to contribute traffic to the facilities), or the improvements are not included in any existing mitigation funding program (therefore, there is no mechanism currently available for development projects to contribute toward the construction of needed improvements, and thus no assurance that the improvements would be implemented). Accordingly, the Project's cumulatively considerable impacts to four (4) intersections in the Existing + Ambient Growth + Project + Cumulative (E+A+P+C) analysis scenario are concluded to be unavoidable. The affected intersections are: 1) Ellsworth Street / Oleander Avenue; 2) Harvill Avenue / Harley Knox Boulevard; 3) I-215 Southbound Ramps / Harley Knox Boulevard; and 4) I-215 Northbound Ramps / Harley Knox Boulevard.
 - Transportation (State Highway System) – Significant and Unavoidable Cumulatively Considerable Impact. The Project would contribute traffic to the state highway system, which is under the jurisdiction of Caltrans. As such, the County of Riverside cannot assure the construction of improvements to state highway facilities. Furthermore, Caltrans does not have funding mechanism in place to allow development projects to contribute fair-share payments. Although a mitigation measure is recommended that requires the Project Applicant to offer fair share fee contributions to Caltrans to fund improvements to state highway system facilities that the Project's traffic would impact, there is no assurance that Caltrans will develop a fee program and implement the improvements prior to the time that the Project begins to contribute traffic to the facilities. Accordingly, the Project's contribution of traffic to the state highway system facilities under E+A+P+C and/or Horizon Year (2035) conditions is concluded to be a significant and unavoidable cumulative impact.



Table S-1 Mitigation Monitoring and Reporting Program

| SUMMARY OF IMPACTS | COUNTY REGULATIONS AND DESIGN REQUIREMENTS (RR) AND/OR MITIGATION MEASURES (MM) | RESPONSIBLE PARTY | MONITORING PARTY | IMPLEMENTATION STAGE | LEVEL OF SIGNIFICANCE AFTER MITIGATION |
|---|--|-------------------|------------------|----------------------|--|
| 4.1 Aesthetics | | | | | |
| Scenic Resources Threshold (a) for the Building D Site and the Building E Site: No Impact. There are no designated scenic highways in the vicinity of the Project site. The portion of the Ramona Expressway located east of I-215 and approximately 1.2 miles southeast of the Project site is a County Eligible scenic highway, but due to the 1.2-mile distance and intervening development, the Project site is not visible from this roadway segment. As such, the Project has no potential to adversely impact views from a scenic highway corridor. | No mitigation is required. | N/A | N/A | N/A | No Impact |
| Scenic Resources Threshold (b) for the Building D Site and the Building E Site: Less-than-Significant Impact. The proposed Project would not substantially damage scenic resources or significantly obstruct any prominent scenic vistas or public views. The Project site does not contain any unique scenic resources. Development of the Project would not substantially block views of scenic mountain resources in the distance. Also, the proposed Project incorporates design elements such as landscaping, landscaped slopes, walls, and architectural features to ensure that development proposed on the Building D and Building E Sites would not create an aesthetically offensive site open to public view. | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |
| Mt. Palomar Observatory Threshold (a) for the Building D Site and the Building E Site: Less-than-Significant | RR-1 (Applies to the Building D Site and the Building E Site) The Project is required to comply with Riverside County Ordinance No. 655, which is | N/A | N/A | N/A | Less-than-Significant Impact |



| SUMMARY OF IMPACTS | COUNTY REGULATIONS AND DESIGN REQUIREMENTS (RR) AND/OR MITIGATION MEASURES (MM) | RESPONSIBLE PARTY | MONITORING PARTY | IMPLEMENTATION STAGE | LEVEL OF SIGNIFICANCE AFTER MITIGATION |
|--|---|-------------------|------------------|----------------------|--|
| <p>Impact. The Project site is located within Zone B of the Mt. Palomar Observatory Nighttime Lighting Policy Area. Mandatory compliance with Riverside County Ordinance No. 655 will ensure that the Project does not interfere with the nighttime use of the Mt. Palomar Observatory and impacts would be less than significant.</p> | <p>intended to restrict the permitted use of certain light fixtures emitting light into the night sky which could have a detrimental effect on astronomical observation and research. Ordinance No. 655 sets forth requirements for lamp source and shielding of light emissions for outdoor fixtures to reduce “skyglow” or light pollution that affects day or nighttime views from the Mt. Palomar Observatory (located approximately 24 miles southeast of the Project site in northern San Diego County).</p> | | | | |
| <p>Other Lighting Issues Threshold (a) for the Building D Site and the Building E Site: Less-than-Significant Impact. Construction and operation of Building D and Building E would introduce new sources of artificial light typical of business park developments. No glare-producing building materials are proposed. Mandatory compliance with Riverside County Ordinances Nos. 655 and 915, which provide lighting standards to eliminate adverse effects of lighting associated with development, will ensure that the Project does not create new sources of substantial light or glare that affect day or nighttime views in the area.</p> | <p>RR-2 (Applies to the Building D Site and the Building E Site) The Project is required to comply with Riverside County Ordinance No. 915, which is intended to provide minimum requirements for outdoor lighting in order to reduce light trespass. Ordinance No. 915 provides regulations on adequate lighting shielding, glare, and light trespass in order to ensure all development in Riverside County installs lighting in a way that does not jeopardize the health, safety, or general welfare of Riverside County residents and degrade their quality of life.</p> <p>RR-1 also applies.</p> | N/A | N/A | N/A | Less-than-Significant Impact |
| <p>Other Lighting Issues Threshold (b) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would not expose residential properties to unacceptable light levels. Mandatory compliance with Riverside County Ordinances Nos. 655 and 915, which provide lighting and light shielding standards would ensure that the Project does not expose off-site residential properties to unacceptable light levels. <u>In addition, as a best practice measure, EIR</u></p> | <p>RR-1 and RR-2 apply.</p> | N/A | N/A | N/A | Less-than-Significant Impact |



| SUMMARY OF IMPACTS | COUNTY REGULATIONS AND DESIGN REQUIREMENTS (RR) AND/OR MITIGATION MEASURES (MM) | RESPONSIBLE PARTY | MONITORING PARTY | IMPLEMENTATION STAGE | LEVEL OF SIGNIFICANCE AFTER MITIGATION |
|--|--|-------------------|------------------|----------------------|--|
| <p>Section 4.11, <i>Noise</i>, includes Mitigation Measure 4.11-2(A) that requires that no construction activities and no construction-related night lighting shall occur within 600 feet of occupied sensitive receptors after 6:00 p.m. and before 6:00 a.m. during the months of June through September or before 7:00 a.m. during the months of October through May.</p> | | | | | |
| 4.2 Agriculture and Forest Resources | | | | | |
| <p>Agriculture Threshold (a) for the Building D Site and the Building E Site: No Impact. The Project as proposed on the Building D Site and Building E Site would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use. There is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) on the Project site and a large majority of the on-site soils have severe limitations for agricultural crop production.</p> | No mitigation is required. | N/A | N/A | N/S | No Impact |
| <p>Agriculture Threshold (b) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Building D Site and the Building E Site do not contain land zoned for agriculture or land used for agricultural purposes. With mandatory compliance to Riverside County Ordinance No. 625, impacts would be less than significant.</p> | <p>RR-3 (Applies to the Building D Site and the Building E Site) The Project is required to comply with Riverside County Ordinance No. 625, which requires that when non-residential uses are developed adjacent to properties zoned primarily for agricultural purposes (that support agricultural operations that have been in place for at least three years and not considered a nuisance operation at the time the operation began), future property owners must be notified of any agricultural operations that are ongoing in the area, and acknowledge that such agricultural uses shall not be the subject of nuisance complaints.</p> | N/A | N/A | N/A | Less-than-Significant Impact |
| <p>Agriculture</p> | RR-3 applies. | N/A | N/A | N/A | Less-than-Significant Impact |



| SUMMARY OF IMPACTS | COUNTY REGULATIONS AND DESIGN REQUIREMENTS (RR) AND/OR MITIGATION MEASURES (MM) | RESPONSIBLE PARTY | MONITORING PARTY | IMPLEMENTATION STAGE | LEVEL OF SIGNIFICANCE AFTER MITIGATION |
|--|---|-------------------|------------------|----------------------|--|
| <p>Threshold (c) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would have less-than-significant impacts to off-site properties that are agriculturally zoned. Aspects of the Building D and Building E Site’s physical design, including the proposed creation of manufactured slopes around the building pad perimeters, would provide a physical separation between the proposed development and off-site agriculturally zoned property. Also, no surrounding property is currently used primarily for agricultural purposes. Should an off-site property within 300 feet become used for agriculture, mandatory compliance to Ordinance No. 625, as would be required by the County, would further ensure that impacts would be less- than-significant.</p> | | | | | |
| <p>Agriculture Threshold (d) for the Building D Site and the Building E Site: No Impact. Due to the lack of agricultural activity and Farmland in the Project vicinity, the Project has no potential to result in changes to the existing environment which, due to their location or nature, could result in the conversion of Farmland to a non-agricultural use</p> | No mitigation is required. | N/A | N/A | N/A | No Impact |
| <p>Forest Threshold (a) for the Building D Site and the Building E Site: No Impact. The Project site is not zoned as forest land and there are no lands within the Project site’s vicinity that are zoned for forest land, timberland, or Timberland Production. Thus, implementation of the proposed Project on the Building D Site and the Building E Site would not conflict with existing zoning for,</p> | No mitigation is required. | N/A | N/A | N/A | No Impact |



| SUMMARY OF IMPACTS | COUNTY REGULATIONS AND DESIGN REQUIREMENTS (RR) AND/OR MITIGATION MEASURES (MM) | RESPONSIBLE PARTY | MONITORING PARTY | IMPLEMENTATION STAGE | LEVEL OF SIGNIFICANCE AFTER MITIGATION |
|---|---|---------------------|--|-----------------------------------|--|
| or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. | | | | | |
| Forest Threshold (b) for the Building D Site and the Building E Site: No Impact. There is no forest land on the Project site. Thus, implementation of the proposed Project on the Building D Site and the Building E Site would not result in the conversion of forest land to non-forest use. | No mitigation is required. | N/A | N/A | N/A | No Impact |
| Forest Threshold (c) for the Building D Site and the Building E Site: No Impact. The Project site does not contain forest land. Thus, the Project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use. | No mitigation is required. | N/A | N/A | N/A | No Impact |
| 4.3 Air Quality | | | | | |
| Threshold (a) for the Building D Site and the Building E Site: Significant Direct and Cumulatively Considerable Impact. Project construction-source emissions would exceed localized significance thresholds for NO _x , PM ₁₀ , and PM _{2.5} . In addition, the Project would exceed the growth forecasts assumed for a portion of the Building E Site by the SCAQMD AQMP; therefore, the proposed Project would conflict with the implementation of the AQMP on a significant direct and cumulatively considerable basis. | RR-4 (Applies to the Building D Site and the Building E Site) The Project is required to comply with the provisions of the South Coast Air Quality Management District (SCAQMD) Rule 403 “Fugitive Dust.” Rule 403 requires implementation of best available dust control measures during construction activities that generate fugitive dust, such as earth moving, grading, and construction equipment travel on unpaved roads. To comply with Rule 403, and prior to grading permit issuance, the County of Riverside shall verify that notes are specified on the Project’s grading plans requiring Rule 403 compliance. Project construction contractors would be required to ensure compliance with the notes and permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. To comply with Rule 403: | Project Contractors | County of Riverside Building & Safety Department | Prior to grading permit issuance. | Short-Term Construction: Less-than-Significant Long-Term Operation: Significant and Unavoidable Direct and Cumulatively Considerable Impact |



| SUMMARY OF IMPACTS | COUNTY REGULATIONS AND DESIGN REQUIREMENTS (RR) AND/OR MITIGATION MEASURES (MM) | RESPONSIBLE PARTY | MONITORING PARTY | IMPLEMENTATION STAGE | LEVEL OF SIGNIFICANCE AFTER MITIGATION |
|--------------------|--|---|---|--|--|
| | <p>1. In order to limit fugitive dust emissions, all clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 miles per hour (mph) per SCAQMD guidelines.</p> <p>2. The construction contractor(s) shall ensure that all disturbed unpaved roads and disturbed areas within the Project site are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three (3) times a day, preferably in the mid-morning, afternoon, and after work is done for the day.</p> <p>3. The construction contractor(s) shall ensure that traffic speeds on unpaved roads and the Project site area are reduced to 15 miles per hour or less.</p> <p>RR-5 (Applies to the Building D Site and the Building E Site) The Project is required to comply with the provisions of the South Coast Air Quality Management District (SCAQMD) Rule 1113 "Table of Standards" pertaining to VOC emissions by using zero-Volatile Organic Compounds paints (no more than 100 gram/liter of VOC) and/or High Pressure Low Volume (HPLV) applications. Prior to building permit final inspection, the County of Riverside shall verify a note requiring Rule 1113 compliance is specified on all building plans. Project contractors would be required to comply with the note and maintain written records of such compliance that can be inspected by the County of Riverside or its designee upon request.</p> <p>RR-6 (Applies to the Building D Site and the Building E Site) The Project's construction activities are required to comply with the provisions of the South Coast Air Quality Management District (SCAQMD) Rule 1186 "PM₁₀ Emissions from Paved and Unpaved</p> | <p>Project Contractors</p> <p>Project Contractors</p> | <p>County of Riverside Building & Safety Department</p> <p>County of Riverside Building & Safety Department</p> | <p>Prior to building permit final inspection.</p> <p>During Project Construction</p> | |



| SUMMARY OF IMPACTS | COUNTY REGULATIONS AND DESIGN REQUIREMENTS (RR) AND/OR MITIGATION MEASURES (MM) | RESPONSIBLE PARTY | MONITORING PARTY | IMPLEMENTATION STAGE | LEVEL OF SIGNIFICANCE AFTER MITIGATION |
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| | <p>Roads and Livestock Operations,” which requires the use of a street sweeper certified by the <u>Air Quality Management District (AQMD)</u>, and the use of non-toxic chemical stabilizers for dust control.</p> <p>RR-7 (Applies to the Building D Site and the Building E Site) Project construction activities are required to comply with the California Manual on Uniform Traffic Control Devices, which specify that temporary traffic controls shall be provided during construction, such as a flag person, during all phases of construction to facilitate the flow of construction traffic on streets abutting the Project site.</p> <p>RR-8 (Applies to the Building D Site and the Building E Site) The Project is required to comply with the provisions of the <u>South Coast Air Quality Management District (SCAQMD) Rule 402</u>, “Nuisance” which requires that a person shall not discharge air contaminants or other materials that would cause health or safety hazards to any considerable number of persons or the public.</p> <p>RR-9 (Applies to the Building D Site and the Building E Site) The Project is required to comply with the California Green Building Standards Code (CALGreen), including all Nonresidential Mandatory Measures, including but not limited to requirements for bicycle parking, parking for clean air vehicles, charging stations, lighting, water conservation, waste reduction, and building maintenance. The provisions of CALGreen reduce energy use and fossil fuel use, which reduce air pollutant emissions.</p> <p>RR-10 (Applies to the Building D Site and the Building E Site) Diesel-fueled vehicles at the Project site are required to comply with the California Air Resources Board (CARB) idling restriction requirements, which currently restrict vehicles from</p> | <p>Project Contractors</p> <p>Project Contractors</p> <p>Project Applicant; Project Contractors</p> <p>Project Contractors</p> | <p>County of Riverside Building & Safety Department</p> <p>County of Riverside Building & Safety Department</p> <p>County of Riverside Building & Safety Department</p> <p>County of Riverside Building & Safety Department</p> | <p>During Project Construction</p> <p>During Project Construction</p> <p>During Project Construction and Operation</p> <p>Prior to building permit final inspection.</p> | |



| SUMMARY OF IMPACTS | COUNTY REGULATIONS AND DESIGN REQUIREMENTS (RR) AND/OR MITIGATION MEASURES (MM) | RESPONSIBLE PARTY | MONITORING PARTY | IMPLEMENTATION STAGE | LEVEL OF SIGNIFICANCE AFTER MITIGATION |
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| | <p>idling for more than 5 minutes. Prior to building permit final inspection, the County of Riverside shall verify that signs are posted in the Project's truck courts specifying the idling restriction requirement.</p> <p>MM 4.3-1 (Applies to the Building D Site and the Building E Site) Prior to grading permit issuance, the County of Riverside shall verify that the following notes are included on the grading plans. Project contractors shall be required to ensure compliance with these notes and permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. These notes also shall be specified in bid documents issued to prospective construction contractors.</p> <ul style="list-style-type: none"> a) Onsite electrical hook-ups to a power grid shall be provided for electric construction tools including saws, drills, and compressors, where feasible, to reduce the need for diesel powered electric generators. b) All Heavy-Heavy Duty Haul Trucks (HHD) accessing the Project site shall use year 2010 or newer engines during all construction activities to the extent such HHD are commercially available. c) All excavators, graders, and rubber-tired dozers shall be CARB Tier 3 Certified or better. d) All scrapers shall be CARB Tier 4 Certified or better. e) The total horsepower-hours per day for all on-site equipment shall not exceed 46,344 horsepower hours per day. f) The maximum daily disturbance area (actively graded area) shall not exceed 11.0 acres per day. g) <u>The use of diesel-powered generators during construction shall be prohibited.</u> | <p>Project Applicant; Project Contractors</p> | <p>County of Riverside Building & Safety Department</p> | <p>Prior to grading permit issuance.</p> | |



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| | <p>MM 4.3-3 (Applies to the Building D Site and the Building E Site) Within six months of building occupancy, signs shall be posted at the building informing truck drivers about the health effects of diesel particulates, the California Air Resources Board diesel-fueled vehicle idling regulations, and the importance of being a good neighbor by not parking in residential areas. Developer and all successors shall include this obligation in all leases of the Project so that all tenants shall fulfill the terms and conditions of this County condition of approval.</p> <p>MM 4.3-4 (Applies to the Building D Site and the Building E Site) Within six months of building occupancy, signs shall be posted in all dock and delivery areas containing the following: truck drivers shall turn off engines when not in use; trucks shall not idle for more than <u>three (3) five</u> minutes; telephone numbers of the building facilities manager and the California Air Resources Board to report violations. Developer and all successors shall include the provisions of the requirements of these obligations in all leases of the Project so that all tenants shall fulfill the terms and conditions of this County condition of approval.</p> <p>MM 4.3-5 (Applies to the Building D Site and the Building E Site) Owner users and tenants of the Project shall maintain records on its fleet equipment and vehicle engine maintenance to ensure that its <u>Heavy-Heavy Duty Haul Trucks (HHD)</u> fleet serving the warehouses within the Project are in good condition, and in proper tune pursuant to manufacturer's specifications. Owner users and tenants shall ensure that all HHD accessing the Project site shall comply with 13 California Code of Regulations Section 2025, as may be amended (the "Regulations"), and that all HHD accessing the Project</p> | <p>Project Applicant and all successors</p> <p>Project Applicant and all successors</p> <p>Project Applicant and all successors</p> | <p>County of Riverside Building & Safety Department</p> <p>County of Riverside Building & Safety Department</p> <p>County of Riverside Building & Safety Department</p> | <p>Within Six Months of Building Occupancy</p> <p>Within Six Months of Building Occupancy</p> <p>Prior to building permit final inspection.</p> | |



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| | <p>site shall comply with the required registration and reporting provisions of the Regulations. Developer and all successors shall include the provisions of the requirements of these obligations in all leases of the Project so that all tenants shall fulfill the terms and conditions of this County condition of approval.</p> <p>MM 4.3-6 (Applies to the Building D Site and the Building E Site) Site enforcement staff in charge of monitoring for excess vehicle idling shall be trained/certified in diesel health effects and technologies, for example, by requiring attendance at California Air Resources Board approved courses. Developer and all successors shall include this obligation in all leases of the Project so that all tenants shall fulfill the terms and conditions of this County condition of approval.</p> <p>MM 4.3-7 (Applies to the Building D Site and the Building E Site) All owner users and future tenants shall participate in Riverside County's Rideshare Program. The purpose of this program is to discourage single-occupancy vehicle trips and encourage other alternative modes of transportation. Carpooling opportunities and public transportation information shall be advertised to employees of the building tenant. Developer and all successors shall include the provisions of this obligation in all leases of the Project so that all tenants shall fulfill the terms and conditions of this County condition of approval.</p> <p>MM 4.3-8 (Applies to the Building D Site and the Building E Site) Prior to the issuance of a building permit, the County shall verify that the building's roof is designed to accommodate a <u>minimum</u> 1 KW photovoltaic (PV) solar array taking into consideration limitations imposed by other rooftop equipment, roof warranties, building and fire code requirements, and other physical or legal limitations. The building shall</p> | <p>Project Applicant and all successors</p> <p>Project Applicant and all successors</p> <p>Project Contractors</p> | <p>County of Riverside Building & Safety Department</p> <p>County of Riverside Building & Safety Department</p> <p>County of Riverside Building & Safety Department</p> | <p>Prior to building permit final inspection.</p> <p>Prior to building permit final inspection.</p> <p>Prior to building permit final inspection.</p> | |



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| | <p>be constructed with the necessary electrical system and other infrastructure to accommodate PV arrays in the future. The electrical system and infrastructure shall be clearly labeled with noticeable and permanent signage which informs future occupants/owners of the existence of this infrastructure.</p> <p>MM 4.3-9 (Applies to the Building D Site and the Building E Site) Developer and all successors shall include information in building lease agreements that inform tenants about the air quality benefits associated with water-based or low volatile organic compounds (VOC) cleaning products.</p> <p>MM 4.3-10 (Applies to the Building D Site and the Building E Site) Developer and all successors shall include information in building lease agreements that inform tenants about the benefits of becoming SmartWay Shippers and SmartWay Carriers. SmartWay is a federal EPA program that advances supply chain sustainability.</p> <p>MM 4.3-11 (Applies to the Building D Site and the Building E Site): <u>Developer and all successors shall stipulate in building lease and sale agreements that yard trucks shall not be fueled with diesel.</u></p> <p>MM 4.3-12 (Applies to the Building D Site and the Building E Site): <u>Prior to the issuance of building permits, the County shall verify that the Project's building plans require the installation of a primary roofing material that has solar reflective index (SRI) value of at least 39 percent.</u></p> | <p>Project Applicant and all successors.</p> <p>Project Applicant and all successors.</p> <p>Project Applicant and all successors.</p> <p>Project Applicant</p> | <p>County of Riverside Building & Safety Department</p> <p>County of Riverside Building & Safety Department</p> <p>County of Riverside Building & Safety Department</p> <p>County of Riverside Building & Safety Department</p> | <p>Prior to building permit final inspection.</p> <p>Prior to issuance of occupancy permits.</p> <p><u>Prior to issuance of occupancy permits.</u></p> <p><u>Prior to building permit final inspection.</u></p> | |
| <p>Thresholds (b) and (c) for the Building D Site and the Building E Site: Significant Direct and Cumulatively Considerable Impact. The Project would emit concentrations of NO_x during construction</p> | <p>MM 4.3-1 and MM 4.3-2 and RR-4 through RR-10 apply.</p> | <p>See above</p> | <p>See above</p> | <p>See above</p> | <p>Significant and Unavoidable Direct and Cumulatively Considerable Impact</p> |



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| that would cause or contribute to an existing or projected air quality violation, on both a direct and cumulatively considerable basis. During long-term operation, the Project would exceed SCAQMD's regional criteria for daily VOC and NO _x emissions which would result in a significant impact to the environment on both a direct and cumulatively considerable basis. | | | | | |
| Threshold (d) for the Building D Site and the Building E Site: Significant Direct and Cumulatively Considerable Impact. The Project's construction-related emissions would exceed the SCAQMD's localized significance thresholds for emissions of NO _x , PM ₁₀ , and PM _{2.5} . The Project's emissions would not create a CO hotspot. Long-term operation at the Project site would cause less-than-significant direct and less-than-significant cumulatively considerable human health impacts due to the exposure of residents, workers, and school children substantial diesel particulate emissions (DPMs). | MM 4.3-1 and MM 4.3-2 apply. | See above | See above | See above | Less-than-Significant Impact |
| Threshold (e) for the Building D Site and the Building E Site: No Impact. The Project proposes to develop the property with two industrial business park buildings which would not contain sensitive receptors that could be exposed to point source emissions. The Project does not propose land uses that would be considered point source emitters. | No mitigation is required. | N/A | N/A | N/A | No Impact |
| Threshold (f) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would not produce unusual or substantial construction-related odors. Odors associated with long-term operation of the Project would be minimal | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |



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| and less than significant. The Project would be required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions that would create a public nuisance. | | | | | |
| 4.4 Biological Resources | | | | | |
| <p>Threshold (a) for the Building D Site and the Building E Site: Significant Direct and Cumulatively Considerable Impact. The Project is subject to compliance with two Habitat Conservation Plans (HCPs): the Western Riverside County Multiple Species Conservation Program (MSHCP) and the Stephens’ Kangaroo Rat (SKR) HCP. The Project site is not located in a planned conservation area of either HCP, and is required by the Riverside County Municipal Code to pay MSCHP and SKR HCP mitigation fees. Regarding applicable MSHCP provisions for properties located outside of conservation areas, the Project would result in significant direct and cumulatively considerable impacts to the western burrowing owl if the species is present on the site when construction activities commence. The Project also would result in the loss of an ephemeral drainage that occurs on the Building D Site (0.09-acre (677 feet)) and the Building E Site (0.13-acre (944 feet)), which qualifies as a MSHCP riverine resource because it receives fresh water flow during all or a portion of the year. The loss of this resource on the Project site would be a direct and cumulatively-considerable impact associated with the loss of riverine resources in the Western Riverside County MSHCP area. Complete avoidance of the</p> | <p>RR-11 The Project Applicant shall comply with County of Riverside Ordinance No. 810 (<u>Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Fee Program Ordinance</u>), which requires a per-acre local development impact and mitigation fee payment prior to the issuance of a building permit.</p> <p>RR-12 The Project Applicant shall comply with County of Riverside Ordinance No. 663 (as amended through 663-10) (<u>Stephens’ Kangaroo Rat Mitigation Fee Ordinance</u>) which requires a per-acre local development and mitigation fee payment prior to the issuance of a grading permit.</p> <p>RR-13 The Project Applicant shall comply with the federal Migratory Bird Treaty Act (<u>MBTA</u>).</p> <p>MM 4.4-1 (Applies to the Building D Site and the Building E Site) Pursuant to Objectives 5, 6, and 7 of the Species Account for the Burrowing Owl included in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), within 30 days prior to the issuance of a grading permit, a pre-construction presence/absence survey for the burrowing owl shall be conducted by a qualified biologist <u>who holds a Memorandum of Understanding (MOU) with the County, and The the survey results shall be provided in writing to the Environmental Programs Department/County Biologist. If the grading permit is not obtained within 30 days of the survey, a</u></p> | <p>Project Applicant</p> <p>Project Applicant</p> <p>Project Applicant</p> <p>Project Applicant; Project Biologist</p> | <p>Riverside County Planning Department</p> <p>Riverside County Planning Department</p> <p>Riverside County Planning Department</p> <p>Riverside County Environmental Programs Department (EPD)</p> | <p>Prior to the issuance of a building permit.</p> <p>Prior to the issuance of a grading permit.</p> <p>Prior to the issuance of a grading permit.</p> <p>Within 30 days prior to grading activities; prior to the issuance of a grading permit.</p> | <p>Less-than-Significant Impact</p> |



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| <p>riparian/riverine resources is not feasible. Because there are no feasible avoidance alternatives available, the MSHCP requires the Project to provide compensatory mitigation to ensure the replacement of any lost functions and values as it related to the plan and wildlife species covered by the MSHCP.</p> | <p>new survey shall be required. If it is determined that the project site is occupied by the burrowing owl, take of "active" nests shall be avoided pursuant to the MSHCP and the Migratory Bird Treaty Act (MBTA). However, when the Burrowing Owl is present, relocation shall only be allowed to take place outside of the burrowing owl nesting season (March 1 through August 31) and is required to be performed by a qualified biologist familiar with relocation methods. shall be required. The County Biologist shall be consulted to determine appropriate type of relocation (active or passive) and <u>potential</u> translocation sites. <u>Burrowing Owl Protection and Relocation Plans and Biological Monitoring Plans are required to be reviewed and approved by the in accordance with California Department of Fish and Wildlife (CDFW) guidelines. In the event that burrowing owls are occupying the Project site at the time of the pre-construction survey, passive relocation shall not be allowed.</u></p> <p><u>If it is determined during the 30-day preconstruction survey that burrowing owls have colonized the Project site prior to initiation of construction, the Project Proponent will immediately inform the Riverside County Biologist, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, and the Regional Conservation Authority and would need to retain a biologist that holds a Memorandum of Understanding (MOW) with the County of Riverside to prepare a Burrowing Owl Protection and Relocation Plan for approval by the County of Riverside and Wildlife Agencies prior to initiating ground disturbance. The relocation plan shall include the following: A grading permit may be issued once the species has been relocated. If the grading permit is not obtained within 30 days of the survey, a new survey shall be required.</u></p> | | | | |



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| | <p>-The locations of nests and owls proposed for relocation.</p> <p>-The locations of the proposed relocation sites.</p> <p>-The numbers of adult owls and juveniles proposed for relocation.</p> <p>-The time of year when relocation is proposed to take place.</p> <p>-The name of the biologist proposed to supervise the relocation and the details of his/her previous experience capturing, handling, and relocating burrowing owl, including the outcomes of the previous relocation efforts (survival/mortality rates and site-fidelity rates of the relocated owls) and relevant permits held.</p> <p>-A detailed description of the proposed method of capture, transport, and acclimation of the current project's owls on the proposed relocation site.</p> <p>-A detailed description of relocation site preparations (e.g., the design and dimensions of the artificial release burrows and hacking cage, duration of hacking activities (including food and water provision).</p> <p>-Description of the monitoring methods and monitoring duration to be employed verify survival of the relocated owls and their long-term retention on the relocation site.</p> <p>MM 4.4-2 (Applies to the Building D Site and the Building E Site) As a condition of grading permits, a migratory nesting bird survey of all trees to be removed shall be conducted by a qualified biologist within 10 days prior to initiating tree removal or vegetation clearing within 500 feet of a mature tree. A copy of the migratory nesting bird survey results report shall be provided to the Riverside County Environmental Programs Department (EPD). If the survey identifies the presence of active nests, then the qualified biologist shall provide the Riverside County EPD with a copy of maps showing the location of all nests and an appropriate buffer zone around each nest</p> | <p>Project Applicant: Qualified Biologist</p> | <p>Riverside County Environmental Programs Department (EPD)</p> | <p>Within 10 days prior to initiating tree removal or vegetation clearing within 500 feet of a mature tree</p> | |



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| | <p>sufficient to protect the nest from direct and indirect impacts. The size and location of all buffer zones, if required, shall be subject to review and approval by the Riverside County EPD and shall be no less than a 300-foot radius around the nest for non-raptors and a 500-foot radius around the nest for raptors. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved buffer zone shall be marked in the field with construction fencing, within which no vegetation clearing or ground disturbance shall commence until the qualified biologist and Riverside County EPD verify that the nests are no longer occupied and the juvenile birds can survive independently from the nests.</p> <p>MM 4.4-3 (Applies to the Building D Site) To mitigate for permanent impacts to a 0.09-acre (677 linear foot) ephemeral drainage feature on the Building D Site, the Project Applicant shall pay into the Riverside Corona Resource Conservation District in-lieu fee program, at a 2:1 ratio, totaling 0.18-acre. Evidence of fee payment shall be supplied to the Riverside County Environmental Programs Department (EPD) prior to issuance of a grading permit.</p> <p>MM 4.4-4 (Applies to the Building E Site) To mitigate for permanent impacts to a 0.11-acre (690 linear feet) ephemeral drainage feature on the Building E Site, the Project Applicant shall pay into the Riverside Corona Resource Conservation District in-lieu fee program, at a 2:1 ratio, totaling 0.22-acre. Evidence of fee payment shall be supplied to the Riverside County Environmental Programs Department (EPD) prior to issuance of a grading permit.</p> | <p>Project Applicant</p> <p>Project Applicant</p> | <p>Riverside County Environmental Programs Department (EPD)</p> <p>Riverside County Environmental Programs Department (EPD)</p> | <p>Prior to issuance of a grading permit.</p> <p>Prior to Issuance of Grading Permit.</p> | |
| Thresholds (b) and (c) for the Building D Site and the Building E Site: Significant | MM 4.4-1, MM 4.4-2, and MM 4.4-3 apply. | See Above | See Above | See Above | Less-than-Significant Impact |



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| <p>Direct and Cumulatively Considerable Impact. The Project would result in less-than-significant impacts to sensitive plant species. No sensitive plant communities are located on the Project site. Although paniculate tarplant is not a MSHCP-covered species, because the plant species is not rare, threatened, or endangered, because its range is sufficiently broad, because the CNPS listing for the species is relatively low for the species, and because habitat for this species is preserved elsewhere within the MSHCP boundaries, the loss of the species on the Project site is considered less than significant. Loss of individual plants on the Project site would not threaten the species as a whole. Thus, the Project's impacts to the species would be less than significant and less than cumulatively considerable. In regards to sensitive wildlife species, the Project would significantly impact the western burrowing owl if the species is present on the Project site at the time construction activities commence. In addition, migratory bird species protected by the MBTA would be impacted by the Project if active nests are present on the site at the time that nesting habitat (trees and shrubs) are removed. These impacts would be direct and cumulatively considerable. Impacts to the San Diego black-tailed jackrabbit is considered less than significant because it is a Western Riverside County MSHCP-covered species.</p> | | | | | |
| <p>Threshold (d) for the Building D Site and the Building E Site: Significant Direct and Cumulatively Considerable Impact. The Project has the potential to impact nesting migratory birds if active nests are</p> | <p>MM 4.4-2 applies.</p> | <p>See Above</p> | <p>See Above</p> | <p>See Above</p> | <p>Less-than-Significant Impact</p> |



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| <p>disturbed during the nesting season (February 1 to August 31). The Project would not substantially interfere with the movement of any other native resident or migratory fish or wildlife species, would not interfere with a migratory wildlife corridors, and would not impede the use of native wildlife nursery sites.</p> | | | | | |
| <p>Threshold (e) and (f) for the Building D Site: Significant Direct and Cumulatively Considerable Impact. The Project as proposed on the Building D Site would result in the direct loss of 0.09-acre (677 feet) of an ephemeral drainage feature dominated by upland plant species that receives fresh water flow during all or a portion of the year. The drainage features qualifies as a Western Riverside County MSHCP riverine resource and falls under the jurisdiction of the CDFW. No impact to riparian habitats, vernal pools, State or federal wetlands, “waters of the United States,” or other sensitive natural communities would occur.</p> | MM 4.4-3 applies. | See Above | See Above | See Above | Less-than-Significant Impact |
| <p>Threshold (e) and (f) for the Building E Site: Significant Direct and Cumulatively Considerable Impact. The Project as proposed on the Building E Site would result in the direct loss of 0.13-acre (944 feet) of an ephemeral drainage feature dominated by upland plant species that receives fresh water flow during all or a portion of the year. The drainage features qualifies as a Western Riverside County MSHCP riverine resource and falls under the jurisdiction of the CDFW. No impact to riparian habitats, vernal pools, State or federal wetlands, waters of the United States, or other sensitive natural communities would occur.</p> | MM 4.4-4 applies. | See Above | See Above | See Above | Less-than-Significant Impact |



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| <p>Threshold (g) for the Building D Site and the Building E Site: No Impact. Other than the Western Riverside County MSHCP and SKR HCP, which are addressed under Threshold (a), there no other local policies or ordinances protecting biological resources that are applicable to resources present on the Project site. No impact would occur.</p> | <p>RR-11, RR-12 and RR-13 apply.</p> | <p>See above.</p> | <p>See above.</p> | <p>See above.</p> | <p>No Impact</p> |
| <p>4.5 Cultural Resources</p> | | | | | |
| <p>Historic Resources: Thresholds (a) and (b) for the Building D Site and Building E Site: Less-than-Significant Impact. The Project as proposed on the Building D Site would not alter or destroy an historic site and would not cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations, § 15064.5.</p> | <p>No mitigation is required.</p> | <p>N/A</p> | <p>N/A</p> | <p>N/A</p> | <p>Less-than-Significant Impact</p> |
| <p>Archaeological Resources: Thresholds (a) and (b) for the Building D and Building E Site: Significant Direct and Cumulatively Considerable Impact. Five archaeological sites are located on the Project site, of which three would be fully impacted by the Project and two would be partially impacted by the Project. None of the five sites meet the definition of a significant historic resource listed in CEQA Guidelines § 15064.5. Therefore, the Project would not alter or destroy a unique archaeological site or cause a substantial adverse change in the significance of a known, unique archaeological resource. However, Project-related construction activities have the potential to unearth and adversely impact significant archaeological resources that may be buried beneath the ground surface and discovered during Project construction</p> | <p>MM 4.5-1 (Applies to the Building D Site and the Building E Site) Prior to the issuance of grading permits, the developer/permit applicant shall enter into a monitoring agreement with the Pechanga and Soboba Native American Tribes. A Native American monitor shall be on-site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, and trenching. In conjunction with an Archaeological Monitor, the Native American Monitor shall have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The developer/permit applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this condition.</p> | <p>Developer/Permit Holder/ Riverside County-qualified approved archaeological monitor and a Native American representative from tribes that chose to participate. /Project Applicant/ Riverside County Archaeologist</p> | <p>Riverside County Planning Department</p> | <p>Prior to the issuance of a grading permits</p> | <p>Less-than-Significant Impact</p> |



| SUMMARY OF IMPACTS | COUNTY REGULATIONS AND DESIGN REQUIREMENTS (RR) AND/OR MITIGATION MEASURES (MM) | RESPONSIBLE PARTY | MONITORING PARTY | IMPLEMENTATION STAGE | LEVEL OF SIGNIFICANCE AFTER MITIGATION |
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| | <p>artifacts associated with Sites CA-RIV-1330H, <u>CA-RIV-8901</u> and CA-RIV-11874 shall be recovered and recorded by the <u>Archaeological Monitor and Native American Monitors</u>, and photo documentation of each site <u>site</u> shall occur. The current Department of Parks and Recreation forms for the sites shall be updated by the <u>Project Archaeologist</u>, detailing which features were relocated, the process through which this was done, and updated maps using sub meter GIS technology to document the new location of each feature. The relocation information shall be included in a Phase IV Monitoring Report (<u>See Mitigation Measure MM 4.5-8</u>).</p> <p>MM 4.5-4 (Applies to the Building E Site) Prior to issuance of a grading permit for Planning Case No. 36962, the developer/permit applicant shall provide evidence to the County Archaeologist that the following notes have been provided on the Grading Plan: “Temporary fencing shall be provided for the protection of the off-site parcel located to the immediate west during any grading activities within 100 feet of the western property boundary. The fence shall be installed under the supervision of the County approved archaeologist <u>and Native American monitors</u> prior to commencement of grading or brushing and be removed only after grading operations have been completed. <u>If a breach in the fence occurs, it shall be immediately repaired by on-site personnel and archaeological monitors shall be notified by the construction contractor within 24-hours to verify that the breach has been repaired and no impacts beyond the fence have resulted from the breach.</u>”</p> <p>MM 4.5-5 (Applies to the Building D Site and the Building E Site) Prior to the issuance of grading permits, the developer/permit applicant shall provide</p> | <p>Developer/Permit Applicant</p> <p>Project Developer / Permit Holder</p> | <p>County Archaeologist</p> <p>Riverside County Planning Department;</p> | <p>Prior to issuance of a grading permit</p> <p>Prior to the issuance of a grading permit.</p> | |



| SUMMARY OF IMPACTS | COUNTY REGULATIONS AND DESIGN REQUIREMENTS (RR) AND/OR MITIGATION MEASURES (MM) | RESPONSIBLE PARTY | MONITORING PARTY | IMPLEMENTATION STAGE | LEVEL OF SIGNIFICANCE AFTER MITIGATION |
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| | <p>evidence to the County of Riverside Planning Department that a County certified professional archaeologist has been contracted to implement a Cultural Resource Monitoring Program. A Cultural Resource Monitoring Plan shall be developed <u>by the Archaeological Monitor and the Native American Monitors</u> that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with this project. This document shall be provided to the County Archaeologist for review and approval prior to issuance of the grading permit <u>who will assure that the Native American representatives have had adequate time to review and comment prior to finalization.</u> These measures shall include, but shall not be limited to, the following:</p> <p>a) <u>Archaeological Monitor:</u> An adequate number of qualified <u>archaeological and Native American</u> monitors shall be present to ensure that all earth moving activities are observed; the monitors shall be on-site during all grading activities for areas to be monitored including any off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist <u>in consultation with the Native American monitors.</u></p> <p>b) <u>Cultural Sensitivity Training:</u> The Project Archaeologist and a representative designated by the Tribe shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all Construction Personnel. Training will include a brief review of the cultural sensitivity of the Project</p> | | Riverside County Archaeologist | | |



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| | <p>site and the surrounding area; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. This is a mandatory training and all construction personnel must attend prior to beginning work on the Project site. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report</p> <p>c) Building D Site Controlled Grading: Several bedrock milling features at cultural sites CA-RIV-8401 and CA-RIV-8402 will be impacted during construction activities and the soils surrounding them will be disturbed. A controlled grading program will be developed by the Project Archaeologist, <u>in consultation with the Native American representatives</u>, and included in the Cultural Resources Monitoring Program. The controlled grading program shall require the systematic removal of the ground surface to allow for the identification, documentation and recovery of any subsurface cultural deposits. Results of the controlled grading program shall be included in the Phase IV Monitoring Report (see Mitigation Measure MM 4.5-8).</p> <p>Building E Site Controlled Grading: Several bedrock milling features at cultural sites CA-RIV-8901, CA-RIV-1330/H and CA-RIV-11874 will be impacted during construction activities and the soils surrounding them will be disturbed. A controlled grading program will be developed by the Project Archaeologist, <u>in consultation with the Native American representatives</u>, and included in the Cultural Resources Monitoring Program. The controlled grading program shall require the systematic removal</p> | | | | |



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| | <p>of the ground surface to allow for the identification, documentation, and recovery of any subsurface cultural deposits. Results of the controlled grading program shall be included in the Phase IV Monitoring Report (see Mitigation Measure MM 4.5-8).</p> <p>MM 4.5-6 (Applies to the Building D Site and the Building E Site) If during ground disturbance activities, unanticipated cultural resources are discovered, the following procedures shall be followed:</p> <p>a) All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the applicant shall call the County Archaeologist immediately upon discovery of the cultural resource*. A meeting shall be convened between the developer, the project archaeologist**, the Native American tribal representative (or other appropriate ethnic/cultural group representative), and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery; avoidance, etc.) for the cultural resource.</p> <p>b) Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.</p> <p>*A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to sacred or cultural importance.</p> <p>** <u>An archaeological monitor is required per Mitigation Measure MM 4.5-5; however, if not already employed by the project developer, a</u></p> | <p>Developer/Permit Applicant/Tribal Monitor</p> | <p>Riverside County Planning Department; Riverside County Archaeologist</p> | <p>During Ground Disturbing Activities</p> | |



| SUMMARY OF IMPACTS | COUNTY REGULATIONS AND DESIGN REQUIREMENTS (RR) AND/OR MITIGATION MEASURES (MM) | RESPONSIBLE PARTY | MONITORING PARTY | IMPLEMENTATION STAGE | LEVEL OF SIGNIFICANCE AFTER MITIGATION |
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| | <p>relocation or residue analysis required as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting. A report documenting the field and analysis results and interpretation of the artifact and research data within the research context shall be completed and submitted to the satisfaction of the Lead Agency (County of Riverside) prior to issuance of any building permits. The report will include Department of Parks and Recreation (DPR) and Primary Archaeological Site Forms. A final copy shall be submitted to the Eastern Information Center (EIS) and Native American tribes that request a copy.</p> | | | | |
| <p>Archaeological Resources: Threshold (c) for the Building D Site and Building E Site: Less-than-Significant Impact. There are no known human remains on the Project site. In the unlikely event that human remains are discovered during Project grading or other ground disturbing activities, compliance with the applicable provisions of the California Health and Safety Code § 7050.5 and California Public Resources Code § 5097 et. seq. is required. Mandatory compliance with State law would ensure that human remains, if encountered, are appropriately treated and would preclude the potential for significant impacts to Native American remains.</p> | <p>RR-14 Pursuant to California Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b), human remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. In the event that the remains are determined to be of Native American origin, the Native American Heritage Commission (NAHC) shall be contacted by the Coroner within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "Most Likely Descendant." The Most Likely Descendant shall then make recommendations and engage in consultation with the property owner concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. Human remains from other ethnic/cultural groups with recognized historical associations to the project area shall also be subject to consultation between appropriate representatives from that group and the County Archaeologist.</p> | <p>Project Contractors</p> | <p>Riverside County Coroner; Native American Heritage Commission; Riverside County Archaeologist</p> | <p>During Project Construction</p> | <p>Less-than-Significant Impact</p> |



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| <p>Archaeological Resources: Threshold (d) for the Building D Site and Building E Site: No Impact. The Project has no potential to restrict a religious or sacred use.</p> | <p>No mitigation is required.</p> | <p>N/A</p> | <p>N/A</p> | <p>N/A</p> | <p>No Impact</p> |
| <p>Archaeological Resources: Threshold (e) Less than Significant Impact. Five archaeological sites are located on the Project site, of which three would be fully impacted by the Project and two would be partially impacted by the Project. None of the five sites meet the definition of a significant resource listed in CEQA Guidelines § 15064. In addition, because there is a lack of substantial evidence to conclude that the subject property is part of a cultural landscape, the Project site is deemed by Riverside County as part of neither a cultural landscape nor a TCR under AB 52. As such, tribal cultural resources as defined in Public Resources Code 21074 do not exist on the Project site and impacts would be less than significant</p> | <p>No mitigation is required.</p> | <p>N/A</p> | <p>N/A</p> | <p>N/A</p> | <p>Less-than-Significant Impact</p> |
| <p>4.6 Geology and Soils</p> | | | | | |
| <p>Alquist-Priolo Earthquake Fault Zone or County Fault Zone Thresholds (a) and (b) for the Building D Site: Less-than-Significant Impact. Development on the Building D Site would not expose people or structures to substantial adverse seismic risks. The Building D Site and the Building E Site are not located within a mapped Alquist-Priolo Earthquake Fault Zone and there are no known active or potentially active faults on the Project site or trending toward the Project site; therefore, the Project site is not subject to risk of fault rupture. Mandatory compliance with local and state regulatory requirements related to</p> | <p>RR-15 (Applies the Building D Site and the Building E Site) <u>The Project is required by law to comply with the California Building Standards Code and the County of Riverside Building Code, which address construction standards including those related to geologic and soil conditions.</u></p> | <p>N/A</p> | <p>N/A</p> | <p>N/A</p> | <p>Less-than-Significant Impact</p> |



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| <p>building construction would ensure that Building D and Building E are developed as required to attenuate the seismic risk to people or structures to less-than-significant levels.</p> | <p>RR-16 (Applies the Building D Site and the Building E Site) As a standard condition of Project approval, the Project will be required to comply with the site-specific recommendations contained in the geotechnical reports prepared for the Building D Site and the Building E Site, included as DEIR Technical Appendices E1 through E4.</p> | | | | |
| <p>Alquist-Priolo Earthquake Fault Zone or County Fault Zone Thresholds (a) and (b) for the Building E Site: Less-than-Significant Impact. The Building E Site is not located within a mapped Alquist-Priolo Earthquake Fault Zone and there are no known active or potentially active faults on the Site or trending toward the Site; therefore, the Site is not subject to risk of fault rupture. However, development of a manufactured slope and parking area on the Building E Site would potentially expose people or structures to substantial adverse seismic risks associated with the presence of an inactive fault feature located in the western portion of the property. With implementation of the Project's design features, the potential for differential settlement, shrinking/expansion along the clay-rich shear zone, and secondary sympathetic movement associated with large earthquakes in the nearby area, would be less than significant.</p> | <p>No mitigation is required.</p> | <p>N/A</p> | <p>N/A</p> | <p>N/A</p> | <p>Less-than-Significant Impact</p> |
| <p>Liquefaction Zone Potential</p> | <p>No mitigation is required.</p> | <p>N/A</p> | <p>N/A</p> | <p>N/A</p> | <p>Less-than-Significant Impact</p> |



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| <p>Threshold (a) for the Building D Site and Building E Site: Less-than-Significant Impact. The Building D Site and the Building E Site have a low potential for liquefaction and seismic-related ground failure. Accordingly, liquefaction impacts would be less than significant</p> | | | | | |
| <p>Ground-Shaking Zone Threshold (a) for the Building D Site and the Building E Site: Less-than-Significant Impact. As with all properties within the southern California region, the Project site is subject to seismic ground shaking associated with earthquakes; however, mandatory compliance with local and state ordinances and building codes including but not limited to the CBSC (Chapter 18) and County of Riverside Building Code would ensure that the proposed structures are developed as required to preclude adverse effects involving strong seismic ground-shaking. Impacts would be less than significant.</p> | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |
| <p>Landslide Risk Threshold (a) for the Building D Site and Building E Site: Less-than-Significant Impact. There is no potential for Building D or Building E to cause on- or off-site landslides or lateral spreading. Potential hazards associated with soils on the Project site that have the potential for lateral spreading and collapse would be precluded through use of non-explosive rock breaking/blasting techniques during Project construction, mandatory adherence to recommendations given in the Building D Site and the Building E Site geotechnical reports, and mandatory compliance with applicable regulations. The Project would create stable manufactured slopes that would</p> | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |



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| not be subject to rockfall hazards. The potential to result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards would be less than significant. | | | | | |
| <p>Ground Subsidence Threshold (a) for the Building D Site and the Building E Site: Less-than-Significant Impact. Ground subsidence has the potential to occur on the Building D and Building E sites. However, mandatory adherence to recommendations given in the Building D Site and the Building E Site geotechnical reports and mandatory compliance with applicable regulations would ensure proper grading techniques such that impacts related to ground subsidence would be less than significant.</p> | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |
| <p>Other Geologic Hazards Threshold (a) for the Building D Site and the Building E Site: No Impact. The Project site has no potential to be subjected to geologic hazards such as seiche, mudflow, or volcanic hazards</p> | No mitigation is required. | N/A | N/A | N/A | No Impact |
| <p>Slopes Threshold (a) for the Building D Site and the Building E Site: Less-than-Significant Impact. Development of the Building D Site and the Building E Site would change topography and ground surface relief features as compared to existing conditions. However, as a standard condition of Project approval, the Project would be required to comply with the site-specific recommendations contained in the geotechnical report for the Building D site and the Building E Site, including recommendations related to site preparation, soil compaction, and manufactured slope design that would minimize potential</p> | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |



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| hazards associated with manufactured slope failure. Impacts would be less than significant. | | | | | |
| <p>Slopes Threshold (b) for the Building D Site and the Building E Site: Less-than-Significant Impact. Building D and Building E would create cut or fill slopes higher than 10 feet and greater than 2:1. Both buildings would be required to comply with the recommendations in the geotechnical reports to ensure the stability of these slopes, as well as all other applicable regulations. Compliance with the recommendations and applicable regulations would reduce impacts associated with slope construction to less than significant.</p> | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |
| <p>Slopes Threshold (c) for the Building D Site: Less-than-Significant Impact. The existing septic system associated with the existing mobile home would be removed in accordance with all applicable rules and regulations. With mandatory compliance with all applicable County rules and regulations, the Project would not result in grading that affects or negates subsurface sewage disposal systems. Impacts would be less than significant.</p> | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |
| <p>Slopes Threshold (c) for the Building E Site: No Impact. The Building E Site contains no subsurface sewage systems. As such, development of the Building E Site would not affect or negate subsurface sewage disposal systems. No impact would occur.</p> | No mitigation is required. | N/A | N/A | N/A | No Impact |
| <p>Soils Threshold (a) for the Building D Site and Building E Site: Less-than-Significant</p> | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |



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| <p>Impact. The Project would not result in substantial soil erosion or the loss of topsoil. The Project Applicant is required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activities as well as adhere to SCAQMD Rule 403 during Project construction. With mandatory compliance to these regulatory requirements, the potential for soil erosion impacts during construction would be less than significant. Following construction, soil erosion on the Project site would be minimized, as the areas disturbed during construction would be landscaped or covered with impervious surfaces and drainage would be controlled through a storm drain system. Furthermore, Building D and Building E are required by law to implement a WQMP during operation, which would preclude substantial erosion impacts in the long-term.</p> | | | | | |
| <p>Soils Threshold (b) for the Building D Site and Building E Site: Less-than-Significant Impact. Soils on the Project site have a very low expansion potential. Accordingly, soil expansion impacts would be less than significant.</p> | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |
| <p>Soils Threshold (c) for the Building D Site and Building E Site: No Impact. The Project would not install septic tanks or alternative wastewater disposal systems. Accordingly, no impact would occur associated with soil compatibility for wastewater disposal systems.</p> | No mitigation is required. | N/A | N/A | N/A | No Impact |
| <p>Erosion Threshold (a) for the Building D Site and Building E Site: No Impact. The Project</p> | No mitigation is required. | N/A | N/A | N/A | No Impact |



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| <p>site does not contain any active streams or rivers, no streams or rivers are located in close proximity to the Project site, and the Project would not discharge water directly to an active stream or river. The Project would be required to prepare and comply with NPDES permits, SWPPPs, and WQMPs, which would treat and filter runoff to reduce erosion. Therefore, no impact to deposition, siltation, or erosion that may modify the channel of a river or stream or the bed of a lake would occur.</p> | | | | | |
| <p>Erosion Threshold (b) for the Building D Site and Building E Site: Less-than-Significant Impact. Buildout of the Project site would result in an increase in impervious surfaces. Storm water falling on the developed portions of the Project site would be collected and treated on-site before being discharged into the storm drain system to be constructed as part of the Project. Storm water runoff with the potential to result in water erosion would be reduced by the Project and a less-than-significant impact would occur.</p> | No mitigation is required | N/A | N/A | N/A | Less-than-Significant Impact |
| <p>Wind Erosion and Blowsand from Project either on or off-site Threshold (a) for the Building D Site and Building E Site: Less-than-Significant Impact. The Project site would be exposed to wind erosion during construction, but would be required to implement BMPs as part of the NPDES permit, and would be required to comply with all other applicable regulations related to wind erosion. Following development of the Project site, soils on the developed portions of the Project site would be covered with impervious</p> | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |



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| surfaces and landscaping and no longer exposed to wind; thus, wind erosion and the loss of topsoil would be substantially reduced as compared to existing conditions. Impacts would be less than significant. | | | | | |
| 4.7 Greenhouse Gas Emissions | | | | | |
| Thresholds (a) and (b): Cumulatively Considerable Significant Impact. At Project buildout, the Project's total annual GHG emissions are calculated to be approximately 24,617.57 MTCO ₂ e per year, which exceeds the Riverside County CAP's annual GHG emissions threshold of 3,000 MTCO ₂ e. Thus, Project would result in cumulatively considerable impacts. | RR-17 The Project's construction activities are required to comply with Title 24 California Code of Regulations (California Building Standards Code) and Title 20 California Code of Regulations (Appliance Energy Efficiency Standards). These regulations establish energy efficiency requirements for new (and altered) buildings and appliances. | Project Applicant; Project Contractors | County of Riverside Building & Safety Department | During Project Construction | Less-than-Significant Impact |
| | RR-18 The Project is required to comply with Riverside County Ordinance No. 859, which is known as the Water Efficient Landscape Requirements Ordinance. Ordinance No. 859 mandates requirements for ensuring efficient landscapes in new development and reduced water waste in existing landscapes. | Project Applicant; Project Contractors | County of Riverside Building & Safety Department | During Project Construction | |
| | MM 4.7-1 (Applies to the Building D Site and the Building E Site) Prior to issuance of a building permit, the Project Applicant shall provide documentation to the County of Riverside Building Department demonstrating that the improvements and/or buildings subject to each building permit application include the following measures from the County of Riverside Climate Action Plan (<u>CAP</u>) (December 2015) Greenhouse Gas Emissions Screening Tables (Appendix F to the Climate Action Plan), as needed to achieve a minimum of 100 points: a) E5. A.1: Enhanced Insulation (rigid wall insulation R-13, roof/attic R-38) – 18 points b) E5. A.2: Enhanced Window Insulation – 8 points | Project Applicant | County of Riverside Building & Safety Department | Prior to Issuance of Building permit | |



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| | <p>c) E5. B.1: Enhanced Duct Insulation (R-8) – 7 points d) E5. B.2: Improved Efficiency HVAC (EER 14/65% AFUE or 89 HSPF) – 7 points e) E5. B.4: High Efficiency Water Heater (0.72 Energy Factor) – 16 points f) E5. B.5: All peripheral rooms having at least one window or skylight – 1 point g) E5. B.6: Very High Efficiency Lights (100% of in-unit fixtures are high efficacy) – 14 points h) E5. B.7: Star Commercial Refrigerator (new) – 4 points i) E5. C.1: North/south alignment of building – 6 points j) W1. C.1: Eliminate turf and only drought tolerant plans – 4 points k) W1. D.2: Water efficient toilets/urinals (1.5 gpm) – 3 points l) W.1.D.3: Water efficient faucets (1.28 gpm) – 3 points m) T1. A.2: Car/vanpool program with preferred parking – 2 points n) T4. A.1: Larger parking spaces to accommodate ride-sharing vans – 1 point o) SW2. B.1: Recycle 20% of debris during construction – 6 points</p> <p>Alternatively, the Project Applicant may demonstrate that other Implementation Measures from Appendix F of the County’s CAP have been incorporated into the building permit application and/or plans to achieve the required minimum of 100 points.</p> | | | | |
| 4.8 Hazards and Hazardous Materials | | | | | |
| <p>Hazards and Hazardous Materials Thresholds (a) and (b) for the Building D Site and the Building E Site: Less-than-Significant Impact. During Project construction and operation, mandatory</p> | <p>No mitigation is required.</p> | <p>N/A</p> | <p>N/A</p> | <p>N/A</p> | <p>Less-than-Significant Impact</p> |



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| <p>compliance to federal, state, and local regulations would ensure that the Project as proposed on the Building D Site and the Building E Site would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.</p> | | | | | |
| <p>Hazards and Hazardous Materials Threshold (c) for the Building D Site and the Building E Site: No Impact. The Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan. No emergency facilities exist on the Project site, nor does the Project site serve as an emergency evacuation route.</p> | <p>No mitigation is required.</p> | <p>N/A</p> | <p>N/A</p> | <p>N/A</p> | <p>No Impact</p> |
| <p>Hazards and Hazardous Materials Threshold (d) for the Building D Site and the Building E Site: No Impact. The Building D Site and the Building E Site are not located within one-quarter mile of any existing or planned school. Accordingly, the Project as proposed on the Building D Site and the Building E Site would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.</p> | <p>No mitigation is required.</p> | <p>N/A</p> | <p>N/A</p> | <p>N/A</p> | <p>No Impact</p> |
| <p>Hazards and Hazardous Materials Threshold (e) for the Building D Site and the Building E Site: No Impact. The Building D Site and the Building E site are not located on any list of hazardous materials compiled pursuant to Government Code Section 65962.5.</p> | <p>No mitigation is required.</p> | <p>N/A</p> | <p>N/A</p> | <p>N/A</p> | <p>No Impact</p> |
| <p>Airports Threshold (a), (b), and (c) for the Building D Site and the Building E Site: Less-than-Significant Impact. Pursuant to mandatory</p> | <p>RR-19 Any outdoor lighting installed shall be hooded or shielded to prevent either the spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing.</p> | <p>Project Applicant</p> | <p>County of Riverside Building & Safety Department</p> | <p>Prior to issuance of final inspection permits; prior to issuance of occupancy permits.</p> | <p>Less-than-Significant Impact</p> |



| SUMMARY OF IMPACTS | COUNTY REGULATIONS AND DESIGN REQUIREMENTS (RR) AND/OR MITIGATION MEASURES (MM) | RESPONSIBLE PARTY | MONITORING PARTY | IMPLEMENTATION STAGE | LEVEL OF SIGNIFICANCE AFTER MITIGATION |
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| <p>compliance with Riverside County ALUC conditions of approval, the Project is consistent with the restrictions and requirements of the March Air Reserve Base/Inland Port Land Use Compatibility Plan. As such, the Project would not result in an airport safety hazard for people residing or working in the Project area.</p> | <p>RR-20 The following uses/activities are not included in the proposed Project and shall be prohibited at the site, in accordance with Note 1 on Table 4 of the Mead Valley Area Plan as noted below.</p> <p>a) Any use which would direct a steady light of flashing light or red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator.</p> <p>b) Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport.</p> <p>c) Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area.</p> <p>d) Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.</p> | Project Applicant | County of Riverside Building & Safety Department | Prior to issuance of final inspection permits; prior to issuance of occupancy permits. | |
| | <p>RR-21 The "Notice of Airport in Vicinity," included in the May 11, 2017 County of Riverside ALUC Staff Report, shall be given to all prospective purchasers of the property and tenants of the buildings, and shall be recorded as a deed notice.</p> | Project Applicant | County of Riverside Building & Safety Department | Prior to the issuance of occupancy permits. | |
| | <p>RR-22 The proposed detention basins on the site (including water quality management basins) shall be designed so as to provide for a maximum 48-hour</p> | Project Applicant | County of Riverside Building & Safety Department | Prior to the issuance of grading permits; prior to the | |



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| | <p>detention period following the conclusion of a storm event for the design storm (may be less, but not more), and to remain totally dry between rainfalls. Vegetation in and around the detention basins that would provide food or cover for bird species that would be incompatible with airport operations shall not be utilized in project landscaping. Trees shall be spaced so as to prevent large expanses of contiguous canopy, when mature.</p> <p>RR-23 The following uses/activities are specifically prohibited: wastewater management facilities; trash transfer stations that are open on one or more sides; recycling centers containing putrescible wastes; and incinerators.</p> <p>RR-24 March Air Reserve Base must be notified of any land use having an electromagnetic radiation component to assess whether a potential conflict with Air Base radio communications could result. Sources of electromagnetic radiation include radio wave transmission in conjunction with remote equipment inclusive of irrigation controllers, access gates, etc.</p> <p>RR-25 The Federal Aviation Administration has conducted aeronautical study of each proposed building (Aeronautical Study Nos. 2017-AWP-2411-OE and 2017-AWP-2412-OE) and has determined that neither marking nor lighting of the proposed structures is necessary for aviation safety. However, if marking and/or lighting for aviation safety are accomplished on a voluntary basis, such marking and/or lighting (if any) shall be maintained in accordance with FAA Advisory Circular 70/7460-1 L Change 1 and shall be maintained in accordance therewith for the life of the Project.</p> | <p>Project Applicant</p> <p>Project Applicant</p> <p>Project Applicant</p> | <p>County of Riverside Building & Safety Department</p> <p>County of Riverside Building & Safety Department</p> <p>County of Riverside Building & Safety Department</p> | <p>issuance of final inspection permits</p> <p>Prior to the issuance of final inspection permits.</p> <p>Prior to the issuance of final inspection permits.</p> <p>Prior to issuance of building permits.</p> | |



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| | <p>RR-26 The maximum height of the structure proposed through Plot Plan No. 25838 (Building D) shall not exceed a height of 55 feet above ground level and shall not exceed a maximum elevation at top point (including all roof-mounted appurtenances, if any) of 1,640 feet above mean sea level.</p> | Project Applicant | County of Riverside Building & Safety Department | Prior to the issuance of building permits. | |
| | <p>RR-27 The maximum height of the structure proposed through Plot Plan No. 25837 (Building E) shall not exceed a height of 55 feet above ground level and shall not exceed a maximum elevation at top point (including all roof-mounted appurtenances, if any) of 1,673 feet above mean sea level.</p> | Project Applicant | County of Riverside Building & Safety Department | Prior to the issuance of building permits. | |
| | <p>RR-28 The maximum height and top point elevations specified in the above RR-26 and RR-27 shall not be amended without further review by the Airport Land Use Commission and the Federal Aviation Administration; provided, however, that reduction in structure height or elevation shall not require further review by the Airport Land Use Commission.</p> | Project Applicant | County of Riverside Building & Safety Department; Airport Land Use Commission; Federal Aviation Administration | Prior to issuance of building permits. | |
| | <p>RR-29 Temporary construction equipment such as cranes used during actual construction of Building D shall not exceed a height of 55 feet and a maximum elevation of 1,640 feet above mean sea level, unless separate notice is provided to the Federal Aviation Administration through the Form 7460-1 process.</p> | Project Applicant | County of Riverside Building & Safety Department; Federal Aviation Administration | During Project construction activities. | |
| | <p>RR-30 Temporary construction equipment such as cranes used during actual construction of Building E shall not exceed a height of 55 feet and a maximum elevation of 1,673 feet above mean sea level, unless separate notice is provided to the Federal Aviation Administration through the Form 7460-1 process.</p> | Project Applicant | County of Riverside Building & Safety Department; Federal Aviation Administration | During Project construction activities. | |
| | <p>Within five (5) days after construction of each building reaches its greatest height, <u>Federal Aviation</u></p> | Project Applicant | County of Riverside Building & Safety | Within five (5) days after construction of each | |



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| | <p><u>Administration</u> (FAA) Form 7460-2 (Part II), Notice of Actual Construction or Alteration, shall be completed by the Project proponent or his/her designee and e-filed with the Federal Aviation Administration. This requirement is also applicable in the event the Project is abandoned or a decision is made not to construct the applicable structure.</p> <p>RR-31 The Federal Aviation Administration (FAA) has conducted a aeronautical studies under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, Part 77 concerning Building D and Building E. The aeronautical studies revealed that the structures do not exceed obstruction standards and would not be met with a hazard to air navigation provided the following condition is met. <u>Within five (5) days after the construction of each building reaches its greatest height</u>, FAA Form 7460 (Part II) -2, Notice of Actual Construction or Alteration shall be completed by the <u>Project Proponent or his/her designee</u> and e-filed with the FAA. any time the Project is abandoned or within 5 days after the construction reaches its greatest height (7460-2, Part 2).</p> | Project Applicant | <p>Department; Federal Aviation Administration</p> <p>County of Riverside Building & Safety Department; Federal Aviation Administration</p> | <p>building reaches its greatest height.</p> <p>Within five (5) days after construction of each building reaches its greatest height.</p> | |
| <p>Hazardous Fire Area Threshold (a) for the Building D Site and the Building E Site: No Impact. The Project site is not located in a wildland fire hazard area. The Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.</p> | No mitigation is required. | N/A | N/A | N/A | No Impact |
| 4.9 Hydrology and Water Quality | | | | | |
| <p>Water Quality Threshold (a) for the Building D Site and the Building E Site: Less-than-Significant Impact. Implementation of the Project as</p> | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |



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| proposed on the Building D Site and the Building E Site would not result in a significant alteration of the site's existing drainage pattern and there would be no significant increases in the rates of erosion or siltation on-or off-site. | | | | | |
| <p>Water Quality Threshold (b) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project as proposed on the Building D Site and the Building E Site would not violate any water quality standards or waste discharge requirements on a direct or cumulatively considerable basis. The Project is required to prepare and comply with a Storm Water Pollution Prevention Program (SWPPP) to address short-term construction-related water quality issues, and is required to comply with the site-specific Water Quality Management Plans (WQMPs) and their associated Best Management Practices (BMPs).</p> | <p>RR-32 Prior to issuance of a grading permit, the Project Applicant shall obtain coverage under a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Evidence that a NPDES permit has been issued shall be provided to the County of Riverside prior to issuance of a grading permit.</p> <p>RR-33 Prior to issuance of a grading permit, the Project Applicant shall prepare a Stormwater Pollution Prevention Plan (SWPPP). Project contractors shall be required to ensure compliance with the SWPPP and shall permit periodic inspection of the construction site by the County of Riverside staff or its designee to confirm compliance.</p> <p>RR-34 Prior to issuance of a grading permit, the Project Applicant shall prepare and the County of Riverside shall approve a Final Water Quality Management Plan (WQMP). The Project Applicant or its property manager shall be required to ensure compliance with the Final WQMP and shall permit periodic inspection of the Project site by County of Riverside staff or its designee to confirm compliance.</p> <p>RR-35 Prior to issuance of a grading permit, the Project Applicant shall obtain a National Pollutant Discharge Elimination System (NPDES) permit or qualify for an exemption thereto-for operational activities.</p> | <p>Project Applicant</p> <p>Project Applicant; Project Contractors</p> <p>Project Applicant or Property Manager</p> <p>Project Applicant</p> | <p>County of Riverside Building & Safety Department; Riverside County Flood Control and Water Conservation District (RCFCWCD)</p> <p>County of Riverside Building & Safety Department; Riverside County Flood Control and Water Conservation District (RCFCWCD)</p> <p>County of Riverside Building & Safety Department; Riverside County Flood Control and Water Conservation District (RCFCWCD)</p> <p>County of Riverside Building & Safety Department; Riverside County Flood Control and Water Conservation District (RCFCWCD)</p> | <p>Prior to the issuance of a grading permit.</p> <p>Prior to the issuance of a grading permit.</p> <p>Prior to issuance of a grading permit.</p> <p>Prior to issuance of a grading permit.</p> | <p>Less-than-Significant Impact</p> |



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| <p>Water Quality Threshold (c) for the Building D and the Building E Site: Less-than-Significant Impact. The Project as proposed on the Building D Site and the Building E Site does not propose the installation of any water wells that would extract groundwater. Also, the proposed Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or lowering of the local groundwater table.</p> | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |
| <p>Water Quality Threshold (d) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project as proposed on the Building D Site and the Building E Site would not create or contribute runoff which would exceed the capacity of existing or planned stormwater drainage systems, nor would the Project provide substantial additional sources of runoff.</p> | RR-33 and RR-34 apply. | See above. | See above. | See above. | Less-than-Significant Impact |
| <p>Water Quality Threshold (e) for the Building D Site and the Building E Site: No Impact. The Project as proposed on the Building D Site and the Building E Site does not involve the construction of housing and no flood zone areas are located on the Building D Site or on the Building E Site. Therefore, the Project would not place housing in a 100-year flood zone.</p> | No mitigation is required. | N/A | N/A | N/A | No Impact |
| <p>Water Quality Threshold (f) for the Building D Site and the Building E Site: No Impact. The Project site is not located within a 100-year flood hazard area.</p> | No mitigation is required. | N/A | N/A | N/A | No Impact |
| Water Quality | No mitigation is required. | N/A | N/A | N/A | No Impact |



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| <p>Threshold (g) for the Building D Site and the Building E Site: No Impact. There are no components associated with the proposed Project that would otherwise result in the substantial degradation of water quality.</p> | | | | | |
| <p>Water Quality Threshold (h) for the Building D Site and the Building E Site: Less-than-Significant Impact. The proposed Project would not result significant environmental effects associated with storm water features such as increased vectors or odors. The Project would comply with the site-specific Water Quality Management Plans (WQMPs) and their associated Best Management Practices (BMPs).</p> | RR-33 and RR-34 apply. | See above. | See above. | See above. | Less-than-Significant Impact |
| <p>Floodplains Threshold (a) for the Building D Site and the Building E Site: Less-than-Significant Impact. Alterations to the drainage characteristics (i.e., flow rate) of the Building D Site and the Building E Site would not substantially increase the rate of surface runoff; thus, the Project would not cause or contribute to flooding on-or-off-site.</p> | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |
| <p>Floodplains Threshold (b) for the Building D Site and the Building E Site: Less-than-Significant Impact. Alterations to the drainage characteristics (i.e., flow rate) of the Building D Site and the Building E Site would not result in substantial changes in absorption rates or the amount of surface runoff; thus, the Project would not cause or contribute to flooding on-or-off-site.</p> | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |
| <p>Floodplains Threshold (c) for the Building D Site and the Building E Site: No Impact. The</p> | No mitigation is required. | N/A | N/A | N/A | No Impact |



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| Project as proposed on the Building D Site and the Building E Site would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. | | | | | |
| Floodplains Threshold (d) for the Building D Site and the Building E Site: No Impact. The Project as proposed on the Building D Site and the Building E Site would not result in changes in the amount of surface water in any water body. | No mitigation is required. | N/A | N/A | N/A | No Impact |
| 4.10 Land Use and Planning | | | | | |
| Land Use: Threshold (a) for the Building D Site and the Building E Site: Significant Direct and Cumulatively Considerable Impact. The Project site is mostly vacant and undeveloped under existing conditions; therefore, the proposed development of an industrial business park on the site would result in a substantial change to the site's use. The land uses proposed by the Project would not substantially differ from the land uses planned for the property by the existing Riverside County General Plan and Mead Valley Area Plan. | Refer to all mitigation measures presented in this EIR. | Refer to all mitigation measures presented in this EIR <u>Summary Table</u> . | Refer to all mitigation measures presented in this EIR <u>Summary Table</u> . | Refer to all mitigation measures presented in this EIR <u>Summary Table</u> . | Significant and Unavoidable Direct and Cumulatively Considerable Impact |
| Land Use: Threshold (b) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would develop land within the City of Perris' Sphere of Influence, but because the City of Perris has not applied any land use or pre-zone designations to the Project site, the Project would not affect the City's planned use of the land. | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |
| Planning: Threshold (a) for the Building D Site and the Building E Site: Less-than- | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |



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| <p>Significant Impact. The Project proposes to change the zoning designation on portions of the Building D Site and Building E Site to Industrial-Park (I-P) zoning. The change in zone would result in less-than-significant impacts as analyzed throughout the EIR. Development on the property would be consistent with the proposed I-P zoning designation.</p> | | | | | |
| <p>Planning: Threshold (b) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would be compatible with the existing, surrounding zoning designations, which are I-P, M-M, and M-SC zoning designations located north, east, and south of the Project site. The Project includes design features (i.e., an open space buffers, screen walls, and landscaping) to ensure compatibility with the existing residentially zoned areas to the west and south of the Project site.</p> | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |
| <p>Planning: Threshold (c) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would be compatible with the existing/planned CD-BP and CD-LI land uses located north and east of the Project site. The Project includes design features (i.e., open space buffers, screen walls, and landscaping) to ensure compatibility with the existing/planned residential land uses to the west and south of the Project site.</p> | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |
| <p>Planning: Threshold (d) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would be consistent with the land use designations and policies of the Riverside County General Plan and the Mead Valley Area Plan.</p> | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |



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| <p>Planning: Threshold (e) for the Building D Site and the Building E Site: No Impact. The Project would not physically divide an established community. The Project's improvements to a segment of Ellsworth Street would improve roadway connections in the local area.</p> | <p>No mitigation is required.</p> | <p>N/A</p> | <p>N/A</p> | <p>N/A</p> | <p>No Impact</p> |
| <p>4.11 Noise</p> | | | | | |
| <p>Airport Noise: Threshold (a) and (b) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would not expose people to excessive noise levels associated with a public airport or public use airport. No private airstrips are located in the vicinity of the Project site. The MARB is located approximately 1.1 miles east of the Project site, but the Project site would not be exposed to aircraft noise greater than the 60 dBA CNEL, which is acceptable for business park uses according to the Riverside County General Plan.</p> | <p>No mitigation is required.</p> | <p>N/A</p> | <p>N/A</p> | <p>N/A</p> | <p>Less-than-Significant Impact</p> |
| <p>Railroad Noise: Threshold (a) for the Building D Site and the Building E Site: No Impact. The Project does not involve the construction, operation, or use of any railroads. Thus, the Project would not expose people to excessive railroad noise.</p> | <p>No mitigation is required.</p> | <p>N/A</p> | <p>N/A</p> | <p>N/A</p> | <p>No Impact</p> |
| <p>Highway Noise: Threshold (a) for the Building D Site and the Building E Site: Less-than-Significant Impact. Project-related traffic noise would raise noise levels along the segments of I-215 that receive the greatest volume of Project traffic by 0 dBA to 0.6 dBA. This noise level range is less than significant and not detectible to the human ear. Thus, the Project would not expose people to excessive highway noise.</p> | <p>No mitigation is required.</p> | <p>N/A</p> | <p>N/A</p> | <p>N/A</p> | <p>Less-than-Significant Impact</p> |



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| <p>Other Noise: Threshold (a) for the Building D Site and the Building E Site: No Impact. The Project site does not contain any other aspects that would qualify as “other noise” that has not been addressed by other thresholds. Thus, the Project would not result in other noise.</p> | <p>No mitigation is required.</p> | <p>N/A</p> | <p>N/A</p> | <p>N/A</p> | <p>No Impact</p> |
| <p>Construction-related Noise Effects on or by the Project: Threshold (a), (b), and (c) for the Building D Site and the Building E Site: Significant Direct Impact (Short-Term) and Cumulatively Considerable Impact (Short-Term). Project-related construction activities, including blasting, would result in a direct short-term significant impact to noise-sensitive receivers. Also, in the event that construction activities occur on any properties surrounding the Project site simultaneously with Project-related construction activities, and that also would contribute construction noise to significantly impacted noise-sensitive receivers, a cumulative impact may occur and the Project’s construction-related noise contribution to the overall noise level in the Project study area would be cumulatively considerable.</p> | <p>RR-36 All construction activities shall comply with the County of Riverside Noise Ordinance (Chapter 9.52 of the County of Riverside Code of Ordinances). This requirement shall be noted on all grading and building plans and in bid documents issued to construction contractors.</p> <p>RR-37 As a Riverside County condition of approval for blasting activities at the Project site, and prior to the issuance of grading permits, a blasting noise and vibration monitoring and abatement plan shall be submitted to and approved by the County of Riverside. The contractor shall be required to comply with the approved plan.</p> <p>a) Pre-blasting inspections shall be offered to property owners within 200 feet of the blast site. b) Existing damage of each structure shall be documented. c) Post-blasting inspections shall be offered to assess any new or additional damage to each structure once blasting activities have ceased for those property owners who accepted pre-blast inspections. d) Property owners within at least 200 feet of the blast site shall be notified via postings on the construction site at least 24 hours before the occurrence of major construction- related noise and vibration impacts (such as grading and rock blasting) which may affect them. e) The County may impose conditions and procedures on the blasting operations as necessary. The construction contractor shall comply with these</p> | <p>Project Applicant; Construction Contractors</p> <p>Project Applicant; Project Construction Contractors</p> | <p>County of Riverside Building & Safety Department</p> <p>County of Riverside Building & Safety Department</p> | <p>Prior to issuance of grading and building permits.</p> <p>Prior to the issuance of grading permits.</p> | <p>Less-than-Significant Impact</p> |



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| | <p>measures for the duration of the blasting permit. The County may inspect the blast site and materials at any reasonable time.</p> <p>MM 4.11-1 (Applies to the Building D Site) Prior to the issuance of grading permits and building permits that would authorize grading and construction activities on the Building D Site, the construction contractor shall install a minimum 6-foot high temporary noise barrier along the southern boundary of the Building D Site. The temporary noise control barrier must present a solid face from top to bottom and must be a minimum of 6 feet high. The temporary noise control barrier shall comply with the following:</p> <ul style="list-style-type: none">a) The noise barrier may be constructed using an acoustical blanket (i.e., vinyl acoustic curtains or quilted blankets) attached to the construction site perimeter fence or equivalent temporary fence posts.b) The noise barriers must be maintained and any damage promptly repaired. Gaps, holes, or weaknesses in the barrier or openings between the barrier and the ground shall be promptly repaired.c) The noise control barriers and associated elements shall be completely removed and the site appropriately restored upon the conclusion of the construction activity. | <p>Project Applicant; Project Construction Contractors</p> | <p>County of Riverside Building & Safety Department</p> | <p>Prior to the issuance of grading and building permits.</p> | |



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| | <p>MM 4.11-2 (Applies to the Building D Site and the Building E Site) Prior to any issuance of grading and building permits, the County of Riverside shall review grading and building plans to ensure the following notes are included on the plans. Project contractors shall be required to comply with these notes and maintain written records of such compliance that can be inspected by the County of Riverside upon request.</p> <p>a) The construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards.</p> <p>b) The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the Project site.</p> <p>c) The construction contractor shall locate equipment staging in the north-central portions of the Project site (in the vicinity of the future Ellsworth Street / Oleander Avenue Road intersection) to maximize the distance between construction-related noise sources and noise-sensitive receivers nearest the Project site.</p> <p>d) The construction contractor shall limit haul truck deliveries to the same hours specified by the Riverside County Noise Ordinance for the operation of construction equipment (between the hours of 6:00 a.m. and 6:00 p.m., during the months of June through September, and 7:00 a.m. and 6:00 p.m., during the months of October through May).</p> <p>e) The contractor shall prepare a haul route exhibit and shall design delivery routes to minimize the exposure of sensitive land uses or residential dwellings to delivery truck-related noise.</p> <p>f) <u>The contractor shall post a durable, legible, weather-proof sign that lists a phone number to report legitimate construction-related noise complaints to Riverside County or its enforcement designee. The</u></p> | <p>Project Applicant; Project Construction Contractors</p> | <p>County of Riverside Building & Safety Department</p> | <p>Prior to the issuance of grading and building permits.</p> | |



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| | <p><u>contractor shall require that the sign be posted on the construction site visible from an adjacent public right-of way during the duration of construction activities.</u></p> <p><u>MM4.11-2(A) (Applies to the Building D Site and the Building E Site).</u> No construction activities and no construction-related sensitive receivers after 6:00 p.m. and before 6:00 a.m. during the months of June through September or before 7:00 a.m. during the months of October through May.</p> | <p><u>Project Applicant: Project Contractors</u></p> | <p><u>County of Riverside Building & Safety Department</u></p> | <p><u>During construction activities.</u></p> | |
| <p>Operational-Related Noise Effects on or by the Project: Threshold (a), (b) and (c) for the Building D Site and the Building E Site: Less-than-Significant Impact. Project-related operational impacts would result in a less-than-significant impact to noise-sensitive receivers associated with on-site operational activities with the installation of an 8-foot-high noise attenuation barrier at portions of the southern property boundary as proposed by the Project. The Project's contribution to off-</p> | <p>MM 4.11-3 (Applies to the Building D Site) Prior to building permit final inspection, the County of Riverside shall verify that a minimum 8-foot high solid noise barrier is constructed along the southwestern and southeastern corners of the Building D Site, adjacent to the truck yard/truck parking area.</p> | <p>Project Applicant: Project Construction Contractors</p> | <p>County of Riverside Building & Safety Department</p> | <p>Prior to building permit final inspection.</p> | <p><u>On-Site Operational Activity:</u> Less-than-Significant Impact</p> <p><u>Off-Site Transportation Noise:</u> Significant and Unavoidable under Existing + Project and Opening Year traffic conditions.</p> |



| SUMMARY OF IMPACTS | COUNTY REGULATIONS AND DESIGN REQUIREMENTS (RR) AND/OR MITIGATION MEASURES (MM) | RESPONSIBLE PARTY | MONITORING PARTY | IMPLEMENTATION STAGE | LEVEL OF SIGNIFICANCE AFTER MITIGATION |
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| | compressors, air scrubbers, emergency generators, large HVAC units, or outdoor amplification (speakers), prior to the issuance of a building permit or occupancy permit that would allow installation of the noise generator, an acoustical study shall be prepared to show that noise levels at noise sensitive receivers would not exceed the Riverside County Noise Ordinance operational noise standards for noise-sensitive receivers of 65 dBA nighttime and 45 dBA nighttime. | | | would allow installation of the noise generator | |
| Threshold (d) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would not generate substantial noise or ground-borne vibration during short-term construction and blasting activities or long-term operational activities. | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |
| 4.12 Population and Housing | | | | | |
| Thresholds (a) and (c) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project site contains one mobile home under existing conditions which would be removed as part of the proposed Project. The removal of one mobile home structure would not result in the displacement of substantial numbers of people or existing housing. A less-than-significant impact would occur. | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |
| Threshold (b) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project site is expected to employ approximately 1,221 workers. It is expected that the job opportunities created by the Project would be filled by the existing residents in Riverside County and residents of homes that are already approved for construction but not yet built... Therefore, the Project would not create a demand for | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |



| SUMMARY OF IMPACTS | COUNTY REGULATIONS AND DESIGN REQUIREMENTS (RR) AND/OR MITIGATION MEASURES (MM) | RESPONSIBLE PARTY | MONITORING PARTY | IMPLEMENTATION STAGE | LEVEL OF SIGNIFICANCE AFTER MITIGATION |
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| additional housing, and impacts would be less-than-significant. | | | | | |
| Threshold (d) for the Building D Site and the Building E Site: No Impact. The Riverside County Redevelopment Agency was dissolved in 2012; therefore, the Project would have no potential to impact a County Redevelopment Project Area. No impact would occur. | No mitigation is required. | N/A | N/A | N/A | No Impact |
| Threshold (e) for the Building D Site and the Building E Site: No Impact. The Project is an employment-generating use that would not directly cause population growth. Therefore, the Project has no potential to exceed regional or local population projections. No impact would occur. | No mitigation is required. | N/A | N/A | N/A | No Impact |
| Threshold (f) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would introduce new businesses and infrastructure improvements to the area. The jobs generated by the Project are expected to be filled by existing residents of Riverside County and residents of homes that are already approved for construction but not yet built. In addition, Project-related utility improvements would service the Building D Site and the Building E Site and would not be sized to accommodate unplanned growth on other surrounding parcels. Accordingly, the Project would not induce substantial population growth and impacts would be less than significant. | No mitigation is required, | N/A | N/A | N/A | Less-than-Significant Impact |
| 4.13 Public Services | | | | | |
| Threshold (a) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would introduce structures, traffic, and workers to the Project site, which would increase the demand for | RR-38 Prior to building permit inspection, the Project Applicant shall comply with the County's Development Impact Fee (DIF) Ordinance (Riverside County Ordinance No. 659), which requires payment of a development mitigation fee to assist in providing | Project Applicant | Riverside County Planning Department | Prior to building permit final inspection. | Less-than-Significant Impact |



| SUMMARY OF IMPACTS | COUNTY REGULATIONS AND DESIGN REQUIREMENTS (RR) AND/OR MITIGATION MEASURES (MM) | RESPONSIBLE PARTY | MONITORING PARTY | IMPLEMENTATION STAGE | LEVEL OF SIGNIFICANCE AFTER MITIGATION |
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| <p>fire protection services provided by the Riverside County Fire Department (RCFD). The increased demand would adversely affect the RCFD's ability to meet its response time goals from Station 59 (located at 21510 Pinewood Street, Perris) and Station No. 90 (located at 333 Placentia Avenue Perris). Although demand would be increased and the RCFD's response time goal of 4:00 minutes would not be met to the Project site, the RCFD's existing fire stations have adequate physical capacity to service the Project. The RCFD does not have plans to construct a new fire station or physically expand fire protection facilities in the Project site's vicinity; therefore, the Project would have no physical environmental effects on fire protection facilities. Increased demand is not an environmental effect under CEQA; thus, impacts are less than significant.</p> <p>Threshold (b) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would introduce structures, traffic, and workers to the Project site, which would increase the demand for sheriff services provided by the Riverside County Sheriff's Department (RCSD). Service to the Project site is provided by the RCSD Perris Station, and the RCSD has no plans to physically construct or expand a station due to the Project or other growth in the area. As such, the Project would have no physical environmental effects on sheriff facilities. Increased demand is not an environmental effect under CEQA; thus, impacts are less than significant</p> | <p>revenue that the County can use to improve public facilities and/or equipment, to offset the incremental increase in the demand for fire, police protection, and health care services that would be created by the Project.</p> <p>RR-38 applies.</p> | <p>See above.</p> | <p>See above.</p> | <p>See above.</p> | <p>Less-than-Significant Impact</p> |



| SUMMARY OF IMPACTS | COUNTY REGULATIONS AND DESIGN REQUIREMENTS (RR) AND/OR MITIGATION MEASURES (MM) | RESPONSIBLE PARTY | MONITORING PARTY | IMPLEMENTATION STAGE | LEVEL OF SIGNIFICANCE AFTER MITIGATION |
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| <p>Threshold (c) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would not result in or require new or expanded public school facilities and would not result in any direct demand for school facilities. There is no potential for the Project to have a direct physical impact on any school. For these reasons, less-than-significant impacts to school facilities would occur.</p> | <p>RR-39 Prior to building permit inspection, the Project Applicant shall comply with the provisions of California Government Code §§ 65995.5-65998 by payment of required school impact fees to the Val Verde Unified School District, in accordance with the District's Level 1 Fee Schedule.</p> | Project Applicant | Riverside County Planning Department; Val Verde Unified School District | Prior to building final inspection. | Less-than-Significant Impact |
| <p>Threshold (d) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would not result in or require new or expanded public library facilities and would not result in any direct demand for library space. There is no potential for the Project to have a direct physical impact on any library. For these reasons, less-than-significant impacts to library facilities would occur.</p> | RR-38 applies. | Project Applicant | Riverside County Planning Department | Prior to building permit final inspection. | Less-than-Significant Impact |
| <p>Threshold (e) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would result in an incremental increase in demand for public health services associated with persons that would be employed at or visit the Project site. However, because the Project would not result in or require the physical construction or alteration of public health facilities to accommodate the Project's demand, impacts to public health facilities would be less than significant.</p> | RR-38 applies. | See above. | See above. | See above. | Less-than-Significant Impact |
| 4.14 Recreation | | | | | |
| <p>Parks and Recreation Threshold (a) and (b) for the Building D site and the Building E Site: No Impact. The Project does not propose any type of</p> | No mitigation is required. | N/A | N/A | N/A | No Impact |



| SUMMARY OF IMPACTS | COUNTY REGULATIONS AND DESIGN REQUIREMENTS (RR) AND/OR MITIGATION MEASURES (MM) | RESPONSIBLE PARTY | MONITORING PARTY | IMPLEMENTATION STAGE | LEVEL OF SIGNIFICANCE AFTER MITIGATION |
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| residential use or other land use that would generate a population that would increase the use of recreation facilities or existing neighborhood or regional parks. Parks would not be physically affected by the Project | | | | | |
| Parks and Recreation Threshold (c) for the Building D Site and the Building E Site: No Impact. The Project does not propose any type of residential use and is not located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees). | No mitigation is required. | N/A | N/A | N/A | No Impact |
| Recreational Trails Threshold (d) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would not physically impact a recreational trail. Also, the Project would provide easements for community segments along Oleander Avenue and Ellsworth Street, as called for by the Mead Valley Area Plan. Environmental effects resulting from ground disturbance in the trail easement areas is evaluated as an inherent part of the Project throughout this EIR and in no cases are significant effects identified specifically related to the trail easements. | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |
| 4.15 Transportation and Traffic | | | | | |
| Threshold (a) for the Building D Site and the Building E Site: Significant Cumulatively Considerable Impact. The Project would contribute to LOS deficiencies at numerous Project study area intersections under the Opening Year (2017) plus Cumulative (E+A+P+C) and Horizon Year (2035) traffic scenarios. | RR-40 Project construction activities are required to comply with the California Manual on Uniform Traffic Control Devices, which specify that temporary traffic controls shall be provided during construction, such as a flag person, during all phases of construction to facilitate the flow of construction traffic on streets abutting the Project site. To implement this requirement, the requirement to comply with the | Project Applicant; Construction Contractors | County of Riverside Transportation Department | Prior to the issuance of grading and building permits. | Significant and Unavoidable Cumulatively Considerable Impact |



| SUMMARY OF IMPACTS | COUNTY REGULATIONS AND DESIGN REQUIREMENTS (RR) AND/OR MITIGATION MEASURES (MM) | RESPONSIBLE PARTY | MONITORING PARTY | IMPLEMENTATION STAGE | LEVEL OF SIGNIFICANCE AFTER MITIGATION |
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| | <p>temporary traffic control plan shall be noted on all grading and building plans and also shall be specified in bid documents issued to prospective construction contractors, including the following notes.</p> <p>a) Delivery trucks shall use the most direct route between the construction site and the I-215 Freeway via Harley Knox Boulevard and Harvill Avenue;</p> <p>b) Construction traffic during the AM peak hour (7:00am-9:00am) and PM peak hour (4:00pm-6:00pm) shall be minimized. The construction contractor shall assure that construction-related trips (passenger cars and trucks) do not exceed 138 trips in the AM peak hour and 151 trips in the PM peak hour (inbound and outbound combined). The construction contractor shall be responsible for periodic monitoring and shall be required to supply the County of Riverside with monitoring records upon the County's request.</p> <p>RR-41 Prior to issuance of building permits, the Project shall comply with the County of Riverside Development Impact Fee (DIF) program, which requires the Project Applicant to pay a fee to the County (less any fee credits), a portion of which is used to fund local roadway improvements.</p> <p>RR-42 Prior to issuance of building permits, the Project shall comply with the Transportation Uniform Mitigation Fee (TUMF) program as administered by the County of Riverside, which requires the Project Applicant to pay a fee that is used to fund regional transportation improvements.</p> <p>MM 4.15-1 (Applies to the Building D Site and the Building E Site) Prior to issuance of building permits, the Project Applicant shall make a fair share monetary contribution to the County of Riverside for improvements to the <u>Ellsworth Street (previously known as Decker Road) / Oleander Avenue</u> intersection which are not included in the Riverside</p> | <p>Project Applicant</p> <p>Project Applicant</p> <p>Project Applicant</p> | <p>County of Riverside Transportation Department</p> <p>County of Riverside Transportation Department</p> <p>County of Riverside Transportation Department</p> | <p>Prior to the issuance of building permits.</p> <p>Prior to the issuance of building permits</p> <p>Prior to the issuance of building permits</p> | |



| SUMMARY OF IMPACTS | COUNTY REGULATIONS AND DESIGN REQUIREMENTS (RR) AND/OR MITIGATION MEASURES (MM) | RESPONSIBLE PARTY | MONITORING PARTY | IMPLEMENTATION STAGE | LEVEL OF SIGNIFICANCE AFTER MITIGATION |
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| | <p>County Development Impact Fee (DIF) program or the Transportation Uniform Mitigation Fee (TUMF) program, as listed below:</p> <ul style="list-style-type: none"> • Install a traffic signal; • Install southbound left turn lane; • Install southbound through lane; and • Install southbound shared through-right turn lane. <p>The Project's fair share of the above-listed improvements is 5.5%.</p> <p>MM 4.15-2 (Applies to the Building D Site and the Building E Site) Prior to issuance of building permits, the Project Applicant shall make a fair share monetary contribution to the County of Riverside, to be held in trust, for improvements to the Harvill Avenue / Harley Knox Boulevard intersection that are not included in the Riverside County Development Impact Fee (DIF) program or the Transportation Uniform Mitigation Fee (TUMF) program, as listed below:</p> <ul style="list-style-type: none"> • Modify traffic signal to implement overlap phasing on the northbound right turn lanes; and • Modify traffic signal to implement overlap phasing on the eastbound right turn lane. <p>The Project's fair share of the above-listed improvements is 5.0%.</p> | Project Applicant | County of Riverside Transportation Department | Prior to the issuance of building permits. | |
| <p>Threshold (b) for the Building D Site and the Building E Site: Significant and Unavoidable Cumulatively Considerable Impact. All state highway system facilities in the Project study area are under the jurisdiction of Caltrans. As such, the County of Riverside cannot assure the construction</p> | <p>MM 4.15-3. (Applies to the Building D Site and the Building E Site) In the event that Caltrans establishes a fair-share funding program for cumulatively considerable impacts to freeway system segments caused by private development projects that would be applicable to the Project site, prior to the issuance of a building permit for the Project, the Project Applicant</p> | Project Applicant | County of Riverside Transportation Department | Prior To The Issuance of a Building Permit | Significant and Unavoidable Cumulatively Considerable Impact |



| SUMMARY OF IMPACTS | COUNTY REGULATIONS AND DESIGN REQUIREMENTS (RR) AND/OR MITIGATION MEASURES (MM) | RESPONSIBLE PARTY | MONITORING PARTY | IMPLEMENTATION STAGE | LEVEL OF SIGNIFICANCE AFTER MITIGATION |
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| of improvements to state highway facilities that may be needed to improve traffic flow. Furthermore, Caltrans does not have any funding mechanism in place to allow development projects to contribute a fair-share payment to contribute to future improvements and off-set cumulatively considerable traffic impacts. Thus, there is no assurance that planned improvements will be in place prior to the time that the Project begins to contribute traffic to the facilities. Accordingly, the Project's contribution of traffic to the freeway facilities listed below under E+A+P+C and/or Horizon Year (2035) conditions would represent a significant and unavoidable cumulative impact | shall provide evidence to Riverside County that such fair-share fee has been paid. If Caltrans has not established such a fee prior to building permit issuance, the Project Applicant shall have no further obligation associated with this mitigation measure. | | | | |
| Threshold (c) for the Building D Site and the Building E Site: No Impact. There is no potential for the Project to change air traffic patterns or create substantial air traffic safety risks. | No mitigation is required. | N/A | N/A | N/A | No Impact. |
| Threshold (d) for the Building D Site and the Building E Site: No Impact. There is no potential for the Project to alter waterborne, rail, or air traffic. | No mitigation is required. | N/A | N/A | N/A | No Impact |
| Threshold (e) for the Building D Site and the Building E Site: Less-than-Significant Impact. The proposed Project would not substantially increase transportation safety hazards due to design features or incompatible uses. <u>As a best practice Mitigation Measures MM 4.15-4 and 4.15-5 are recommended to assist in avoiding wrong turns and to direct vehicle traffic away from residential neighborhoods.</u> | <p>MM 4.15-4 (Applies to the Building D Site and the Building E Site): <u>The developer or successor in interest shall be required to install and perpetually maintain durable, legible, weather-proof signs at exit driveways that prohibit trucks from traveling south on Decker Road/Ellsworth Street.</u></p> <p>MM 4.15-5 (Applies to the Building D Site and the Building E Site): <u>A provision shall be included in building user lease agreements and sales agreements</u></p> | <p><u>The developer or successor in interest.</u></p> <p><u>The developer of successor in interest.</u></p> | <p><u>County of Riverside Building & Safety Department</u></p> <p><u>County of Riverside Building & Safety Department</u></p> | <p><u>Prior to the issuance of occupancy permits and throughout the use of the buildings.</u></p> <p><u>Prior to the issuance of building user lease</u></p> | Less-than-Significant Impact |



| SUMMARY OF IMPACTS | COUNTY REGULATIONS AND DESIGN REQUIREMENTS (RR) AND/OR MITIGATION MEASURES (MM) | RESPONSIBLE PARTY | MONITORING PARTY | IMPLEMENTATION STAGE | LEVEL OF SIGNIFICANCE AFTER MITIGATION |
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| | that require building users to designate truck routing away from southbound Decker Road/Ellsworth Street and away from residential neighborhoods. | | | agreements and sales agreements. | |
| Threshold (f) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would not cause a significant need for new or altered maintenance of roads. | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |
| Threshold (f) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would not cause a significant need for new or altered maintenance of roads. | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |
| Threshold (g) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would not cause a substantial adverse effect upon circulation during the Project's construction phase. | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |
| Threshold (h) for the Building D Site and the Building E Site: Less-than-Significant Impact. Adequate emergency access would be provided to the Project site during both short-term construction and long-term operation. The Project would not result in inadequate emergency access to the site or surrounding properties. | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |
| Threshold (i) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project provides for community trail easements along the Project site's frontage with Oleander Avenue and Ellsworth Street, as called for by the planned Riverside County trail network. The Project is designed to minimize potential conflicts with non-vehicular means of transportation. | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |



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| 4.16 Utilities and Service Systems | | | | | |
| <p>Thresholds (a) and (b) for the Building D Site and the Building E Site: Less-Than-Significant Impact. The EMWD has sufficient capacity to serve the Project with water in light of its existing and projected commitments, and no new entitlements are required. The Project would not have an adverse effect on the ability of the EMWD to implement its Water Shortage Contingency Plan prepared in response to Executive Order B-29-15. Impacts associated with the installation of on-site and off-site water infrastructure are evaluated throughout the EIR and mitigation measures are identified for construction-related effects that would reduce construction-phase impacts to the maximum feasible extent. There would be no significant impacts specifically related to the installation of water infrastructure beyond the overall construction-related effects of the Project as a whole.</p> | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |
| <p>Thresholds (c) and (d) for the Building D Site and the Building E Site: Less-Than-Significant Impact. The proposed Project's wastewater generation would not exceed the capacity of the EMWD's Perris Valley Regional Water Reclamation Facility (PVWRF) and payment of mandatory connection fees and surcharges established by the EMWD's Wastewater Ordinance No. 59.6 would reduce the Project's incremental effect to a level of less than significant. Additionally, impacts associated with the construction of the proposed sewer facilities are an inherent part of the Project's construction process and environmental effects associated with the Project's</p> | No mitigation is required. | N/A | N/A | N/A | Less-than-Significant Impact |



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| <p>construction phase have been evaluated throughout this EIR. Mitigation measures have been identified to reduce construction-related impacts to the maximum feasible extent, and there are no environmental impacts attributable solely to the Project's sewer connections. Impacts would be less than significant.</p> | | | | | |
| <p>Threshold (e) for the Building D Site and the Building E Site: Less-Than-Significant Impact. The proposed Project's solid waste disposal needs can be accommodated by existing Riverside County Waste Management Department (RCWMD) landfills (i.e., Badlands Landfill and/or El Sobrante Landfill), and the Project would be fully consistent with the Countywide Integrated Waste Management Plan (CIWMP) and its requirements. Project impacts would be less than significant.</p> | <p>No mitigation is required.</p> | <p>N/A</p> | <p>N/A</p> | <p>N/A</p> | <p>Less-than-Significant Impact</p> |
| <p>Threshold (f) for the Building D Site and the Building E Site: Less-Than-Significant Impact. The Project would be required to comply with all applicable solid waste statutes and regulations; as such, impacts related to solid waste statutes and regulations would be less than significant.</p> | <p>No mitigation is required.</p> | <p>N/A</p> | <p>N/A</p> | <p>N/A</p> | <p>Less-than-Significant Impact</p> |
| <p>Threshold (g) for the Building D Site and the Building E Site: Less-Than-Significant Impact. Impacts associated with the construction of electricity, natural gas, communications systems, storm water drainage, street lighting, public facilities maintenance, and other governmental services are an inherent part of the Project's construction process and environmental effects associated with the Project's construction phase have been evaluated throughout this EIR. Mitigation measures</p> | <p>No mitigation is required.</p> | <p>N/A</p> | <p>N/A</p> | <p>N/A</p> | <p>Less-than-Significant Impact</p> |



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| <p>have been identified to reduce construction-related impacts to the maximum feasible extent. There are no unique conditions associated with the Project's proposed utility service connections that would result in impacts to the environment that have not already been addressed by this EIR.</p> | | | | | |
| 4.17 Paleontological Resources | | | | | |
| <p>Paleontological Resources: Threshold (a) for the Building D Site: Significant Direct and Cumulatively Considerable Impact. Construction activities on the Building D Site have the potential to unearth and adversely impact paleontological resources that may be buried beneath the ground in Quaternary very old alluvial fan sediments located in the northeastern corner of the Building D Site mapped as having "High B" paleontological sensitivity. Impacts would be significant on a direct and cumulatively considerable basis if discovered resources are significant and are not properly identified and treated.</p> | <p>MM 4.17-1 (Applies to the Building D Site) <u>The County of Riverside shall require that for any mass grading and excavation-related activities, including utility trenching, that will exceed 4.0 feet in depth during construction activities in the Area of Potential Effect (APE), i.e., areas of exposed in Quaternary very older alluvial fan sediments (Qof) located in the northeast fringe of the property, the County of Riverside shall require that the Project's Paleontological Resource Impact Mitigation Program (PRIMP) (EIR No. 546 Technical Appendix D5) be implemented by a qualified paleontologist. The PRIMP shall be consistent with current regulations implemented by the County of Riverside and the proposed guidelines of the Society of Vertebrate Paleontology. The PRIMP shall be prepared and submitted by a qualified paleontologist to the County of Riverside prior to the issuance of a grading permit for the Building D Site. The PRIMP shall outline the locations where monitoring by a qualified paleontologist would be required and the protocols to be followed in the event that fossils are discovered to ensure that significant resources are properly identified and treated and that no significant paleontological resource, site, or unique geologic feature is destroyed. The protocols documented in the PRIMP are required to be followed.</u></p> | <p>Project Applicant; Project Paleontologist</p> | <p>Riverside County Planning Department</p> | <p>During grading activities that will occur greater than 4.0 feet in depth in Quaternary very old alluvial fan sediments located in the northeast portion of the Building D Site.</p> | <p>Less-than-Significant Impact</p> |
| <p>Paleontological Resources: Threshold (a) for the Building E Site: Less-than-</p> | <p>No mitigation is required.</p> | <p>N/A</p> | <p>N/A</p> | <p>N/A</p> | <p>Less-than-Significant Impact</p> |



| SUMMARY OF IMPACTS | COUNTY REGULATIONS AND DESIGN REQUIREMENTS (RR) AND/OR MITIGATION MEASURES (MM) | RESPONSIBLE PARTY | MONITORING PARTY | IMPLEMENTATION STAGE | LEVEL OF SIGNIFICANCE AFTER MITIGATION |
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| <p>Significant Impact. The Project as proposed on the Building E Site would not directly or indirectly destroy a unique paleontological resource, or site, or unique geologic feature.</p> | | | | | |
| <p>4.18 Tribal Cultural Resources</p> | | | | | |
| <p>NOTE: In the Draft EIR, the following appeared in Subsection 4.5, <i>Cultural Resources</i>. The content did not change when moved to Subsection 4.18, <i>Tribal Cultural Resources</i>.</p> | | | | | |
| <p>Tribal Cultural Resources: Threshold (a) for the Building D Site and Building E Site: No Impact. The Project has no potential to restrict a religious or sacred use.</p> | <p>No mitigation is required.</p> | <p>N/A</p> | <p>N/A</p> | <p>N/A</p> | <p>No Impact</p> |
| <p>Tribal Cultural Resources: Threshold (b) Less-than Significant Impact. Five archaeological sites are located on the Project site, of which three would be fully impacted by the Project and two would be partially impacted by the Project. None of the five sites meet the definition of a significant resource listed in CEQA Guidelines § 15064. In addition, because there is a lack of substantial evidence to conclude that the subject property is part of a cultural landscape, the Project site is deemed by Riverside County as part of neither a cultural landscape nor a TCR under AB 52. As such, tribal cultural resources as defined in Public Resources Code 21074 do not exist on the Project site and impacts would be less than significant</p> | <p>No mitigation is required.</p> | <p>N/A</p> | <p>N/A</p> | <p>N/A</p> | <p>Less-than-Significant Impact</p> |



1.0 INTRODUCTION

1.1 PURPOSES OF CEQA AND THIS EIR

As stated by the California Environmental Quality Act (CEQA) Guidelines Section (§) 15002(a), the basic purposes of CEQA are to:

- Inform governmental decision makers and the public about the potential, significant environmental effects of proposed government actions (including the discretionary approval of private development projects);
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and

If a project will be approved involving significant environmental effects,

- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose.

This Environmental Impact Report (EIR No. 546) is an informational document that represents the independent judgment of the County of Riverside (as the Lead Agency) and evaluates the physical environmental effects that could result from planning, constructing, and operating the proposed Knox Business Park Building D and Knox Business Park Building E. Because these projects are adjacent and are proposed by the same Project Applicant, CEQA requires that they be evaluated as a single project. CEQA prohibits piecemeal environmental review of projects with related impacts that could be considered a single project. Both properties are collectively referred to in this EIR as the “Project site” and individually as the “Building D Site” and the “Building E Site.” Both projects are collectively referred to in this EIR as the “Project” and individually as the “Building D Project” and the “Building E Project.”

Governmental approvals requested by the Project Applicant from the County of Riverside include General Plan Amendment Nos. 1151 and 1152, Change of Zone Nos. 7872 and 7873, Lot Line Adjustment No. 5524, Tentative Parcel Map Nos. 36950 and 36962, Plot Plan Nos. 25837 and 25838; other related discretionary and administrative actions also may be required to implement the Project evaluated in this EIR.

As a first step in the CEQA compliance process, the County of Riverside completed an Initial Study pursuant to CEQA Guidelines § 15063 to determine if the Project could have a significant effect on the environment. The Initial Study determined the Project has the potential to result in significant environmental effects, and a Project EIR, as defined by CEQA Guidelines § 15161, is required. As stated in CEQA Guidelines § 15161, a Project EIR should “...focus primarily on the changes in the



environment that would result from the development project,” and “... examine all phases of the project including planning, construction, and operation.”

Accordingly, and in conformance with CEQA Guidelines § 15121(a), the purposes of this Project EIR are to: (1) disclose information by informing public agency decision makers and the public generally of the significant environmental effects associated with all phases of the Project, (2) identify possible ways to minimize or avoid those significant effects, and (3) to describe a reasonable range of alternatives to the Project that would feasibly attain most of the basic Project objectives but would avoid or substantially lessen its significant environmental effects.

1.2 SUMMARY OF THE PROJECT EVALUATED BY THIS EIR

For purposes of this EIR, the term “Project” refers to the discretionary actions required to implement the Knox Business Park Buildings D Project and Building E Project as proposed and all of the activities associated with its implementation including planning, construction, and ongoing operation of two proposed warehouse buildings (Buildings D and E). The Project site is comprised of two adjacent properties located south of Oleander Avenue that are separated by Ellsworth Street (also referred to as “Decker Road” throughout this EIR). The Building D Site comprises approximately 37.1 gross acres east of Ellsworth Street and the Building E Site comprises approximately 21.5 gross acres west of Ellsworth Street, for a total Project site area of approximately 58.6 acres. The Building D Site is proposed to contain a business park warehouse building with a maximum of 702,645 s.f. of building space (677,645 s.f. of warehouse floor space served by loading docks, 10,000 s.f. of mezzanine office space, and 15,000 s.f. of ground floor office space). The Building E Site is proposed to contain a business park warehouse building with a maximum of 410,982 s.f. of building space (395,982 s.f. of warehouse floor space served by loading docks and 15,000 s.f. of ground floor office space). The Project also proposes roadway improvements and off-site utility connections.

The Project Applicant proposes the following discretionary actions, which are under consideration by the County of Riverside:

□ Building D Applications

- **General Plan Amendment (GPA 1151):** The Building D Site is designated “Community Development-Light Industrial (CD-LI)” and “Community Development-Business Park (CD-BP)” by the Riverside County General Plan under existing conditions. GPA 1151 would change the land use designation of the portion of the property designated CD-BP to CD-LI, so that the entire Building D Site is designated CD-LI.
- **Change of Zone No. 7872 (CZ 7872):** The Building D Site is zoned “Manufacturing – Medium (M-M),” “Rural Residential (R-R),” and “Industrial Park (I-P)” under existing conditions. CZ 7872 would change the zoning designation of the portions of the property zoned M-M and R-R to I-P, so that the entire Building D Site is zoned I-P.



- **Tentative Parcel Map No. 36950 (PM 36950):** PM 36950 would combine the property’s four existing parcels into a single, approximately 34.5-net-acre parcel and would dedicate approximately 2.6 acres to the County of Riverside as public right-of-way (i.e., frontage improvements to Ellsworth Street and Oleander Avenue). In addition, PM 36950 identifies the locations of proposed utility infrastructure improvements.
- **Plot Plan No. 25838 (PP 25838):** PP 25838 would provide for the development of one business park warehouse building containing 702,645 s.f. of building space (677,645 s.f. of warehouse floor space, 15,000 s.f. of ground floor office space, and 10,000 s.f. of mezzanine office space). PP 25838 includes a land use plan, architectural plans, and landscape design for the Building D Site.

Building E Applications

- **General Plan Amendment No. 1152 (GPA 1152):** The Building E Site is designated “Community Development-Business Park (CD-BP)” by the Riverside County General Plan under existing conditions. GPA 1152 would change the land use designation of the property to “Community Development – Light Industrial (CD-LI)”.
- **Change of Zone No. 7873 (CZ 7873):** The Building E Site is zoned “Rural Residential 1/2-Acre Lot Sizes (R-R-1/2),” and “Industrial Park (I-P)” under existing conditions. CZ 7873 would change the zoning designation on the portion of the property zoned R-R-1/2 to I-P so that the entire Building E Site is zoned I-P.
- **Tentative Parcel Map No. 36962 (PM 36962):** PM 36962 would combine the property’s three existing parcels into a single, approximately 19.5-net-acre parcel and would dedicate approximately 2.0 acres to the County of Riverside as public right-of-way (i.e., frontage improvements to Ellsworth Street and Oleander Avenue). In addition, PM 36962 identifies the locations of proposed utility infrastructure improvements.
- **Plot Plan No. 25837 (PP 25837):** PP 25837 would provide for the development of one business park warehouse building containing 410,982 s.f. of building space (395,982 s.f. of warehouse floor space and 15,000 s.f. of ground floor office space). PP 25837 includes a land use plan, architectural plans, and landscape design for the Building E Site.

1.3 LEGAL AUTHORITY FOR THIS EIR

This EIR has been prepared in accordance with all criteria, standards, and procedures of CEQA (California Public Resource Code § 21000 *et seq.*) and the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, § 15000 *et seq.*).

Pursuant to CEQA § 21067 and CEQA Guidelines Article 4 and § 15367, the County of Riverside is the Lead Agency under whose authority this EIR has been prepared. “Lead Agency” refers to the public agency that has the principal responsibility for carrying out or approving a project. Serving as



the Lead Agency and before taking action to approve the Project, the County of Riverside has the obligation to: (1) ensure that this EIR has been completed in accordance with CEQA; (2) review and consider the information contained in this EIR as part of its decision making process; (3) make a statement that this EIR reflects the County of Riverside's independent judgment; (4) ensure that all significant effects on the environment are eliminated or substantially lessened where feasible; and, if necessary (5) make written findings for each unavoidable significant environmental effect stating the reasons why mitigation measures or project alternatives identified in this EIR are infeasible and citing the specific benefits of the proposed Project that outweigh its unavoidable adverse effects (CEQA Guidelines §§ 15090 through 15093).

Pursuant to CEQA Guidelines §§ 15040 through 15043 and upon completion of the CEQA review process, the County of Riverside will have the legal authority to do any of the following:

- Approve the Project;
- Require feasible changes in any or all activities involved in the Project in order to substantially lessen or avoid significant effects on the environment;
- Deny approval of the Project, if necessary, in order to avoid one or more significant effects on the environment that would occur if the Project was approved as proposed; or
- Approve the Project even though the Project would cause a significant effect on the environment if the County makes a fully informed and publicly disclosed decision that: 1) there is no feasible way to lessen the effect or avoid the significant effect; and 2) expected benefits from the Project will outweigh significant environmental impacts of the Project.

This EIR fulfills the CEQA environmental review requirements for the proposed General Plan Amendment Nos. 1151 and 1152, Change of Zone Nos. 7872 and 7873, Tentative Parcel Map Nos. 36950 and 36962, and Plot Plan Nos. 25837 and 25838, and all other governmental discretionary and administrative actions related to the Project.

1.4 RESPONSIBLE AND TRUSTEE AGENCIES

The California Public Resource Code (§ 21104) requires that all EIRs be reviewed by responsible and trustee agencies (see also CEQA Guidelines § 15082 and § 15086(a)). As defined by CEQA Guidelines § 15381, “the term ‘Responsible Agency’ includes all public agencies other than the Lead Agency which have discretionary approval power over the project.” A Trustee Agency is defined in CEQA Guidelines § 15386 as “a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California.”

For the proposed Project, the California Department of Fish and Wildlife (CDFW) is identified as a Trustee Agency that is responsible for the protection of California's fish and wildlife resources. The Santa Ana Regional Water Quality Control Board (RWQCB) is identified as a Trustee Agency that is responsible for the protection of California's water resources. The CDFW and Santa Ana RWQCB



are also Responsible Agencies for any discretionary actions that these entities are requested to take related to the proposed Project. The CDFW is responsible for issuance of Streambed Alteration Agreements (California Fish and Game Code 1600 *et seq*) and California Endangered Species Act Permits for Incidental Take of Endangered, Threatened, and/or Candidate species (California Fish and Game Code Sections 2080 and 2080.1). The Santa Ana RWQCB is responsible for issuance of National Pollutant Discharge Elimination System (NPDES) Permits to ensure that during and after the construction of development projects, water flows do not result in siltation, other erosional actions, or degradation of surface or subsurface water quality. Other known Responsible Agencies for the Project include the Riverside County Airport Land Use Commission (RCALUC) and the Eastern Municipal Water District (EMWD). The RCALUC is responsible for determining consistency with the Riverside County Airport Land Use Plan; the Project site is located within the influence area of March Air Reserve Base (MARB). EMWD is responsible for approval of a Water Supply Assessment (WSA) as well as approvals of domestic water and sewer system designs; the Project site is located within EMWD's water and sewer service area.

1.5 EIR SCOPE, FORMAT, AND CONTENT

1.5.1 EIR SCOPE

As a first step in complying with the procedural requirements of CEQA, Riverside County completed an Initial Study to preliminarily identify the environmental issue areas that may be adversely impacted by the Project. Following completion of the Initial Study, the County filed a Notice of Preparation (NOP) with the California Office of Planning and Research (State Clearinghouse) to indicate that an EIR would be prepared to evaluate the Project's potential to impact the environment. The NOP was filed with the State Clearinghouse and distributed to Responsible Agencies, Trustee Agencies, and other interested parties on August 31, 2015, for a 30-day public review period. The NOP was distributed for public review to solicit responses to help the County identify the full scope and range of potential environmental concerns associated with the Project so that these issues could be fully examined in this EIR. In addition, a publicly-noticed EIR Scoping Meeting was held at Riverside County Administrative Building on September 14, 2015, which provided members of the general public an opportunity to comment on the scope and range of environmental issues to be addressed in this EIR.

As a result of the Initial Study and in consideration of all comments received by the County on the NOP and during the Scoping Meeting, this EIR evaluates the Project's potential to cause adverse effects to the following environmental issue areas:

- Aesthetics
- Agriculture and Forestry
- Cultural Resources
- Greenhouse Gas Emissions
- Hydrology/ Water Quality
- Noise
- Air Quality
- Biological Resources
- Geology/Soils
- Hazards/ Hazardous Materials
- Land Use/ Planning
- Population/ Housing



- Public Services
- Transportation/Traffic
- Energy Conservation
- Mandatory Findings of Significance
- Tribal Cultural Resources
- Recreation (Trails)
- Utilities/ Service Systems
- Paleontological Resources

The Initial Study, NOP, and written comments received by the County during the NOP public review period are provided in *Technical Appendix A* to this EIR. Substantive issues raised in response to the NOP are summarized below in Table 1-1, *Summary of NOP Comments*. The purpose of this table is to present the primary environmental issues of concern raised in comments submitted by public agencies and the public at-large during the NOP review period. The table is not intended to list every comment received by the County during the NOP review period. Regardless of whether or not a comment is listed in the table, all applicable comments received in responses to the NOP are addressed in this EIR.

The Initial Study analyzed the version of the proposed Project that was on file with Riverside County at the time of NOP issuance. Since that time, the Project Applicant has revised the proposed Building E applications to reduce the size of the Building E Site and the business park warehouse building proposed on the Building E Site. These modifications did not change the scope of this EIR, as determined by the Initial Study. Some of the comments received by the County on the NOP related to potential land use compatibility issues with property to the west, which have been assuaged by the changes that the Applicant has since made to the Building E applications.

The Lead Agency has not identified any issues of controversy associated with the proposed Project evaluated in this EIR, after consideration of all comments received in response to the NOP.

Table 1-1 Summary of NOP Comments

| COMMENTS | DATE | COMMENTS | LOCATION IN EIR WHERE COMMENT(S) ADDRESSED |
|--|--------------------|---|---|
| California Department of Fish and Wildlife | September 23, 2015 | <ul style="list-style-type: none"> – EIR should inventory and assess impacts to sensitive habitats, flora fauna, riparian areas, wetlands, and other biological resources within and adjacent to the Project’s physical disturbance area. – EIR should include information on the regional setting. – EIR should analyze potential indirect impacts to biological resources from lighting, noise, human activity, and wildlife-human interactions. | – Subsection 4.4, <i>Biological Resources</i> |



Table 1-1 Summary of NOP Comments

| COMMENTER | DATE | COMMENTS | LOCATION IN EIR WHERE COMMENT(S) ADDRESSED |
|--|--------------------|---|--|
| | | <ul style="list-style-type: none"> - Request for mitigation measures for Project-related impacts to biological resources. - Provides information on the California Endangered Species, Act, the Western Riverside County MSHCP, the Stephens' Kangaroo Rat HCP, and the California Lake and Streambed Alteration Program. | |
| City of Riverside Community & Economic Development | September 30, 2015 | <ul style="list-style-type: none"> - Request for the City of Riverside Traffic and Engineering Division of Public Works review the scope of the Traffic Impact Analysis. - Request that the Project's traffic impact analysis analyze existing congestion, potential Project impacts to I-215, truck traffic impacts to the City of Riverside, and provide appropriate mitigation measures for any significant impacts. | <ul style="list-style-type: none"> - Informational Comment. - Subsection 4.15, <i>Transportation and Traffic</i> |
| Lozeau/Drury LLP | October 2, 2015 | <ul style="list-style-type: none"> - Acknowledged receipt of NOP and requested notices of CEQA actions and notices of any public hearings. | <ul style="list-style-type: none"> - Informational Comment |
| Verbal Comments from the Scoping Meeting | September 14, 2015 | <ul style="list-style-type: none"> - EIR should study air emissions from vehicles that would access the site. - Acknowledgement that a General Plan Amendment and Rezone are needed to implement the Project. EIR should analyze compatibility with adjacent land uses, including residences, schools, trails, and animal keeping. - EIR should analyze drainage patterns, traffic patterns, cumulative traffic effects from projects located east of I-215, potential increases in noise, and the potential use of hazardous materials. | <ul style="list-style-type: none"> - Subsection 4.2, <i>Air Quality</i> - Section 3.0, <i>Project Description</i>; Subsection 4.10, <i>Land Use and Planning</i> - Subsection 4.9, <i>Hydrology/Water Quality</i>; Subsection 4.15, <i>Transportation and Traffic</i>; Subsection 4.8, <i>Hazards and Hazardous Materials</i> |



1.5.2 EIR FORMAT AND CONTENT

This EIR contains all of the information required to be included in an EIR as specified by the CEQA Statutes and Guidelines (California Public Resources Code, § 21000 *et. seq.* and California Code of Regulations, Title 14, Chapter 5). CEQA requires that an EIR contain, at a minimum, certain specified content. Table 1-2, *Location of CEQA Required Topics*, provides a quick reference in locating the CEQA-required sections within this document.

Table 1-2 Location of CEQA Required Topics

| CEQA REQUIRED TOPIC | CEQA GUIDELINES REFERENCE | LOCATION IN THIS EIR |
|---|----------------------------------|------------------------------------|
| Table of Contents | § 15122 | Table of Contents |
| Summary | § 15123 | Section S.0 |
| Project Description | § 15124 | Section 3.0 |
| Environmental Setting | § 15125 | Section 2.0 |
| Consideration and Discussion of Environmental Impacts | § 15126 | Section 4.0 |
| Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented | § 15126.2(b) | Section 4.0 & Subsection 5.1 |
| Significant Irreversible Environmental Changes Which Would be Caused by the Proposed Project Should it be Implemented | § 15126.2(c) | Subsection 5.2 |
| Growth-Inducing Impact of the Proposed Project | § 15126.2(d) | Subsection 5.3 |
| Consideration and Discussion of Mitigation Measures Proposed to Minimize Significant Effects | § 15126.4 | Section 4.0 & Table S-1 |
| Consideration and Discussion of Alternatives to the Proposed Project | § 15126.6 | Section 6.0 |
| Effects Not Found to be Significant | § 15128 | Subsection 5.5 |
| Organizations and Persons Consulted | § 15129 | Section 7.0 & Technical Appendices |
| Discussion of Cumulative Impacts | § 15130 | Section 4.0 |
| Energy Conservation | Appendix F | Subsection 5.4 |



In summary, the content and format of this EIR is as follows:

- **Section S.0, Executive Summary**, provides an overview of the EIR document and CEQA process. The Project, including its objectives, is described, and the location and regional setting of the Project site is documented. In addition, the Executive Summary identifies the potential alternatives to the proposed Project as required by CEQA. Finally, the Executive Summary provides a summary of the Project's impacts, mitigation measures, and conclusions, in a table that forms the basis of the EIR's Mitigation, Monitoring, and Reporting Program (MMRP).
- **Section 1.0, Introduction**, provides introductory information about the CEQA process and the responsibilities of the County of Riverside, serving as the Lead Agency for this EIR.
- **Section 2.0, Environmental Setting**, describes the environmental setting, including descriptions of the Project site's physical conditions and surrounding context. The existing setting is defined as the condition of the Project site and surrounding area at the approximate date this EIR's NOP was released for public review (August 31, 2015).
- **Section 3.0, Project Description**, serves as the EIR's Project Description for purposes of CEQA and contains a level of specificity commensurate with the level of detail proposed by the Project, including the summary requirements pursuant to CEQA Guidelines § 15123.
- **Section 4.0, Environmental Analysis**, provides an analysis of potential direct, indirect, and cumulative impacts that may occur with implementation of the proposed Project. A conclusion concerning significance is reached for each discussion; mitigation measures are presented as warranted. The environmental changes identified in Section 4.0 and throughout this EIR are referred to as "effects" or "impacts" interchangeably. The CEQA Guidelines also identify the terms "effects" and "impacts" as being synonymous (CEQA Guidelines § 15358). In the environmental analysis subsections of Section 4.0, the existing conditions are disclosed that are pertinent to the subject area being analyzed, accompanied by a specific analysis of physical impacts that may be caused by implementation of the proposed Project. The analyses are based in part upon technical reports that are appended to this EIR. Information also is drawn from other sources of analytical materials that directly or indirectly relate to the proposed Project and cited in Section 7.0, *References*. Where the analysis demonstrates that a physical adverse environmental effect may or would occur without undue speculation, feasible mitigation measures are recommended to reduce or avoid the significant effect. In most cases, implementation of the mitigation measures would reduce the adverse environmental impact to below a level of significance. If mitigation measures are not available or feasible to reduce an identified impact to below a level of significance, the environmental effect is identified as a significant and unavoidable adverse impact, for which a statement of overriding considerations would need to be adopted by the County of Riverside pursuant to CEQA Guidelines § 15093.
- **Section 5.0, Other CEQA Considerations**, includes specific topics that are required by CEQA. These include a summary of the Project's significant and unavoidable environmental



effects, a discussion of the significant and irreversible environmental changes that would occur should the Project be implemented, an analysis of the Project's energy consumption, as well as potential growth-inducing impacts of the proposed Project. Section 5.0 also includes a discussion of the potential environmental effects that were found not be significant during this EIR's Initial Study and NOP process and that, therefore, do not require a detailed evaluation in this EIR.

- **Section 6.0, Project Alternatives**, describes and evaluates potential alternatives to the proposed Project that could reduce or avoid the Project's adverse environmental effects, while still achieving the Project's objectives. CEQA does not require an EIR to consider every conceivable alternative to the Project but rather the consideration of a reasonable range of alternatives that will foster informed decision making and public participation.
- **Section 7.0, References**, cites all reference sources used in preparing this EIR and lists the agencies and persons that were consulted in preparing this EIR. Section 7.0 also lists the persons who authored or participated in preparing this EIR.
- **Technical Appendices**. CEQA Guidelines § 15147 states that the "information contained in an EIR shall include summarized...information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public," and that the "placement of highly technical and specialized analysis and data in the body of an EIR shall be avoided." Therefore, the detailed technical studies, reports, and supporting documentation that were used in preparing this EIR are bound separately as Technical Appendices. The Technical Appendices are available for review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, California 92501, during the County's regular business hours or can be requested in electronic form by contacting the County's Planning Department. The individual technical studies, reports, and supporting documentation that comprise the Technical Appendices are as follows:

- A: Initial Study, Notice of Preparation, and Written Comments on the NOP
- B1: Air Quality Impact Analysis
- B2: Mobile Source Health Risk Assessment
- C1: Building D MSHCP Habitat Assessment/Constraints Analysis
- C2: Building D Burrowing Owl Survey
- C3: Building D Jurisdictional Delineation
- C4: Building E MSHCP Habitat Assessment/Constraints Analysis
- C5: Building E Burrowing Owl Survey
- C6: Building E Jurisdictional Delineation
- C7: Building D Determination of Biologically Equivalent or Superior Preservation
- C8: Building E Determination of Biologically Equivalent or Superior Preservation
- D1: Building D Phase I and II Cultural Resources Assessment
- D2: Building E Phase I and II Cultural Resources Assessment
- D3: Building D Paleontological Resource Assessment



D4: Building E Paleontological Resource Assessment
D5: Paleontological Resource Impact Mitigation Program
E1: Building D Geotechnical Study
E2: Building D Supplementary Geotechnical Report
E3: Building E Geotechnical Study
E4: Building E Supplementary Geotechnical Report
F: Greenhouse Gas Analysis
G1: Building D Phase I Environmental Site Assessment,
G2: Building E Phase I Environmental Site Assessment
H: Hydrology and Water Quality Information
I: Noise Impact Analysis
J1: Traffic Impact Analysis
J2: Supplemental Basic Freeway Segment Analysis
K: Water Supply Assessment
L: Energy Analysis Report
M: General Plan Consistency Analysis
N: Written Correspondence

- **Documents Incorporated by Reference.** CEQA Guidelines § 15150 allows for the incorporation “by reference all or portions of another document...[and is] most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of a problem at hand.” Documents, analyses, and reports that are incorporated into this EIR by reference are listed in Section 7.0, *References*, of this EIR. The purpose of incorporation by reference is to assist the Lead Agency in limiting the length of an EIR. Where this EIR incorporates a document by reference, the document is identified in the body of the EIR, citing the appropriate section(s) of the incorporated document and describing the relationship between the incorporated part of the referenced document and this EIR.



2.0 ENVIRONMENTAL SETTING

2.1 REGIONAL SETTING AND LOCATION

The approximately 58.6 gross-acre Project site is located in the unincorporated community of Mead Valley, in western Riverside County, California. Western Riverside County abuts San Bernardino County to the northeast, Orange County to the west, and San Diego County to the south. Los Angeles County is located further to the northwest. Figure 3-1, *Regional Map*, in EIR Section 3.0, *Project Description*, depicts the Project site's location in a regional context. Riverside County is located in an urbanizing area of southern California commonly referred to as the Inland Empire. The Inland Empire is an approximately 28,000 square mile region comprising Riverside County, San Bernardino County, and the eastern tip of Los Angeles County. The Southern California Association of Governments (SCAG) estimates that the majority of growth in the entire southern California region will take place in Riverside and San Bernardino Counties (SCAG, 2012a, p. 2). According to U.S. Census data, the 2010 population of Riverside County was 2,189,641 (USCB, 2014). SCAG forecast models predict that the population of Riverside County will grow to approximately 3,324,000 persons (an approximate 1.1 million-person increase) by the Year 2035 (SCAG, 2012b).

The Project site is located west of the cities of Moreno Valley and Perris and southeast of the City of Riverside. Specifically, the Project site is located approximately 0.4-mile west of Interstate 215 (I-215) and the City of Perris, 1.5 miles west of the City of Moreno Valley, 5.8 miles south of State Route 60 (SR-60), and 2.5 miles southeast of the City of Riverside.

2.2 LOCAL SETTING AND LOCATION

At the local scale, the Project site is located south of Oleander Avenue, north of Redwood Drive, east of Day Street, and west of Harvill Avenue. Ellsworth Street (also referred to as "Decker Road" throughout this EIR) transects the Project site in a north to south direction. The approximately 37.1-acre portion of the Project site located east of Ellsworth Street is referred to within this EIR as the "Building D Site." The approximately 21.5-acre portion of the Project site located west of Ellsworth Street is referred to within this EIR as the "Building E Site." Figure 3-2, *Vicinity Map*, in EIR Section 3.0, *Project Description*, identifies the location of the Project site and illustrates the relationship between the Building D Site and Building E Site.

The Project site lies within the northeastern portion of Section 2, Township 4 South, Range 4 West (San Bernardino Baseline and Meridian). The Building D Site occupies Assessor Parcel Number APN 314-040-001, 314-040-002, 314-040-003, and 314-040-008. The Building E Site occupies, 314-020-017 and a portion of APN 314-020-010.

2.3 SURROUNDING LAND USES AND DEVELOPMENT

The Project site is located in the I-215 corridor, which is an area of Riverside County that is developing as an employment center, containing business park, distribution warehousing, e-commerce, and light



industrial land uses. Figure 2-1, *Surrounding Land Uses and Development*, depicts the existing land uses in the immediate vicinity of the Project site. As illustrated in Figure 2-1, lands north of the Project site are largely undeveloped, with exception of a recently constructed industrial warehouse building located north of Oleander Road and east of Harvill Avenue. To the south of the Project site are scattered, rural residences and business ventures, and undeveloped land. Southwest of the Building E Site is a water tank owned by the Eastern Municipal Water District (EMWD). To the west of the Project site are undeveloped lands, beyond which are single-family homes. To the east of the Project site are undeveloped lands, several scattered single-family residences and an industrial warehouse building located along the eastern edge of Harvill Avenue. Approximately 0.4 miles to the east is I-215, beyond which are the March Air Reserve Base (MARB) and an area of the City of Moreno Valley mostly developed with industrial warehouse buildings.

2.4 PLANNING CONTEXT

This subsection provides a description of the Project site's land use and zoning designations, as well as a description of broader, regional planning documents that are applicable to the Project site.

2.4.1 COUNTY OF RIVERSIDE GENERAL PLAN AND MEAD VALLEY AREA PLAN

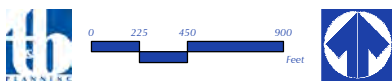
The prevailing planning document for the Project site and its surrounding area is the Riverside County General Plan. As shown on Figure 2-2, *Existing General Plan Land Use Designations*, the Riverside County General Plan and Mead Valley Area Plan designate the majority of the Building D Site for "Community Development-Light Industrial (CD-LI)" land uses and the southwest portion of the Building D Site for "Community Development-Business Park (CD-BP)" Land uses. The entirety of the Building E Site is designated for "Community Development-Business Park (CD-BP)" land uses. The CD-BP land use designation allows for employee-intensive uses, including research & development, technology centers, corporate offices, clean industry, and supporting retail uses at a maximum building intensity of 0.60 floor area ratio (FAR). The CD-LI land use designation allows for industrial and related uses including warehousing/distribution, assembly and light manufacturing, repair facilities, and supporting retail uses at a maximum building intensity of 0.60 FAR. (Riverside County, 2003a, Table LU-4) The Project site is located in the City of Perris Sphere-of-Influence (SOI). A SOI is a geographic area that could eventually be incorporated into a city by annexation, subject to approval of the Riverside County Local Agency Formation Commission (LAFCO).

2.4.2 ZONING

As shown on Figure 2-3, *Existing Zoning Designations*, Riverside County applies four zoning designations to the Project site. The Building D Site is zoned for "Manufacturing – Medium (M-M)," "Rural Residential (R-R)," and "Industrial Park (I-P)." The Building E Site is zoned for "Rural Residential 1/2-Acre Lot Sizes (R-R-1/2)" and "Industrial Park (I-P)." The R-R-1/2 zoning designation allows for single-family residential development and limited agricultural and animal keeping uses on minimum one-half-acre lot sizes. The "M-M" zoning designation allows for limited agricultural uses, medium-intensity manufacturing and commercial uses, and more intensive manufacturing uses with



Figure 2-1



SURROUNDING LAND USES AND DEVELOPMENT

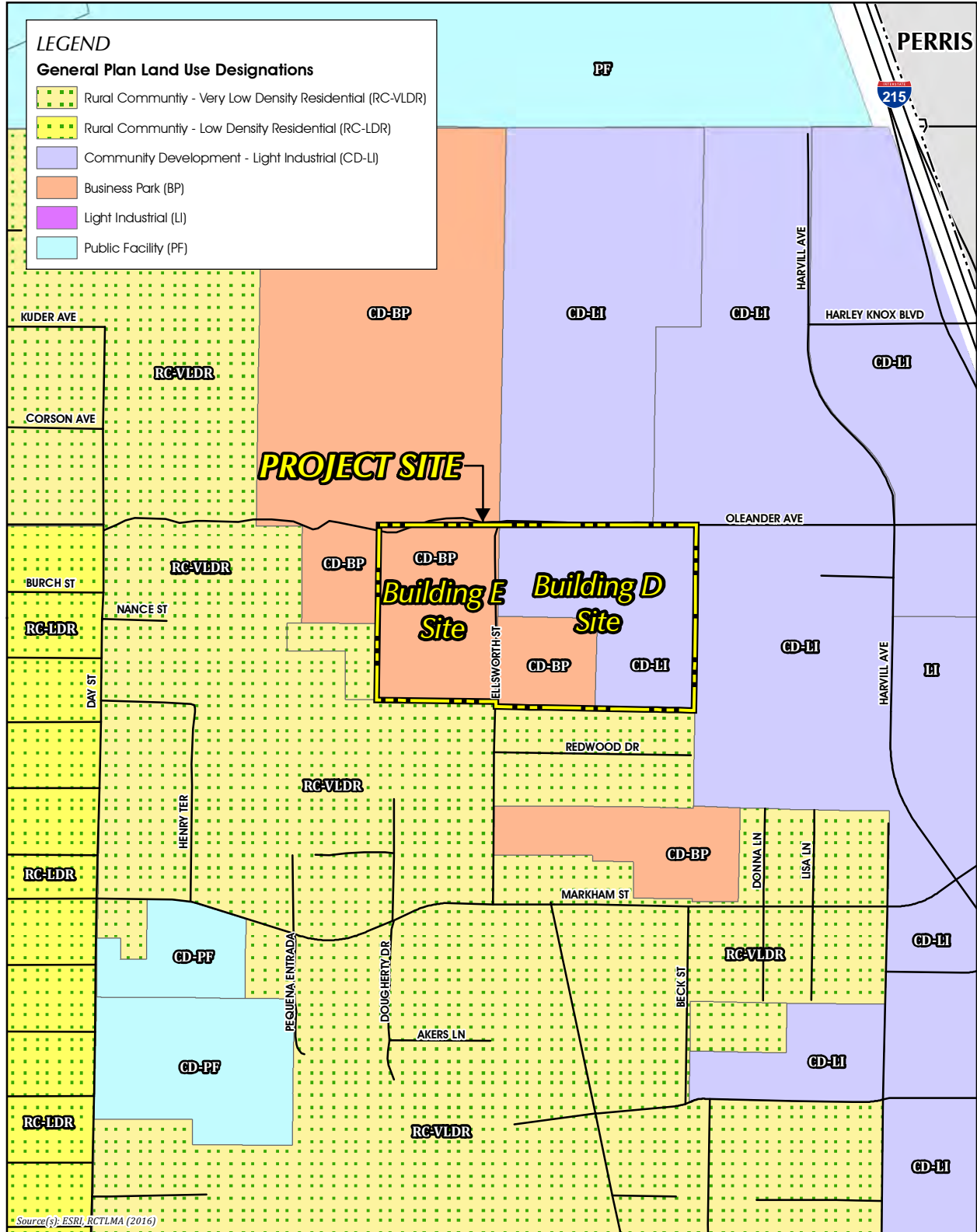


Figure 2-2



EXISTING GENERAL PLAN LAND USE DESIGNATIONS

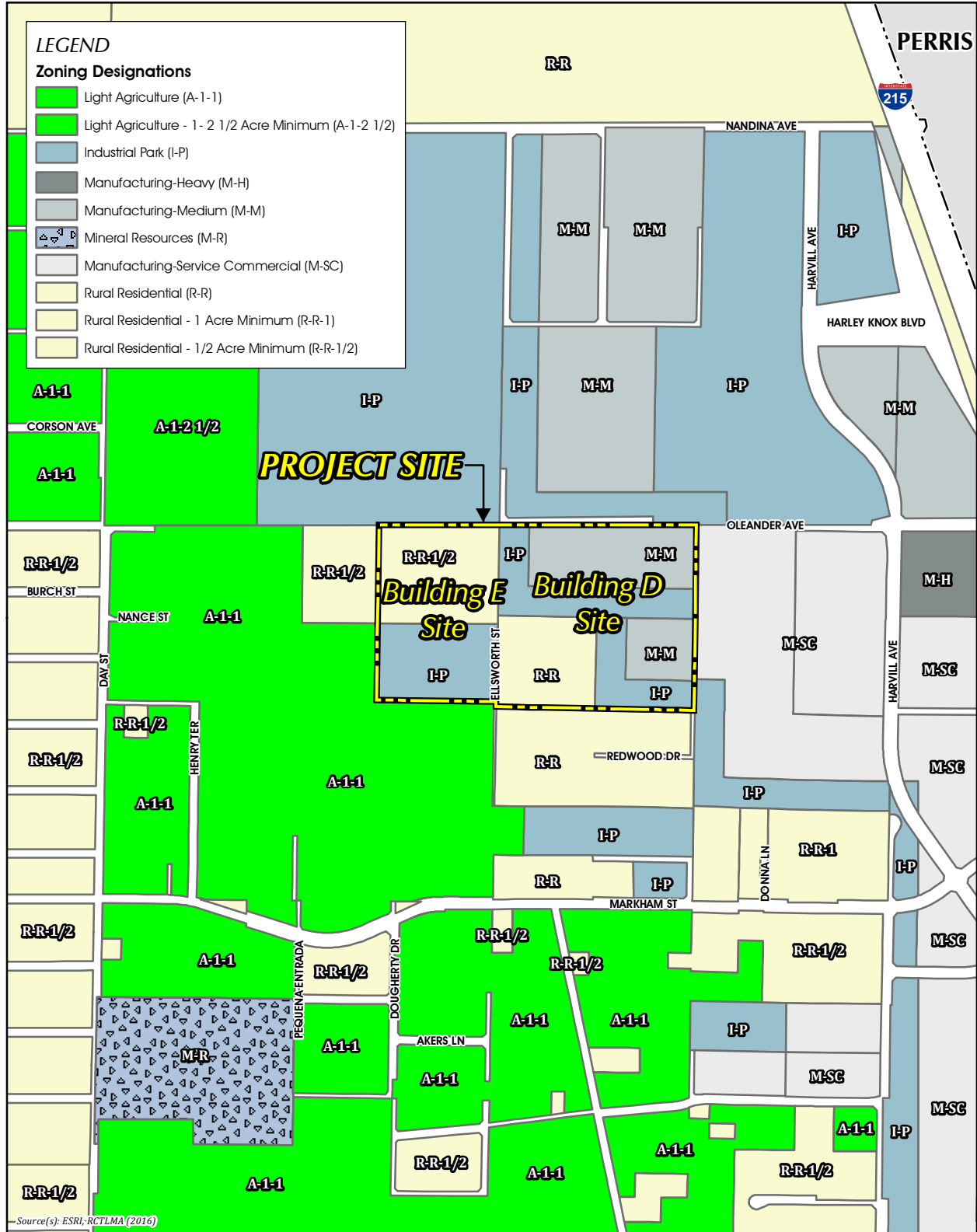
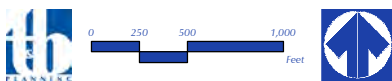


Figure 2-3



EXISTING ZONING DESIGNATIONS



approval of a conditional use permit. The “R-R-1/2” zoning designation allows for single-family dwellings and small-scale agricultural uses. The “I-P” zoning designation allows for industrial and manufacturing uses with approval of a plot plan, and certain specified service and commercial uses with approval of a plot plan.

2.4.3 SCAG REGIONAL TRANSPORTATION PLAN

SCAG is a Joint Powers Authority (JPA) under California state law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under state law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles. SCAG develops long-range regional transportation plans including sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations and other plans for the region.

As a MPO and public agency, SCAG develops transportation and housing plans that transcend jurisdictional boundaries that affect the quality of life for southern California as a whole. SCAG’s *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)* includes a chapter titled “Goods Movement” that is applicable to the proposed Project because the Project proposes two business park warehouse buildings in the SCAG region that could support a variety of light industrial, distribution warehousing, and logistics users. The *2012-2035 RTP/SCS* states that the SCAG region hosts one of the largest clusters of logistics activity in North America. Logistics activities, and the jobs that go with them, depend on a network of warehousing and distribution facilities, highway and rail connections, and intermodal rail yards. To that end, the *Goods Movement Appendix* of the *RTP/SCS* sets forth regional strategies to achieve an efficient movement of goods, which states the following:

“Goods movement and freight transportation are essential to supporting the SCAG regional economy and quality of life. The goods movement system in the SCAG region is a multimodal, coordinated network that includes deep water marine ports, international border crossings, Class I rail lines, interstate highways, state routes and local roads, air cargo facilities, intermodal facilities, and regional distribution and warehousing clusters. In 2010, over 1.15 billion tons of cargo valued at almost \$2 trillion moved across the region’s transportation system. Whether carrying imported goods from the San Pedro Bay Ports to regional distribution centers, supplying materials for local manufacturers, or delivering consumer goods to SCAG residents, the movement of freight provides the goods and services needed to sustain regional industries and consumers on a daily basis.” (SCAG, 2012c, p. 1)

According to SCAG’s *Comprehensive Regional Goods Movement Plan and Implementation Strategy*, the SCAG region is forecasted to have a demand for over one billion square feet of warehousing space



by the year 2035, including a demand for 943 million square feet of non-port warehouse space (SCAG, 2013, pp. 4-39 and 4-40). However, SCAG projects that the region will run out of suitably zoned vacant land designated for warehouse facilities around the year 2028 unless other land not currently zoned for warehousing becomes available (SCAG, 2013, p. 4-39).

Within the SCAG region, Riverside County contains the largest share of undeveloped space suitable for industrial warehouse development (60.0 million square feet, 32.2%), of which the vast majority (67.5%) is located in outlying desert areas (SCAG, 2013, p. 3-34). A substantial amount of available industrial land is located in the vicinity of the SR-60 corridor, particularly in Moreno Valley, Perris, and unincorporated areas near March Air Reserve Base. Approximately 50% of the SCAG region's projected future industrial warehouse space is located within a five (5) mile radius of SR-60 (SCAG, 2013, p. 6-16).

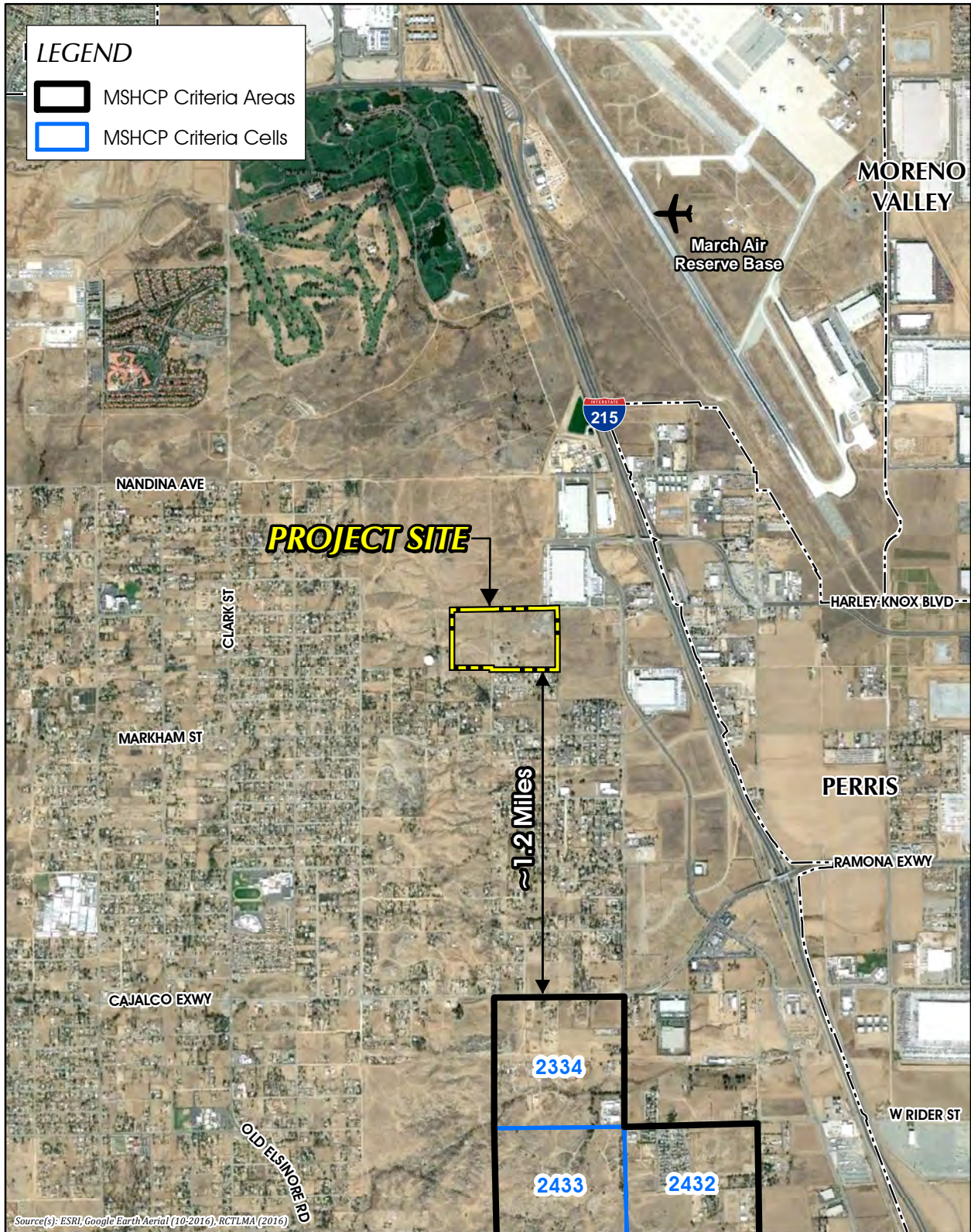
2.4.4 RIVERSIDE COUNTY AIRPORT LAND USE COMPATIBILITY PLAN

The MARB Airport Land Use Compatibility Plan (ALUCP) identifies land use standards and design criteria for new development located in the proximity of the MARB to ensure compatibility between the airport and surrounding land uses and to maximize public safety. The Project site is located within the influence area of MARB and is subject to the March Air Reserve Base ALUCP. The Project site is located within Compatibility Zone C2 of the ALUCP. According to ALUCP Table MA-2, *Base Compatibility Criteria*, within Compatibility Zone C2, highly noise-sensitive outdoor residential uses and hazards to flight are prohibited. In addition, children's schools are discouraged, airspace review is required for objects greater than 70 feet tall, and the MARB must be notified of any land use having an electromagnetic radiation component to assess whether a potential conflict with Air Base radio communications could result. (RCALUC, 2014, Table MA-2)

2.4.5 WESTERN RIVERSIDE COUNTY MULTIPLE SPECIES HABITAT CONSERVATION PLAN

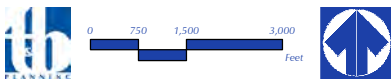
The Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), a regional Habitat Conservation Plan (HCP), was adopted on June 17, 2003, and an Implementing Agreement (IA) was executed between the United States Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and participating entities. The intent of the Western Riverside County MSHCP is to preserve native vegetation and meet the habitat needs of multiple species, rather than focusing preservation efforts on one species at a time. The MSHCP identifies Criteria Areas, in which habitat conservation efforts are targeted. As shown on Figure 2-4, *MSHCP Criteria Areas*, the Project site is not located within any MSHCP Criteria Cells; thus, the Project site is not targeted for conservation under the MSHCP.

The Building D Site and the Building E Site are located within the MSHCP Mead Valley Area Plan of the Western Riverside County MSHCP. However, the Building D Site and the Building E Site are not located within an MSHCP Criteria Cell or Area Plan Subunit (RCIT, 2015) (Cadre, 2015a, p. 4) (HES, 2015b, p. 9) The nearest MSHCP Criteria Cell is located approximately 1.2 miles south of the Project site (Cell No. 2334). Additionally, according to the MSHCP Conservation Summary Report Generator



Source(s): ESRI, Google Earth Aerial (10-2016), RCTLMA (2016)

Figure 2-4



MSHCP CRITERIA AREAS



the Project site is not located in a special linkage area, nor is the Project site located within the Criteria Area Species Survey Area (CASSA) for amphibian species, mammals, or narrow endemic plants (pursuant to MSHCP Section 6.3.2). Additionally, the Project site is not located within any narrow endemic plant species survey areas (pursuant to MSHCP Section 6.3.2), nor is the Project site subject to the MSHCP Urban/Wildland Interface Guidelines (pursuant to MSHCP Section 6.1.4), because the Project site is not located near any MSHCP conservation areas. However, the Project site is located within the CASSA for the western burrowing owl, pursuant to MSHCP Section 6.3.2. (RCIT, 2015) (County of Riverside TLMA, 2015) The Project site also is located in the Stephens' Kangaroo Rat (SKR) Habitat Conservation Plan (HCP) and lies within the known range of this species. (RCIT, 2015)

Refer to EIR Section 4.4, *Biological Resources*, for a detailed discussion of the Project site's existing biological setting.

2.5 EXISTING PHYSICAL SITE CONDITIONS

Pursuant to CEQA Guidelines § 15125, the physical environmental conditions for purposes of establishing the setting of an EIR is the environment as it existed at the time the EIR's NOP was released for public review. The NOP for this EIR was released for public review on August 31, 2015, and the following subsections provide a description of the Project site's physical environmental conditions as of that approximate date ("existing conditions"). More information regarding the Project site's environmental setting is provided in the various subsections of EIR Section 4.0, *Environmental Analysis*.

2.5.1 LAND USE

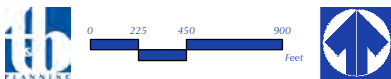
As depicted on Figure 2-5, *Aerial Photograph*, the Project site consists of vacant, undeveloped land, with exception of the southwestern portion of the Building D Site that contains a mobile home, outbuildings, and a concrete pad that is used for the storage of construction equipment. The undeveloped portions of the Project site are regularly maintained for weed abatement and wildfire suppression purposes.

2.5.2 AESTHETICS AND TOPOGRAPHIC FEATURES

As shown on Figure 3-3, *USGS Topographical Map*, in EIR Section 3.0, the Project site ranges in elevation from a high point of approximately 1,665 feet above mean sea level (AMSL) at the western portion of the Building E Site to a low point of approximately 1,556 feet AMSL at the northeastern portion of the Building D Site. Portions of the Project site (i.e., the southwestern corner of the Building D Site and western portion of the Building E Site) contain mature trees. Additionally, portions of the Project site contain rock outcroppings. The Project site is transected in a north to south direction by Ellsworth Street, an unimproved dirt roadway, which separates the Building D Site from the Building E Site. In addition, several dirt roadways traverse the south-central and western portions of the Building E Site.



Figure 2-5



AERIAL PHOTOGRAPH



There are no prominent scenic vistas or views open to the public available at the Project site. The surrounding area contains rural and suburban development, the I-215 freeway, the MARB, and industrial lands to the east and north, and rural residential and business venture uses to the south and west. The only potential scenic resource identified by the Moreno Valley Area Plan (MVAP) in the immediately surrounding area is the Gavilan Hills, located approximately 3.5 miles southwest of the Project site.

Refer to EIR Subsection 4.1, *Aesthetics*, for a detailed discussion of the Project site's existing aesthetic and topographic setting.

2.5.3 AGRICULTURAL SETTING

According to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency (and as reported by Riverside County GIS), the Project site contains land classified by the FMMP as "Other Lands" and "Farmland of Local Importance." No portions of the Project site are mapped as containing Prime Farmland, Farmland of Statewide Importance, or Unique Farmland ("Farmland"). No property in the immediately surrounding area is used for commercial agricultural production. According to mapping information available from the California Department of Conservation (CDC) and Riverside County, the Project site is not included within or near any active Agricultural Preserves or Williamson Act contracts. (RCIT, 2015) (CDC, 2014) (CDC, 2012)

Refer to EIR Subsection 4.2, *Agricultural Resources*, for a detailed discussion of the Project area's existing agricultural setting.

2.5.4 AIR QUALITY AND CLIMATE

The Project site is located in the 6,745-square-mile South Coast Air Basin (SCAB), which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is bound by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The SCAB is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD), the agency charged with bringing air quality in the SCAB into conformity with federal and state air quality standards. As documented in the Project's air quality impact analysis (*Technical Appendix B1* to this EIR), although the climate of the SCAB is characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. More than 90% of the SCAB's rainfall occurs from November through April. Temperatures during the year range from an average minimum of 36°F in January to over 100°F maximum in the summer. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with the traveling storms moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed "Santa Ana[s]" each year.

Although air quality in the SCAB has improved over the past several decades, according to the SCAQMD, the SCAB currently does not meet state or federal criteria for ozone (8-hour standard) or particulate matter (<2.5 microns, or PM_{2.5}), and does not meet the state criteria for ozone (1-hour



standard) or particulate matter (<10 microns, or PM₁₀) (CARB, 2014). The SCAQMD conducts in-depth analysis of toxic air contaminants and their resulting health risks for all of Southern California. This study, entitled *Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES IV)*, predicted an excess cancer risk of 211.33 in one million for the vicinity of the Project site. (SCAQMD, 2015)

Refer to EIR Subsections 4.3, *Air Quality*, and 4.7, *Greenhouse Gas Emissions*, for a detailed discussion of the Project site's existing air quality and climatic setting.

2.5.5 CULTURAL RESOURCE SETTING

From an archaeological perspective, regional prehistory within the Project area is defined by the Paleo-Indian Period (11,500 to 9,000 years ago), the Archaic Period (9,000 to 1,300 years ago), and the Late Prehistoric Period (approximately 1,300 years ago). Each of these periods in prehistory are discussed in EIR Subsection 4.5, *Cultural Resources*. In summary, human habitation of Southern California dates back to approximately 11,500 years ago. Over a series of cultural periods, the area transitioned from a hunting and gathering society, to settlements of small groups of people, to large occupations near natural water sources, to formations of distinct ethnographic groups. The Late Prehistoric component in the area of western Riverside County was represented by the Luiseño with influences from the Gabrielino, Cahuilla, and Serrano Indians. (BFSa, 2015a, pp. 2.0-5 through 2.0-7) (BFSa, 2015b, pp. 2.05 through 2.0-7)

The Project site is located within the vicinity of a Payómkawichum village complex recognized by Native American tribes and known as Qaxáalku. The village complex is located off-site and to the west of the Project site. As part of the SB18 and AB52 consultation processes, the County of Riverside received information from the Pechanga Band of Luiseño Indians asserting that the Project site is part of a cultural landscape extending several miles around the Project site and consisting of related archaeological sites associated with either the village of Qaxáalku or a smaller (unnamed) village. However, the County does not have the substantial evidence necessary to conclude that the Project site is part of landscape that meets the definition of a tribal cultural resource as defined by California Public Resources Code § 21074 and the State CEQA Guidelines. Further, the individual archaeological resources that are known to be located on the Project site are not significant sites under CEQA, as evidenced from a Phase II testing program.

The Project site is not known to have historical significance to the region and does not contain any resources recognized by the National Register of Historic Places (NHRP), California Registered Historic Landmarks Architecture (CRHL), California Points of Historic Interest (CPHI), or Riverside County Historical Landmarks (RCHL) (Riverside County, 2015d, Figure 4.9-2).

Refer to EIR Subsection 4.5, *Cultural Resources*, for a more detailed discussion of the Project site's existing cultural resource setting.



2.5.6 GEOLOGY AND SOILS

The Project site does not contain any known seismic fault lines and is not located within an Alquist-Priolo Fault Zone or County-designated fault hazard zone. (Riverside County, 2003a, Figure S-2). The nearest Alquist-Priolo Zone is located approximately 4.2 miles northeast of the Project site and the nearest Riverside County Fault Hazard Zone is located approximately 9.3 miles east of the Project site (Riverside County, 2003a, Figure S-3)(RCIT, 2015). As with all areas of southern California, the Project site is located in an area subject to seismic hazards associated with strong ground shaking resulting from activity on local and regional faults.

The surficial soils on the Project site are comprised of artificial fills in the southwestern and northeastern portion of the Project site and Quaternary Very Old Alluvial Fan Deposits and Cretaceous Val Verde Tonalite. The Very Old Alluvial fan deposits overlie the majority of the eastern portion of the Project site to depths of 3 to 12 feet. The Val Verde Tonalite underlies the balance of the Project site below the alluvium and in some areas, exposed at the surface. Large granitic outcroppings associated with the Tonalite exist on the south and southeastern portion of the Project site. (Matrix, 2014, p. 8) (Matrix, 2015, p. 6)

Refer to EIR Subsection 4.6, *Geology and Soils*, for a detailed discussion of the Project site's existing geological setting.

2.5.7 HYDROLOGY AND WATER QUALITY

The Project site is located in the San Jacinto and the San Jacinto River Sub-Watershed of the greater Santa Ana River Watershed. The Santa Ana River Watershed drains a 2,650 square-mile area. The Santa Ana River drains the largest coastal system in southern California and flows over 100 miles to a discharge point into the Pacific Ocean at the location of the City of Huntington Beach. (SAWPA, 2014a, Section 3.0)

The Project site is not located within an area subject to 100-year flood hazards. The nearest 100-year flood hazard area is located approximately 0.25 mile northwest of the Project site. (FEMA, 2015) Under existing conditions, stormwater runoff drains across the Project site from west to east (DEA, 2017). Groundwater is present on the Project site at an approximate depth of 20 feet. (Matrix, 2014, p. 4) (Matrix, 2015 pp. 4 and 7)

Refer to EIR Subsection 4.9, *Hydrology and Water Quality*, for a detailed discussion of the Project site's existing hydrology and water quality setting.

2.5.8 NOISE

The background ambient noise levels in the Project study area are dominated by vehicle noise from the nearby arterial roadway network and aircraft noise from the MARB. Secondary background ambient noise is also included in the noise level measurements from existing stationary noise sources in the Project study area, such as the existing warehouse/distribution building located northeast of the



Project site. Urban Crossroads, Inc. collected 24-hour noise measurements at seven (7) locations in the Project area from March 31 to April 1, 2015. Measured hourly noise levels in the study area ranged from 60.0 equivalent level decibels (dBA Leq) to 70.5 dBA Leq which correlates to a Community Noise Level (CNEL) from 67.0 CNEL to 75.1 CNEL (Urban Crossroads, Inc., 2017b, Table 5-1).

Refer to EIR Subsection 4.11, *Noise*, for a detailed discussion of the Project site's existing noise setting.

2.5.9 PALEONTOLOGICAL RESOURCE SETTING

No fossil remains are known to underlie the Project site. According to data compiled by Riverside County during preparation of the County's General Plan, the entire Building E Site and majority of the Building D Site have "Low" paleontological sensitivity. The northeastern corner of the Building D Site has "High B" paleontological sensitivity (refer to Figure 4.17-1, *Paleontological Sensitivity Map*). Based on this information, there is a potential for fossil bearing rock formations to be present beneath the northeastern portion of the Project site. (BFSa, 2015c, pp. 2-3)

Refer to EIR Subsection 4.17, *Paleontological Resources*, for a detailed discussion of the Project site's paleontological setting.

2.5.10 TRANSPORTATION AND TRAFFIC

The Project site is vacant with the exception of a mobile home, out structures, and a concrete parking pad for construction equipment. As such, a nominal amount of traffic is generated by the Project site under existing conditions. Major vehicular travel routes in the region include I-215, SR-60, State Route 91 (SR-91), and Interstate 15 (I-15). Local roads in the Project site's vicinity include Oleander Avenue, Ellsworth Street (which transects the Project site), and Harvill Avenue. Several local roads are unpaved. Existing traffic on nearby roadways consists of both passenger vehicles and heavy trucks. Field observations conducted in April 2015 by Urban Crossroads, Inc. indicated nominal pedestrian and bicycle activity within the Project area (Urban Crossroads, Inc., 2015e, p. 31).

Refer to EIR Subsection 4.15, *Transportation and Traffic*, for a detailed discussion of the Project site's existing transportation and circulation setting.

2.5.11 UTILITIES AND SERVICE SYSTEMS

The Project site is serviced by the Eastern Municipal Water District (EMWD) for domestic water and sewer service. EMWD manages the domestic water supply and delivery service within its 555 square mile service area. As documented in EMWD's 2010 Urban Water Management Plan, EMWD has four sources of water supply: 1) imported water from the Metropolitan Water District (MWD); 2) recycled water; 3) local groundwater production; and 4) desalted groundwater (EMWD, 2011, Chapter 3). EMWD has an adopted Water Shortage Contingency Plan (EMWD Ordinance 117.2) that applies regulations and restrictions on the delivery of and consumption of water during water shortages. Regarding sewer collection and treatment, EMWD collects and treats all of the wastewater collected in its service area to tertiary standards.



Solid waste collection and disposal in the Project area is conducted by Waste Management of the Inland Empire, a division of Waste Management, Inc. Landfills that have the potential of receiving solid waste from the Project site include the El Sobrante Landfill, the Badlands Sanitary Landfill, and the Lamb Canyon Sanitary Landfill.

Refer to EIR Subsection 4.16, *Utilities and Service Systems*, for a detailed discussion of the Project site's existing and utilities and service systems.

2.5.12 VEGETATION AND HABITAT CLASSIFICATIONS

As disclosed above in Subsection 2.4.5, the Project site is not located within or adjacent to any area designated for habitat preservation by the Western Riverside County MSHCP. Plant communities and habitat classifications observed on the Building D Site were documented by Cadre Environmental (Cadre) as: disturbed, gravel road/splay, structure, and trees (non-native Olive trees, Peruvian Pepper trees, and Mexican Palo Verde trees) (Cadre, 2015a, pp. 8-9). The plant communities and habitat classifications observed on the Building E Site were documented by Hernandez Environmental Services (HES) as: disturbed non-native vegetation, disturbed non-vegetated, Peruvian Pepper trees, and granitic rock outcrops (HES, 2015b, pp. 6-7). An ephemeral drainage feature that meets the MSHCP definition of a riparian/riverine feature, because it receives fresh water flow all or part of the year, crosses the Project site and encompasses 0.09-acre (677 linear feet) of the Building D Site and 0.11-acre (690 linear feet) of the Building E Site.

Refer to EIR Subsection 4.4, *Biological Resources*, for a detailed discussion of the Project site's biological resources.

2.5.13 WILDLIFE

The Project site occurs within a predetermined Survey Area for the western burrowing owl (*Athene cunicularia*). During field surveys, Cadre detected a single adult burrowing owl foraging and utilizing a network of burrow sites within the Building D Site and HES observed a single burrowing owl outside of its burrow in the north central portion of the Building E Site (Cadre, 2015a, pp. 2,6,8) (HES, 2015c, n.p.). In addition, two San Diego black-tailed jackrabbit (*Lepus californicus bennetti*) individuals, a California Species of Concern (CSC), were identified by Cadre during their field survey on the Building D Site. (Cadre, 2015a, p. 16)

2.5.14 RARE AND UNIQUE RESOURCES

As required by CEQA Guidelines Section 15125(c), the environmental setting should identify any inconsistencies between a proposed project and applicable general, specific, or regional plans, and place special emphasis on resources that are rare or unique to that region and would be affected by the project. The Project Applicant proposes to develop an approximately 58.6-acre property to accommodate two business park warehouse buildings. The principal discretionary actions required of Riverside County to implement the Project are described in detail in Section 3.0, *Project Description* and are listed in Table 3-2, *Matrix of Project Approvals/Permits*. As noted, the Project Applicant



proposes to change the land use and zoning designations on portions of the property; as such, the proposed Project is not consistent with the existing General Plan designations. The potential environmental effects associated with this inconsistency are evaluated in Section 4.0, *Environmental Analysis*, of this EIR. Based on the existing conditions of the Project site and surrounding area described above and discussed in more detail in Section 4.0, *Environmental Analysis*, the Project site does not contain any resources that are rare or unique to the region. In regards to Native American resources, a Payómkawichum village complex recognized by Native American tribes known as Qaxáalku is located off-site and to the west of the Project site. As part of the SB18 and AB52 consultation processes, the County of Riverside received information from the Pechanga Band of Luiseño Indians asserting that the Project site is part of a cultural landscape extending several miles around the Project site and consisting of related archaeological sites associated with either the village of Qaxáalku or a smaller (unnamed) village. However, the County does not have the substantial evidence necessary to conclude that the Project site is part of landscape that meets the definition of a tribal cultural resource as defined by California Public Resources Code § 21074 and the State CEQA Guidelines. Further, the individual archaeological resources that are known to be located on the Project site are not significant sites under CEQA, as evidenced from a Phase II testing program. Therefore, the archaeological resources present on the Project site are not considered to be rare or unique.



3.0 PROJECT DESCRIPTION

This section provides all of the information required of an EIR Project Description by CEQA Guidelines § 15124, including a description of the Project’s precise location and boundaries; a statement of the Project’s objectives; a description of the Project’s technical, economic, and environmental characteristics; and a description of the intended uses of this EIR, including a list of the governmental agencies that are expected to use this EIR in their decision-making processes, a list of the permits and approvals that are required to implement the Project, and a list of related environmental review and consultation requirements.

The Project evaluated by this EIR encompasses two separate, independent projects, referred to herein as Knox Business Park Building D and Knox Business Park Building E. Because these projects are adjacent and are proposed by the same Project Applicant, CEQA requires that they be evaluated as a single project. CEQA prohibits piecemeal environmental review of projects with related impacts that could be considered a single project. The Building D Site is located on approximately 37.1 acres east of Ellsworth Street and the Building E Site is located on approximately 21.5 acres west of Ellsworth Street. Both properties are collectively referred to in this EIR as the “Project site” and individually as the “Building D Site” and the “Building E Site.” Both projects are collectively referred to in this EIR as the “Project” and individually as the “Building D Project” and the “Building E Project.”

Under existing conditions, the approximately 58.6 gross-acre Project site is mostly undeveloped and vacant, with exception of the southwest corner of the Building D Site which contains a mobile home, out structures, and a concrete pad that is used for storage of construction equipment. The proposed Project involves the demolition and removal of the existing structures and associated improvements, grading and preparation of the property for development, and the construction and operation of two business park warehouse buildings (Buildings D and E) with a combined, maximum floor space of 1,113,627 square feet (s.f.). The Building D Site, located south of Oleander Avenue and east of Ellsworth Street (also referred to as “Decker Road” throughout this EIR), would contain one business park warehouse building with a maximum of 702,645 s.f. of building space. The Building E Site located south of Oleander Avenue and west of Ellsworth Street, would contain one business park warehouse building with a maximum of 410,982 s.f. of building space. Associated improvements to the Building D and E Sites would include, but are not limited to, surface parking areas, vehicle drive aisles, truck courts, utility infrastructure, landscaping, exterior lighting, signage, walls and fencing, a guard shack, and water quality/detention basins. Both the Building D Project and the Building E Project also would construct frontage improvements to Ellsworth Street and Oleander Avenue. The Project Applicant proposes to construct Buildings D and E on a speculative basis, meaning that the proposed buildings’ future occupants are not yet known. Building occupants are proposed to be high cube/logistics warehouse uses, which is a permitted use under the County’s Industrial Park (I-P) Zone, and provides a realistic assessment of the potential environmental impacts that would occur once the Project is operational.



This EIR analyzes the physical environmental effects associated with all components of the Project, including planning, construction, and ongoing operation. Governmental approvals requested from the County of Riverside to implement the Project for the Building D Site include General Plan Amendment No. 1151 (GPA 1151), Change of Zone No. 7872 (CZ 7872), Tentative Parcel Map No. 36950 (PM 36950), and Plot Plan No. 25838 (PP 25838). Governmental approvals requested from the County of Riverside to implement the Project for the Building E Site include General Plan Amendment No. 1152 (GPA 1152), Change of Zone No. 7873 (CZ 7873), Tentative Parcel Map No. 36962 (PM 36962), and Plot Plan No. 25837 (PP 25837). These applications, as submitted to the County of Riverside by the Project Applicant, are herein incorporated by reference pursuant to CEQA Guidelines § 15150 and are available for review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, California 92501. All other discretionary and administrative approvals that would be required of the County of Riverside or other government agencies to implement the Project are also within the scope of the Project analyzed in this EIR.

3.1 PROJECT SITE LOCATION

The Building E Site and the Building D Site collectively comprise approximately 58.6 gross acres within the unincorporated community of Mead Valley in the northwestern portion of Riverside County, California (see Figure 3-1, *Regional Map*). The community of Mead Valley is located north and west of the City of Perris, west of the City of Moreno Valley, east of the unincorporated communities of Gavilan Hills and Glen Valley, and south and east of the City of Riverside. Portions of the Mead Valley community, including the Building D Site and Building E Site, are located within the Sphere of Influence (SOI) of the City of Perris. At the local scale, the Project site is located south of Oleander Avenue, north of Redwood Drive, and east and west of Ellsworth Street (also referred to as “Decker Road” throughout this EIR) (see Figure 3-2, *Vicinity Map*). The Project site is located approximately 0.4-mile west of I-215, 5.8 miles southwest of SR-60, and 1.1 miles west of the nearest runway at the March Air Reserve Base (MARB).

The I-215 corridor is an area of Riverside County that is developing as an employment center, containing business park, distribution warehousing, e-commerce, and light industrial land uses. Lands immediately north and east of the Project site are largely undeveloped, with exception of a recently constructed industrial warehouse building located north of Oleander Road and east of Harvill Avenue. These undeveloped properties to the north and east are designated by the County’s General Plan and Mead Valley Area Plan for future development with light industrial uses. To the south of the Project site are scattered, rural residences and business ventures, and undeveloped land. The nearest sensitive receptors are occupied residential structures located to the south of the Project site with the closest off-site residence located about 276 feet from the Building D Site’s southern boundary line. The next closest residence is located about 881 feet from the Building D Site’s southern boundary line, with additional homes located approximately 1,000 feet and further from the Project site. Southwest of the Building E Site is a water tank owned by the Eastern Municipal Water District (EMWD). To the west of the Project site are undeveloped lands, beyond which are single-family homes.

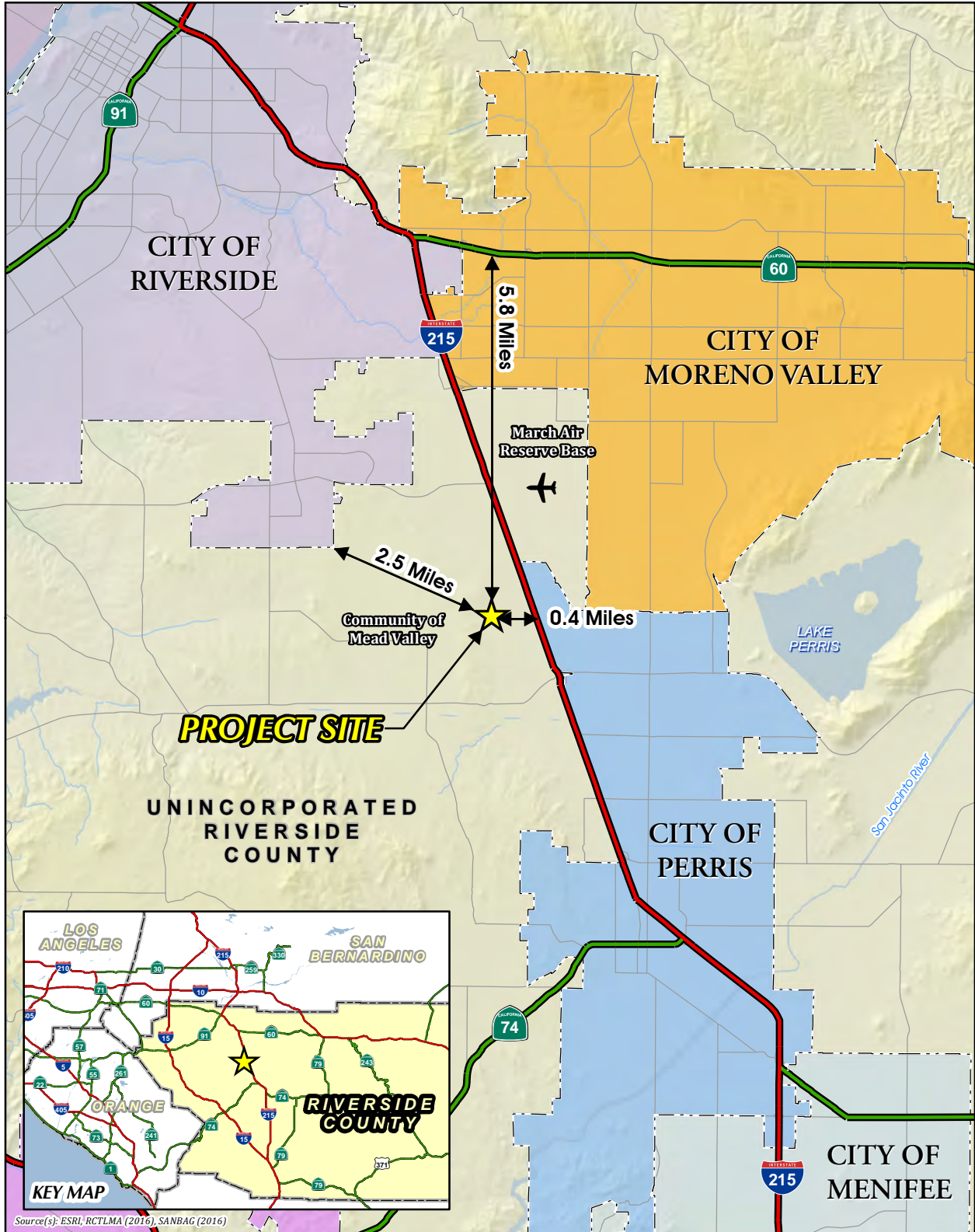
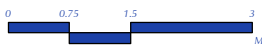


Figure 3-1



REGIONAL MAP

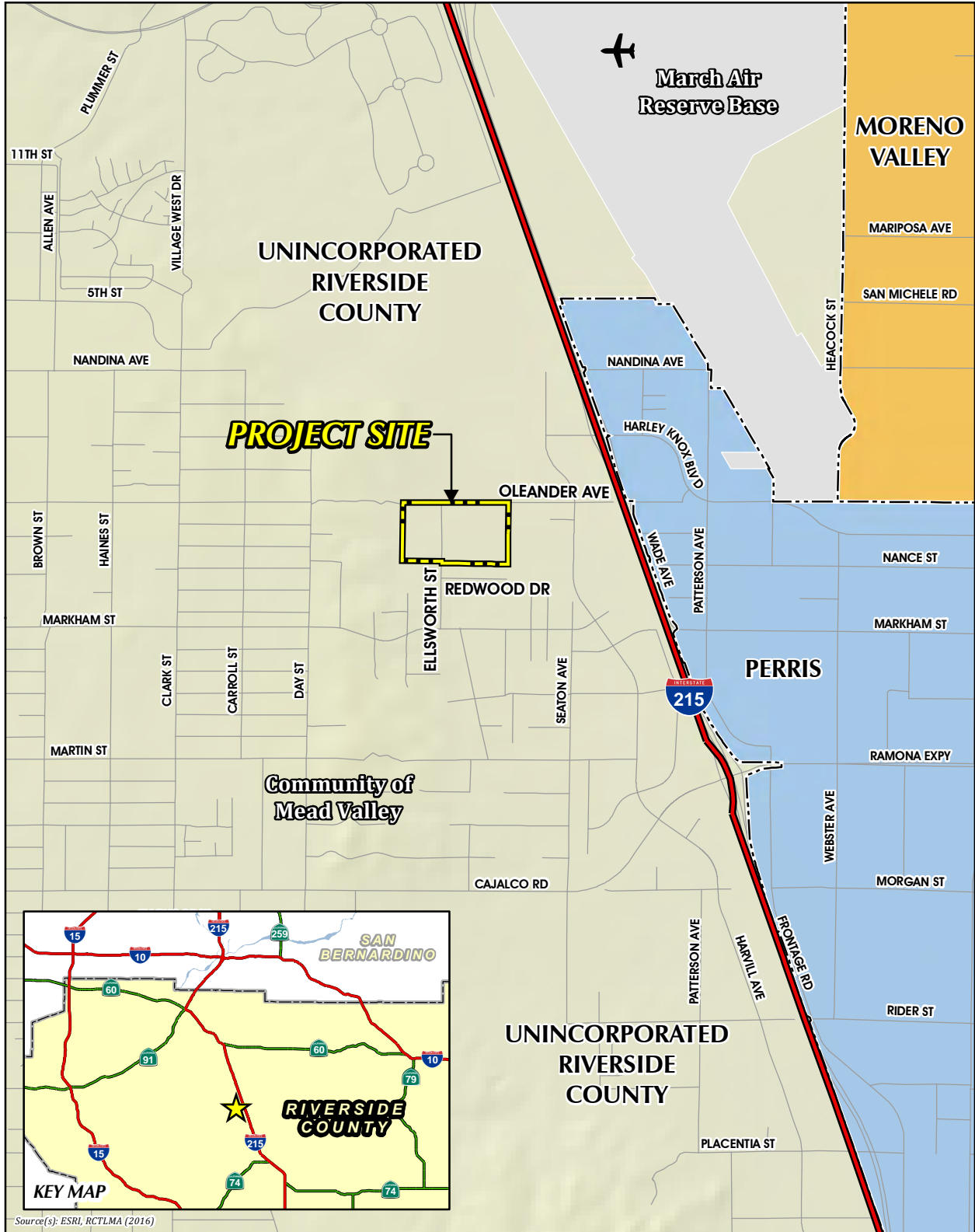
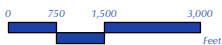


Figure 3-2



VICINITY MAP



As shown on Figure 3-3, *USGS Topographic Map*, the Project site ranges in elevation from a high point of approximately 1,665 feet above mean sea level (AMSL) at the western portion of the Building E Site to a low point of approximately 1,556 feet AMSL at the northeastern portion of the Building D Site.

Additional information about the Project site's location and setting is provided in EIR Section 2.0, *Environmental Setting*.

3.2 STATEMENT OF OBJECTIVES

The underlying purpose of the proposed Project and the County's primary objective is to entitle property in the Mead Valley community for commerce and employment-generating purposes to bring new business and jobs to the area. The objectives pertinent to the proposed Project are as follows:

- A. To develop vacant or underutilized property in Mead Valley in close proximity to I-215 with business park warehouse buildings offering loading bays that can be used as part of the Southern California goods movement network.
- B. To make efficient use of a property in Mead Valley by maximizing its buildout potential for employment-generating uses.
- C. To attract new employment-generating businesses along the I-215 corridor thereby growing the economy and providing a more equal jobs-housing balance in the Riverside County/Inland Empire area that will reduce the need for members of the local workforce to commute outside the area for employment.
- D. To develop Class A business park warehouse buildings in Mead Valley that meet industry standards for modern, operational design criteria and can accommodate a wide variety of users.
- E. To develop vacant or underutilized property in Mead Valley with structures that have architectural design and operational characteristics that complements other new developments in the immediate vicinity.
- F. To develop business park warehouse buildings that are economically competitive with similar industrial business park buildings in the local area and region.

3.3 PROJECT'S COMPONENT PARTS

The Project is a proposal to develop two business park warehouse buildings, Building D and Building E, on approximately 58.6 gross acres. The principal discretionary actions required of Riverside County to implement the Project are described in detail on the following pages and are listed in Table 3-2, *Matrix of Project Approvals/Permits*, at the end of this EIR section.

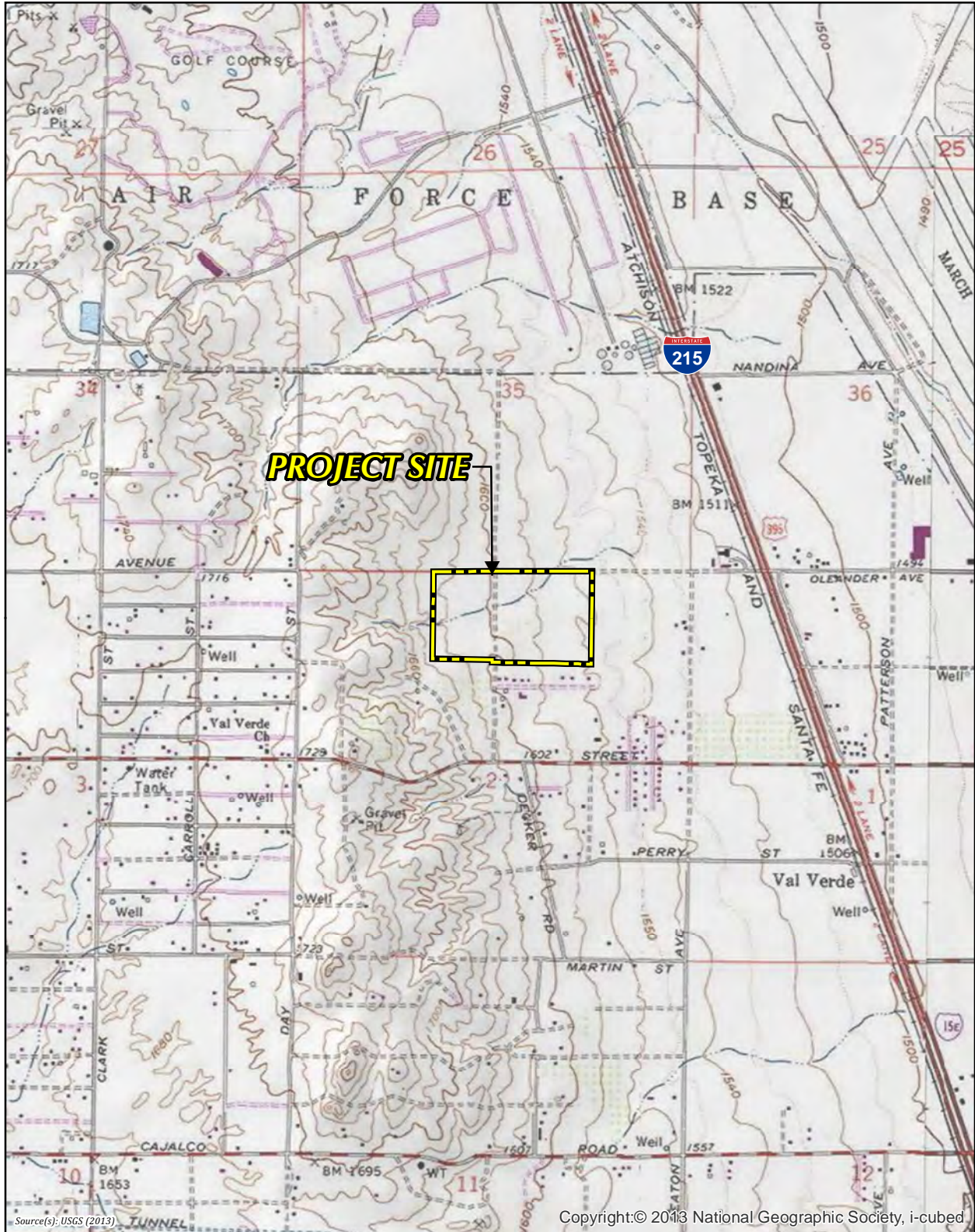
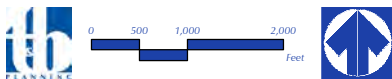


Figure 3-3



USGS TOPOGRAPHIC MAP



3.3.2 BUILDING D APPLICATIONS

A. General Plan Amendment No. 1151 (GPA 1151)

The Building D Site is designated “Community Development-Light Industrial (CD-LI)” and “Community Development-Business Park (CD-BP)” by the Riverside County General Plan under existing conditions. GPA 1151 would change the land use designation of the portion of the property designated CD-BP to CD-LI so that the entire Building D Site is designated CD-LI, as depicted on Figure 3-4, *General Plan Amendment – Building D Site*.

B. Change of Zone No. 7872 (CZ 7872)

The Building D Site is zoned “Manufacturing – Medium (M-M),” “Industrial Park (I-P),” and “Rural Residential (R-R)” under existing conditions. CZ 7872 would change the zoning designations of the portions of the property zoned M-M and R-R to I-P, so that the entire Building D Site is zoned I-P, as depicted on Figure 3-5, *Change of Zone – Building D Site*.

C. Tentative Parcel Map No. 36950 (PM 36950)

Tentative Parcel Map No. 36950 (PM 36950) proposes to consolidate the four parcels on the Building D Site into one, approximately 34.5-net-acre parcel as depicted on Figure 3-6, *Tentative Parcel Map No. 36950 (Building D Site)*. In addition, PM 36950 identifies the earthwork and grading and stormwater drainage improvements needed on the Building D Site to support proposed development, as summarized below, as well as the roadway and utility infrastructure improvements required to support proposed development, as presented later in Subsection 3.4, *Technical Characteristics*.

1. *Earthwork and Grading*

Grading would occur over the entire Building D Site; no portion of the site would be left undisturbed. Proposed earthwork activities would result in approximately 192,500 cubic yards of cut and 192,500 cubic yard of fill. Based on the expected shrinkage and compaction of on-site soils, earthwork activities are expected to balance and no import or export of soil materials would be required. When grading is complete, the building pad would sit approximately 17 feet below the ground elevation of Ellsworth Street and abutting property to the south, and the property would have a slight west-to-east-slope as depicted on Figure 3-7, *Conceptual Grading Plan – Building D Site*. After grading, the highest point of the property would be its southwest corner (approximately 1,602 feet AMSL) and the lowest point of the property would be its northeast corner (approximately 1,560 AMSL). To accommodate the proposed grading concept, manufactured slopes measuring up to 17-feet in height with a maximum incline of 47.8% would be required, as would retaining walls ranging in height from four to 12-feet tall along the southern and western portions of the property.

2. *Stormwater Plan*

A system of trench drains, drop inlets, underground storm drain pipes, and a bioretention/detention basin are proposed to be installed on the Building D Site to collect, treat, and temporarily store

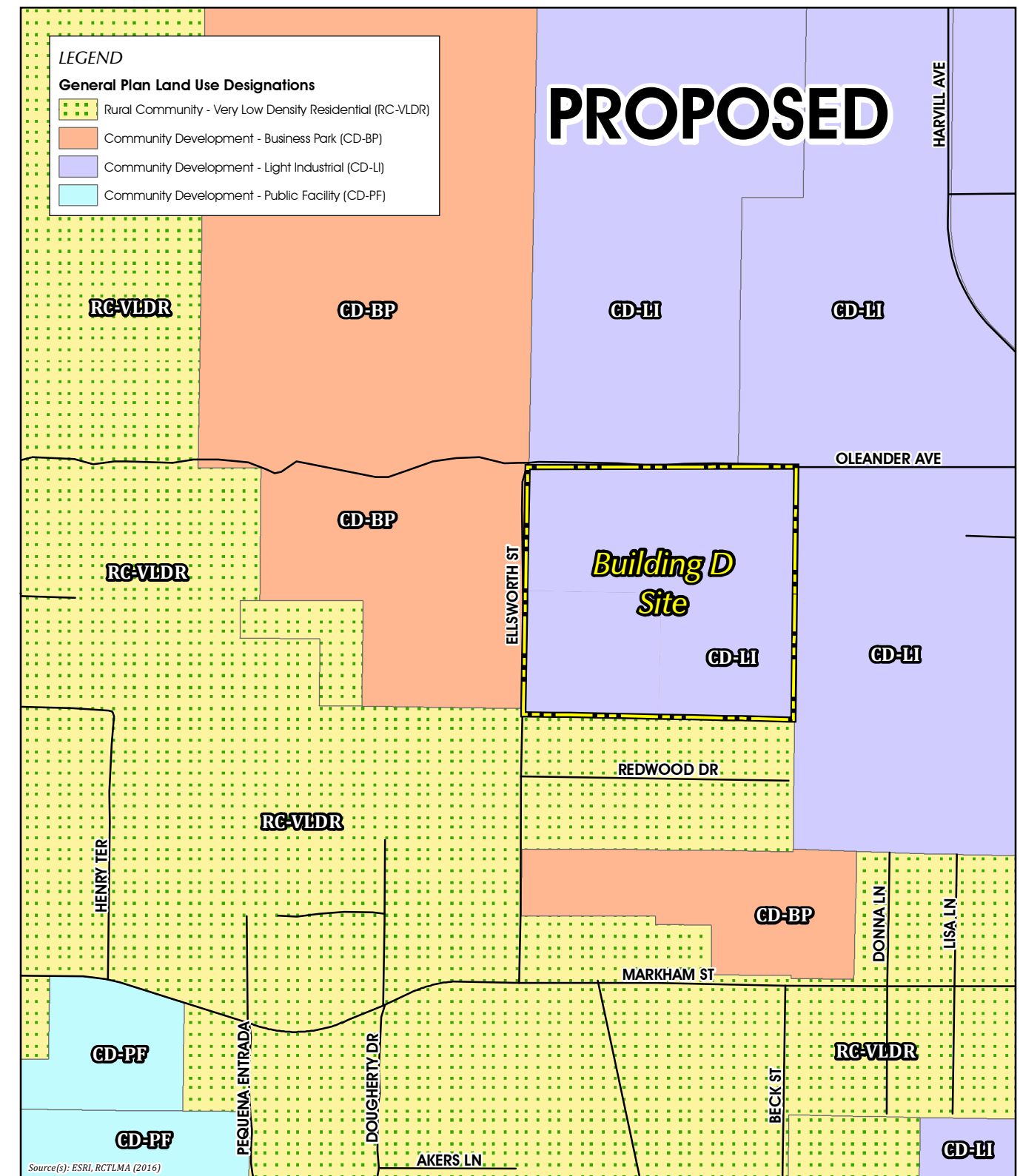
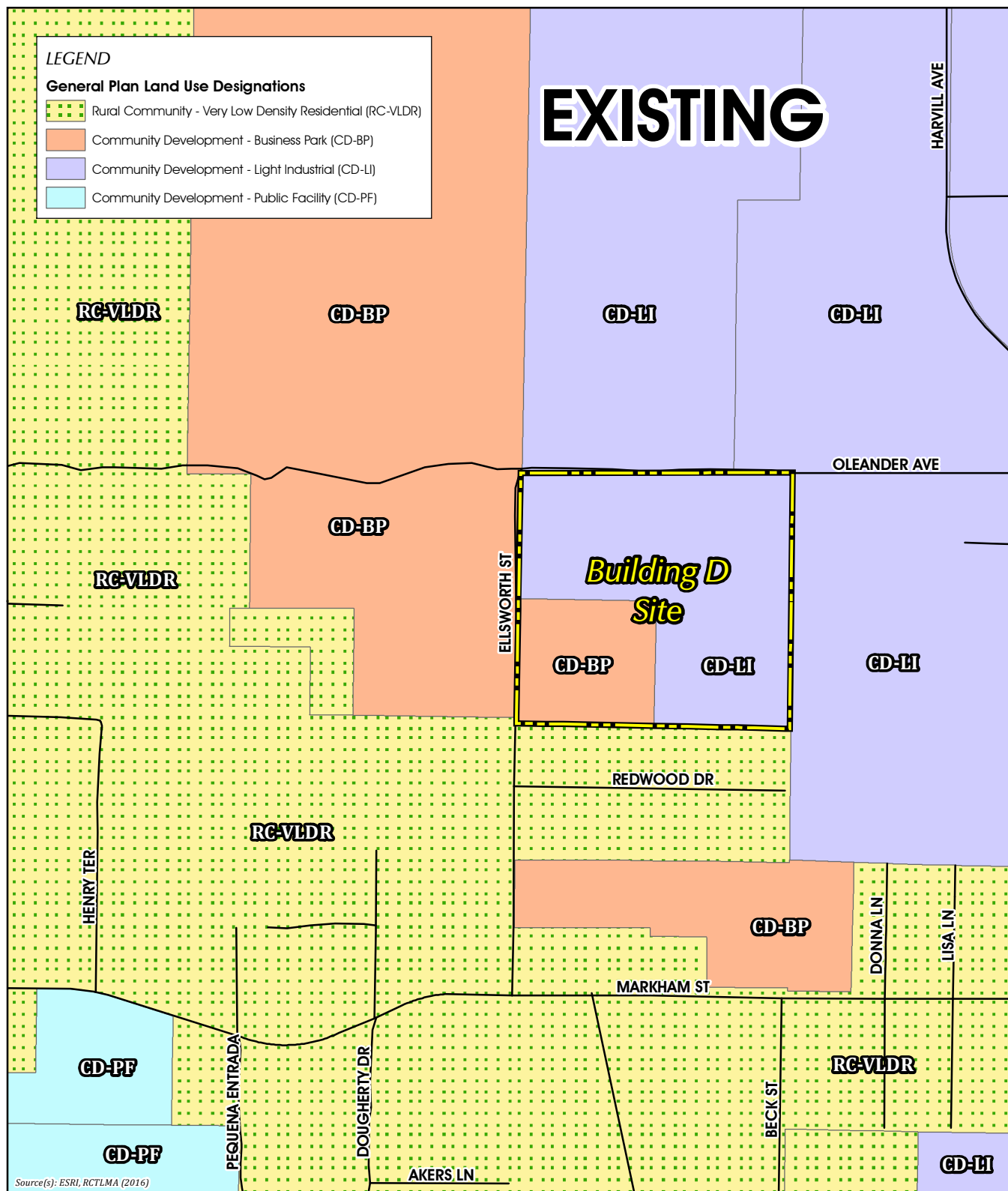
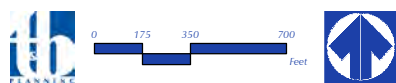


Figure 3-4



GENERAL PLAN AMENDMENT - BUILDING D SITE

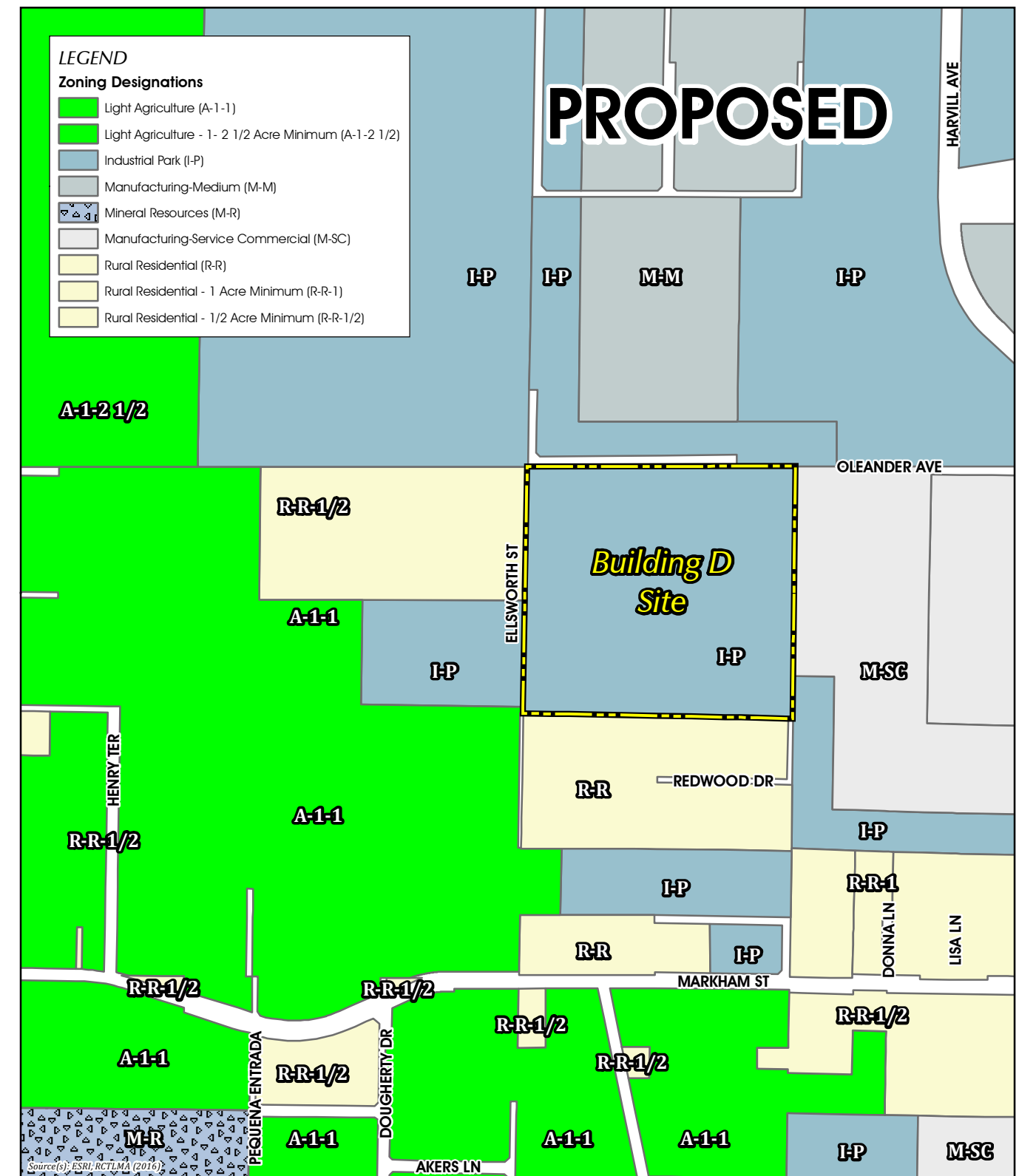
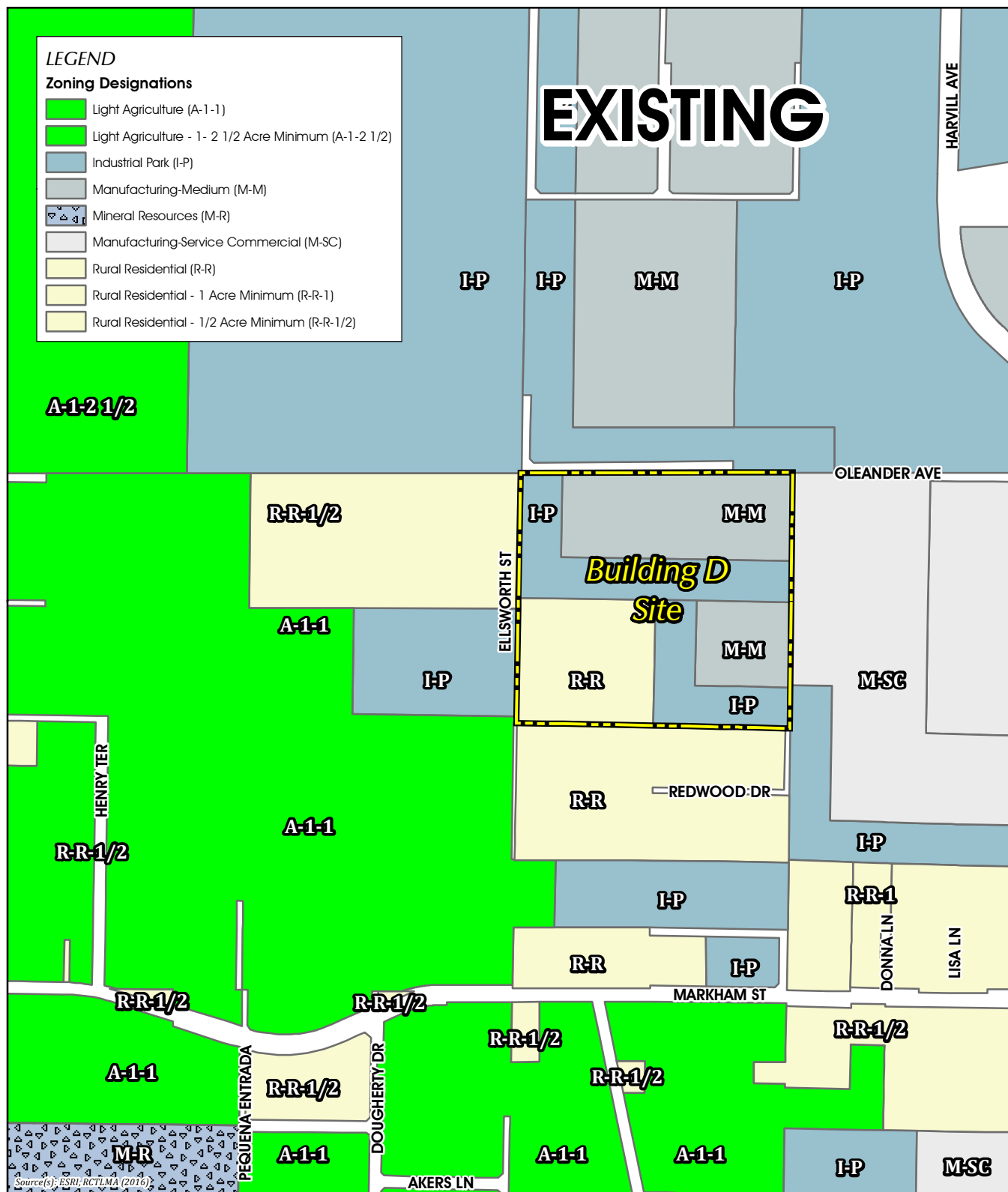
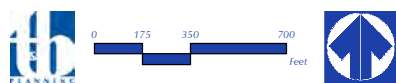
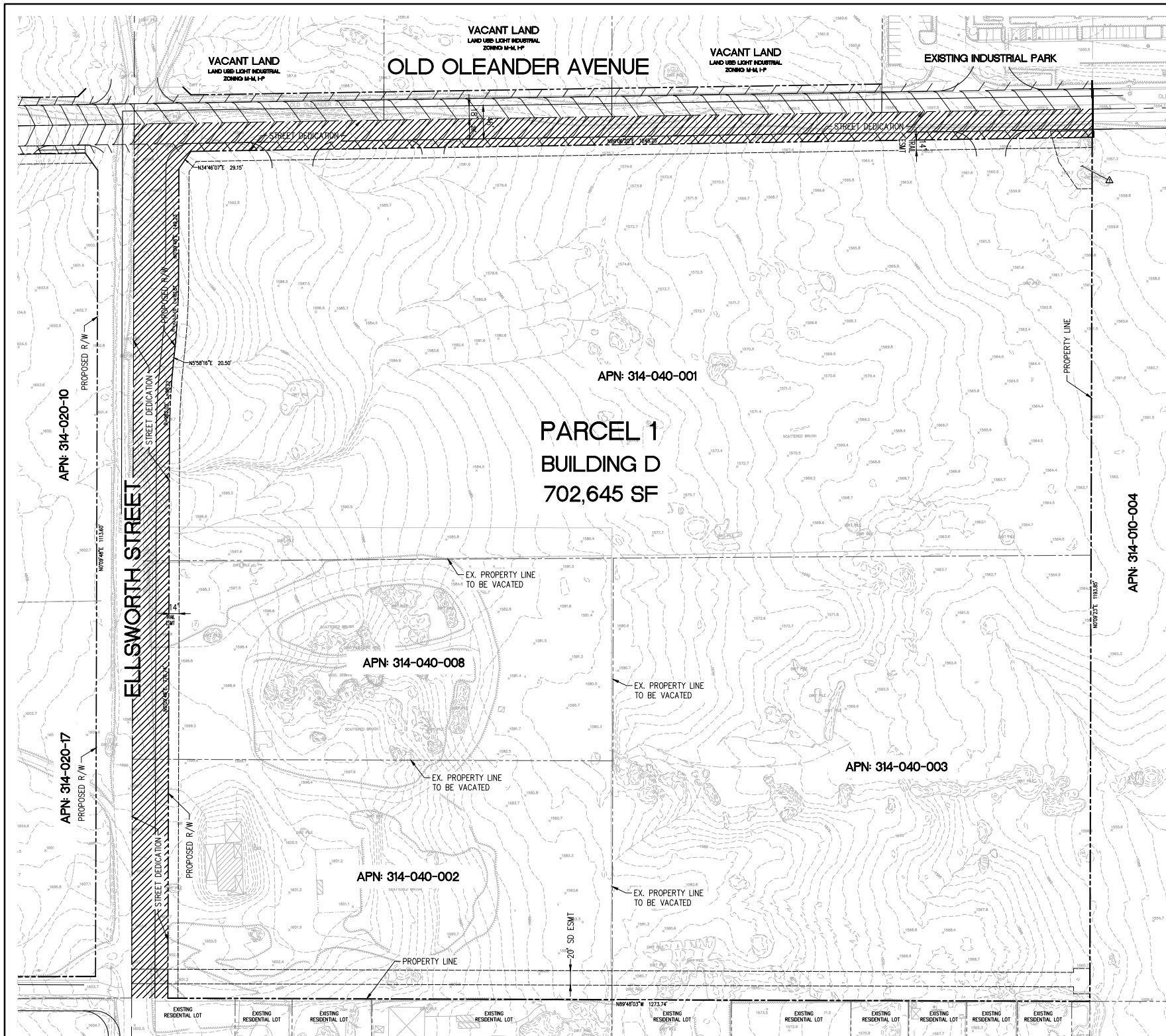


Figure 3-5



CHANGE OF ZONE - BUILDING D SITE



LEGEND

| | |
|--|------------------------|
| | STREET DEDICATION |
| | CENTER LINE |
| | EASEMENT |
| | EXISTING PROPERTY LINE |
| | PROPOSED R/W |

LEGEND:

| | |
|------|--------------------|
| CL | - CENTER LINE |
| ESMT | - EASEMENT |
| EG | - EXISTING GRADE |
| EX | - EXISTING |
| FF | - FINISHED FLOOR |
| FG | - FINISHED GRADE |
| FH | - FIRE HYDRANT |
| FL | - FLOW LINE |
| FS | - FINISHED SURFACE |
| GB | - GRADE BREAK |
| HP | - HIGH POINT |
| INV | - INVERT |
| MH | - MANHOLE |
| R/W | - RIGHT OF WAY |
| SD | - STORM DRAIN |
| SS | - SANITARY SEWER |
| SF | - SQUARE FEET |
| TC | - TOP OF CURB |
| TYP | - TYPICAL |
| W | - WATER |

- NOTES:**
1. THOMAS BROS. MAP PAGE 747, GRID B7 (2008 EDITION)
 2. THE PROJECT AREA IS NOT SUBJECT TO LIQUIFACTION OR OTHER GEOLOGIC HAZARDS NOTED WITHIN ANY SPECIAL STUDIES ZONES
 3. FEMA COMMUNITY PANEL 06065C1410G, ZONE X (OUTSIDE THE 0.2% ANNUAL CHANCE FLOODPLAIN)
 4. THIS PROJECT IS NOT WITHIN A SPECIFIC PLAN
 5. THE PROJECT AREA IS NOT SUBJECT TO OVERFLOW INUNDATION OR FLOOD HAZARD
 6. THE PROJECT DOES NOT INTEND TO USE SUBSURFACE SEPTIC SEWAGE
 7. PROPOSED DEDICATION/EASEMENTS TO BE MADE BY SEPARATE DOCUMENTS
 8. THIS PROJECT IS NOT PHASED
 9. REFER TO ARCHITECTURAL PLANS FOR WALL AND FENCING DETAILS

EASEMENTS:

△ EASEMENT TO COUNTY OF RIVERSIDE FOR TEMPORARY DRAINAGE AND INCIDENTAL PURPOSES, RECORDED MARCH 31, 1994 AS INSTRUMENT NO. 94-136338 OF OFFICIAL RECORDS

EASEMENT TO VAL VERDE MUTUAL WATER COMPANY, A CORPORATION, FOR PIPELINES, RECORDED OCTOBER 27, 1915 AS IN BOOK 430, PAGE 345 OF DEEDS (EXACT LOCATION AND EXTENT OF SAID EASEMENT IS NOT DISCLOSED OF RECORD)

PROJECT DESCRIPTION:

THE 34.5 ACRE PROJECT SITE WILL BE DEVELOPED TO CONSTRUCT ONE 702,645 SQUARE FOOT INDUSTRIAL WAREHOUSE/DISTRIBUTION BUILDING CONSISTING OF 15,000 SQUARE FEET OF OFFICE SPACE, 10,000 SQUARE FEET OF MEZZANINE, AND 677,645 SQUARE FEET OF WAREHOUSE. THE SITE WILL CONTAIN 251 TRUCK/TRAILER PARKING STALLS (10'x53') AND 251 STANDARD (9'x18') AUTOMOBILE PARKING STALLS

NOTE:

THE MAP INCLUDES THE ENTIRE CONTIGUOUS OWNERSHIP OF THE LAND DIVIDER.

EASEMENTS:

△ EASEMENT TO COUNTY OF RIVERSIDE FOR TEMPORARY DRAINAGE AND INCIDENTAL PURPOSES, RECORDED MARCH 31, 1994 AS INSTRUMENT NO. 94-136338 OF OFFICIAL RECORDS

EASEMENT TO VAL VERDE MUTUAL WATER COMPANY, A CORPORATION, FOR PIPELINES, RECORDED OCTOBER 27, 1915 AS IN BOOK 430, PAGE 345 OF DEEDS (EXACT LOCATION AND EXTENT OF SAID EASEMENT IS NOT DISCLOSED OF RECORD)

OWNER:

PARCEL 3 (APN: 314-040-001)
DON PARKER
43910 FLORES DR, TEMECULA, CA 92592
TEL: (951) 383-0975

BILL THOMAS
P.O. BOX 127
CHERRYVILLE, MO 65446
TEL: (573) 743-6125

PARCEL 4 (APN: 314-040-008)
LANCE R. AND DIANE K VERDUGO
16589 ARABIAN AVE, RIVERSIDE, CA 92504
TEL: (951) 212-0651

PARCEL 5 (APN: 314-040-002)
ARTHUR M. AND LUCY LOPEZ
3000 TYLER ST, RIVERSIDE, CA 92503
TEL: (951) 805-1310

PARCEL 6 (APN: 314-040-003)
DON PARKER
43910 FLORES DR, TEMECULA, CA 92592
TEL: (951) 383-0975

BILL THOMAS
P.O. BOX 127
CHERRYVILLE, MO 65446
TEL: (573) 743-6125

APPLICANT:

TRAMMELL CROW COMPANY
3501 JAMBOREE ROAD, SUITE 230
NEWPORT BEACH, CA 92660
PHONE: (949)477-4700

UTILITY PURVEYORS:

WATER - EASTERN MUNICIPAL WATER DISTRICT
SEWER - EASTERN MUNICIPAL WATER DISTRICT
GAS - SOUTHERN CALIFORNIA GAS COMPANY
ELECTRIC - SOUTHERN CALIFORNIA EDISON COMPANY
TELEPHONE - VERIZON

ENGINEER:

DAVID EVANS AND ASSOCIATES
17782 17TH STREET, SUITE 200
TUSTIN, CA 92780
PHONE: (714)665-4500

ARCHITECT:

HPA ARCHITECTURE
18831 BARDEEN AVENUE, SUITE 100
IRVINE, CA 92612
PHONE: (949)863-1770

SCHOOL DISTRICT:

VAL VERDE UNIFIED SCHOOL DISTRICT

Source(s): David Evans and Associates (12-01-2016)

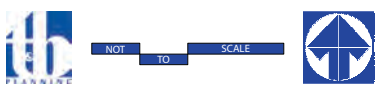
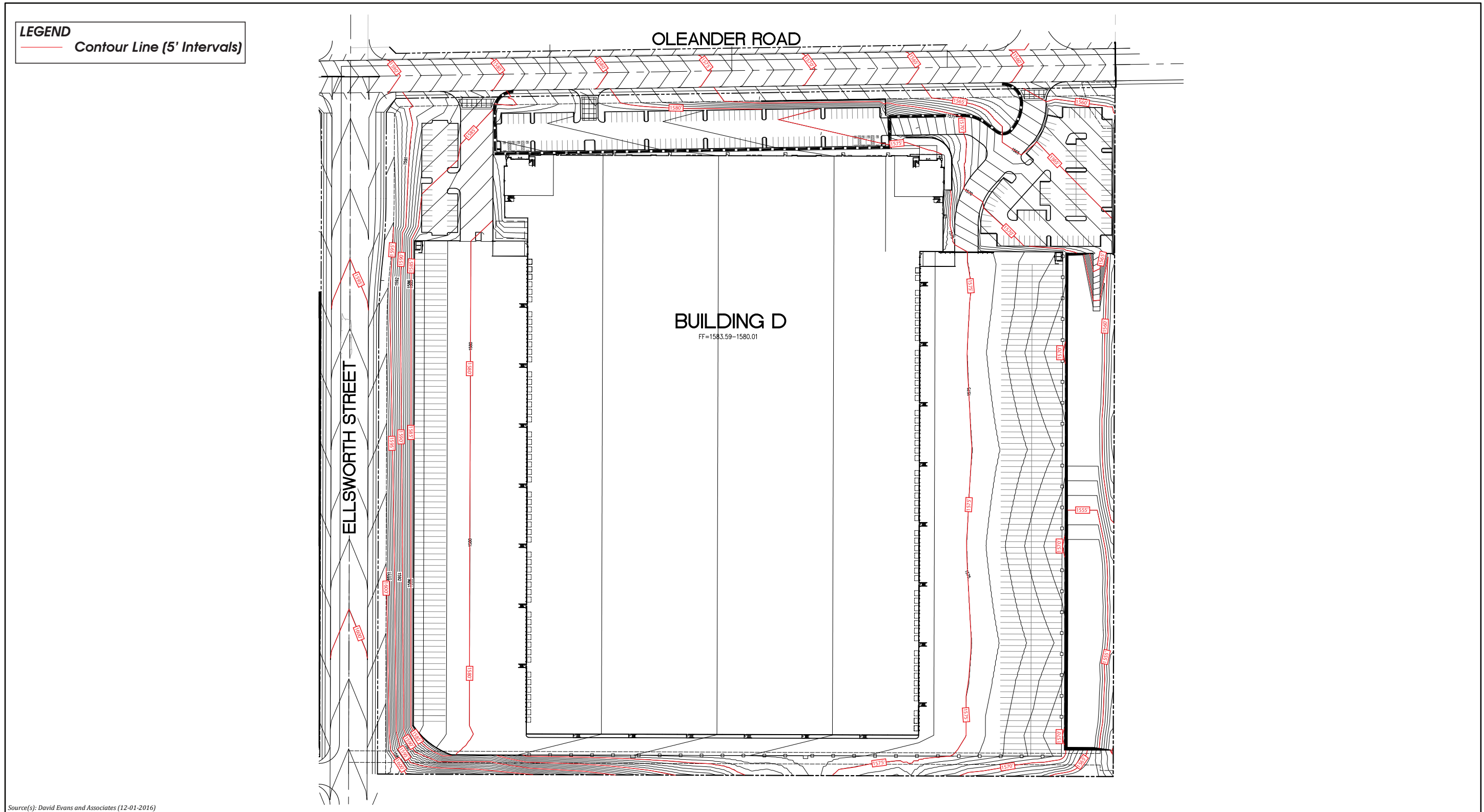


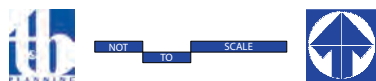
Figure 3-6

TENTATIVE PARCEL MAP NO. 36950 (BUILDING D SITE)



Source(s): David Evans and Associates (12-01-2016)

Figure 3-7



CONCEPTUAL GRADING PLAN - BUILDING D SITE



stormwater runoff from the site before discharging treated flows from the property. First flush stormwater runoff flows (i.e., typically the first $\frac{3}{4}$ inch of initial surface runoff after a rainstorm, which contains the highest proportion of waterborne pollution) would be conveyed to the bioretention/detention basin proposed along the eastern boundary of the property; stormwater runoff captured after the first flush would be discharged off-site via storm drain lines associated with the Perris Valley Master Drainage Plan (MDP). (DEA, 2017a) Refer to Subsection 3.4B, *Utility Infrastructure Improvements*, for additional information regarding storm drain improvements.

D. Plot Plan No. 25838 (PP 25838)

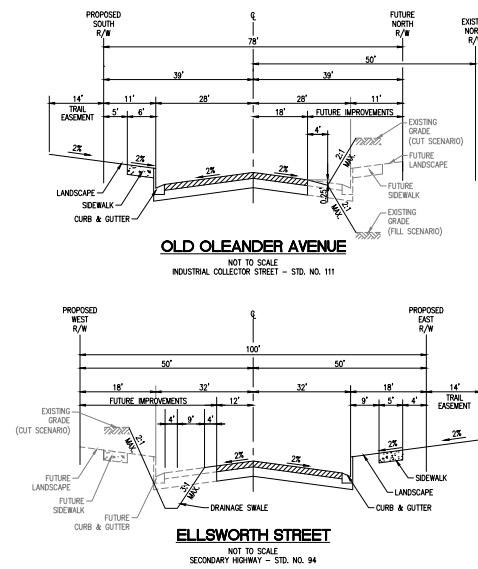
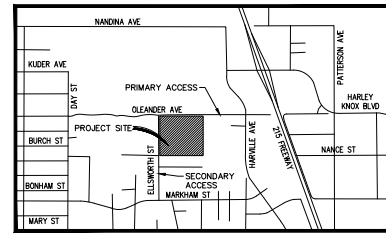
1. *General Description*

Proposed Building D would contain 702,645 s.f. of building space, including 677,645 s.f. of warehouse floor space, 15,000 s.f. of ground floor office space, and 10,000 s.f. of mezzanine office space. As shown on Figure 3-8, *Plot Plan No. 25838 (Building D Site)* office spaces would be located at the northwest and northeast corners of the building. Vehicular access to Building D would be provided by three driveways connecting to Oleander Avenue. All driveways on the Building D Site would be stop-sign controlled. The middle driveway on Oleander Avenue would provide access for passenger vehicles only while the westernmost and easternmost driveways on Oleander Avenue may be used by both passenger vehicles and trucks. The driveways would provide access to automobile parking areas, loading areas, and truck parking areas. Access to the proposed loading and truck parking areas located interior to the Building D Site would be gated. Proposed truck check-in points and driveways are positioned interior to the Building D Site to create interior queuing areas and minimize the potential for trucks accessing the property to stack onto Oleander Avenue.

2. *Parking and Loading*

Figure 3-8 depicts the proposed locations of parking spaces and loading docks for Building D. The Building D Site would provide approximately 439 ~~passenger-automobile~~ parking stalls spaces distributed on the northern, eastern, and western sides of the building and approximately 159 ~~254~~ truck trailer parking stalls spaces distributed on the western and eastern sides of the building. Bicycle parking would be provided in compliance with Riverside County Ordinance No. 348, Article XVII, Section 18.12.D, *Bicycle Parking Facilities*, which requires one bicycle space for every 25 passenger vehicle parking spaces.

Building D would include 54 loading docks (also called “bays”) on the west side of the building and 55 docks on the east side of the building (109 docks total) to be used for the loading, unloading, and short-term parking of trucks. Docks on one side of Building D would likely be used for deliveries and docks on the other side of the building would likely be used for shipments. Loading dock positions facilitate operations inside the building. When trucks have the option to dock close to the area where their cargo is sorted and stored inside the structure, workers inside the building have a shorter distance to cover when moving goods between the exterior docks and interior storage areas.

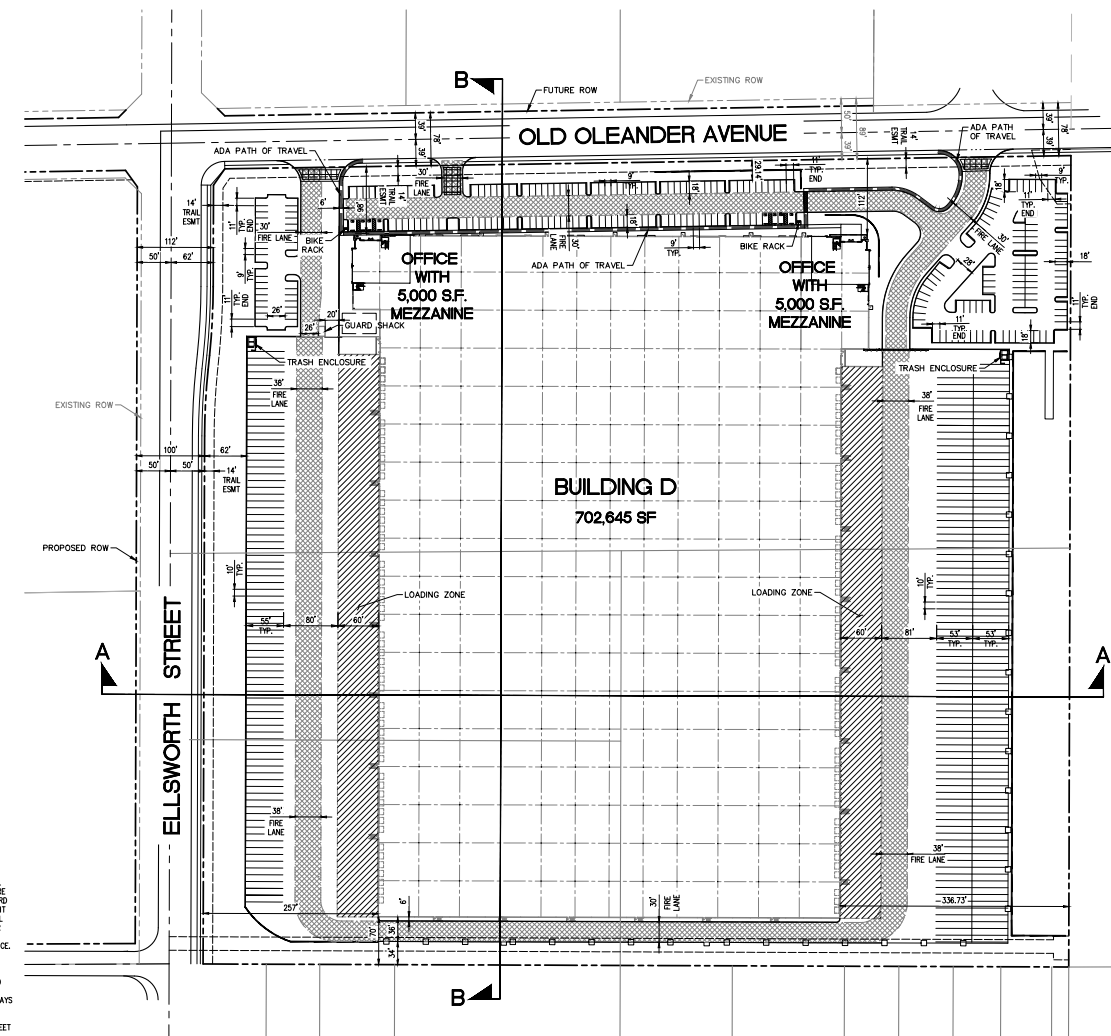
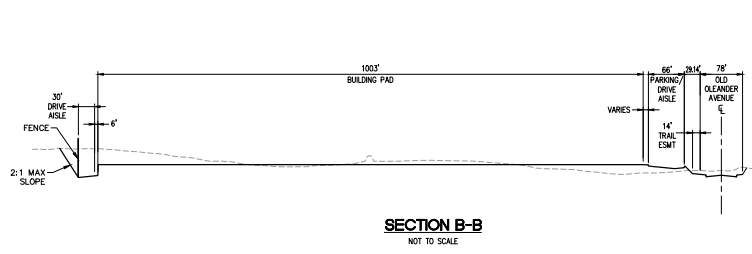
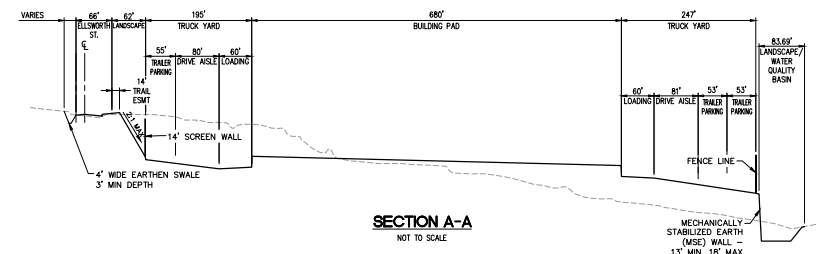


SITE TABULATION:

| SITE | PROPOSED NET AREA | 34.5 ACRES |
|-----------|------------------------------|------------|
| BUILDING | OFFICE | 15,000 SF |
| | MEZZANINE | 10,000 SF |
| | WAREHOUSE | 672,645 SF |
| | TOTAL BUILDING AREA | 702,645 SF |
| | LOADING BAYS | 108 |
| | F.A.R. | 0.60 |
| LANDSCAPE | LANDSCAPING REQUIRED (15%) | 105,397 SF |
| | LANDSCAPING PROVIDED | 105,397 SF |
| | LANDSCAPE COVERAGE | 15% |
| PARKING | LANDSCAPING PROVIDED | 105,397 SF |
| | PARKING REQUIRED (OFFICE) | 40 STALLS |
| | PARKING REQUIRED (MEZZANINE) | 40 STALLS |
| | PARKING REQUIRED (WAREHOUSE) | 138 STALLS |
| | TOTAL REQUIRED PARKING | 218 STALLS |
| | AUTO PARKING PROVIDED | 218 |
| | HANDICAP PARKING REQUIRED | 8 |
| | HANDICAP PARKING PROVIDED | 8 |
| | TOTAL PARKING PROVIDED | 226 |
| | TRAILER PARKING PROVIDED | 251 |

SETBACK REQUIREMENTS

- RIVERSIDE COUNTY ORDINANCE NO. 348.4818 SECTION 10.4 DEVELOPMENT STANDARDS (1-97 ZONES):
- THE MAXIMUM HEIGHT OF ALL STRUCTURES, INCLUDING BUILDINGS, SHALL BE 35 FEET AT THE YARD SETBACK LINE. ANY PORTION OF A STRUCTURE THAT EXCEEDS 35 FEET IN HEIGHT SHALL BE SET BACK FROM EACH YARD SETBACK LINE NOT LESS THAN TWO FEET FOR EACH ONE FOOT IN HEIGHT THAT IS IN EXCESS OF 35 FEET. ALL BUILDINGS AND STRUCTURES SHALL NOT EXCEED 30 FEET IN HEIGHT, UNLESS A HEIGHT UP TO 75 FEET FOR BUILDINGS, OR 100 FEET FOR OTHER STRUCTURES IS SPECIFICALLY PERMITTED UNDER THE PROVISIONS OF SECTION 10.5.4 OF THIS ORDINANCE.
 - A MINIMUM 25 FOOT SETBACK SHALL BE REQUIRED ON ANY STREET. A MINIMUM TEN FOOT STRIP ADJACENT TO THE STREET LINE SHALL BE APPROPRIATELY LANDSCAPED AND MAINTAINED, EXCEPT FOR DESIGNATED PEDESTRIAN AND VEHICULAR ACCESS WAYS. THE REMAINDER OF THE SETBACK MAY BE USED FOR OFF-STREET AUTOMOBILE PARKING, DRIVEWAYS OR LANDSCAPING.
 - THE MINIMUM SIDE YARD SETBACK SHALL EQUAL NOT LESS THAN TEN FEET FOR THE TWO SIDE LOT AREAS COMBINED.
 - THE MINIMUM REAR YARD SETBACK SHALL BE 15 FEET.
 - A MINIMUM 50 FOOT SETBACK SHALL BE REQUIRED ON ANY BOUNDARY WHERE THE INDUSTRIAL PROPERTY ADJACENT IS RESIDENTIAL OR COMMERCIALLY ZONED PROPERTY. A MINIMUM OF 20 FEET OF THE SETBACK SHALL BE LANDSCAPED, UNLESS A TRAILER IS APPROVED, IN WHICH CASE THE SETBACK AREA MAY BE USED FOR AUTOMOBILE PARKING, DRIVEWAYS OR LANDSCAPING. BLOCK WALLS OR OTHER FENCING MAY BE REQUIRED.



APPLICANT:
 TRAMMELL CROW COMPANY
 3501 JAMBORIE ROAD, SUITE 230
 NEWPORT BEACH, CA 92660
 PHONE: (949)477-4700

ENGINEER:
 DAVID EVANS AND ASSOCIATES
 17782 17TH STREET, SUITE 200
 TUSTIN, CA 92680
 PHONE: (714)865-4500

ARCHITECT:
 IPA ARCHITECTURE
 1803 BARBERS AVENUE, SUITE 100
 IRVINE, CA 92612
 PHONE: (949)883-1770

UTILITY PURVEYORS:
 WATER - EASTERN MUNICIPAL WATER DISTRICT
 SEWER - EASTERN MUNICIPAL WATER DISTRICT
 GAS - SOUTHERN CALIFORNIA GAS COMPANY
 ELECTRIC - SOUTHERN CALIFORNIA EDISON COMPANY
 TELEPHONE - VERIZON

LAND AREA:
 37.08 GROSS ACRES
 0.2(1) ADDRESS ROAD DEDICATION
 34.47 NET ACRES

EARTHWORK:
 CUT: 192,500 CUBIC YARDS
 FILL: 192,500 CUBIC YARDS
 NET: BALANCED SITE

SCHOOL DISTRICT:
 VAL VERDE UNIFIED SCHOOL DISTRICT

LAND USE / ZONING:
 EXISTING ADDRESS:
 APN 314-040-001: 22305 OLEANDER AVENUE, PERRIS, CA
 APN 314-040-002: 16220 DECEMBER ROAD, PERRIS, CA
 APN 314-040-003: NOT AVAILABLE
 APN 314-040-008: NOT AVAILABLE

EXISTING LAND USE:
 APN 314-040-001: LIGHT INDUSTRIAL
 APN 314-040-002: BUSINESS PARK
 APN 314-040-003: LIGHT INDUSTRIAL
 APN 314-040-008: BUSINESS PARK

PROPOSED LAND USE: LIGHT INDUSTRIAL (L)

EXISTING ZONING:
 APN 314-040-001: M-M, I-P (MANUFACTURING - MEDIUM INDUSTRIAL PARK)
 APN 314-040-002: R-R (RURAL RESIDENTIAL)
 APN 314-040-003: M-M, I-P (MANUFACTURING - MEDIUM INDUSTRIAL PARK)
 APN 314-040-008: R-R (RURAL RESIDENTIAL)

PROPOSED ZONING: I-P (INDUSTRIAL PARK)

LEGAL DESCRIPTION
 CHICAGO TITLE COMPANY, ORDER NO. 00023989-001-PS, DATED SEPTEMBER 16, 2014.
 THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:
 PARCEL 1: APN 314-040-001
 THE NORTH HALF OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER OF SECTION 2, TOWNSHIP 4 SOUTH, RANGE 4 WEST, SAN BERNARDINO MERIDIAN, IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, ACCORDING TO THE OFFICIAL PLAT THEREOF.
 PARCEL 2: APN 314-040-003
 THE SOUTHWEST QUARTER OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER OF SECTION 2, TOWNSHIP 4 SOUTH, RANGE 4 WEST, SAN BERNARDINO MERIDIAN, IN THE COUNTY OF CALIFORNIA, ACCORDING TO THE OFFICIAL PLAT THEREOF.
 CHICAGO TITLE COMPANY, ORDER NO. 00023987-001-PS, DATED SEPTEMBER 12, 2014.
 THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:
 APN 314-040-002
 THE SOUTH HALF OF THE SOUTHWEST QUARTER OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER OF SECTION 2, TOWNSHIP 4 SOUTH, RANGE 4 WEST, SAN BERNARDINO MERIDIAN, IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, ACCORDING TO THE OFFICIAL PLAT THEREOF.
 CHICAGO TITLE COMPANY, ORDER NO. 00023991-001-PS, DATED SEPTEMBER 12, 2014.
 THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:
 APN 314-040-008
 THE NORTH HALF OF THE SOUTHWEST QUARTER OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER OF SECTION 2, TOWNSHIP 4 SOUTH, RANGE 4 WEST, SAN BERNARDINO MERIDIAN, IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, ACCORDING TO THE OFFICIAL PLAT THEREOF.

NOTES:
 1. THOMAS BROS. MAP PAGE 747, GRID B7 (2008 EDITION)
 2. THE PROJECT AREA IS NOT SUBJECT TO LIQUIDATION OR OTHER GEOLOGIC HAZARDS NOTED WITHIN ANY SPECIAL STUDIES ZONES.
 3. FEMA COMMUNITY PANEL 0606024100, ZONE X (OUTSIDE THE 0.2% ANNUAL CHANCE FLOODPLAIN)
 4. THIS PROJECT IS NOT WITHIN A SPECIFIC PLAN.
 5. THE PROJECT AREA IS NOT SUBJECT TO OVERFLOW INUNDATION OR FLOOD HAZARD.
 6. THE PROJECT DOES NOT INTEND TO USE SUBSURFACE SEPTIC SEWERAGE.
 7. PROPOSED EASEMENTS/EXEMPTIONS TO BE MADE BY SEPARATE DOCUMENTS.
 8. THIS PROJECT IS NOT PHASED.
 9. REFER TO ARCHITECTURAL PLANS FOR WALL AND FENCING DETAILS.

EASEMENTS:
 EASEMENT TO COUNTY OF RIVERSIDE FOR TEMPORARY DRAINAGE AND INCIDENTAL PURPOSES, RECORDED MARCH 31, 1994 AS INSTRUMENT NO. 94-136338 OF OFFICIAL RECORDS.
 EASEMENT TO VAL VERDE MUTUAL WATER COMPANY, A CORPORATION, FOR PIPELINES, RECORDED OCTOBER 27, 1915 AS IN BOOK 430, PAGE 345 OF DEEDS (EXACT LOCATION AND EXTENT OF SAID EASEMENT IS NOT DISCLOSED OF RECORD).

PROJECT DESCRIPTION:
 THE 34.5 ACRES SUBJECT SITE WILL BE DEVELOPED TO CONSTRUCT ONE 702,645 SQUARE FOOT INDUSTRIAL WAREHOUSE/DISTRIBUTION BUILDING CONSISTING OF 15,000 SQUARE FEET OF OFFICE SPACE, 10,000 SQUARE FEET OF MEZZANINE, AND 672,645 SQUARE FEET OF WAREHOUSE. THE SITE WILL CONTAIN 251 TRUCK/TRAILER PARKING STALLS (10'x15') AND 251 STANDARD (9'x18') AUTOMOBILE PARKING STALLS.

LEGEND:
 EX - EXISTING
 FF - FRESH FLOOR
 FL - FLOW LINE
 FS - FRESH SURFACE
 GB - GRADE BREAK
 HP - HIGH POINT
 INV - INVERT
 SD - STORM DRAIN
 SS - SANITARY SEWER
 TC - TOP OF CURB
 W - WATER

Source(s): David Evans and Associates (12-01-2016)

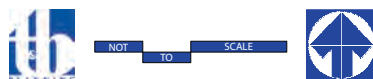


Figure 3-8

PLOT PLAN NO. 25838 (BUILDING D SITE)



3. *Architecture, Walls, and Fences*

Figure 3-9, *Conceptual Architecture Elevations – Building D*, depicts the conceptual architecture elevations proposed for Building D. Building D would be constructed to a height of approximately 40 feet above finished grade, with architectural projections reaching up to 44 feet. The building would be constructed with painted concrete tilt-up panels and low-reflective, blue-glazed glass. Articulated building elements, primarily at the building corners and along Oleander Avenue, are proposed as decorative elements. The exterior color palette for the proposed building is comprised of various mild, earth-toned colors, including various shades of beige, tan, and brown.

Painted concrete 14-foot tall tilt-up screen walls, with access gates, would be provided on the north and west sides of Building D facing Oleander Avenue and Ellsworth Street, to screen the loading bays and truck parking areas from public view. Eight-foot tall tube steel fencing would be provided along the western perimeter of the Building D Site. In addition, a concrete block retaining wall would be located along the site’s southern and eastern boundaries, ranging from one to 23 feet in height.

4. *Conceptual Landscaping Plan*

The conceptual landscape plan is depicted in Figure 3-10, *Conceptual Landscape Plan – Building D*. Landscaping would be ornamental in nature and include trees, shrubs, accent plants, and a variety of groundcovers. As shown on Figure 3-10, trees and groundcover are proposed along the Building D Site’s frontage with Oleander Avenue and Ellsworth Street. Landscaping also would occur at building entries, in and around automobile parking areas, in and around the Building D Site’s water quality/detention basin, and along proposed screen walls. Landscaping would be ornamental, except in water quality/detention basins where plant materials would serve water quality functions. Prior to the issuance of a building permit to construct Building D, the Project Applicant would be required to submit final planting and irrigation plans to the County of Riverside for review and approval. The plans are required to comply with Riverside County Ordinance No. 859, which establishes requirements for landscape design, automatic irrigation system design, and water-use efficiency.

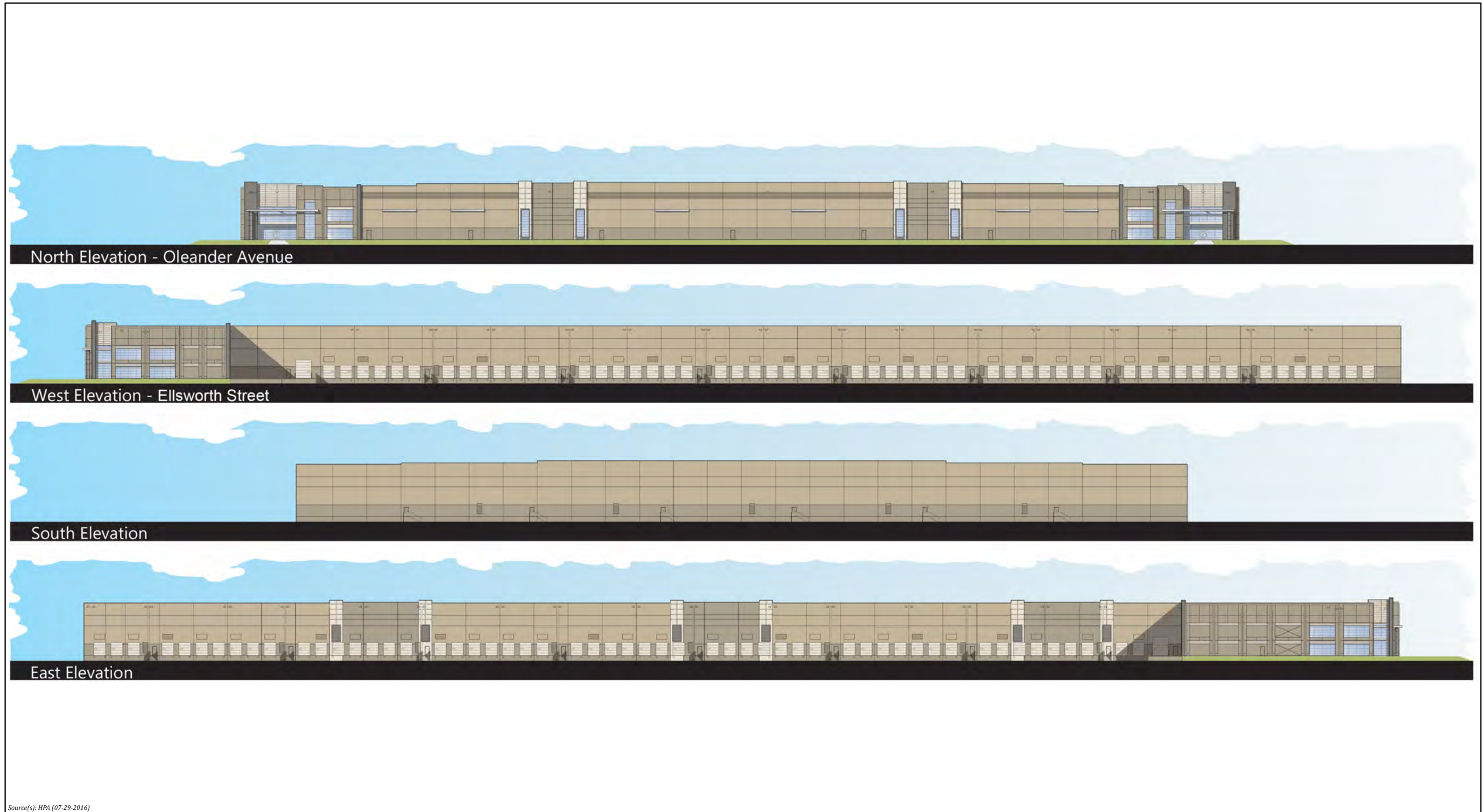
3.3.3 BUILDING E APPLICATIONS

A. General Plan Amendment No. 1152 (GPA 1152)

The Building E Site is designated “Community Development-Business Park (CD-BP)” by the Riverside County General Plan under existing conditions. GPA 1152 would change the land use designation from CD-BP to “Community Development-Light Industrial (CD-LI).” This EIR analyzes the effects of GPA 1152, as depicted on Figure 3-11, *General Plan Amendment – Building E Site*.

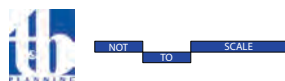
B. Change of Zone No. 7873 (CZ 7873)

The Building E Site is zoned “Rural Residential 1/2-Acre Lot Sizes (R-R-1/2)” and “Industrial Park (I-P)” under existing conditions. CZ 7873 would change the zoning designations of the portion of the property zoned R-R-1/2 to I-P so that the entire Building E Site is zoned I-P. This EIR analyzes the effects of CZ 7873, as depicted on Figure 3-12, *Change of Zone – Building E Site*.



Source(s): HPA (07-29-2016)

Figure 3-9



CONCEPTUAL ARCHITECTURE ELEVATIONS - BUILDING D

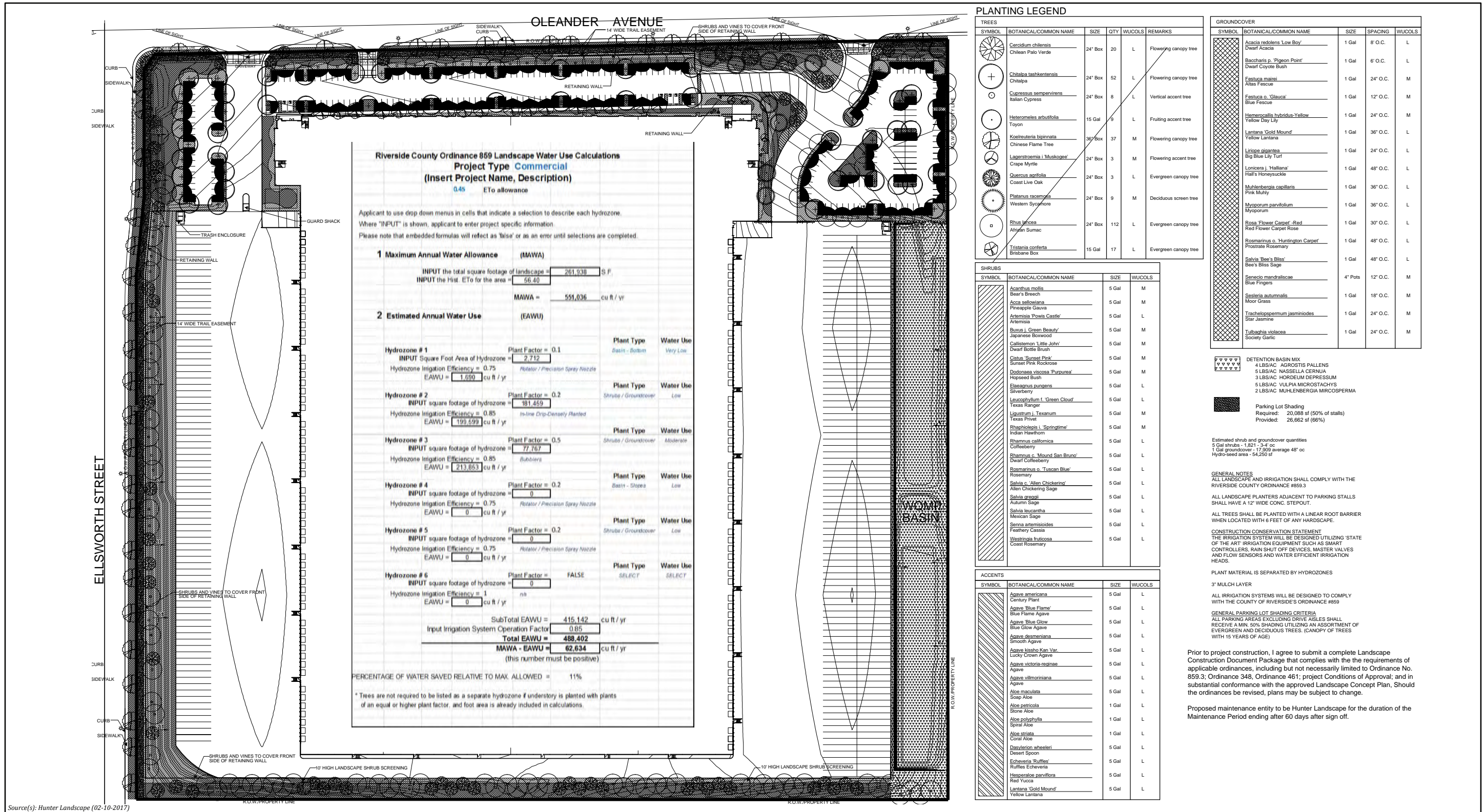
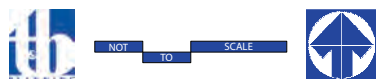


Figure 3-10



CONCEPTUAL LANDSCAPE PLAN - BUILDING D SITE

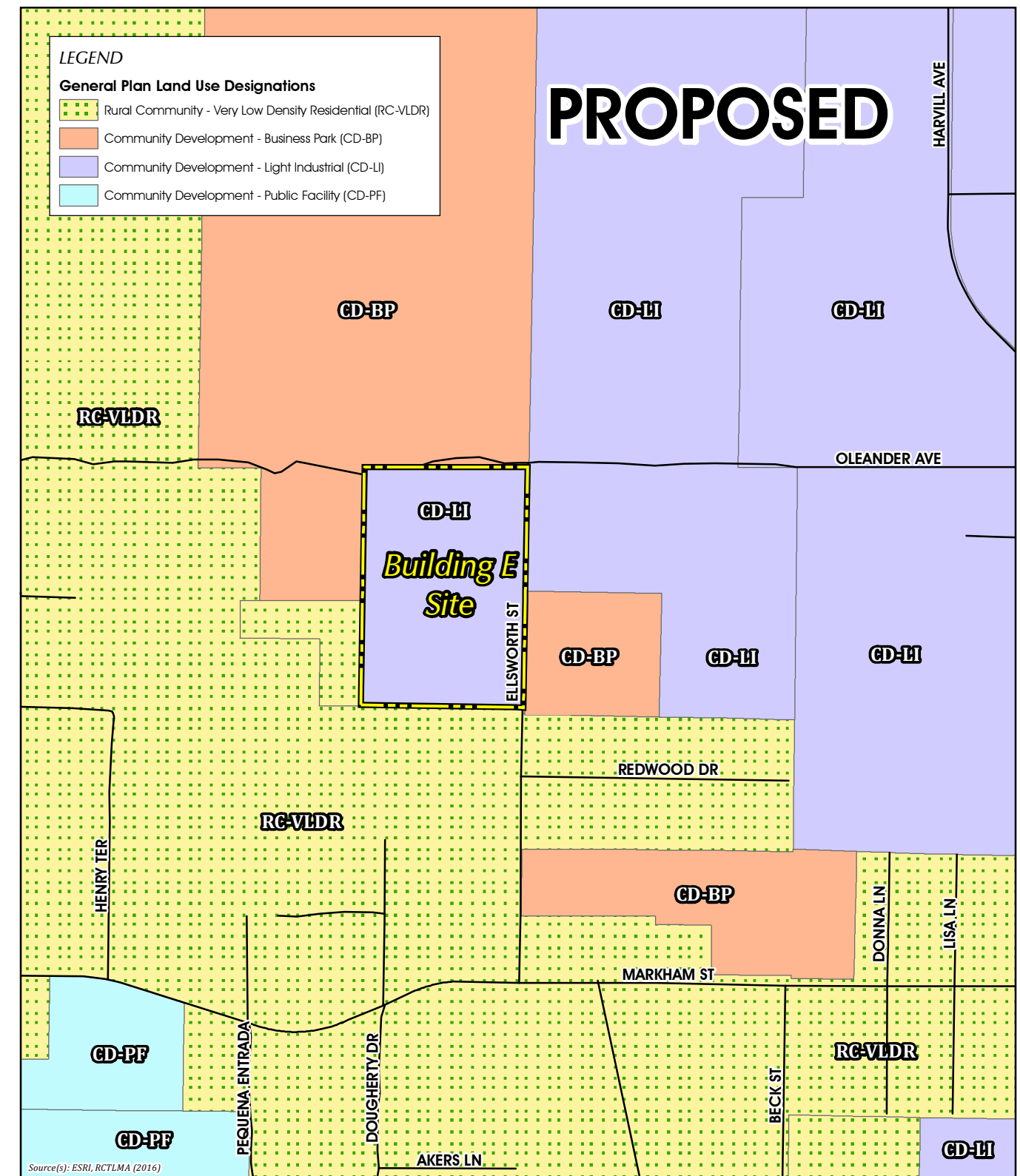
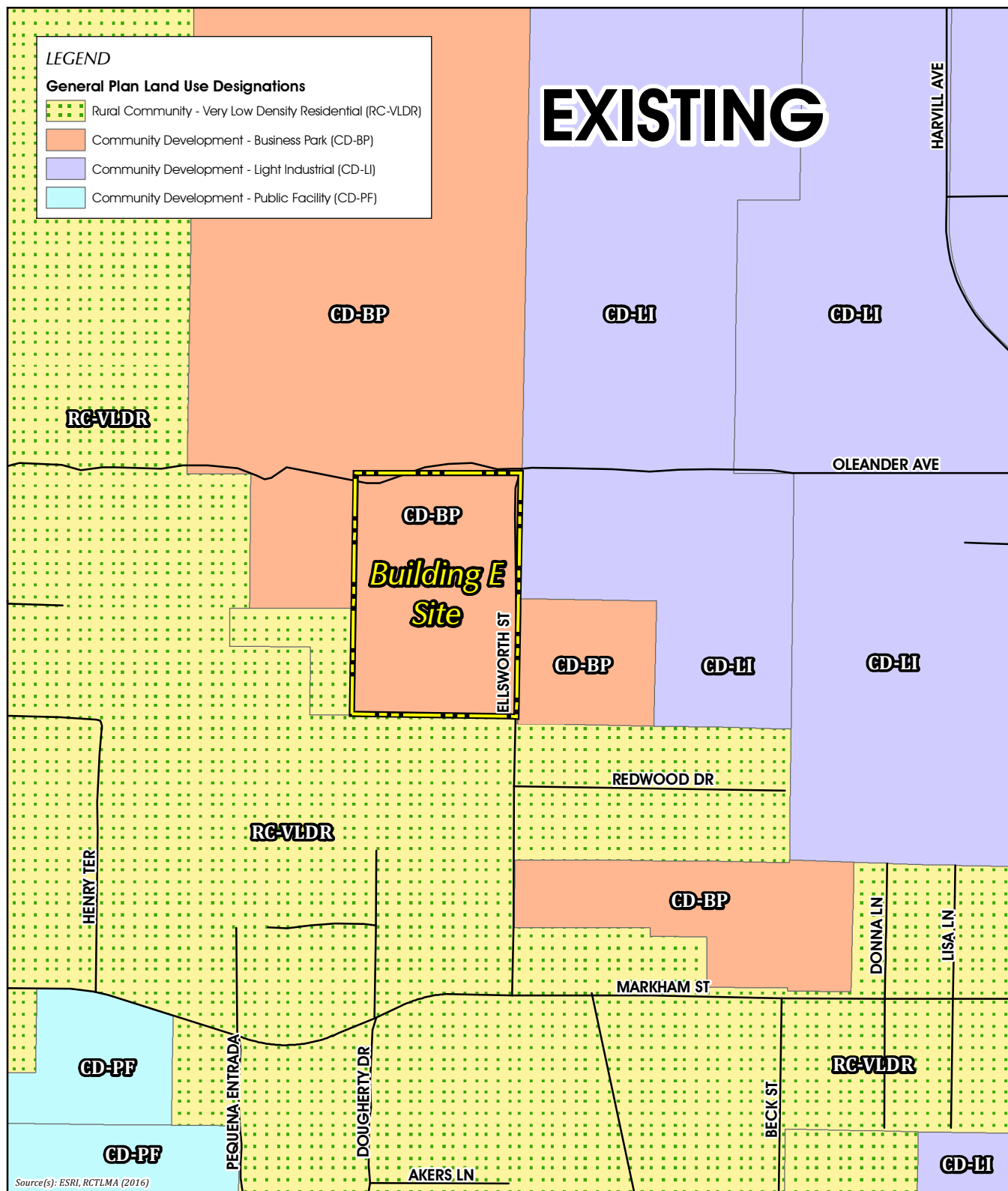
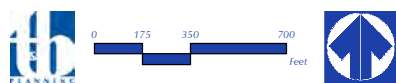


Figure 3-11



GENERAL PLAN AMENDMENT - BUILDING E SITE

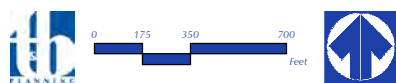
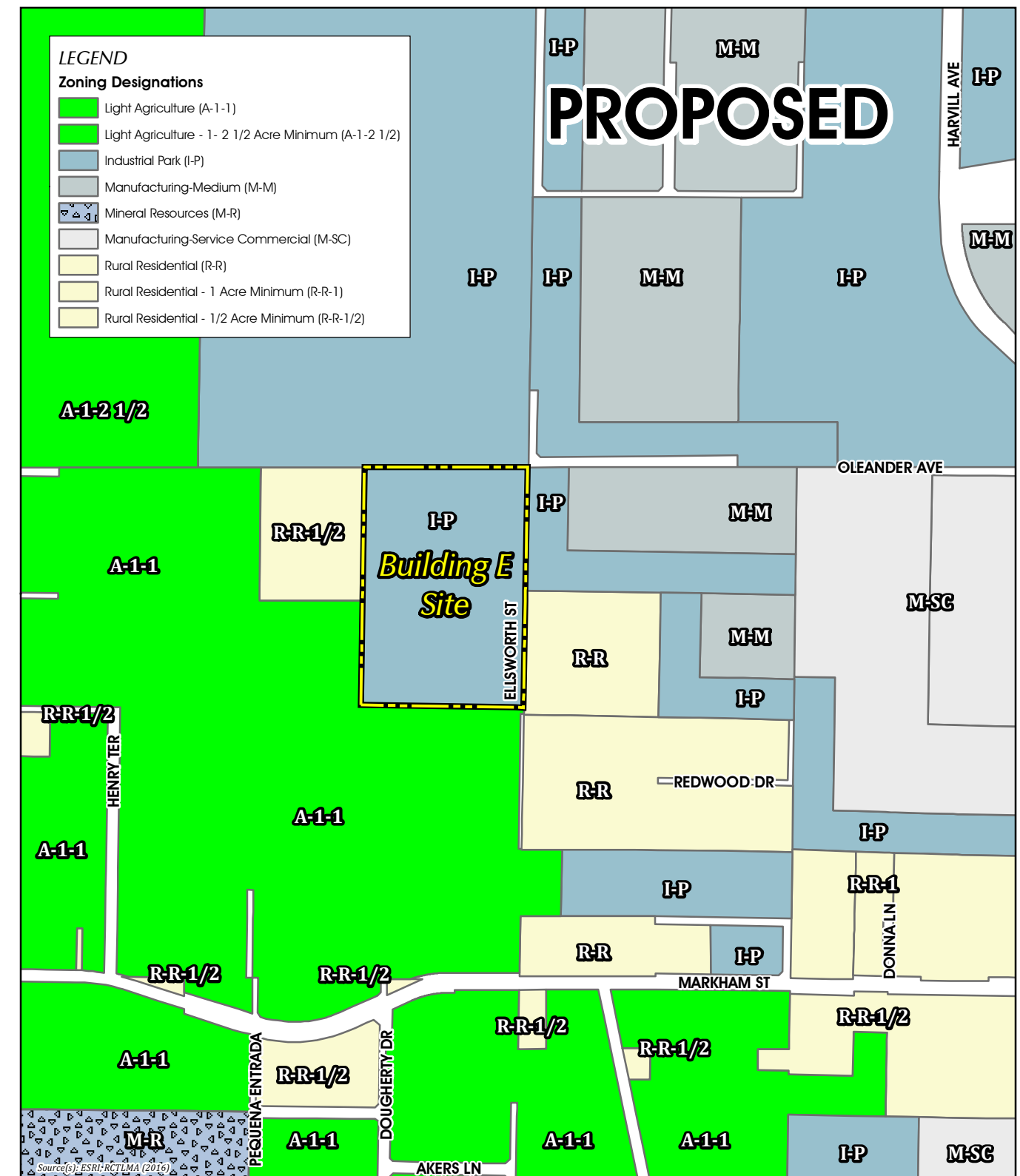
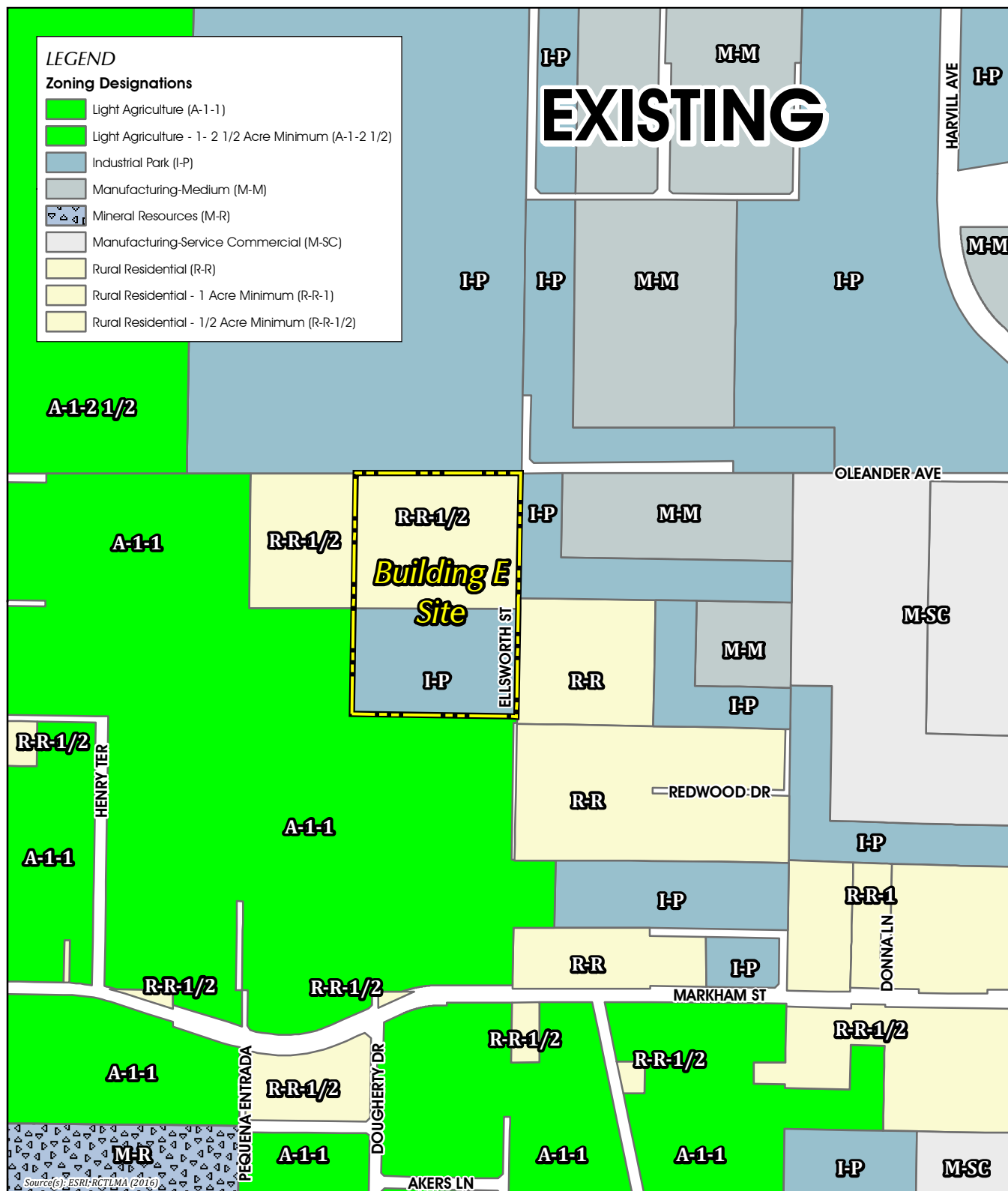


Figure 3-12

CHANGE OF ZONE - BUILDING E SITE



C. Tentative Parcel Map No. 36962 (PM 36962)

Tentative Parcel Map No. 36962 (PM 36962) proposes to consolidate the three parcels on the Building E Site into one, approximately 19.5 net-acre parcel, as depicted on Figure 3-13, *Tentative Parcel Map No. 36962 (Building E Site)*. In addition, PM 36962 identifies the earthwork and stormwater drainage improvements needed on the Building E Site to support proposed development, as well as the roadway and utility infrastructure improvements required to support proposed development, as presented later in Subsection 3.4, *Technical Characteristics*.

1. *Earthwork and Grading*

Grading would occur over the entire Building E Site; no portion of the site would be left undisturbed. Proposed earthwork activities would result in approximately 80,000 cubic yards of cut and 80,000 cubic yard of fill. Based on the expected shrinkage and compaction of on-site soils, earthwork activities are expected to balance and no import or export of earthwork materials would be required. When grading is complete, manufactured slopes ranging from approximately four to 15 feet in height would occur along the south, east, and west perimeters of the property, and the Building E property would have a slight west-to-east-slope, as depicted on Figure 3-14, *Conceptual Grading Plan – Building E Site*. After grading, the highest point of the property would be its southwest corner (approximately 1,630 AMSL) and the lowest point of the property would be at the bottom of the detention basin near its northeast corner (approximately 1,588 AMSL). To accommodate the proposed grading concept, retaining walls ranging in height from one to seven feet tall would occur on the property. Also, a mechanically stabilized earth wall up to 18 feet in height is proposed along the west and south sides of the proposed water quality basin.

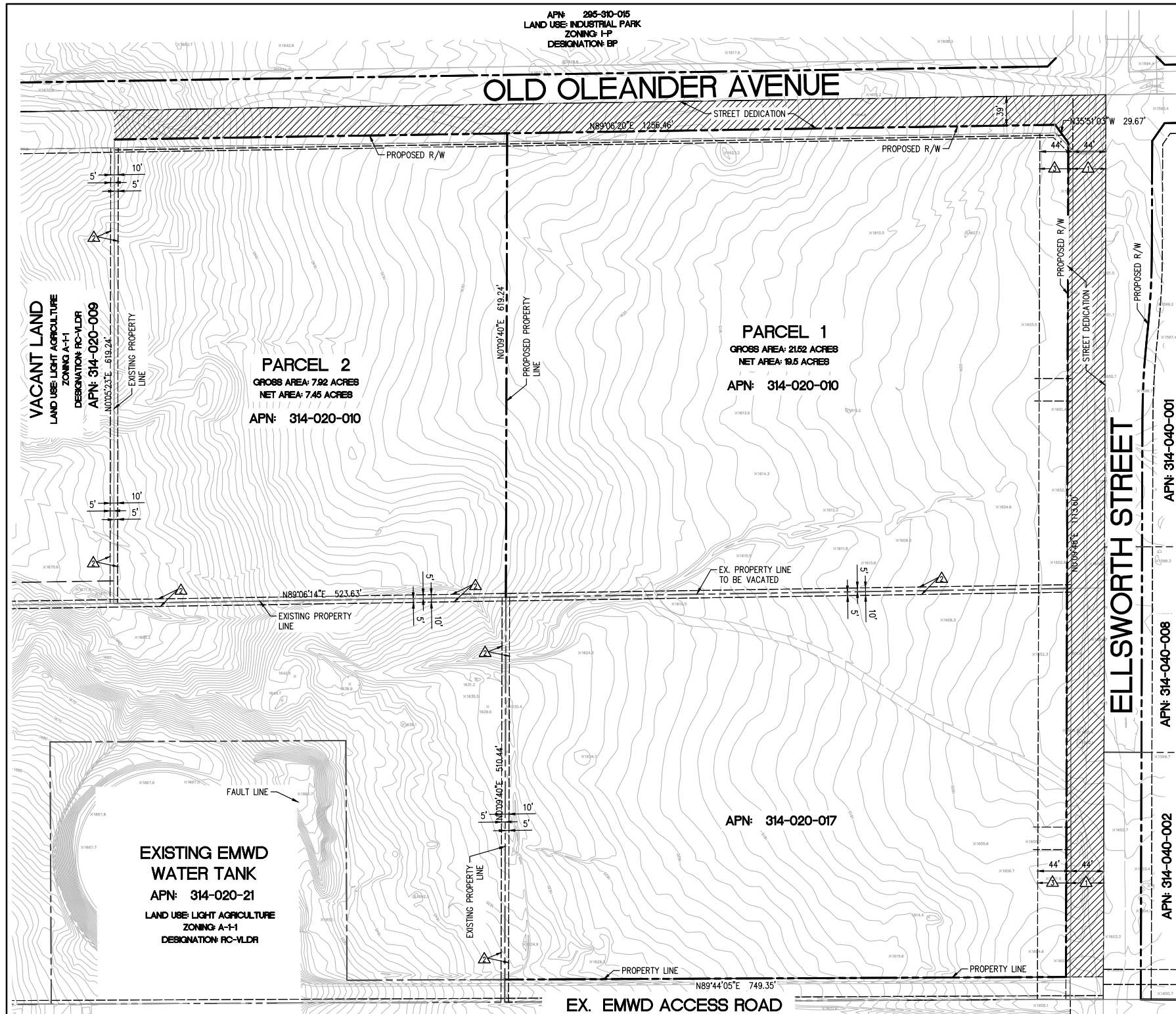
2. *Stormwater Plan*

A system of trench drains, drop inlets, underground storm drain pipes and basins, and a bioretention/detention basin are proposed to be installed on the Building E Site to collect, treat, and temporarily store stormwater runoff (as needed) before discharging treated flows from the property. First flush stormwater runoff flows (i.e., typically the first ¼ inch of initial surface runoff after a rainstorm, which contains the highest proportion of waterborne pollution) would be conveyed to a bioretention/detention basin located at the northeastern corner of the property. Stormwater runoff captured after the first flush would be discharged off-site via proposed connections to the Perris Valley MDP system. (DEA, 2017a, n.p.) Refer Subsection 3.4B for additional information regarding storm drain improvements.

D. Plot Plan No. 25837

1. *General Description*

The proposed building would contain 410,982 s.f. of building space, including 395,982 s.f. of warehouse floor space and 15,000 s.f. of ground floor office space. As shown on Figure 3-15, *Plot Plan No. 25837 (Building E Site)*, proposed office spaces would be located at the northwest and



LEGEND

| | |
|--|------------------------|
| | STREET DEDICATION |
| | CENTER LINE |
| | EASEMENT |
| | EXISTING PROPERTY LINE |
| | PROPOSED R/W |

LEGEND:

| | |
|------|---------------------------|
| BMF | - BEDROCK MILLING FEATURE |
| CL | - CENTER LINE |
| ESMT | - EASEMENT |
| EG | - EXISTING GRADE |
| EX | - EXISTING |
| FF | - FINISHED FLOOR |
| FG | - FINISHED GRADE |
| FH | - FIRE HYDRANT |
| FL | - FLOW LINE |
| FS | - FINISHED SURFACE |
| GB | - GRADE BREAK |
| HP | - HIGH POINT |
| INV | - INVERT |
| MH | - MANHOLE |
| R/W | - RIGHT OF WAY |
| SD | - STORM DRAIN |
| SS | - SANITARY SEWER |
| SF | - SQUARE FEET |
| TC | - TOP OF CURB |
| TYP | - TYPICAL |
| W | - WATER |

APPLICANT:
 TRAMMELL CROW COMPANY
 3501 JAMBOREE ROAD, SUITE 230
 NEWPORT BEACH, CA 92660
 PHONE: (949)477-4700

UTILITY PURVEYORS:
 WATER - EASTERN MUNICIPAL WATER DISTRICT
 SEWER - EASTERN MUNICIPAL WATER DISTRICT
 GAS - SOUTHERN CALIFORNIA GAS COMPANY
 ELECTRIC - SOUTHERN CALIFORNIA EDISON COMPANY
 TELEPHONE - VERIZON

OWNER:
 PARCEL 1A AND 2 (APN-314-020-010)
 C R COUSINS INC/
 HARRY AND ROY MURANAKA
 PO BOX 8360, PORTER RANCH, CA 91327
 TEL: (818) 491-0638

PARCEL 1B (APN-314-020-017)
 JACK ROBERT RECH
 2447 ALAMO HEIGHTS DR,
 DIAMOND BAR CA 91765
 TEL: (909) 263-6969

NOTES:

1. THOMAS BROS. MAP PAGE 747, GRID B7 (2008 EDITION)
2. THE PROJECT AREA IS NOT SUBJECT TO LIQIFACTION OR OTHER GEOLOGIC HAZARDS NOTED WITHIN ANY SPECIAL STUDIES ZONES
3. FEMA COMMUNITY PANEL 06065C1410G, ZONE X (OUTSIDE THE 0.2% ANNUAL CHANCE FLOODPLAIN)
4. THIS PROJECT IS NOT WITHIN A SPECIFIC PLAN
5. THE PROJECT AREA IS NOT SUBJECT TO OVERFLOW INUNDATION OR FLOOD HAZARD
6. THE PROJECT DOES NOT INTEND TO USE SUBSURFACE SEPTIC SEWAGE
7. PROPOSED DEDICATION/EASEMENTS TO BE MADE BY SEPARATE DOCUMENTS
8. THIS PROJECT IS NOT PHASED
9. REFER TO ARCHITECTURAL PLANS FOR WALL AND FENCING DETAILS

EASEMENTS:

- △ 44' WIDE EASEMENT TO THE COUNTY OF RIVERSIDE FOR PUBLIC ROAD, PUBLIC UTILITY, AND PUBLIC SERVICES USES RECORDED ON JUNE 5, 1973 AS INSTRUMENT NO. 1973-72894
- △ 10' WIDE EASEMENT TO THE COUNTY OF RIVERSIDE FOR PUBLIC UTILITIES RECORDED ON DECEMBER 6, 1973 AS INSTRUMENT NO. 1973-157864
- △ 44' WIDE EASEMENT TO THE COUNTY OF RIVERSIDE FOR PUBLIC UTILITIES RECORDED ON APRIL 25, 1980 AS INSTRUMENT NO. 1980-78836

PROJECT DESCRIPTION:

THE 21.52 ACRE PROJECT SITE WILL BE DEVELOPED TO CONSTRUCT ONE 410,982 SQUARE FOOT INDUSTRIAL WAREHOUSE/DISTRIBUTION BUILDING CONSISTING OF 15,000 SQUARE FEET OF OFFICE SPACE, AND 395,982 SQUARE FEET OF WAREHOUSE. THE SITE WILL CONTAIN 80 TRUCK/TRAILER PARKING STALLS (10'x53') AND 229 STANDARD (9'x16' WITH 2' OVERHANG) AUTOMOBILE PARKING STALLS, AND 7 HANDICAP PARKING STALLS (9'x16' WITH 2' OVERHANG)

EASEMENTS:

- △ 44' WIDE EASEMENT TO THE COUNTY OF RIVERSIDE FOR PUBLIC ROAD, PUBLIC UTILITY, AND PUBLIC SERVICES USES RECORDED ON JUNE 5, 1973 AS INSTRUMENT NO. 1973-72894
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- △ 44' WIDE EASEMENT TO THE COUNTY OF RIVERSIDE FOR PUBLIC UTILITIES RECORDED ON APRIL 25, 1980 AS INSTRUMENT NO. 1980-78836

ENGINEER:

DAVID EVANS AND ASSOCIATES
 17782 17TH STREET, SUITE 200
 TUSTIN, CA 92780
 PHONE: (714)665-4500

ARCHITECT:

HPA ARCHITECTURE
 18831 BARDEEN AVENUE, SUITE 100
 IRVINE, CA 92612
 PHONE: (949)863-1770

SCHOOL DISTRICT:

VAL VERDE UNIFIED SCHOOL DISTRICT

Source(s): David Evans and Associates (01-17-2017)

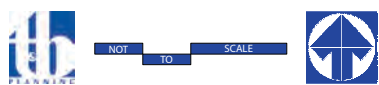


Figure 3-13

TENTATIVE PARCEL MAP NO. 36962 (BUILDING E SITE)

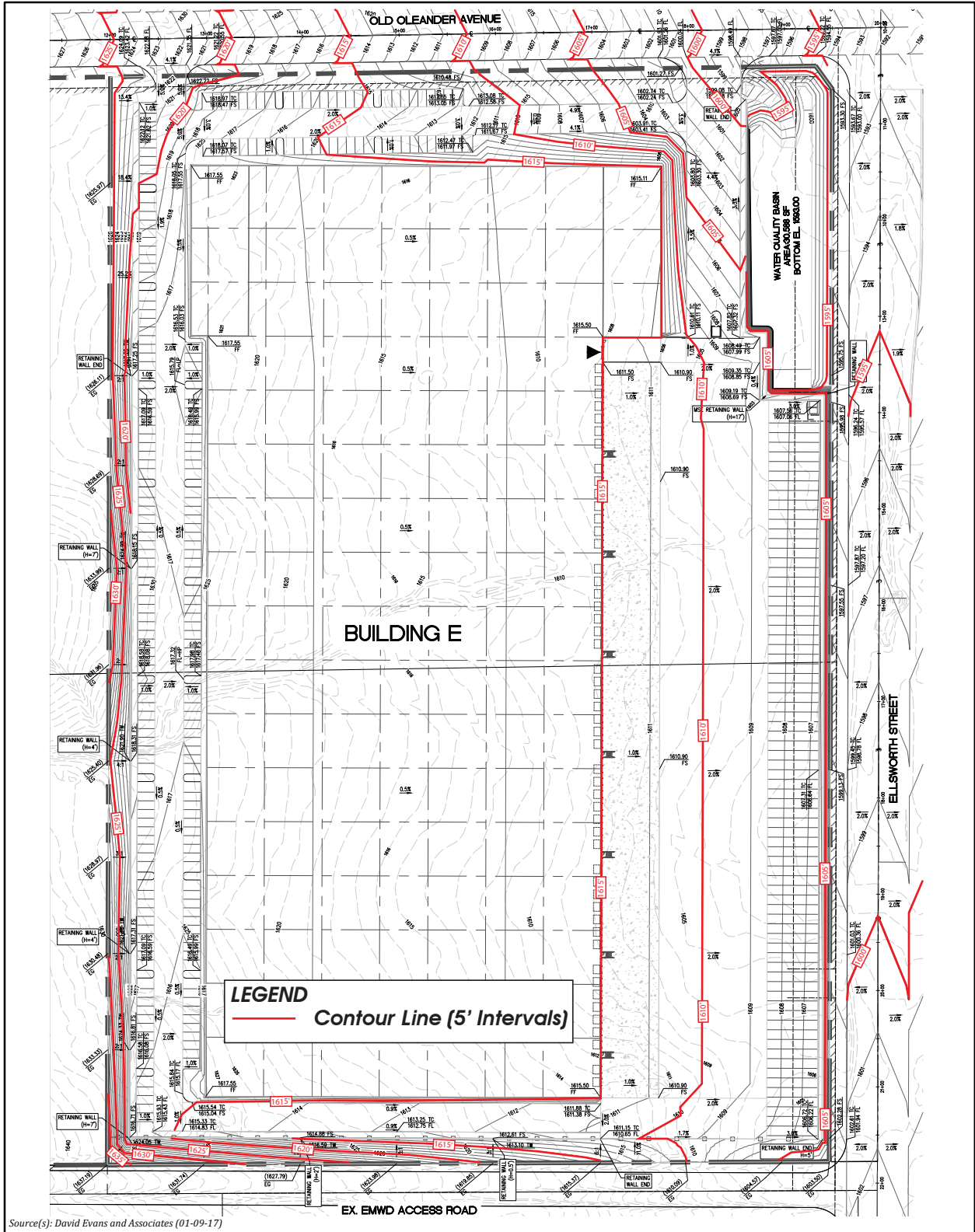


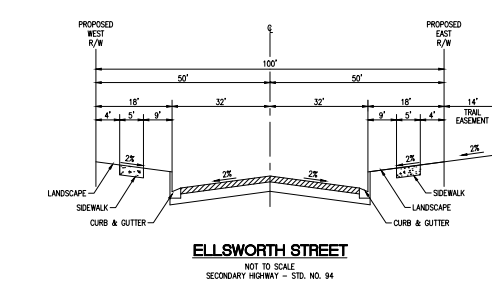
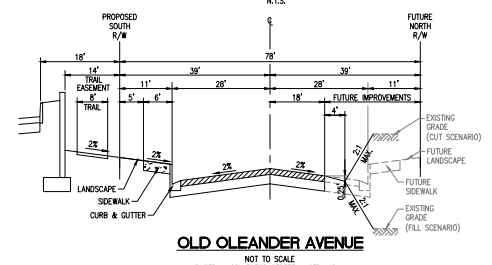
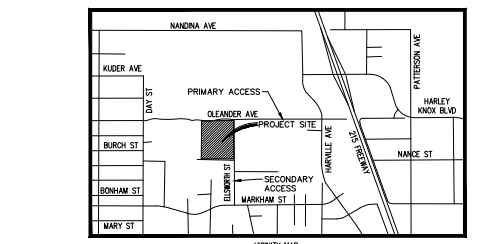
Figure 3-14



NOT TO SCALE

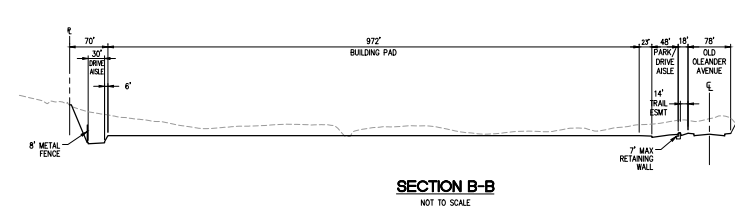
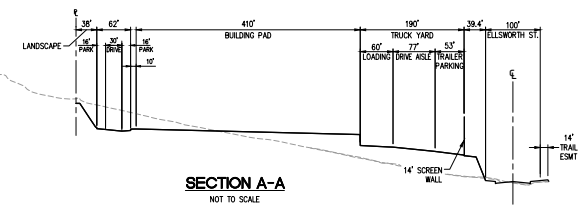
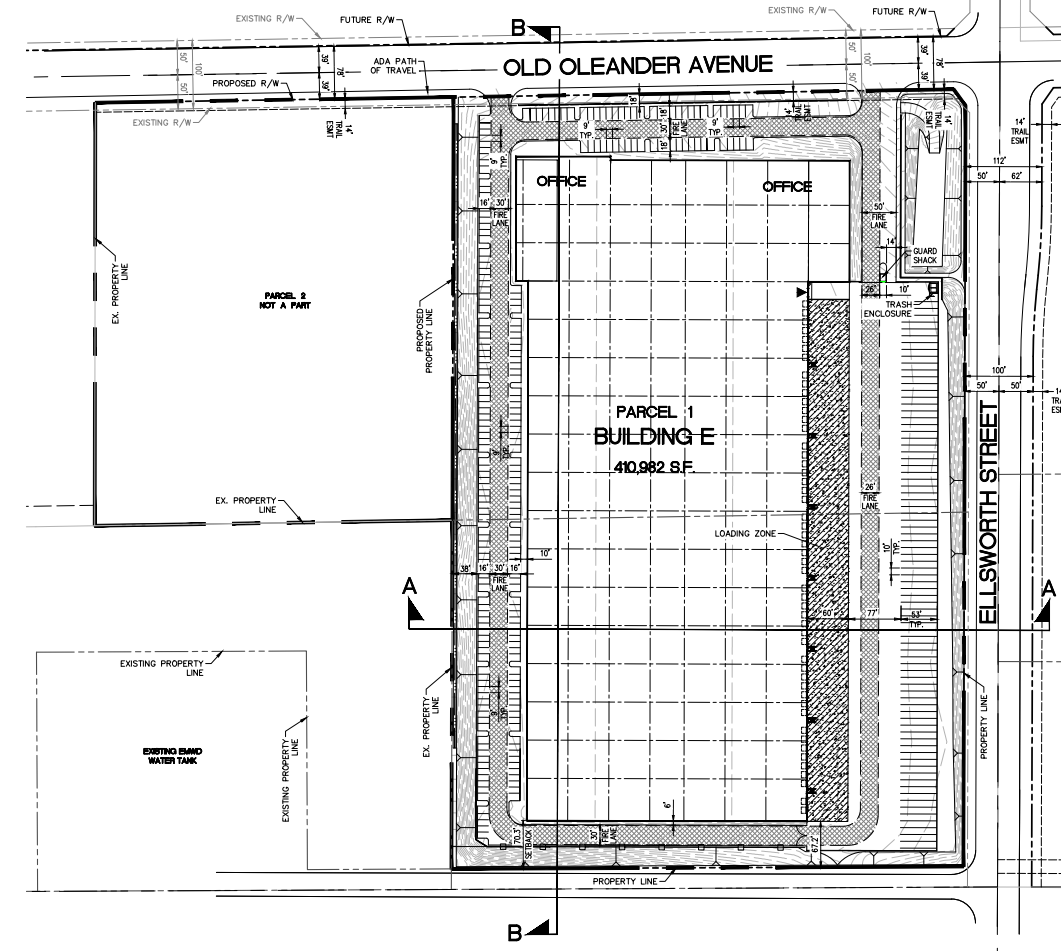
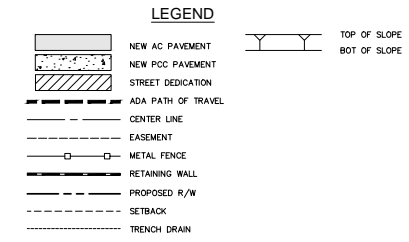


CONCEPTUAL GRADING PLAN - BUILDING E SITE



SITE TABULATION

| ITEM | QUANTITY | REMARKS |
|-------------------------------------|-------------|---------|
| SITE | 21.52 ACRES | |
| PROPOSED NET AREA | 15,000 SF | |
| OFFICE | 30,000 SF | |
| TOTAL BUILDING AREA | 410,982 SF | |
| LOADING DOCK | 25 | |
| F.A.R. | 0.80 | |
| HEIGHT | 50 FT | |
| LANDSCAPING REQUIRED (15%) | 127,641 SF | |
| LANDSCAPING PROVIDED | 160,000 SF | |
| LANDSCAPE COVERAGE | 19.4% | |
| PARKING (OFFICE) 1 STALL/200 SF | 80 STALLS | |
| PARKING (WAREHOUSE) 1 STALL/2000 SF | 198 STALLS | |
| TOTAL REQUIRED PARKING | 278 STALLS | |
| TRUCK/TRAILER PARKING PROVIDED | 80 | |
| STANDARD PARKING PROVIDED | 228 | |
| HANDICAP PARKING REQUIRED | 7 | |
| HANDICAP PARKING PROVIDED | 7 | |
| TOTAL PARKING PROVIDED | 235 | |



APPLICANT:
 TRAMMELL CROW COMPANY
 300 LAMARQUE ROAD, SUITE 230
 NEWPORT BEACH, CA 92660
 PHONE: (949)477-4100

ENGINEER:
 DAVID EVANS AND ASSOCIATES
 17782 17TH STREET, SUITE 200
 TUSTIN, CA 92780
 PHONE: (714)665-4500

ARCHITECT:
 HPA ARCHITECTURE
 1883 BARSEEN AVENUE, SUITE 100
 IRVINE, CA 92617
 PHONE: (949)663-1770

UTILITY PURVEYORS:
 WATER - EASTERN MUNICIPAL WATER DISTRICT
 SEWER - EASTERN MUNICIPAL WATER DISTRICT
 GAS - SOUTHERN CALIFORNIA GAS COMPANY
 ELECTRIC - SOUTHERN CALIFORNIA Edison COMPANY
 TELEPHONE - VERIZON

LAND AREA:
 21.52 GROSS ACRES
 (2.02) ACRES ROAD DEDICATION
 19.5 NET ACRES

EARTHWORK:
 CUT: 80,000 CUBIC YARDS
 FILL: 80,000 CUBIC YARDS
 NET: BALANCED SITE

SCHOOL DISTRICT:
 VAL VERDE UNIFIED SCHOOL DISTRICT

LAND USE / ZONING:
 EXISTING ADDRESS:
 APN 314-020-010: 23409 OLEANDER AVE, PERRIS, CA 92570
 APN 314-020-017: 18215 ELLSWORTH ST, PERRIS, CA 92570
 APN 314-020-018: NOT AVAILABLE

EXISTING LAND USE:
 APN 314-020-010: BUSINESS PARK
 APN 314-020-017: LIGHT INDUSTRIAL
 APN 314-020-018: RURAL, COMMUNITY-VERY LOW DENSITY RESIDENTIAL

PROPOSED LAND USE: LIGHT INDUSTRIAL (LI)

EXISTING ZONING:
 APN 314-020-010: R-R-1/2 (RURAL RESIDENTIAL)
 APN 314-020-017: I-P (INDUSTRIAL PARK)
 APN 314-020-018: A-1-1 (LIGHT INDUSTRIAL)

PROPOSED ZONING: I-P (INDUSTRIAL PARK)

LEGAL DESCRIPTION:
 FROM THE PRELIMINARY TITLE REPORT ORDER NO. 00029420-001-PS
 THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:
 PARCEL 3 AS SHOWN ON PARCEL MAP 5042, IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, ON FILE IN BOOK 8 PAGE 84 OF PARCEL MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA.
 EXCEPTING THEREFROM THAT PORTION CONVEYED TO THE COUNTY OF RIVERSIDE BY DEED RECORDED APRIL 20, 1992 AS INSTRUMENT NO. 138450, OFFICIAL RECORDS.
 FROM THE PRELIMINARY TITLE REPORT ORDER NO. 00029418-001-X23
 THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:
 PARCEL 4 AS SHOWN ON PARCEL MAP 5042, IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, ON FILE IN BOOK 8 PAGE 84 OF PARCEL MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA.
 EXCEPTING THEREFROM THAT PORTION CONVEYED TO THE COUNTY OF RIVERSIDE BY FINAL ORDER OF CONDEMNATION RECORDED NOVEMBER 1, 1993 AS INSTRUMENT NO. 93-50388A, OF OFFICIAL RECORDS.
 APN: 314-020-019
 FROM THE PRELIMINARY TITLE REPORT ORDER NO. 00029422-001-PS
 THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:
 PARCEL 2 OF PARCEL MAP NO. 5042, COUNTY RIVERSIDE, STATE OF CALIFORNIA, AS PER MAP FILED IN BOOK 8, PAGE 84 OF PARCEL MAPS IN OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.
 APN: 314-020-010

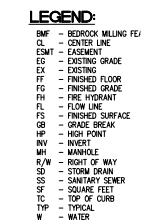
NOTES:

- THOMAS CROSS MAP PAGE 747, GRID B7 (2008 EDITION)
- THE PROJECT AREA IS NOT SUBJECT TO LIQUIDATION OR OTHER GEOLOGIC HAZARDS NOTED WITHIN ANY SPECIAL STUDIES ZONES
- TEAM COMMUNITY PANEL DROESCH410X, ZONE X (OUTSIDE THE 0.2% ANNUAL CHANCE FLOODPLAIN)
- THIS PROJECT IS NOT WITHIN A SPECIFIC PLAIN
- THE PROJECT AREA IS NOT SUBJECT TO OVERFLOW INUNDATION OR FLOOD HAZARD
- THE PROJECT DOES NOT INTEND TO USE SUBSURFACE SEPTIC SEWAGE
- PROPOSED DESIGN/ASSESSMENTS TO BE MADE BY SEPARATE DOCUMENTS
- THIS PROJECT IS NOT PHASED
- REFER TO ARCHITECTURAL PLANS FOR WALL AND FENCING DETAILS

EASEMENTS:

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Source(s): David Evans and Associates (01-17-2017)

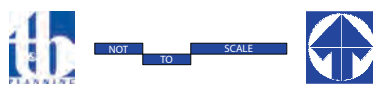


Figure 3-15

PLOT PLAN NO. 25837 (BUILDING E SITE)



northeast corners of the building. Vehicular access to Building E would be provided by two driveways connecting to Oleander Avenue, with the western driveway for passenger cars and the eastern driveway for trucks. The Project also proposes the option to add another passenger car driveway between the two driveways. All driveways on the Building E Site would be stop-sign controlled. Access to the proposed loading and truck parking areas located interior to the Building E Site would be gated. Proposed truck check-in points and driveways are positioned interior to the Building E Site to create interior queuing areas and minimize the potential trucks accessing the property to stack onto Oleander Avenue.

2. Parking and Loading

Figure 3-15 depicts the proposed locations of parking spaces and loading docks for Building E. Building E would provide approximately 260 ~~229~~ ~~automobile passenger vehicle parking stalls spaces~~ distributed on the north and the west sides of the building, ~~seven handicap parking spaces~~, and approximately ~~66~~ ~~80~~ truck trailer parking stalls distributed on the east side of the building. Bicycle parking would be provided in compliance with Riverside County Ordinance No. 348, Article XVII, Section 18.12.D, *Bicycle Parking Facilities*, which requires one space for every 25 passenger vehicle parking spaces. Building E would include 51 loading docks (also called “bays”) on the east side of the building to be used for the loading, unloading, and short-term parking of trucks. Loading dock positions facilitate operations inside the building. When trucks have the option to dock close to the area where their cargo is sorted and stored inside the structure, workers inside the building have a shorter distance to cover when moving goods between the exterior docks and interior storage areas.

3. Architecture, Walls, and Fences

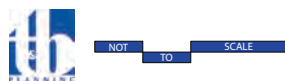
Figure 3-16, *Conceptual Architecture Elevations – Building E*, depicts the conceptual architecture elevations proposed for Building E. Building E would be constructed to a height of approximately 40 feet above finished grade, with architectural projections reaching up to 44 feet. The building would be constructed with painted concrete tilt-up panels and low reflective, blue-glazed glass. Articulated building elements, primarily at the building corners and along Oleander Avenue, are proposed to be provided as decorative elements. The exterior color palette for the proposed building is comprised of various mild, earth-toned colors, including shades of beige, tan, and brown.

Painted concrete 14-foot tall tilt-up screen walls, with access gates, would be provided on the north side of Building E, facing Oleander Avenue, to screen the loading bays and truck parking areas from public view. Eight-foot tall fencing would be provided along the western and southern perimeter of the Building E Site. In addition, a concrete block retaining wall would be located along the site’s southwestern and eastern boundaries, ranging from one to seven feet in height. Also, a mechanically stabilized earth wall up to 18 feet in height is proposed along the west and south sides of the proposed water quality basin.



Source(s): HPA (07-29-2016)

Figure 3-16



CONCEPTUAL ARCHITECTURE ELEVATIONS - BUILDING E



4. *Conceptual Landscaping Plan*

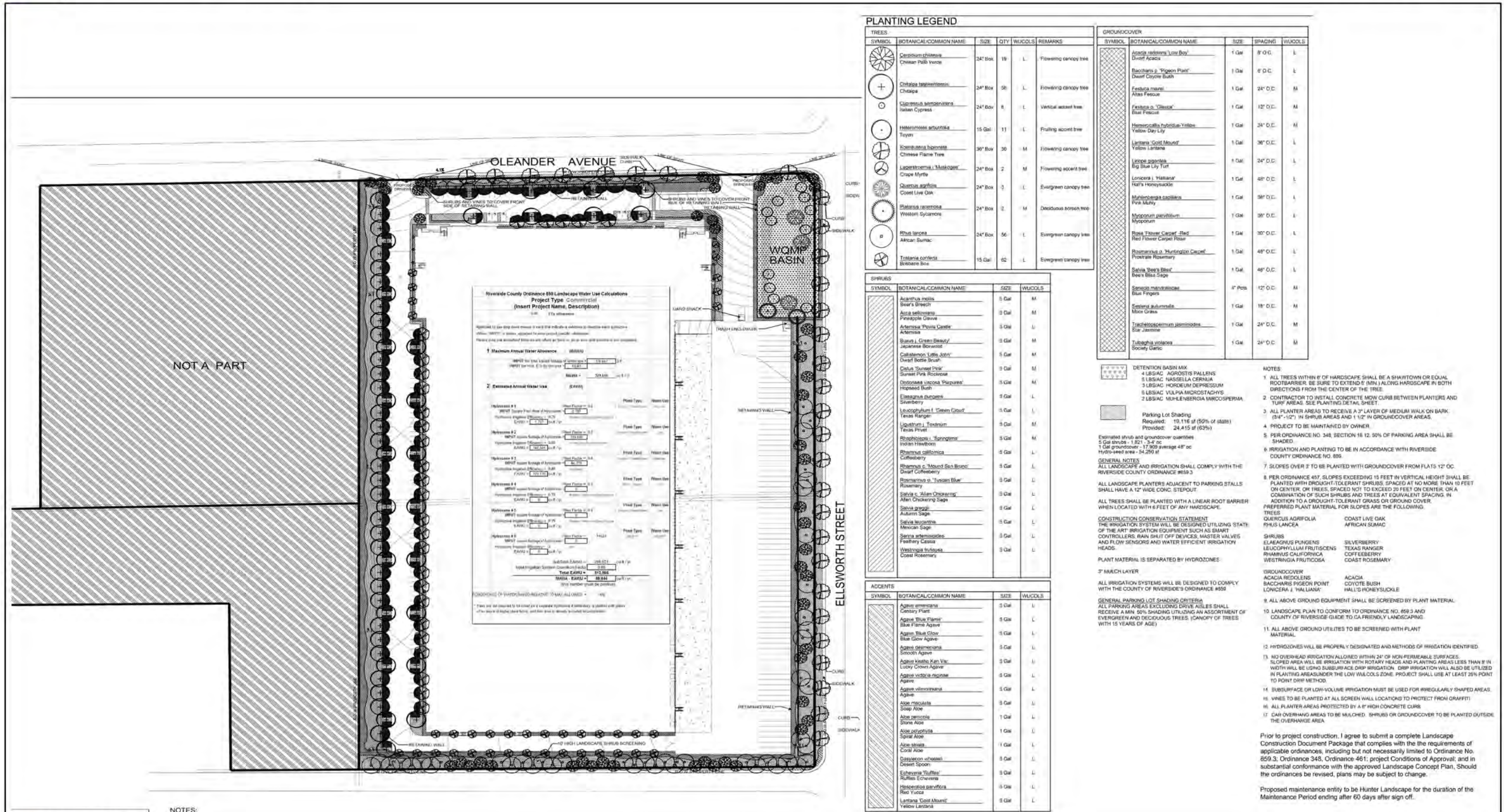
The conceptual landscape plan is depicted in Figure 3-17, *Conceptual Landscape Plan – Building E Site*. Proposed landscaping would be ornamental in nature and would feature trees, shrubs, and drought-tolerant accent plants in addition to a variety of groundcovers. As shown on Figure 3-17, trees and groundcover are proposed along the site’s frontage with Oleander Avenue and Ellsworth Street (including landscaping within the public right-of-way). Landscaping also would occur at building entries, in and around automobile parking areas, in and around the Building E site’s water quality/detention basins, and along proposed screen walls. Proposed landscaping would be ornamental, except within water quality/detention basin where plant materials would be selected to serve water quality functions. Prior to the issuance of a building permit to construct Building E, the Project Applicant would be required to submit final planting and irrigation plans to the County of Riverside for review and approval. The plans are required to comply with Riverside County Ordinance No. 859, which establishes requirements for landscape design, automatic irrigation system design, and water-use efficiency.

3.4 TECHNICAL CHARACTERISTICS

A. Public Roadway Improvements and Dedications

Public roadway improvements that are proposed as part of the Project include the following:

- **Oleander Avenue.** Oleander Avenue is an east-west oriented roadway that abuts the northern property boundaries of the Building D and Building E Sites. The Project would construct Oleander Avenue along the Building D and Building E property frontages, including pavement, curb, gutter, sidewalk, and landscape parkway improvements, to its ultimate half-width section as an Industrial Collector Street (78-foot-wide public right-of-way, County Standard No. 111). A 14-foot-wide trail easement also would be provided along the Project site frontage. In addition, the Project would construct a paved, 18-foot-wide vehicular travel way on the northern half of Oleander Avenue to ensure adequate vehicular access for two-way traffic. Proposed improvements to Oleander Avenue would conform to applicable County of Riverside Transportation Department standards. Refer to Figure 3-18, *Roadway Cross-Sections*, for an illustration of proposed improvements to Oleander Avenue.
- **Ellsworth Street.** Ellsworth Street is a north-south oriented roadway that bisects the Project site and separates the Building D Site (located to the east of Ellsworth Street) from the Building E Site (located to the west of Ellsworth Street). The Project would construct Ellsworth Street from the southern Project site boundary to the northern Project site boundary (i.e., along the western frontage of the Building D Site and the eastern frontage of the Building E Site), including pavement, curb, gutter, sidewalk, and landscape parkway improvements, to provide its ultimate full-width section as a Secondary Highway (100-foot-wide public right-of-way, County Standard No. 94). In addition, a 14-foot trail



Source(s): Hunter Landscape (02-10-2017)

NOTES:



Lead Agency: County of Riverside

Figure 3-17

CONCEPTUAL LANDSCAPE PLAN - BUILDING E SITE

SCH No. 2015081081

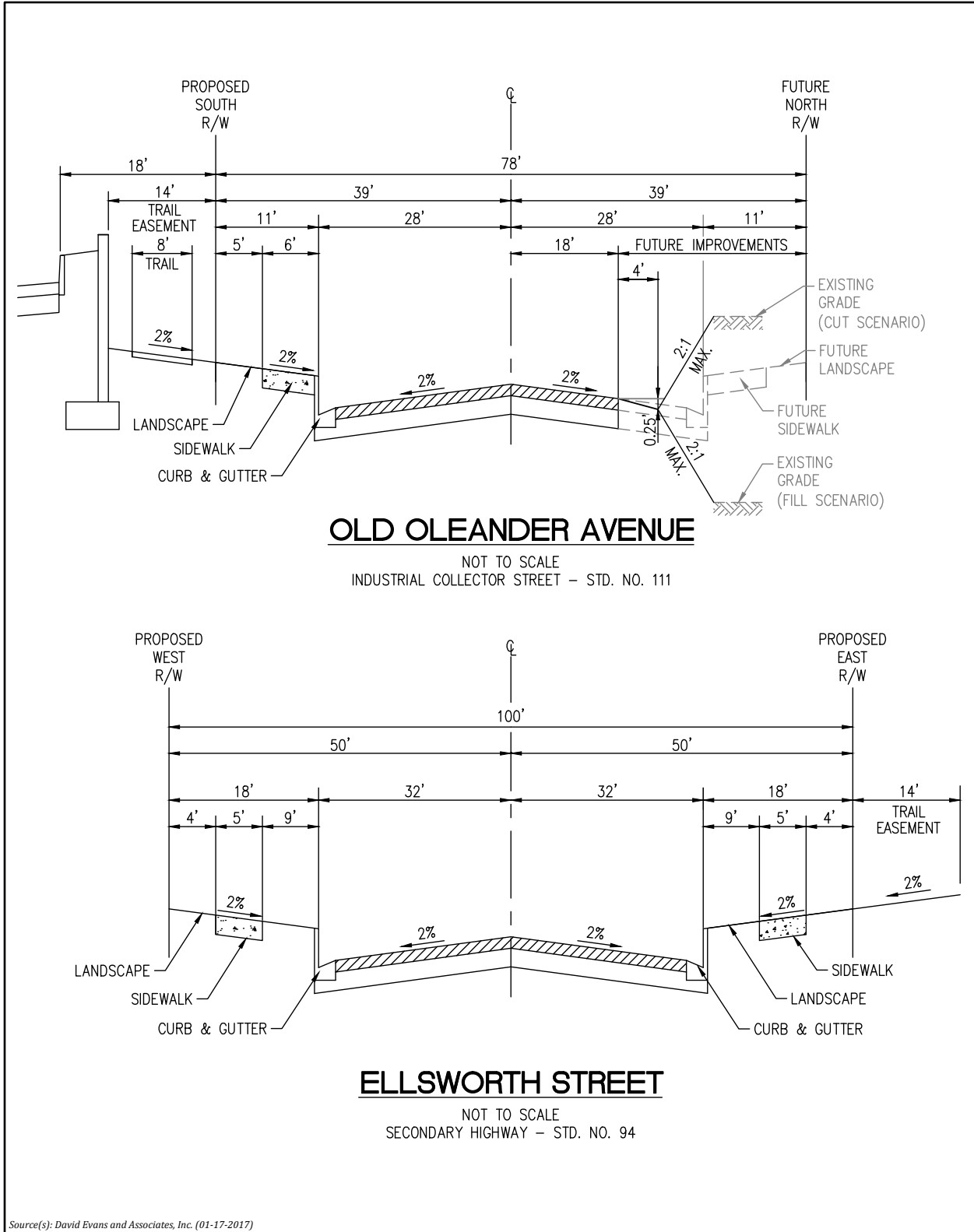


Figure 3-18



NOT TO SCALE

ROADWAY CROSS-SECTIONS



easement would be provided adjacent to the eastern side of the right-of-way of Ellsworth Street (on the Building D Project Site). Proposed improvements to Ellsworth Street would conform to applicable County of Riverside Transportation Department standards. Refer to Figure 3-18 for an illustration of proposed improvements to Ellsworth Street.

The Building D Project would dedicate approximately 2.63-acres of land and the Building E Project would dedicate approximately 2.0 acres of land as public right-of-way to the County of Riverside to accommodate the construction of Oleander Avenue and Ellsworth Street. The proposed street dedications would occur as part of subsequent, administrative-level street dedication actions.

B. Utility Infrastructure Improvements

Water Infrastructure

Water service would be provided to the Project by the Eastern Municipal Water District (EMWD). Under existing conditions, 12-inch-diameter water lines are installed beneath the paved Oleander Avenue segment that abuts the northeastern corner of the Building D Site and beneath an unnamed, private EMWD water tank access road that abuts the southern Project site boundary. The Project would install a 12-inch-diameter water line that connects to the existing water line that abuts the southern Project site boundary; travels north beneath Ellsworth Street to Oleander Avenue; travels west beneath Oleander Avenue between Ellsworth Street and the western Building E Site boundary; and travels east beneath Oleander Avenue from Ellsworth Street to approximately 1,055 feet east of the Oleander Avenue/Ellsworth Street intersection, where it connects to the existing water line that abuts the northeast corner of the Building D Site. Buildings D and E would connect to the proposed water line beneath Oleander Avenue.

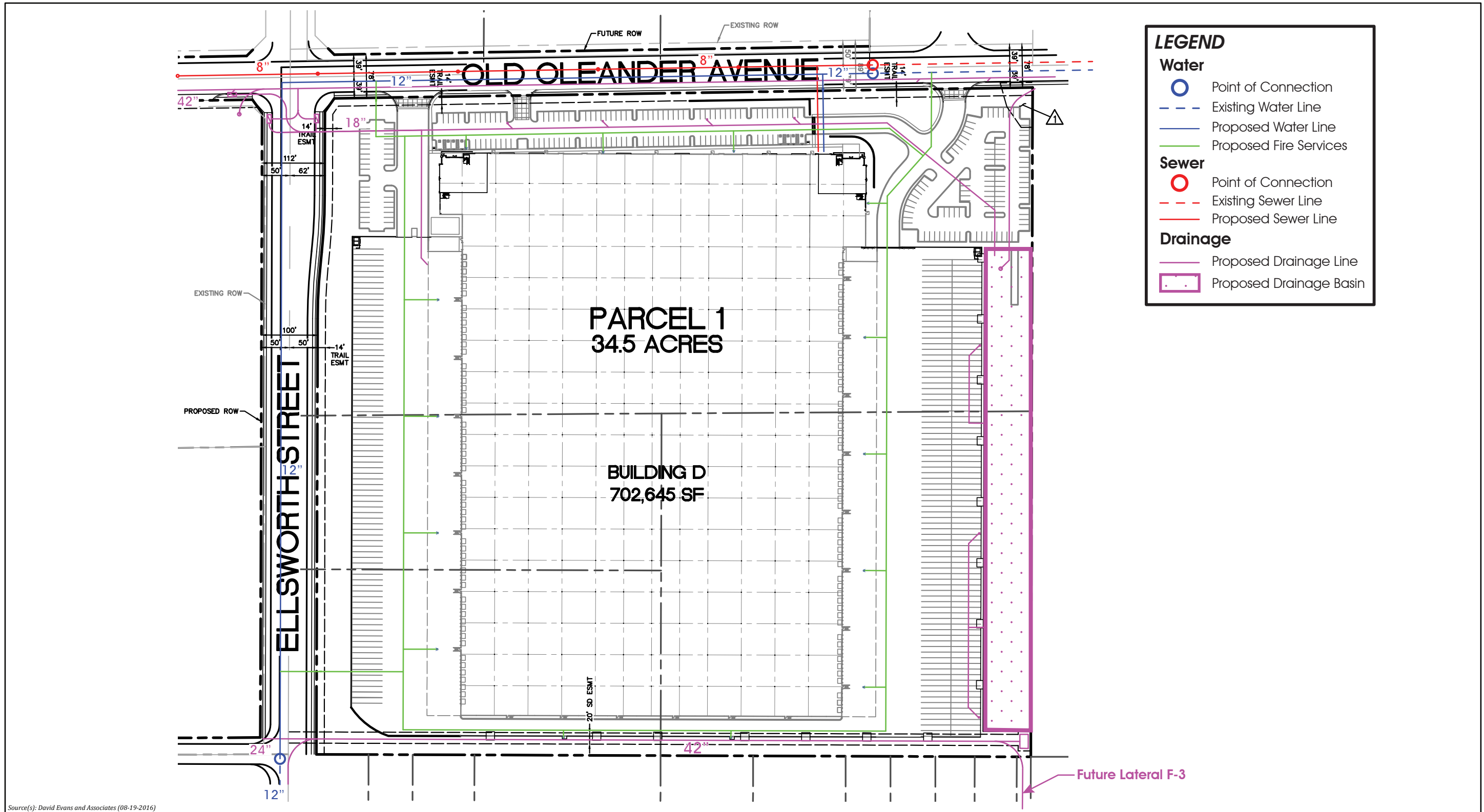
All proposed water facilities would be designed in accordance with EMWD standards and would require approval by EMWD prior to installation.

Wastewater Infrastructure

Wastewater conveyance services would be provided by EMWD. Under existing conditions, an 8-inch-diameter sewer line is installed beneath the paved Oleander Avenue segment that abuts the northeastern corner of the Building D Site. As depicted on the utility plans shown in Figure 3-19, *Conceptual Utility Plan – Building D*, and Figure 3-20, *Conceptual Utility Plan – Building E*, the Project would install an 8-inch-diameter sewer line beneath Oleander Avenue, between the western Project site boundary and the existing wastewater line that abuts the northeast corner of the Project site. Buildings D and E would connect to the proposed wastewater line beneath Oleander Avenue. All proposed wastewater facilities would be designed in accordance with EMWD standards and would require approval by EMWD prior to installation.

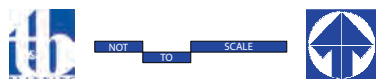
Stormwater Drainage Infrastructure

The Project site's natural drainage pattern would be replaced by a constructed storm drain system. The



Source(s): David Evans and Associates (08-19-2016)

Figure 3-19



CONCEPTUAL UTILITY PLAN - BUILDING D SITE

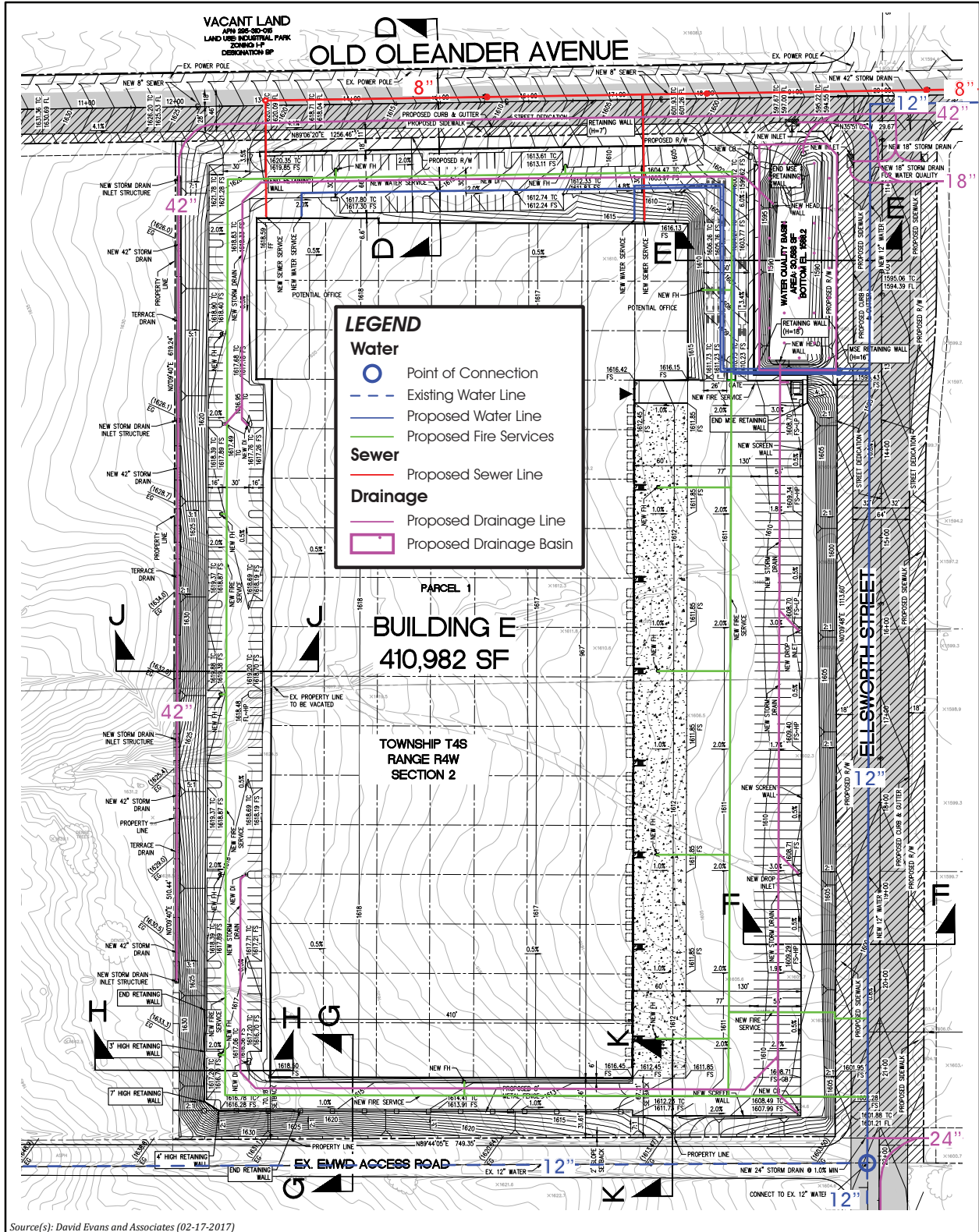


Figure 3-20



NOT TO SCALE



CONCEPTUAL UTILITY PLAN - BUILDING E SITE



proposed on-site storm drain system is proposed to consist of a system of trench drains, drop inlets, underground storm drain pipes and basins, and bioretention/detention basins that would collect, treat, and temporarily store stormwater runoff (as needed) before discharging treated flows from the property. First flush stormwater runoff flows (i.e., typically the first $\frac{3}{4}$ inch of initial surface runoff after a rainstorm, which contains the highest proportion of waterborne pollution) would be conveyed to the bioretention/detention basins located on the Building D Site and the Building E Site. Stormwater runoff captured after the first flush would be discharged off-site via proposed connections to the Perris Valley MDP system. (DEA, 2017a, n.p.)

In conjunction with development of the Building D Site, Perris Valley MDP Lateral F-4 would be extended in Oleander Road from its existing terminus near the northeast corner of the Building D Site to Ellsworth Street. Perris Valley MDP Laterals F-3 and F-3.1 are proposed to be combined as a single storm drain line (Lateral F-3) primarily installed along the southern boundary of the Building D Site, with an approximately 300-foot segment located beneath Ellsworth Street. Lateral F-3 would outlet at an energy dissipater with weir device located at the southeast corner of the Building D Site. (DEA, 2017a)

Similarly, in conjunction with development of the Building E Site, Perris Valley MDP Lateral F-4 would be extended in Oleander Road from its existing terminus near the northeast corner of the Building D Site to the northwest corner of the Building E Site. Also, as would occur for development of the Building D Site, Perris Valley MDP Laterals F-3 and F-3.1 would be combined as a single storm drain line (Lateral F-3) installed along the southern boundary of the Building D Site, which would outlet at an energy dissipater with weir device located at the southeast corner of the Building D Site.

At full proposed buildout of both the Building D Site and the Building E Site, during peak storm events, the Project would discharge approximately 29 cubic feet per second (cfs) of stormwater runoff to Lateral F-4 and approximately 26 cfs of stormwater runoff to Lateral F-3. When peak storm runoff flows from off-site tributary areas are added to the Project's flows, Lateral F-4 would have a total flow of 130 cfs and Lateral F-3 would have a total flow of 141, both of which are below their available capacities of 138 cfs and 206 cfs, respectively. (DEA, 2017a, n.p.) As such, the Project would be consistent with the Perris Valley MDP. All of the Project's proposed stormwater drainage facilities would be designed in accordance with RCFCWCD standards and would require approval by RCFCWCD prior to installation. Also, pursuant to the County's MS4 general permits, the peak storm water runoff discharge would not exceed the estimated pre-development rate.

3.5 OPERATIONAL CHARACTERISTICS

At the time this EIR was prepared, the future user(s) of proposed Buildings D and E were unknown; however, the Project Applicant expects the buildings to be occupied by high-cube warehouse users. The proposed business park warehouse buildings are not designed to accommodate an occupant that requires cold storage (i.e., refrigeration); therefore, the analysis in this EIR assumes that the proposed buildings would not house a tenant that uses cold storage.



This EIR assumes that Buildings D and E would be operational 24 hours per day, seven (7) days per week, with exterior areas safety-lit at night. The proposed buildings would be designed such that business operations would be conducted primarily within the enclosed building, with the exception of traffic movement, parking, and the loading and unloading of tractor trailers at the loading bays. Based on the Project's traffic study supplement (*Technical Appendix JI*), during long-term operational conditions, Building D is calculated to generate 1,853 passenger car equivalent (PCE) trips, while Building E is calculated to generate 1,038 PCE trips. In total, the Project would generate up to 3,319 PCE vehicle trips per day.

Because users of the Project's buildings are not yet known, the number of jobs that the Project would generate cannot be precisely determined; therefore, for purposes of analysis, employment estimates have been calculated using data and average employment density factors utilized in the County of Riverside General Plan. The General Plan estimated that light industrial business would employ one (1) worker for every 1,030 s.f. of building area. Based on this employment generation rate, the Project is expected to create approximately 1,081 new, recurring jobs (1,113,627 s.f. ÷ 1,030). (Riverside County, 2016 Appendix E, Table ES-5)

According to a Water Supply Assessment prepared for the Project by EMWD (*Technical Appendix K*), the Project would result in a demand for approximately 38,890 gallons per day (gpd) of potable water, which translates into an annual demand of approximately 44 acre-feet per year (AFY). The Project also would generate a total of approximately 49,130 gallons of wastewater per day. Based on calculations utilized in the Project's Energy Analysis (*Technical Appendix L*), the proposed Project would demand approximately 4,381,622 kilowatt hours of electricity per year (kWh/yr) and 2,142,900 British thermal unit of natural gas per year (kBtu/yr). These calculations are based on a larger sized Building E than is currently proposed, and are therefore higher than the water, wastewater, and energy demands that would actually occur.

Refer to EIR Subsections 4.7, *Greenhouse Gas Emissions*, and 5.4, *Energy Conservation*, for more information about the Project's proposed energy efficiencies. Although the actual efficiency measures that are implemented at building construction will be determined at the building permit stage of Project design, the Project Applicant expects to include skylights and windows to allow light penetration to reduce indoor artificial lighting; enhanced window and duct insulation; improved or high efficiency HVAC units, water heaters, and appliances; high efficiency lights; and features to reduce water use such as low water use landscaping and water efficient toilets and faucets. Also, the roofs of both buildings are proposed to be designed and constructed to accommodate a 1 KW photovoltaic (PV) solar array taking into consideration limitations imposed by other rooftop equipment, roof warranties, building and fire code requirements, and other physical or legal limitations. Also, the buildings will be constructed with the necessary electrical systems and other infrastructure to accommodate PV arrays in the future. Further, the proposed buildings would be required by law to comply with enhanced building/utilities energy efficiencies mandated under California building codes (e.g., Title 24, the California Green Building Code). Vehicles accessing the Project site would be required by law to comply with increasingly stringent state and federal regulatory actions addressing vehicle fuel economies and vehicle emissions standards.



3.6 CONSTRUCTION CHARACTERISTICS

Based on information supplied by the Project Applicant regarding the Project's expected construction schedule, this EIR assumes that the proposed Project would be constructed in one phase over the course of approximately 23 months. Commencement of construction is expected to occur in 2018. At the time the NOP was released for this EIR (August 2015), construction was anticipated to commence in 2016; thus, the technical analysis presented in this EIR is based on a construction period spanning 2016-2017. Although actual construction of Building D and Building E would commence in 2018, the technical analysis presented in this EIR that assumes an earlier construction period is adequate under CEQA because it overstates construction-related impacts. This is because as time passes, construction equipment operators phase out the use of older equipment and phase in newer pieces of equipment that emit lower levels of air pollutants and noise. Thus, there was no need to update the technical analyses, as any updates for a later construction period would have shown nominally lesser levels of impact as a result of the later construction period and the phasing out of older construction equipment. Also, should Building D and Building E be constructed in two phases instead of one phase, the analysis in this EIR also represents worst-case analyses because simultaneous construction would result in a greater daily impact than would occur if the buildings were constructed one at a time.

Construction equipment is expected to operate on the Project site eight hours per day, five days per week during the construction period. Construction workers would travel to the Project site by passenger vehicle and materials deliveries would occur by medium- and heavy-duty trucks. The types and numbers of off-road heavy equipment expected to be used on the Project site during construction activities are listed in Table 3-1, *Construction Equipment Assumptions*.

When construction activities commence, site preparation and the demolition/removal of the existing improvements on the Project site would occur first. Then the property would be mass-graded and underground infrastructure and retaining walls would be installed. Next, fine grading would occur, surface materials would be poured, and the proposed buildings would be erected, connected to the underground utility system, and painted. Lastly, landscaping, fencing, screen walls, lighting, signage, and other site improvements would be installed.

As part of proposed grading activities, blasting would be necessary in hard rock areas in the southern portion of the Building D Site boundaries. Based on the excavation plans prepared on June 16, 2015, by the Henry-Ann Company, rock blasting within the Building D Site is expected to include the drilling of up to 5,253 holes in the largest area, in which small charges would be placed to fragment the rocks into smaller, crushable pieces. Approximately 112,090 cubic yards (c.y.) of rock is expected to be produced during proposed blasting activities, which would be crushed and used on the Project site as construction base. An electric rock crusher powered by a 300-horsepower diesel generator is proposed to further break down the fragmented rocks. The Project Applicant calculates that approximately 2,759 tons of rock would be processed on the Project site per day during the blasting and rock crushing phase of construction (approximately 65 working days). (Urban Crossroads, Inc, 2016a, pp. 31-32) The contractor may potentially eliminate the use of an on-site rock crusher by breaking up rock fragments over 12" in place utilizing crushing jaws on an excavator (Holdridge, 2017). Rock fragments that



exceed 12” are expected to be approximately 5% of the material. Fragments less than 12” would be handled and graded in the same manner as soils and utilized along with on-site soils to form the building pad and pavement areas of the proposed development. Because the use of an on-site rock crusher may occur, the use of a mechanical rock crusher is evaluated as an inherent part of the Project’s construction activities in this EIR.

3.7 STANDARD REQUIREMENTS AND CONDITIONS OF APPROVAL

The proposed General Plan Amendment Nos. 1151 and 1152, Change of Zone Nos. 7872 and 7873, Tentative Parcel Map Nos. 36950 and 36962, and Plot Plan Nos. 25837 and 25838, and their technical aspects have been reviewed in detail by numerous County of Riverside departments and divisions.

Table 3-1 Construction Equipment Assumptions

| Activity | Equipment | Number | Hours Per Day |
|------------------------------|------------------------------|---------------|----------------------|
| Demolition | Concrete/Industrial Saws | 1 | 8 |
| | Excavators | 3 | 8 |
| | Rubber Tired Dozers | 2 | 8 |
| Grading (Including Blasting) | Excavators | 1 | 8 |
| | Generator Sets | 1 | 8 |
| | Graders | 1 | 8 |
| | Water Trucks | 2 | 8 |
| | Rubber Tired Dozers | 5 | 8 |
| | Scrapers | 8 | 8 |
| | Tractors/Loaders/Backhoes | 2 | 8 |
| Underground Utilities | Excavators | 3 | 8 |
| | Off-Highway Trucks | 2 | 8 |
| | Rubber Tired Dozers | 1 | 8 |
| | Rubber Tired Loaders | 1 | 8 |
| Building Construction | Cranes | 1 | 8 |
| | Forklifts | 2 | 8 |
| | Generator Sets | 3 | 8 |
| | Other Construction Equipment | 1 | 8 |
| | Tractors/Loaders/Backhoes | 3 | 8 |
| | Welders | 6 | 8 |
| Landscaping | Tractors/Loaders/Backhoes | 1 | 8 |
| Paving & Site Finishes | Pavers | 2 | 8 |
| | Paving Equipment | 2 | 8 |
| | Rollers | 2 | 8 |
| Architectural Coatings | Air Compressors | 2 | 8 |
| | Aerial Lifts | 4 | 8 |

Source: (Urban Crossroads, Inc, 2016a, Table 3-3)



These departments and divisions are responsible for reviewing land development applications for compliance with applicable County codes, ordinances, policies, plans, and regulations. These departments and divisions also were responsible for exercising their independent judgment in reviewing this EIR and its Technical Appendices for technical accuracy and compliance with CEQA. The County of Riverside departments and divisions responsible for technical review include:

- Planning Department, Planning Division
- Planning Department, Cultural Resources Division
- Planning Department, Environmental Programs Division
- Planning Department, Geology Division
- Planning Department, Landscape Review
- Building & Safety Department
- Environmental Health Department
- Fire Department
- Parks and Recreation Department
- Transportation Department

Review of the proposed Project by the Riverside County departments and divisions listed above, in addition to the Riverside County Flood Control and Water Conservation District (RCFCWCD), will result in the production of a comprehensive set of Conditions of Approval for the Building D Project and the Building E Project that will be available for public review prior to consideration of the proposed Projects by the Riverside County Board of Supervisors. These conditions will be considered by the Board of Supervisors in conjunction with their consideration of proposed General Plan Amendment Nos. 1151 and 1152, Change of Zone Nos. 7872 and 7873, Tentative Parcel Map Nos. 36950 and 36962, and Plot Plan Nos. 25837 and 25838. If the Building D Project and the Building E Project are approved by the Board of Supervisors, the Projects will be required to comply with all imposed Conditions of Approval.

Conditions of Approval and other applicable regulations, codes, policies, and requirements to which the Project is required to comply and that result in the reduction or avoidance of an environmental impact are specified in each subsection of EIR Section 4.0, *Environmental Analysis*.

3.8 SUMMARY OF ACTIONS REQUESTED OF RIVERSIDE COUNTY

The County of Riverside has primary approval responsibility for the proposed Project. As such, the County serves as the Lead Agency for this EIR pursuant to CEQA Guidelines § 15050. (The role of the Lead Agency was previously described in detail in Subsection 1.4 of this EIR). The Riverside County Planning Commission will consider the Project's requested discretionary permit applications and approvals and make advisory recommendations to the Riverside County Board of Supervisors. The Board of Supervisors will have final authority over approval, approval with changes, or denial of the requested actions that within the County's jurisdiction. The County will use its independent judgment when considering the information contained in this EIR and this EIR's Administrative



Record during its decision-making processes. Upon approval of the Building D Project and the Building E Project and certification of this EIR, the County would conduct administrative reviews and approve ministerial permits and approvals to implement Project requirements and conditions of approval. A list of the primary actions under County jurisdiction is provided in Table 3-2, *Matrix of Project Approvals/Permits*.

3.9 RELATED ENVIRONMENTAL REVIEW AND CONSULTATION REQUIREMENTS

In addition to the Project-related actions under consideration by the County of Riverside, additional discretionary and/or administrative actions would be necessary to implement the proposed Project. Table 3-2 lists the agencies that are expected to use this EIR and provides a summary of the related actions associated with the Project. This EIR covers all federal, state, local government and quasi-government approvals which may be needed to construct or implement the Project, whether or not they are explicitly listed in Table 3-2 or elsewhere in this EIR (CEQA Guidelines § 15124(d)).

Table 3-2 Matrix of Project Approvals/Permits

| PUBLIC AGENCY | APPROVALS AND DECISIONS |
|---|--|
| County of Riverside | |
| County of Riverside Discretionary Approvals (Proposed Project) | |
| Riverside County Planning Commission | <ul style="list-style-type: none"> Recommend approval, conditional approval, or denial of General Plan Amendment Nos. 1151 and 1152, Change of Zone Nos. 7872 and 7873, Tentative Parcel Map Nos. 36950 and 36962, and Plot Plan Nos. 25837 and 25838; and Recommend that the Board of Supervisors reject or certify this EIR along with appropriate CEQA Findings. |
| Riverside County Board of Supervisors | <ul style="list-style-type: none"> Approve, conditionally approve, or deny General Plan Amendment Nos. 1151 and 1152, Change of Zone Nos. 7872 and 7873, Tentative Parcel Map Nos. 36950 and 36962, and Plot Plan Nos. 25837 and 25838; and Reject or certify this EIR along with appropriate CEQA Findings. |
| Subsequent County of Riverside Approvals | |
| Riverside County Subsequent Implementing Approvals | <ul style="list-style-type: none"> Approve Final Maps, parcel mergers or parcel consolidations, as may be necessary. Approve Conditional or Temporary Use Permits, if required. Issue Grading Permits. Issue Building Permits. Approve Road Improvement Plans. Issue Encroachment Permits. Accept public right-of-way dedications. Approve street vacations. |
| Other Agencies – Subsequent Approvals and Permits | |
| Riverside County Flood Control and Water Conservation District | <ul style="list-style-type: none"> Approvals for construction of drainage infrastructure. |



| PUBLIC AGENCY | APPROVALS AND DECISIONS |
|--|--|
| Eastern Municipal Water District | <ul style="list-style-type: none">• Approvals for construction of water and sewer infrastructure. |
| Santa Ana Regional Water Quality Control Board | <ul style="list-style-type: none">• Issuance of a Construction Activity General Construction Permit.• Issuance of a National Pollutant Discharge Elimination System (NPDES) Permit. |
| California Department of Fish & Wildlife | <ul style="list-style-type: none">• Issuance of a 1602 Permit. |



4.0 ENVIRONMENTAL ANALYSIS

4.0.1 SUMMARY OF EIR SCOPE

In accordance with CEQA Guidelines §§ 15126-15126.4, this EIR Section 4.0, *Environmental Analysis*, provides analyses of potential direct, indirect, and cumulatively considerable impacts that could occur from planning, constructing, and operating the proposed Project.

In compliance with the procedural requirements of CEQA, Riverside County completed an Initial Study to determine the scope of environmental analysis for this EIR. Public comment on the scope consisted of written comments received by the County of Riverside in response to the NOP issued for this EIR and oral comments provided by members of the public at the EIR scoping meeting held on September 14, 2015, at the Riverside County Administrative Building. Taking all known information and public comments into consideration, ~~18~~ 17 primary environmental subject areas are evaluated in this Section 4.0, as listed below. Each subsection evaluates several specific subject matters related to the general topic of the subsection. The title of each subsection is not limiting; therefore, refer to each subsection for a full account of the subject matters addressed therein.

| | | | |
|-----|----------------------------------|------|----------------------------------|
| 4.1 | Aesthetics | 4.10 | Land Use/Planning |
| 4.2 | Agriculture and Forest Resources | 4.11 | Noise |
| 4.3 | Air Quality | 4.12 | Population/Housing |
| 4.4 | Biological Resources | 4.13 | Public Services |
| 4.5 | Cultural Resources | 4.14 | Recreation |
| 4.6 | Geology/Soils | 4.15 | Transportation/Traffic |
| 4.7 | Greenhouse Gas Emissions | 4.16 | Utilities/Service Systems |
| 4.8 | Hazards/Hazardous Materials | 4.17 | Paleontological Resources |
| 4.9 | Hydrology/Water Quality | 4.18 | <u>Tribal Cultural Resources</u> |

Public Resources Code (PRC) § 21100(b)(3) and CEQA Guidelines § 15126.4 require EIRs to describe, where relevant, the wasteful, inefficient, and unnecessary consumption of energy caused by a project. Accordingly, in addition to the subject matters listed above, this EIR addresses the topic of energy conservation in Section 5.0, *Other CEQA Considerations* pursuant to Appendix F of the State CEQA Guidelines.

One environmental subject was determined by the County to have no potential to be significantly impacted by the Project, as concluded by the Project's Initial Study (included in *Technical Appendix A* to this EIR) and after consideration of all comments received by the County on the scope of this EIR and information documented in the County's Administrative Record for this Project. This one subject, Mineral Resources, is discussed briefly in Section 5.0.



4.0.2 SCOPE OF CUMULATIVE EFFECTS ANALYSIS

CEQA requires that an EIR contain an assessment of the cumulative impacts that may be associated with a proposed project. As noted in CEQA Guidelines § 15130(a), “an EIR shall discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable.” “A cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects creating related impacts” (CEQA Guidelines § 15130(a)(1)). As defined in CEQA Guidelines § 15355:

‘Cumulative Impacts’ refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

- (a) The individual effects may be changes resulting from a single project or a number of separate projects.*
- (b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.*

CEQA Guidelines § 15130(b) describes two acceptable methods for identifying a study area for purposes of conducting a cumulative impact analysis. These two approaches include: “1) a list of past, present, and probable future projects producing related or cumulative impacts, including if necessary, those projects outside the control of the agency [‘the list of projects approach’], or 2) a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact [‘the summary of projections approach’].”

The summary of projections approach is used in this EIR, except for the evaluation of cumulative traffic and vehicular-related air quality, greenhouse gas, and noise impacts. The analysis of cumulative traffic impacts uses a combined approach, using the summary of projections approach with the manual addition of past, present, and reasonably foreseeable projects that were not accounted for in the projections, where appropriate. This approach was determined to be appropriate by the County of Riverside because long-range planning documents contain a sufficient amount of information to enable an analysis of cumulative effect for all subject areas, with expectation of traffic and vehicular-related air quality, greenhouse gas, and noise effects, which require a greater level of detailed study. The cumulative analyses of traffic and vehicular-related air quality, and noise impacts, which rely on data from the traffic study, inherently utilize the combined approach.

Using the summary of projections approach, the cumulative study area includes the City of Moreno Valley, the City of Perris, and the City of Riverside, as well as the Harvest Valley/Winchester Area



Plan (HVWAP), Lakeview/Nuevo Area Plan (LNAP), and the Mead Valley Area Plan (MVAP), which are part of the Riverside County General Plan. These three cities and the three Riverside County Area Plans encompass portions of western Riverside County that have similar environmental characteristics as the Project area. The selected study area encompasses the Perris Valley, which is largely bounded by prominent topographic landforms, such as Reche Canyon to the north, the Badlands to the east, and the Lakeview Mountains to the southeast. This study area exhibits similar characteristics in terms of climate, geology, and hydrology, and therefore is also likely to have similar biological characteristics and cultural resources. This study area also encompasses the service areas of the Project's primary public service and utility providers. Areas outside of this study area either exhibit topographic, climatological, or other environmental circumstances that are different from those of the Project area, or are simply too far from the proposed Project site to produce environmental effects that could be cumulatively considerable.

Environmental impacts associated with buildout of the Riverside County General Plan were evaluated in a Program EIR certified by Riverside County in 2003 (SCH No. 2002051143). The Riverside County General Plan EIR is herein incorporated by reference and is available for review at the County of Riverside Transportation and Land Management Agency Planning Department, 4080 Lemon Street, 12th Floor, Riverside, California 92502. In addition to the Riverside County General Plan EIR that was certified in 2003, at the time this EIR was prepared, the County of Riverside was in the process of updating its General Plan, which has since been approved and became effective on December 15, 2015. The General Plan Update and the General Plan Update EIR No. 521 (SCH No. 200904105) are also incorporated herein by reference and are available for review at the street address listed above, as well as on the County of Riverside's website noted in Section 7.0, *References*. The Riverside County General Plan Update EIR No. 521 also was used as a reference by this EIR in the evaluation of environmental impacts associated with the buildout of the County of Riverside General Plan Update. The environmental impacts associated with the buildout of the City of Perris General Plan were evaluated in a Program EIR that was certified by the Perris City Council on April 26, 2005 (SCH No. 2004031135). The City of Perris General Plan EIR is also incorporated by reference and is available for review at the City of Perris Department of Community Development, 135 North "D" Street, Perris, California 92570. The environmental impacts associated with buildout of the City of Moreno Valley General Plan were evaluated in the Program EIR that was certified by the Moreno Valley City Council on July 11, 2006 (SCH No. 2000091075). The Moreno Valley General Plan EIR is incorporated by reference and is available for review at the City of Moreno Valley Economic Development Department, 14177 Frederick Street, Moreno Valley, California 92552. Finally, the environmental impacts associated with the buildout of the City of Riverside General Plan was evaluated in a Program-level EIR that was certified by the Riverside City Council in November 2007 (SCH No. 2004021108). The City of Riverside General Plan EIR is also incorporated by reference and is available for review at the City of Riverside Community Development Department, Planning Division, 3900 Main Street, Riverside, California 92522.

The study area for cumulative traffic impacts (as well as vehicular-related air quality, greenhouse gas, and noise impacts) includes approved and pending development projects in proximity to the Project site, as of the time the NOP for this EIR was released for public review, that have the potential to



contribute a measurable amount of traffic to the same transportation facilities as the Project, as well as several large, traffic-intensive projects farther from the Project site that have the potential to affect regional transportation facilities. As such, the cumulative impact analysis of traffic and vehicular-related air quality, greenhouse gas, and noise impacts analyzes 103 other past, present, and reasonably foreseeable projects within this study area. This methodology presents a more reasonable approach to cumulative traffic analysis than the General Plan projection approach by recognizing development projects that actually have the potential to contribute traffic to the same intersections, roadway segments, and/or state highway system facilities as the proposed Project and have the potential to be made fully operational during a similar timeframe as the proposed Project. Specific development projects included in the cumulative traffic impact analysis shown in Figure 4.0-1 *Cumulative Development Location Map*, and are listed in Table 4.0-1, *Cumulative Development Land Use Summary*.

4.0.3 IDENTIFICATION OF IMPACTS

Subsections 4.1 through 4.17 of this EIR evaluate the 17 environmental subjects warranting detailed analysis, as determined by this EIR's Initial Study and in consideration of public comment on this EIR's NOP. The format of discussion is standardized as much as possible in each section for ease of review. The environmental setting is discussed first, followed by a discussion of the Project's potential environmental impacts based on specified thresholds of significance used as criteria to determine whether potential environmental effects are significant.

The thresholds of significance used in this EIR are based on the thresholds presented in the Project's Initial Study Checklist (included in *Technical Appendix A* to this EIR). As the CEQA Lead Agency, Riverside County uses an Initial Study format for projects within its jurisdiction called the "Riverside County Environmental Assessment/Initial Study Form." This document contains thresholds of significance applicable to Riverside County that are based on the sample form found in CEQA Guidelines Appendix G. The thresholds are intended to assist the reader of this EIR in understanding how and why this EIR reaches a conclusion that an impact would or would not occur, is significant, or is less than significant.

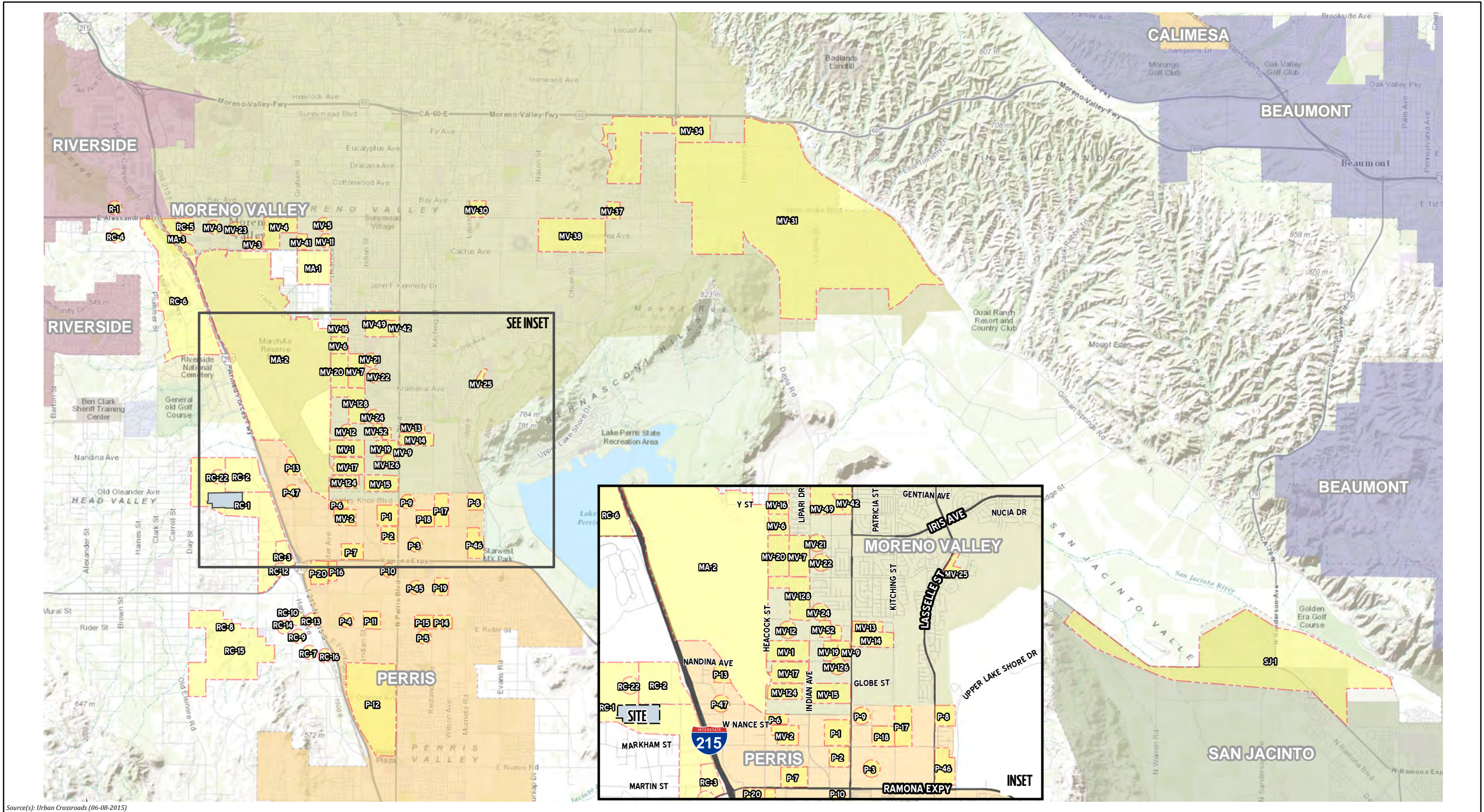
Serving as the CEQA Lead Agency for this EIR, the County of Riverside is responsible for determining whether an adverse environmental effect identified in this EIR should be classified as significant or less than significant. The standards of significance used in this EIR are based on the independent judgment of the County of Riverside, taking into consideration CEQA Guidelines Appendix G, the County of Riverside's Code of Ordinances and adopted County policies, the judgment of the technical experts that prepared this EIR's Technical Appendices, performance standards adopted, implemented, and monitored by regulatory agencies, significance standards recommended by regulatory agencies, and the standards in CEQA that trigger the preparation of an EIR.

As required by CEQA Guidelines § 15126.2(a), impacts are identified in this EIR as direct, indirect, cumulative, short-term, long-term, on-site, and/or off-site impacts of the proposed Project and/or Project-related components. A summarized "impact statement" is provided in each subsection



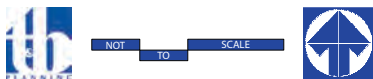
following the analysis. Each subsection also includes a discussion or listing of the applicable regulatory criteria (laws, policies, regulations) that the Project and its implementing actions are required to comply with (if any). If impacts are identified as significant after mandatory compliance with regulatory criteria, feasible mitigation measures are presented if feasible measures are available that would either avoid the impact or reduce the magnitude of the impact.

For any impact identified in this EIR as significant and unavoidable, the County of Riverside would be required to adopt a statement of overriding considerations pursuant to CEQA Guidelines § 15093 in order to approve the Project despite its significant impact(s) to the environment. The statement of overriding considerations would list the specific economic, legal, social, technological, and other benefits of the Project, supported by substantial evidence in the Project's administrative record, that outweigh the unavoidable impacts.



Source(s): Urban Crossroads (06-08-2015)

Figure 4.0-1



CUMULATIVE DEVELOPMENT LOCATION MAP



Table 4.0-1 Cumulative Development Land Use Summary

| TAZ | Project Name | Land Use ¹ | Quantity | Units ² |
|------------------------------|--|----------------------------|----------|--------------------|
| COUNTY OF RIVERSIDE | | | | |
| RC-1 | SP 341; PP 21552 (Majestic Freeway Business Center) | High-Cube Warehouse | 6100.715 | TSF |
| RC-2 | PP 20699 (Oleander Business Park) | Warehousing | 1206.710 | TSF |
| RC-3 | Ramona Metrolink Station | Light Rail Transit Station | 300 | SP |
| RC-4 | PP 22925 (Amstar/Kaliber Development) | Office (258.102 TSF) | 258.102 | TSF |
| | | Warehousing | 409.312 | TSF |
| | | General Light Industrial | 42.222 | TSF |
| | | Retail | 10.000 | TSF |
| RC-5 | Alessandro Metrolink Station | Light Rail Transit Station | 300 | SP |
| RC-6 | Meridian Business Park North | Industrial Park | 5985.000 | TSF |
| RC-7 | PP 18908 | General Light Industrial | 133.000 | TSF |
| RC-8 | Tract 33869 | SFDR | 39.000 | DU |
| RC-9 | PP 16976 | General Light Industrial | 85.000 | TSF |
| RC-10 | PP 21144 | Industrial Park | 190.802 | TSF |
| RC-12 | CUP03315 | Gas Station w/ Market | 17 | VFP |
| | | Fast Food w/o Drive-Thru | 5.600 | TSF |
| | | High-Turnover Restaurant | 6.500 | TSF |
| RC-13 | PP23342 | Industrial Park | 180.600 | TSF |
| RC-14 | TR30592 | SFDR | 131 | DU |
| RC-15 | Rider Street Quarry | Quarry | 2500.0 | AC |
| RC-16 | PP 20711 | Manufacturing | 20.0 | AC |
| | Yocum Baldwin | Warehousing | 46.8 | AC |
| RC-22 | Blanding Assemblage | High Cube Warehouse | 707.880 | TSF |
| CITY OF MORENO VALLEY | | | | |
| MV-1 | PA 06-0152 & PA 06-0153 (First Park Nandina I & II) | High-Cube Warehouse | 1182.918 | TSF |
| MV-2 | Integra Pacific Industrial Facility | High-Cube Warehouse | 880.000 | TSF |
| MV-3 | PA 08-0072 (Overton Moore Properties) | High-Cube Warehouse | 520.000 | TSF |
| MV-4 | Harbor Freight Expansion | High-Cube Warehouse | 1279.910 | TSF |
| MV-5 | PA 04-0063 (Centerpointe Buildings 8 and 9) | General Light Industrial | 361.384 | TSF |
| MV-6 | PA 07-0035; PA 07-0039 (Moreno Valley Industrial Park) | General Light Industrial | 204.657 | TSF |
| | | High-Cube Warehouse | 409.920 | TSF |
| MV-7 | PA 07-0079 (Indian Business Park) | High-Cube Warehouse | 1560.046 | TSF |
| MV-8 | PA 08-0047-0052 (Komar Cactus Plaza) ³ | Hotel | 110 | RMS |
| | | Fast Food w/Drive Thru | 8.000 | TSF |
| | | Commercial | 42.400 | TSF |
| MV-9 | First Inland Logistics Center | High-Cube Warehouse | 400.130 | TSF |
| MV-11 | PA 08-0093 (Centerpointe Business Park II) | General Light Industrial | 99.988 | TSF |
| MV-12 | PA 06-0021; PA 06-0022; PA 06-0048; PA 06-0049 (Komar Investments) | Warehousing | 2057.400 | TSF |
| MV-13 | PA 06-0017 (Ivan Devries) | Industrial Park | 569.200 | TSF |
| MV-14 | Modular Logistics (Dorado Property) | High-Cube Warehouse | 1109.378 | TSF |
| MV-15 | PA 09-0004 (Vogel) | High-Cube Warehouse | 1616.133 | TSF |
| MV-16 | TM 34748 | SFDR | 135 | DU |
| MV-17 | First Nandina Logistics Center | High-Cube Warehouse | 1450.000 | TSF |
| MV-19 | First Park Nandina III | High-Cube Warehouse | 691.960 | TSF |
| | Moreno Valley Commerce Park | High-Cube Warehouse | 354.321 | TSF |
| MV-20 | March Business Center | General Light Industrial | 16.732 | TSF |
| | | Warehousing | 87.429 | TSF |
| | | High-Cube Warehouse | 1380.246 | TSF |
| MV-21 | TM 33810 | SFDR | 16 | DU |
| MV-22 | TM 34151 | SFDR | 37 | DU |
| MV-23 | 373K Industrial Facility | High-Cube Warehouse | 373.030 | TSF |
| MV-24 | TM 32716 | SFDR | 57 | DU |
| MV-25 | TM 32917 | Condo/Townhomes | 227 | DU |



Table 4.0-1 Cumulative Development Land Use Summary

| TAZ | Project Name | Land Use ¹ | Quantity | Units ² |
|-------------------------------------|--|----------------------------------|-----------|--------------------|
| MV-30 | PA 08-0079-0081 (Winco Foods) | Discount Supermarket | 95.440 | TSF |
| | | Specialty Retail | 14.800 | TSF |
| MV-31 | Moreno Beach Marketplace (Lowe's) | Commercial Retail | 175.000 | TSF |
| | Auto Mall Specific Plan (Planning Area C) | Commercial Retail | 304.500 | TSF |
| | Westridge | High-Cube Warehouse | 937.260 | TSF |
| | ProLogis | High-Cube Warehouse | 1916.190 | TSF |
| | | Warehousing | 328.448 | TSF |
| | World Logistics Center | High-Cube Warehouse | 41400.000 | TSF |
| | | Warehousing | 200.000 | TSF |
| Gas Station w/ Market | | 12 | VFP | |
| | Existing SFDR | 7 | DU | |
| MV-34 | a Westridge Commerce Center | High-Cube Warehouse | 937.260 | TSF |
| | b P06-158 (Gascon) | Commercial Retail | 116.360 | TSF |
| | c Auto Mall Specific Plan (PAC) | Commercial Retail | 304.500 | TSF |
| | d ProLogis | Warehousing | 367.000 | TSF |
| | | High-Cube Warehouse | 1901.000 | TSF |
| e TR 35823 (Stowe Passco) | SFDR | 261 | DU | |
| | Apartments | 216 | DU | |
| MV-37 | Lowe's (Moreno Beach Marketplace) | Home Improvement Store | 175.000 | TSF |
| MV-38 | a Convenience Store/ Fueling Station | Gas Station w/ Market | 30.750 | TSF |
| | b Senior Assisted Living | Assisted Living Units | 139 | DU |
| | c TR 31590 (Winchester Associates) | SFDR | 96 | DU |
| | d TR 32548 (Gabel, Cook & Associates) | SFDR | 107 | DU |
| | e 26th Corp. & Granite Capitol | SFDR | 32 | DU |
| | f TR 32218 (Whitney) | SFDR | 63 | DU |
| | g Moreno Marketplace | Commercial Retail | 93.788 | TSF |
| | h Medical Plaza | Medical Offices | 311.633 | TSF |
| MV-40 | Moreno Valley Industrial Center (Industrial Area SP) | General Light Industrial | 354.810 | TSF |
| MV-41 | Centerpointe Business Park | General Light Industrial | 356.000 | TSF |
| MV-42 | Moreno Valley Shopping Center | Free Standing Discount Store | 189.520 | TSF |
| | | Gas Station w/ Market / Car Wash | 16 | VFP |
| MV-49 | TR 22180 / Young Homes | Residential | 140 | DU |
| MV-52 | San Michele Industrial Center (Industrial Area SP) | General Light Industrial | 865.960 | TSF |
| MV-124 | PA 06-0014 (Pierce Hardy Limited Partnership) | Lumbar Yard | 67.000 | TSF |
| MV-126 | Moval Assemblage | High-Cube Warehouse | 456.337 | TSF |
| MV-128 | Moreno Valley Logistics Center | High-Cube Warehouse | 1351.770 | TSF |
| | | General Light Industrial | 385.748 | TSF |
| MARCH JOINT POWERS AUTHORITY | | | | |
| MA-1 | March Lifecare Campus Specific Plan ⁴ | Medical Offices | 190.000 | TSF |
| | | Commercial Retail | 210.000 | TSF |
| | | Research & Education | 200.000 | TSF |
| | | Hospital | 50 | Beds |
| | | Institutional Residential | 660 | Beds |
| MA-2 | Airport Master Plan | Airport Use | 559.000 | TSF |
| MA-3 | Freeway Business Center (March JPA) | High-Cube Warehouse | 710 | TSF |
| CITY OF RIVERSIDE | | | | |
| R-1 | P07-1028 (Alessandro Business Park) | General Light Industrial | 662.018 | TSF |
| | Alessandro and Gorgonio | Fast Food w/Drive Thru | 4.050 | TSF |
| | 2100 Alessandro Boulevard | Vocational School | 11.505 | TSF |
| CITY OF PERRIS | | | | |
| P-1 | P 05-0113 (IDI) | High-Cube Warehouse | 1750.000 | TSF |
| P-2 | P 05-0192 (Oakmont I) | High-Cube Warehouse | 697.600 | TSF |
| P-3 | P 05-0477 | High-Cube Warehouse | 462.692 | TSF |
| P-4 | Rados Distribution Center | High-Cube Warehouse | 1200.000 | TSF |



Table 4.0-1 Cumulative Development Land Use Summary

| TAZ | Project Name | Land Use ¹ | Quantity | Units ² |
|------|--|--------------------------|----------|--------------------|
| P-5 | Investment Development Services (IDS) II | High-Cube Warehouse | 350.000 | TSF |
| P-6 | P 07-09-0018 | Warehousing | 170.000 | TSF |
| P-7 | P 07-07-0029 (Oakmont II) | High-Cube Warehouse | 1600.000 | TSF |
| P-8 | TR 32707 | SFDR | 137 | DU |
| P-9 | TR 34716 | SFDR | 318 | DU |
| P-10 | P 05-0493 (Ridge I) | High-Cube Warehouse | 700.000 | TSF |
| P-11 | Ridge II | High-Cube Warehouse | 2000.000 | TSF |
| P-12 | Harvest Landing Specific Plan | SFDR | 717 | DU |
| | | Condo/Townhomes | 1,139 | DU |
| | | Sports Park | 16.7 | AC |
| | | Business Park | 1233.401 | TSF |
| | | Shopping Center | 73.181 | TSF |
| | Perris Marketplace | Shopping Center | 450.000 | TSF |
| P-13 | P 06-0411 (Concrete Batch Plant) | Manufacturing | 2.000 | TSF |
| P-14 | Jordan Distribution | High-Cube Warehouse | 378.000 | TSF |
| P-15 | Aiere | High-Cube Warehouse | 642.000 | TSF |
| P-16 | P 08-11-0005; P 08-11-0006 (Starcrest) | High-Cube Warehouse | 454.088 | TSF |
| P-17 | Stratford Ranch Specific Plan | High-Cube Warehouse | 1725.411 | TSF |
| P-18 | Stratford Ranch | High-Cube Warehouse | 480.000 | TSF |
| | | General Light Industrial | 120.000 | TSF |
| P-19 | P05-0493 | Logistics | 597.370 | TSF |
| P-20 | Starcrest, P011-0005; 08-11-0006 | General Light Industrial | 454.088 | TSF |
| P-45 | IDS 04-0464 | High-Cube Warehouse | 1686.760 | TSF |
| P-46 | TTM 32708 (50% Complete) | SFDR | 238 | DU |
| P-47 | PM 34199 | Gen. Light Industrial | 46.500 | TSF |
| | DPR 05-0387 | Gen. Light Industrial | 9.854 | TSF |
| | DPR 05-0452 | Warehousing | 31.200 | TSF |
| | TPM 34697 | Gen. Light Industrial | 47.400 | TSF |
| | DPR 06-0396 | Warehousing | 159.823 | TSF |

¹ SFDR = Single Family Detached Residential; MFDR = Multi-Family Detached Residential

² DU = Dwelling Units; TSF = Thousand Square Feet; SP = Spaces; VFP = Vehicle Fueling Positions; RMS = Rooms; AC = Acres; EMP = Employees

³ Source: Cactus Avenue and Commerce Center Drive Commercial Center TIA, Urban Crossroads, Inc., December 9, 2008 (Revised).

⁴ Source: March Lifecare Campus Specific Plan Traffic Impact Analysis, Mountain Pacific, Inc., May 2009 (Revised).

Source: (Urban Crossroads, 2015e, Table 4-4)



4.1 AESTHETICS

This subsection describes the aesthetic qualities and visual resources present on the Project site and in the site's vicinity and evaluates the potential effects that the Project may have on these resources. Descriptions of existing visual characteristics, both on-site and in the vicinity of the Project site, and the analysis of potential impacts to aesthetic resources are based, in part, on field observations and site photographs collected by T&B Planning, Inc. in April 2015 (Lusk, 2015); analysis of aerial photography (Google Earth, 2015); and Project application materials submitted to the County of Riverside and described in Section 3.0, *Project Description*, of this EIR. This subsection also is based in part on information contained in the Multipurpose Open Space Element of the County of Riverside General Plan (Riverside County, 2015c, Chapter 5), the Aesthetics section of the County of Riverside General Plan Update EIR (County of Riverside, 2015d, Section 4-04), and applicable Riverside County Ordinances (County of Riverside, n.d.).

4.1.1 EXISTING CONDITIONS

The Project site encompasses approximately 58.6 acres of land in unincorporated Riverside County, described in two parts as the "Building D Site" (approximately 37.1 gross acres) and the "Building E Site" (approximately 21.5 gross acres). The Project site is located immediately south of Oleander Avenue and is bisected by Ellsworth Street (the Building D Site is located to the east, and the Building E Site is located to the west), as shown on Figure 2-5, *Aerial Photograph*. The eastern boundary of the Project site is located approximately 0.25-mile west of Harvill Avenue, and the western boundary of the Project site is located approximately 0.34-mile east of Day Street. The highest point of the Project site's natural ground surface is in the western portion of the Building E Site, at 1,665 feet above mean sea level (AMSL). The lowest point of the Project site's natural ground surface is in the eastern portion of the Building D Site at 1,556 feet AMSL. The Project site is moderately sloping from west to east.

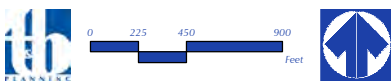
A. Site Photographs

To illustrate the existing visual conditions of the Project site, a photographic inventory is presented herein. Figure 4.1-1, *Site Photograph Key Map*, depicts the location of four (4) vantage point photographs from public viewing areas, each of which are described below. These photographs, shown on Figure 4.1-2, *Site Photographs 1 and 2*, and Figure 4.1-3, *Site Photographs 3 and 4*, provide a representative visual inventory of the site's visual characteristics as seen from nearby locations accessible to the public:

Site Photograph 1 (Figure 4.1-2): Site Photograph 1 was taken from the approximate midpoint of the Project site's southern boundary, looking north. The Building E Site is visible on the left-hand side of the photograph and the Building D Site is visible on the right-hand side of the photograph, with Ellsworth Street – visible as a dirt road on the lower right-hand corner of the photograph and extending toward the horizon – separating the two properties. The Building E Site is undeveloped and primarily features low, ruderal/weedy vegetation, with the exception of a few scattered trees in the mid-ground on the left-hand portion of the photograph. Evidence



Figure 4.1-1



SITE PHOTOGRAPH KEY MAP



West

East

SITE PHOTO 1: Looking north along Ellsworth Street, with Building E Site on the left-hand side of the photo (West) and Building D Site on the right-hand side of the photo (East).

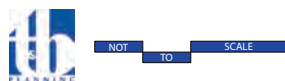


East

West

SITE PHOTO 2: Looking south along Ellsworth Street, with Building D Site on the left-hand side of the photo (East) and Building E Site on the right-hand side of the photo (West).

Figure 4.1-2



SITE PHOTOGRAPHS 1 AND 2

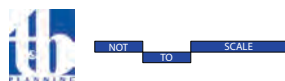


SITE PHOTO 3: Looking southeast across the Building E Site, East to South.



SITE PHOTO 4: Looking southwest across the Building D Site, South to West.

Figure 4.1-3





of past discing on the Building E Site (i.e., tire tracks) is visible on the left-hand side of the photograph in the foreground. An EMWD water tank (off site) and a private maintenance access road for the water tank (off site) are visible on the left-hand side of the photograph. A mobile home on the Building D Site is visible in the mid-ground on the right-hand side of the photograph. A tractor, truck trailers, and dirt stockpiles are visible near the mobile home. Like the Building E Site, the Building D Site features low, ruderal/weedy vegetation and several trees. Along the horizon off-site in the distance, the Box Springs Mountains, Reche Canyon, and Russell Mountains are visible beneath cloud cover.

- Site Photograph 2 (Figure 4.1-2): Site Photograph 2 was taken from the intersection of Ellsworth Street and Oleander Avenue, at the approximate midpoint of the northern boundary of the Project site. The Building D site is located on the left-hand side of the photograph and the Building E site is located on the right-hand side of the photograph. In the foreground of the far left hand side of the photograph is Oleander Road, an unimproved dirt road. In the background on the far left hand side is a logistics warehouse building located northeast of the Project site. Off site in the distance along the horizon on the left-hand side of the photograph the Russell Mountains are visible beneath cloud cover. In the fore- and mid-ground of the left hand side to the center of the photograph, the corner of the Building D Site is visible and the photograph shows the undeveloped and generally flat nature of the site, with minimal vegetation throughout. The center of the photograph looks along Ellsworth Street, which is an unimproved dirt road. The right-hand side of the photograph shows the low-lying vegetation, exposed bedrock and small changes in elevation from dirt trails that transect the Building E Site. The off-site EMWD water tank is faintly visible along the horizon in the right-hand side of the photograph.
- Site Photograph 3 (Figure 4.1-3): Site Photograph 3 was taken from the northwest corner of the Building E Site, looking southeast. The left hand side of the photograph looks east along the northern boundary of the Project site and shows Oleander Avenue, which is an unimproved dirt road. In the foreground of the photograph are some of the exposed bedrock outcroppings present on the Building E Site. The middle of the photograph, from the foreground and extending outward, shows the west-to-east trending topographic relief of the site. The right hand side of the photograph shows more of the exposed bedrock, as well as one of the dirt trails that intersect the Building E Site. In the far right hand side of the photograph the off-site EMWD water tank located to the south and west of the Building E Site is visible. Along the horizon, the Russell Mountains, located approximately 4.0 miles to the east of the Project site, are partially visible beneath cloud cover.
- Site Photograph 4 (Figure 4.1-3): Site Photograph 4 was taken from the northeast corner of the Building D Site, looking southwest. Looking from left to right, the foreground of the photograph shows low-lying vegetation and scattered rocks. In the background of the photograph, the tree line separating the Building D Site from the rural residential lots and business ventures to the south is visible. Along the horizon in the right hand side of the



photograph, the off-site EMWD water tank is visible. Oleander Avenue is seen in the far right-hand side of the photograph, extending along the Project site's northern boundary.

B. Scenic Highway Corridors

No State-designated or Riverside County-designated scenic highway corridors are located in the vicinity of the Project site. The Riverside County General Plan designates the segment of the Ramona Expressway located east of I-215 as a County Eligible scenic highway (County of Riverside, 2015d, Figure 4.4.2). This highway is located approximately 1.2 miles southeast of the Project site. Due to the 1.2-mile distance and intervening development, the Project site is not visible from this roadway segment.

C. Scenic Resources

The County of Riverside General Plan Land Use Element and Open Space Element contain policies to ensure that the unincorporated portions of Riverside County are developed with aesthetically pleasing features and that existing resources are maintained and preserved. The Open Space Element defines scenic resources as “areas that are visible to the general public and considered visually attractive...including natural landmarks and prominent or unusual features of the landscape” (Riverside County, 2015c, p.OS-44). Based upon this definition, the Project site does not contain any scenic resources. The site is gently sloping without prominent topographic features; the main visible features are scattered trees, rock outcroppings, and dirt roads. The physical features present on the Project site are neither prominent nor unusual features of the landscape. The surface rock outcroppings and trees that exists on the Project site are typical for the region. No other characteristics of the Project site contain scenic resources. Off site in the distance, the Box Springs Mountains, Reche Canyon, and Russell Mountains are visually prominent and thus are considered scenice resources for purposes of evaluation herein.

D. Light and Glare

Under existing conditions, the mobile home on the Building D Site contains the only sources of artificial light on the Project site. Ellsworth Street does not contain any artificial light along the portion of the road that bisects the Project site. Oleander Avenue does not contain any artificial light along the Project site's northern boundary except at the southeast corner associated with the off-site warehouse building. Approximately 270 feet of paved roadway abuts the northeastern corner of the Building D Site, which provides access to the warehouse building immediately northeast of the Building D Site. This warehouse property and associated paved roadway contain sources of artificial light within parking lots and surrounding the building.

Mt. Palomar Observatory is located approximately 42.1 miles southeast of the Project site, on the top of Palomar Mountain in north San Diego County. The Observatory contains three active research telescopes owned and operated by the California Institute of Technology (Caltech). Since at least the 1980s, CalTech has worked with the surrounding communities to mitigate and minimize the effects of ambient light occurring from increased urbanization on the Observatory's research mission (CalTech,



2014). Properties located within a 45-mile radius of the Mt. Palomar Observatory are considered to have the potential to contribute to lighting impacts on the Observatory. This type of lighting condition is known as “sky glow.” According to the Riverside County General Plan EIR, the Project site is located within Zone B of the Mt. Palomar Nighttime Lighting Policy Area (County of Riverside, 2015d, Figure 4.1.1).

4.1.2 APPLICABLE REGULATORY REQUIREMENTS

Ordinance No. 655 – Regulating Light Pollution

The Riverside County Board of Supervisors adopted Ordinance No. 655 to minimize sources of undesirable light pollution that have a detrimental effect on astronomical observation and research at the Mt. Palomar Observatory. Ordinance No. 655 defines approved lighting sources, establishes the type and manner of installation and operation of lighting, and details lighting prohibitions that apply within lighting restriction Zone A and Zone B. The lighting restriction zones are based on distance from the Mt. Palomar Observatory: Zone A encompasses a 15 miles radius around the observatory and Zone B encompasses the area outside Zone A but within 45-mile radius around the observatory. (County of Riverside, 2015d, p. 4.4-11) The Project site is located within lighting restriction Zone B.

Ordinance No. 915 – Regulating Outdoor Lighting

Ordinance No. 915 was adopted by the Riverside County Board of Supervisors to provide minimum requirements for outdoor lighting in order to reduce light trespass, and to protect the health, property, and well-being of residents in the unincorporated areas of the County. Ordinance No. 915 provides regulations on adequate light shielding, glare, and light trespass in order to ensure all development in Riverside County installs lighting in a way that does not jeopardize the health, safety or general welfare of Riverside County residents and degrade their quality of life. (County of Riverside, 2011). All development projects in unincorporated Riverside County are required to comply with all applicable provisions of Ordinance No. 915.

4.1.3 BASIS FOR DETERMINING SIGNIFICANCE

The proposed Project would result in a significant impact to aesthetic resources if the Project or any Project-related component would:

Scenic Resources:

- a. *Have a substantial effect upon a scenic highway corridor within which it is located; or*
- b. *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view.*

Mt. Palomar Observatory:

- a. *Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655.*



Other Lighting Issues:

- a. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area; or
- b. Expose residential property to unacceptable light levels.

4.1.4 IMPACT ANALYSIS

Scenic Resources

Threshold a) Would the project have a substantial effect upon a scenic highway corridor within which it is located?

According to the California Department of Transportation, the only designated scenic highways within Riverside County are State Route 62 (SR 62), State Route 74 (SR 74), and State Route 243 (SR 243) (CalDOT, 2013). The Project site is located approximately 5.3 miles north of SR 74, approximately 38 miles west of SR 62, and approximately 22.8 miles west of SR 243. Due to distance and intervening development and topography, and based on a viewshed analysis conducted by T&B Planning, Inc. using Google Earth Pro, the Project site is not visible from any of these designated scenic routes (Google Earth, 2015). According to the Riverside County General Plan Update EIR, the portion of the Ramona Expressway located east of I-215 is designated as a County Eligible scenic highway (County of Riverside, 2015d, Figure 4.4.2). This highway is located approximately 1.2 miles southeast of the Project site. Due to distance and intervening development, the Project site is not visible from this roadway. Because the Project site is not located within or adjacent to a scenic highway corridor and is not visible from a designated or eligible corridor, it therefore would not have a substantial effect (CalDOT, 2013). No impact would occur.

Scenic Resources

Threshold b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?

As described above under Subsection 4.1.1, the Project site does not contain any scenic resources. The Building D site contains one building, a mobile home, within the southwestern corner of the site, while the rest of the Building D Site and the entirety of the Building E Site are undeveloped and contain low-lying vegetation and groupings of exposed bedrock. There are some trees within the site, primarily in the southern portion of the Building D Site and along the western portion of the Building E Site. However, these trees are not dominant or prominent visual features of the site. Neither the exposed bedrock groupings nor the trees are considered scenic resources because rock outcroppings and trees are commonplace within the vicinity of the Project site. There are no landmark features on the Project site.



As shown in Figure 4.1-2 and Figure 4.1-3, the only possible viewpoints containing prominent scenic vistas or views open to the public are along Ellsworth Street and Oleander Avenue. Due to the existing regional topography and development, views beyond the Project site are limited to the north and to the east. The Riverside County General Plan Update EIR determined that a “major visible aesthetic effect...would mean affecting open views of local foothills or mountains” (County of Riverside, 2015d, p. 4.4-25). Therefore, the Project would result in aesthetic impacts if it were to substantially block open views of mountains or foothills from Ellsworth Street and Oleander Avenue.

From the Project site, the Box Springs Mountains are visible to the north along Ellsworth Street, and the Russell Mountains are visible to the east along Oleander Avenue. The distance and location of the Box Springs Mountains and Russell Mountains in relation to the Project site do not provide prominent, distinct views of these scenic resources from the site under existing conditions. The views of the Box Springs Mountains to the north would be unaffected due to the east/west orientation of Oleander Avenue in relation to Buildings D and E that are proposed south of the road. Views from Oleander Avenue of the Russell Mountains to the east would also be unaffected. Development of the Building D Site would alter the existing views from Ellsworth Street of the Russell Mountains to the east. Under existing conditions, Ellsworth Street is not paved and the mobile home property located in the southwestern corner of the Building D Site partially obscures views to the east from this unpaved roadway. The approximately 550 feet of Ellsworth Street that abuts the northwestern boundary of the Building D Site has distant views of the Russell Mountains under existing conditions. These views would be affected by development of the Building D Site. However, this minor loss of visibility is considered a less-than-significant impact because, aside from the roadway itself, there is no property immediately west of the Building D Site that is open to the public and that offers views of the Russell Mountains. Views of the Russell Mountains are available throughout western Riverside County and within the vicinity of the Project site. The Russell Mountains would still be visible from Oleander Avenue and to the east of the Building D Site.

As described in Subsection 3.4.2 of this EIR, the Project would be constructed over a period of approximately 23 months. Heavy equipment would be used, which would be visible to the immediately surrounding areas during the temporary construction period. Construction activities are a common occurrence in the developing Inland Empire region of southern California and are not considered to result in the creation of an aesthetically offensive site open to public view. Furthermore, except for the short-term use of cranes during building construction and lifts during the architectural coating phase, the construction equipment is expected to be low in height and not substantially visible to the surrounding area. All construction activities would be temporary in nature and all construction equipment would be removed from the Project site following completion of construction activities. For these reasons, temporary aesthetic effects during the Project’s construction period would be less than significant.

Although the aesthetic changes to the Project site would be noticeable and obvious upon Project completion, neither Building D nor Building E would result in the creation of an aesthetically offensive site open to public view. The buildings incorporate a number of features intended to soften the visual



prominence of the buildings and their loading docks from public viewing areas, including enhanced architectural treatments and landscaping. The buildings also incorporate screen walls to obscure loading and docking bays from public views along Ellsworth Street and Oleander Avenue. The visual prominence of these screening walls would be reduced through the installation of landscaping (trees, shrubs, and groundcover) in front of the walls.

When grading is complete, the building pad on the Building D Site would sit approximately 17 feet below the ground elevation of Ellsworth Street and sit between three and 17 feet below the ground elevation of abutting property to the south. The elevation differences would further reduce the visual prominence of proposed Building D as seen from off-site properties to the west and south. When grading is complete for the Building E Site, the building pad would approximately 14 feet lower in elevation than off-site property to the west, and sit three to 19 feet lower in elevation than off-site property to the south and southwest. The differences in elevation would reduce the visual prominence of the building as seen from off-site properties to the south and west. From Oleander Road, the building pads on the Building D Site and Building E Site would sit between three and 24 feet above the road, but because off-site properties located immediately north of Oleander Road are either vacant or developed with industrial warehouse uses, and because no loading docks are proposed on the buildings' north elevations, the buildings would not create an offensive view as seen from the north. Taking into consideration the Project's grading plan and visual features of the proposed development, the proposed Project would not create an aesthetically offensive site open to public view. In fact, from some perspectives, the Project would improve the aesthetic characteristics of the surrounding area by improving roads, installing landscaping, and introducing high-quality architectural building design to the proposed buildings on the property. Impacts would be less than significant.

Mt. Palomar Observatory:

Threshold a) Would the project interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?

According to the Riverside County General Plan Update EIR, the Project site is located within Zone B of the Mt. Palomar Nighttime Lighting Policy Area (County of Riverside, 2015d, Figure 4.1.1). All developments within Zone B of the Mt. Palomar Nighttime Lighting Policy Area, including the Project, are required to adhere to the requirements of Riverside County Ordinance No. 655, which controls artificial lighting sources to protect the observatory. The Project's Conditions of Approval imposed by Riverside County require compliance with all such requirements, and the County of Riverside would be obligated to review subsequent building permits to ensure compliance. Thus, with mandatory compliance to Ordinance No. 655, the proposed Project would result in less-than-significant impacts to the Mt. Palomar Observatory.



Other Lighting Issues:

Threshold a) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Threshold b) Would the project expose residential property to unacceptable light levels?

Under existing conditions, the Project site contains limited sources of artificial light from the mobile home located in the southwest corner of the Building D Site. As part of Project implementation on the Building D Site, the mobile home would be removed along with the associated sources of artificial light. As part of the proposed Project, new artificial lighting features (e.g., pole mounted lights, building mounted lights, street lights) would be installed on the property to illuminate the Building D Site and Building E Site.

Lighting on the Building D Site and Building E Site would be required to comply with the conditions outlined in Riverside County Ordinances Nos. 655 and 915, which provide minimum requirements for outdoor lighting in order to reduce light trespass and to protect the health, property, and well-being of residents. Plans submitted to Riverside County for future implementing permits and approvals (i.e., building permits) would be required to demonstrate compliance with these standards. Accordingly, mandatory compliance with County Ordinances No. 655 and 915 would ensure that neither Building D nor Building E create a new source of substantial light or glare which would adversely affect day or nighttime views or expose residential properties to unacceptable light levels.

As discussed in Section 3.0, *Project Description* of this EIR, the majority of the Project's proposed exterior building surfaces would consist of tilt-up concrete construction that does not include any physical properties that would produce substantial amounts of glare. The concrete wall surfaces would be coated with flat paint. Although Building D and Building E would utilize blue-glazed glass within the architectural elements on the northeastern and northwestern corners of the buildings, the use of this material would not adversely affect daytime views of any surrounding properties because the glass would be low-reflective and would not be mirrored. Neither the glass nor the architectural design features would create new sources of glare that would adversely affect day or nighttime views in the area. Impacts related to other lighting issues would be less than significant.

The roofs of both buildings are proposed to be designed and constructed to accommodate a 1 KW photovoltaic (PV) solar array taking into consideration limitations imposed by other rooftop equipment, roof warranties, building and fire code requirements, and other physical or legal limitations. Also, the buildings are proposed to be constructed with the necessary electrical systems and other infrastructure to accommodate PV arrays in the future. Because solar panels absorb light – and do not reflect it – they would not result in substantial adverse glare effects. Potential glare impacts would be less than significant.



4.1.5 CUMULATIVE IMPACT ANALYSIS

The Project site is not visible from any designated or eligible scenic routes and therefore would not have any substantial effect upon a scenic highway corridor. Therefore, the proposed Project has no potential to contribute to a cumulatively significant scenic resource impact. As such, the Project would not have a cumulatively considerable effect upon a scenic highway corridor.

The Project site and surrounding area contain features that are typical to the region such as bedrock outcroppings and trees that do not represent substantial scenic resources. The land to the south and west of the Project site is developed under existing conditions. More specifically, as shown previously on Figure 2-1, *Surrounding Land Uses and Development*, lands north of the Project site are largely undeveloped, with exception of a recently constructed industrial warehouse building located north of Oleander Road and east of Harvill Avenue. To the south of the Project site are scattered, rural residences and business ventures, and undeveloped land. Southwest of the Building E Site is a water tank owned by the Eastern Municipal Water District (EMWD). To the west of the Project site are undeveloped lands, beyond which are single-family homes. To the east of the Project site are undeveloped lands, several scattered single-family residences and an industrial warehouse building located along the eastern edge of Harvill Avenue. Approximately 0.4 miles to the east is I-215, beyond which are the March Air Reserve Base (MARB) and an area of the City of Moreno Valley mostly developed with industrial warehouse buildings. The undeveloped lands to the north and east of the Project site contain aesthetic features similar in nature to those found on the Project site. As discussed above, the development of a site containing exposed bedrock and sparse, low-lying vegetation does not qualify as a significant impact to scenic resources. Therefore, any future development of similarly-characterized land would not result in a significant cumulative impact. Therefore, the Project has no potential to result in a cumulatively considerable impact to scenic resources. Views of the Box Springs Mountains and the Russell Mountains are available from public viewing areas adjacent to the Project site; however, such views are available throughout the County of Riverside and are not unique to the Project site's location. Due to the distance and large size of the Box Springs Mountains and the Russell Mountains, it is unlikely that future development would significantly obscure views of these features. With buildout of the proposed Project and other developments within the Project's viewshed, there would be a less-than-significant cumulative effect to any existing scenic vistas. The Project's design features are subject to review by the County of Riverside and are subject to all applicable regulations and policies governing development. All new development in the surrounding areas would be subject to the same review and regulations to ensure that they do not result in the creation of an aesthetically offensive site open to public view. The Riverside County review process and mandatory compliance with regulations ensures that the Project would not result in a cumulatively considerable impact.

The Project is located in Zone B of the Mt. Palomar Nighttime lighting Policy Area. All developments in Riverside County that are within 45 miles of the observatory are subject to the lighting regulations included in Riverside County Ordinance No. 655 to prevent interference with nighttime use of the observatory. Similar lighting regulations are enforced by other jurisdictions that fall within a 45-mile radius of the observatory. Accordingly, the Project's mandatory compliance with Ordinance No. 655 ensures that no cumulatively considerable impact would occur.



With respect to potential cumulative light and glare impacts, County of Riverside Ordinances Nos. 655 and 915 set standards for development to ensure minimal impact upon surrounding development relating to light pollution and glare. All development projects in surrounding Riverside County areas would be required to comply with the same light reduction requirements. Surrounding cities including but not limited to Moreno Valley, Perris, and Riverside have similar lighting standards. Although cumulative development in the Project's surrounding area is expected to introduce new sources of artificial lighting and potentially reflective materials, the required compliance with the applicable requirements would ensure that future cumulative development does not introduce substantial sources of artificial lighting or glare, including light spillage onto residential properties. As such, the Project would not contribute to cumulatively considerable, adverse impacts to the existing daytime or nighttime views in the area, or to exposure of residential property to unacceptable light levels.

4.1.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

1. *Scenic Resources*

Threshold (a) for the Building D Site and the Building E Site: No Impact. There are no designated scenic highways in the vicinity of the Project site. The portion of the Ramona Expressway located east of I-215 and approximately 1.2 miles southeast of the Project site is a County Eligible scenic highway, but due to the 1.2-mile distance and intervening development, the Project site is not visible from this roadway segment. As such, the Project has no potential to adversely impact views from a scenic highway corridor.

Threshold (b) for the Building D Site and the Building E Site: Less-than-Significant Impact. The proposed Project would not substantially damage scenic resources or significantly obstruct any prominent scenic vistas or public views. The Project site does not contain any unique scenic resources. Development of the Project would not substantially block views of scenic mountain resources in the distance. Also, the proposed Project incorporates design elements such as landscaping, landscaped slopes, walls, and architectural features to ensure that development proposed on the Building D and Building E Sites would not create an aesthetically offensive site open to public view.

2. *Mt. Palomar Observatory*

Threshold (a) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project site is located within Zone B of the Mt. Palomar Observatory Nighttime Lighting Policy Area. Mandatory compliance with Riverside County Ordinance No. 655 will ensure that the Project does not interfere with the nighttime use of the Mt. Palomar Observatory and impacts would be less than significant.

3. *Other Lighting Issues*

Threshold (a) for the Building D Site and the Building E Site: Less-than-Significant Impact. Construction and operation of Building D and Building E would introduce new sources of artificial light and typical of business park developments. No glare-producing building materials are proposed. Mandatory compliance with Riverside County Ordinances Nos. 655 and 915, which provide lighting



standards to eliminate adverse effects of lighting associated with development, will ensure that the Project does not create new sources of substantial light or glare that affect day or nighttime views in the area.

Threshold (b) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would not expose residential properties to unacceptable light levels. Mandatory compliance with Riverside County Ordinances Nos. 655 and 915, which provide lighting and light shielding standards, would ensure that Project does not expose off-site residential properties to unacceptable light levels. In addition, as a best practice measure, EIR Section 4.11, *Noise*, includes Mitigation Measure 4.11-2(A) that requires that no construction activities and no construction-related night lighting shall occur within 600 feet of occupied sensitive receptors after 6:00 p.m. and before 6:00 a.m. during the months of June through September or before 7:00 a.m. during the months of October through May.

4.1.7 MITIGATION

Applicable County Regulations and Design Requirements

The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- The Project is required to comply with Riverside County Ordinance No. 655, which is intended to restrict the permitted use of certain light fixtures emitting light into the night sky which could have a detrimental effect on astronomical observation and research. Ordinance No. 655 sets forth requirements for lamp source and shielding of light emissions for outdoor fixtures to reduce “skyglow” or light pollution that affects day or nighttime views from the Mt. Palomar Observatory (located approximately 24 miles southeast of the Project site in northern San Diego County).
- The Project is required to comply with Riverside County Ordinance No. 915, which is intended to provide minimum requirements for outdoor lighting in order to reduce light trespass. Ordinance No. 915 provides regulations on adequate lighting shielding, glare, and light trespass in order to ensure all development in Riverside County installs lighting in a way that does not jeopardize the health, safety, or general welfare of Riverside County residents and degrade their quality of life.

Mitigation

Impacts would be less than significant. Mitigation is not required.



4.2 AGRICULTURE & FOREST RESOURCES

The following analysis is based on information obtained in part from the United States Department of Agriculture (USDA) Natural Resources Conservation Service (USDA NRCS, 2015), the California Department of Conservation (CDC) (CDC, 2012) (CDC, 2014) (CDC, 2015a) (CDC, 2015b), and the County of Riverside General Plan (Riverside County, 2003a). All references used in this Subsection are listed in EIR Section 7.0, *References*.

4.2.1 EXISTING CONDITIONS

A. Forest Resources

No forest resources are located on the Project site or in the immediate vicinity of the Project site. As shown on Figure 2-5, *Aerial Photograph*, lands surrounding the Project site are largely void of tree groves and do not contain forestry resources. Based on biological surveys conducted by Cadre Environmental (Cadre), the Building D Site contains disturbed land, gravel road/splay areas, structure (mobile home), and several scattered trees (Cadre, 2015a, pp. 8-9) which do not constitute a forest. Based on biological surveys conducted by Hernandez Environmental Services (HES), the Building E Site contains disturbed non-native vegetation, granitic rock outcrops, and Peruvian Pepper trees (HES, 2015b, pp. 6-7) which do not constitute a forest. None of the on-site vegetation communities are associated with forest land. The trees are isolated and in small groupings and do not constitute a forest or forest resource. As such, there are no forest resources within the Project site.

B. Agricultural Resources

There are no lands currently used for commercial agricultural purposes on the Project site or in the area immediately surrounding the Project site. The Project site is located in a portion of Riverside County around the I-215 corridor that is developing as an employment center, containing business park, distribution warehousing, e-commerce, and light industrial land uses. Under existing conditions, and as shown on Figure 2-5, *Aerial Photograph*, lands north of the Project site are largely undeveloped, with exception of a logistics warehouse building located north of the Project site's northeastern corner. To the east are undeveloped lands, several scattered single family homes, and an additional warehouse building located along the eastern edge of Harvill Avenue. To the south of the Project site are several large lot, single family rural homes and business ventures. Near the southwest corner of the property is an EMWD water tank. To the west of the Project site are undeveloped lands, beyond which are large lot single family homes. Some of the rural residential lots near the Project site contain ancillary agricultural uses such as gardens and animal corrals, but the primary use is rural residential and not agriculture.

No evidence exists that the Project site was ever used for agriculture purposes. Based on field reconnaissance, key person interviews, agency records review, historical research, and government database review conducted during the Phase I Environmental Site Assessments prepared for the Building D Site and the Building E Site by Kennedy/Jenks Consultants (refer to *Technical Appendices G1 and G2*), the Project site has historically been comprised of vacant, undeveloped land (Kennedy/Jenks, 2014) (Kennedy/Jenks, 2015). Currently, the Project site still consists of vacant,



undeveloped land, with exception of a mobile home and a concrete pad located in the southwestern portion of the Building D Site, unimproved Ellsworth Street that separates the Building D Site and the Building E Site, and unimproved dirt roadways that occur throughout the western and southeastern portions of the Project site. No agricultural uses are present.

C. Land Use, Zoning, and Agricultural Lands Designations

Planning and zoning documents that have relevance to potential forestry and agricultural resource designations on the Project site are the Riverside County General Plan, the Riverside County Zoning Ordinance, and the CDC Farmland Mapping & Monitoring Program (FMMP). Each of these are described below.

1. County of Riverside General Plan

The Riverside County General Plan is the prevailing long-range planning document for all lands in unincorporated Riverside County. The General Plan does not assign any forestry or agricultural designations to the Project site. As shown on Figure 2-2, *Existing General Plan Land Use Designations*, the Riverside County General Plan and Mead Valley Area Plan designate the majority of the Building D Site for “Community Development–Light Industrial (CD-LI)” land uses and the southwest portion of the Building D Site for “Community Development-Business Park (CD-BP)” land uses. The entirety of the Building E Site is designated for “Community Development-Business Park (CD-BP)” land uses. (Riverside County, 2003a, LU-4) None of these designations are intended for agriculture or forest use.

2. County of Riverside Zoning Ordinance Designations

As shown on Figure 2-3, *Existing Zoning Designations*, no portion of the Project site is zoned for forest use or agricultural use. Other zoning designations applied to the Project site include “Manufacturing – Medium (M-M),” “Rural Residential (R-R),” and “Industrial Park (I-P)” on the Building D Site and “Rural Residential ½ Acre Lot Sizes (R-R-1/2)” and “Industrial Park (I-P)” on the Building E Site. The R-R-1/2 and M-M zoning designations allow for limited and small-scale agricultural uses, but agriculture is not a permitted primary use. Agriculture is not permitted in areas zoned I-P.

Adjacent and surrounding zoning designations include “I-P” and “M-M” to the north; “Manufacturing – Service Commercial (M-SC)” and “I-P” to the east; “R-R” and “A-1-1” to the south; and “A-1-1” to the west. As mentioned previously, no properties in the immediate vicinity of the Project site are used primarily for agricultural purposes.

3. Farmland Classifications

The CDC identifies farmlands throughout the State of California as part of its Farmland Mapping & Monitoring Program (FMMP), pursuant to the provisions of CA Government Code § 65570. The FMMP utilizes data from the Natural Resources Conservation Service (NRCS) soil survey and current land use information to categorize lands into eight separate mapping categories: Prime Farmlands, Farmland of Statewide Importance, Unique Farmlands, Farmland of Local Importance, Grazing Land,



Urban and Built-up Land, Other Land, and Water. These eight classifications are dependent on soil characteristics, climatic conditions, and water supply. “Farmland” is defined in Section II(a) of Appendix G of the State CEQA Guidelines to mean “Prime Farmland,” “Farmland of Statewide Importance,” or “Unique Farmland” (“Farmland”). These Farmland types are described below.

- Prime Farmland: Farmland with the best combination of physical and chemical features able to sustain long term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. (CDC, 2015a)
- Farmland of Statewide Importance: Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. (CDC, 2015a)
- Unique Farmland. Farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date. (CDC, 2015a)

As shown on Figure 4.2-1, *FMMP Farmlands Map*, no portions of the Project site contain Prime Farmland, Farmland of Statewide Importance, or Unique Farmland (“Farmland”). As shown on Figure 4.2-1, a small portion of the Building E Site along its western boundary contains land defined by the FMMP as “Other Land.” The remainder of the Building E Site and the entirety of the Building D Site are designated as “Farmland of Local Importance.” These designations are defined by the CDC as:

- Other Land: Land not included in any other mapping category. Common examples include low density rural developments, brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock; poultry or aquaculture facilities; strip mines; borrow pits; and water bodies smaller than 40 acres.
- Farmland of Local Importance: Land of importance to the local agricultural economy as determined by each county’s board of supervisors and a local advisory committee.

Farmland of Local Importance is assigned to land that is either currently producing agricultural crops, or has the capability of production, but does not meet the criteria of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland. According to the CDC classifications, the large portion of the Project site that is designated Farmland of Local Importance likely (about 57.7 acres) carries this designation because the soils in this area are capable of agricultural production, but the property has never been used for agriculture and lacks available irrigation water for use in agricultural crop production and no active farming is occurring in the general area.

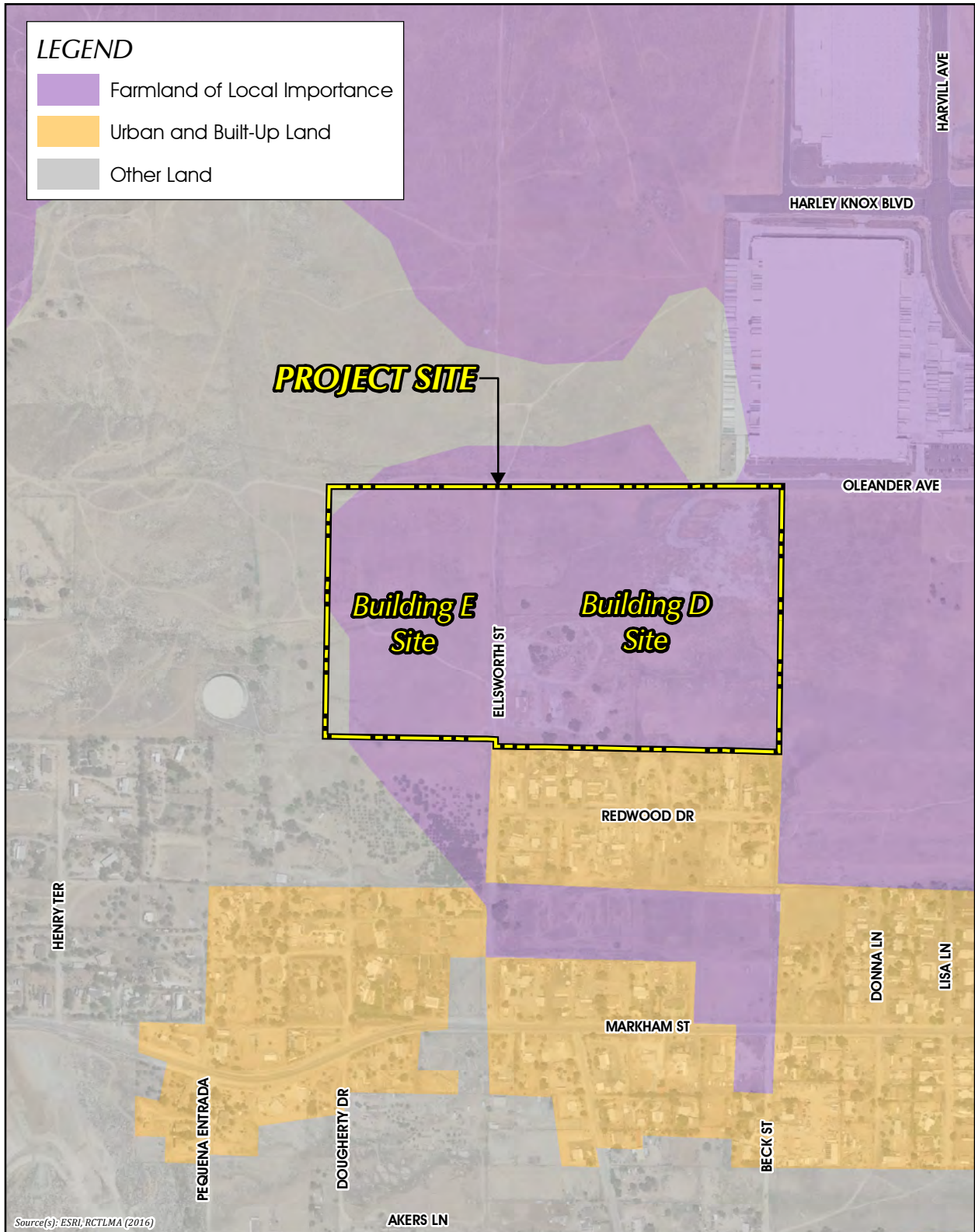
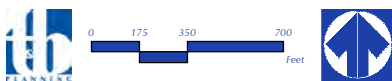


Figure 4.2-1



FMMP FARMLANDS MAP



4. *Storie Index*

The Storie Index is a rating system first developed by R. Earl Storie in 1933 that determines the value of farmland by evaluating the soil type on a given property. The Storie Index rating system ranks each soil according to four general factors: 1) the characteristics of the soil profile and its depth; 2) the texture of the surface soil; 3) the slope of the land on which the soil is located; and 4) other factors, including drainage, salt content, erosion, and alkali. A score ranging from 0 to 100 percent is determined for each factor, and the scores are then multiplied together to derive an index rating. Soils are graded according to their index on a scale of 1 through 6. (UC, 1978)

Grade 1 soils (excellent) score between 80 and 100 percent and have few or no limitations that restrict their use for crops. Grade 2 soils (good) score between 60 and 79 percent and have few special management needs and are suitable for most crops, but they have minor limitations that narrow the choice of crops. Grade 3 soils (fair) score between 40 and 59 percent and are suited to a few crops or to special crops and require special management. Grade 4 soils (poor) score between 20 and 39 percent and are severely limited for crops, and if used, require careful management. Grade 5 soils (very poor) score between 10 and 19 percent and generally are not suited to cultivated crops but can be used for pasture and range. Grade 6 soils (nonagricultural) consist of soils and land types that score less than 10 percent and generally are not suited to farming. (USDA NRCS, 2015)

Figure 4.2-2, *Soils Map*, depicts the distribution of soils across the Project site and Table 4.2-1, *Soil Types*, summarizes the soil types found on the Project site and their associated Storie Index rating. As shown, 18.9 % of the Project site contains soils that have a Storie Index Grade of 1 and the remaining 81.1%% of the Project site's soils have a Storie Index Grade of 3, 4, and 5 (fair to very poor).

4.2.2 APPLICABLE REGULATORY SETTING

A. California Land Conservation Act

The California Land Conservation Act (CLCA) of 1965, also known as the Williamson Act (CA Gov. Code § 51200, *et seq.*), allows owners of agricultural land to have their properties assessed for tax purposes on the basis of agricultural production rather than current market value. The main purpose of the Williamson Act is to encourage property owners to continue to farm their land, and to prevent the premature conversion of farmland to urban uses. The Williamson Act allows local governments to enter into contracts with landowners to restrict property to agricultural or related open space uses for a minimum of 10 years in exchange for a lower property tax assessment to the landowner. The contract remains in effect until the land owner or local government cancels the contract by filing a notice of non-renewal. Once canceled, the land is protected under the “non-renewal” status for a period of 10 years, during which time tax rates gradually increase during the non-renewal period, until they reach normal (i.e., non-restricted) levels upon termination of the contract.

Participation in this program is voluntary and requires 100 contiguous acres of agricultural land under one or more ownerships to file an application for agricultural preserve status with the Riverside County

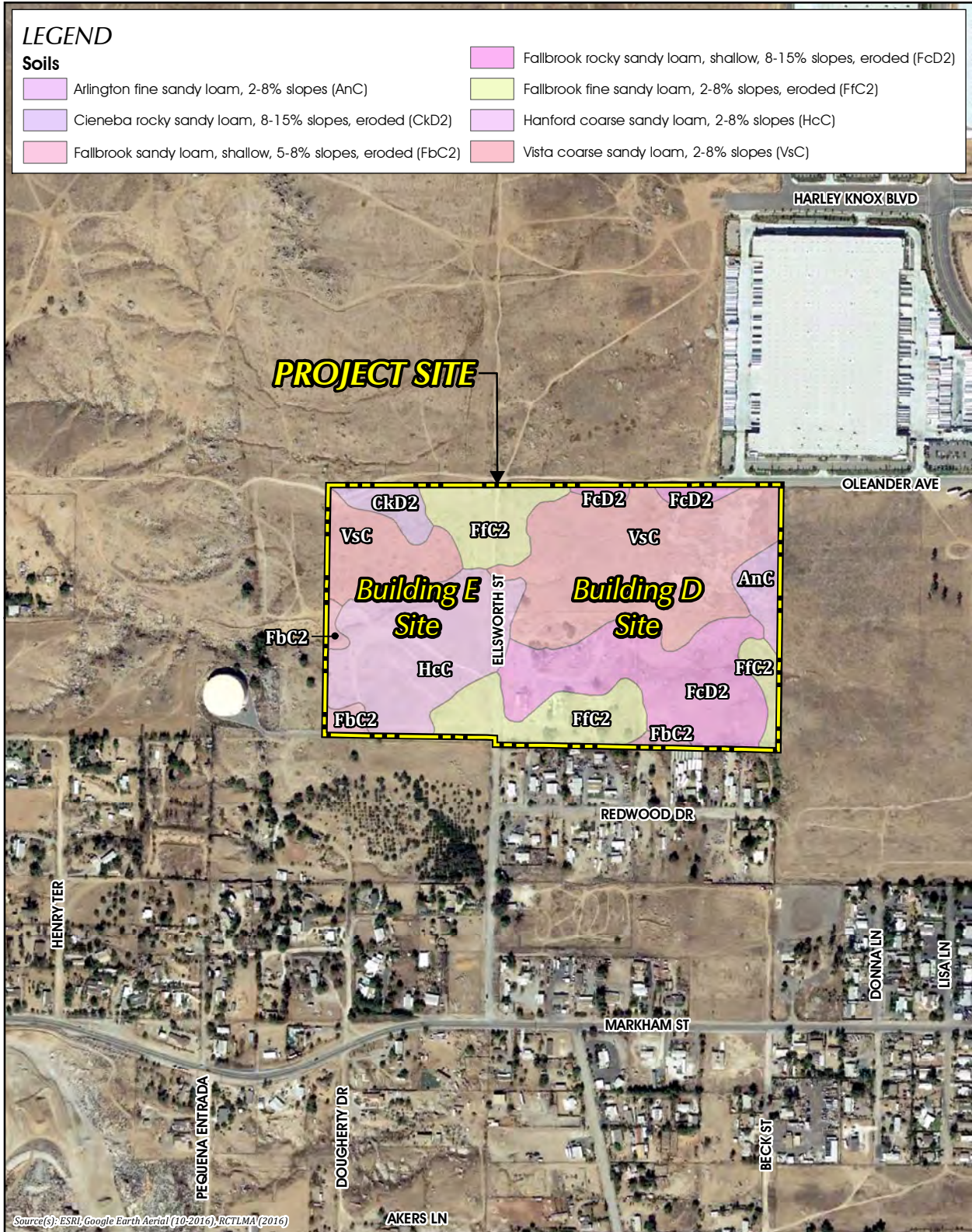
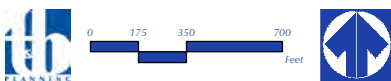


Figure 4.2-2



SOILS MAP



Table 4.2-1 Soil Types

| SOIL SYMBOL | SOIL UNIT NAME | % OF PROJECT SITE | STORIE INDEX RATING |
|-------------|---|-------------------|---------------------|
| AnC | Arlington fine sandy loam, 2 to 8 percent slopes | 2.7% | Grade 4-Poor |
| CkD2 | Cieneba rocky sandy loam, deep, 8 to 15 percent slopes, eroded | 2.7% | Grade 4-Poor |
| FbC2 | Fallbrook sandy loam, shallow, 5 to 8 percent slopes, eroded | 2.4% | Grade 4-Poor |
| FcD2 | Fallbrook rocky sandy loam, shallow, 8 to 15 percent slopes, eroded | 20.2% | Grade 4-Poor |
| FfC2 | Fallbrook fine sandy loam, 2 to 8 percent slopes, eroded | 17.4% | Grade 3-Fair |
| HcC | Hanford coarse sandy loam, 2 to 8 percent slopes | 18.9% | Grade 1-Excellent |
| VsC | Vista coarse sandy loam, 2 to 8 percent slopes | 35.7% | Grade 3-Fair |

(USDA NRCS, 2015)

Planning Department (Riverside County, 2003a, p. OS-14). No portion of the Project site is covered by a Williamson Act contract. In addition, no properties immediately adjacent to the Project site are covered by a Williamson Act contract. (CDC, 2012)

B. Agricultural Preserves

An agricultural preserve defines the boundary of an area within which a city or county will enter into contracts with landowners. The boundary is designated by resolution of the board of supervisors or city council having jurisdiction. Only land located within an agricultural preserve is eligible for a Williamson Act contract. Preserves are regulated by rules and restrictions designated in the resolution to ensure that the land within the preserve is maintained for agricultural or open space use. (CDC, 2015b)

An agricultural preserve must consist of no less than 100 acres. However, in order to meet this requirement, two or more parcels may be combined if they are contiguous or in common ownership. Smaller agricultural preserves may be established if a board or council determines that the unique characteristic of the agricultural enterprise in the area calls for smaller agricultural units, and if the establishment of the preserve is consistent with the city or county’s General Plan. Preserves may be made up of land in one or more ownerships. Property owners with less than 100 acres may combine



with neighbors to form preserves, provided the properties are contiguous. (CDC, 2015b) The Project site is not located in a Riverside County Agricultural Preserve.

C. Riverside County Ordinance No. 625 (Right-to-Farm Ordinance)

According to the Riverside County Right-to-Farm Ordinance, any new development that is introduced into an area where agricultural uses have been occurring for more than three years, forgo their right to claim that the ongoing agricultural use is a nuisance (due to odors, dust, noise, and other effects typical to an agricultural operation). Ordinance No. 625 states:

“The Riverside County Board of Supervisors finds that where non-agricultural land uses extend into agricultural areas or exist side-by-side, agricultural operations often become the subject of nuisance complaints. As a result, some agricultural operations are forced to cease or curtail operations, others are discouraged from making investments in farm improvements, and efficient agricultural production is generally discouraged due to burdensome litigation against farmers.”

“No agricultural activity, operation, or facility, or appurtenances thereof, conducted or maintained for commercial purposes, and in a manner consistent with proper and accepted customs and standards, as established and followed by similar agricultural operations in the same locality, shall be or become a nuisance, private or public, due to any changed condition in or about the locality, after the same has been in operation for more than three (3) years if it was not a nuisance at the time it began.”

4.2.3 BASIS FOR DETERMINING SIGNIFICANCE

The proposed Project would result in a significant impact to agriculture and/or forest resources if the Project or any Project-related component would:

Agriculture

- a) *Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use; or*
- b) *Conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve; or*
- c) *Cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 “Right-to-Farm”); or*
- d) *Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use.*

Forest

- a) *Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code*



section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g)); or

- b) Result in the loss of forest land or conversion of forest land to non-forest use; or*
- c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use.*

4.2.4 IMPACT ANALYSIS

Agriculture

Threshold a: Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

According to the FMMP and as reported by Riverside County GIS, the Project site contains land defined by the FMMP as “Other Lands” and “Farmland of Local Importance.” There are no portions of the Project site that contain Prime Farmland, Farmland of Statewide Importance, or Unique Farmland (“Farmland”). Also, there are no areas surrounding the Project site that contain Farmland. Areas surrounding the Project site are designated as “Farmland of Local Importance,” “Urban and Built-Up Land,” and “Other Lands.” (RCIT, 2015) (CDC, 2014)

As shown on Figure 4.2-2 and as identified on Table 4.2-1, only 18.9% of the Project site has a Storie Index Grade of 1, which indicates that these soils have only slight limitations for agricultural use. The remainder of the Project site’s soils (81.1%) have Storie Index Grades of 3, 4, and 5, which indicates that these soils have severe limitations for agricultural use. As shown on Figure 4.2-2, the Hanford coarse sandy loam, on 2 to 8 percent slopes (HcC), which have a Storie Index Grade of 1, are located in an area of the Project site that is divided by Ellsworth Street. The division of the lands mapped with HcC soils by Ellsworth Street effectively precludes this area of the Project site from being productively farmed. In addition, as discussed in Subsection 4.2.1, the lands surrounding the Project site do not contain farmland. The only agricultural uses located in the surrounding area are ancillary gardens and animal corrals on rural residential lots, and the primary use of these lands is rural residential and not agriculture.

Because no evidence exists that the Project site was ever used for agricultural use, the site is not surrounded by lands under active agricultural production, and the majority of the Project site is not suitable for productive farmland according to the land capability classification of the USDA Storie Index, the Project has no potential to result in direct or indirect impacts to Farmland. No impact would occur.



Agriculture

Threshold b: *Would the Project conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve?*

A. Williamson Act Contracts and Agricultural Preserves

According to mapping information available from Riverside County GIS, the Project site is not included within any active Agricultural Preserves. The nearest Agricultural Preserve (“Woodcrest 5”) occurs approximately 2.1 miles west of the Project site (RCIT, 2015). Due to the 2.1 mile distance and intervening topography, the Project would have no potential to conflict with the existing Agricultural Preserve (“Woodcrest 5”). In addition, as discussed in Subsection 4.2.1, no portion of the Project site is covered by a Williamson Act contract. In addition, no properties immediately adjacent to the Project site are covered by a Williamson Act contract. (CDC, 2012)

B. Agricultural Zoning and Agricultural Use

No portion of the Building D Site is zoned for agricultural use. Lands immediately to the west and south of the Building E Site are zoned A-1-1. However, none of the surrounding lands are currently used for agricultural production, with the exception of ancillary agricultural activities such as gardens and animal corrals that occur on off-site rural residential lots for personal use. A discussion of potential impacts associated with agricultural zoning and use as a result of implementing the proposed Project on the Building D Site and Building E Site is presented below.

1. Building D Site

The Building D Site does not contain any agricultural uses and is zoned “Manufacturing – Medium (M-M),” “Rural Residential (R-R),” and “Industrial Park (I-P).” Accordingly, the Building D Site does not contain land primarily zoned for agriculture or land used for agricultural purposes. Thus, the Project as proposed on the Building D Site would not conflict with existing agricultural zoning or agricultural use. Further, as shown on Figure 2-3, *Existing Zoning Designations*, no properties with agricultural zoning are located immediately adjacent to the Building D Site; thus, implementation of the proposed Project on the Building D Site has no potential to indirectly impact off-site agriculturally zoned parcels. Ancillary agricultural uses that occur on rural residential properties to the south of the Building D Site would be unaffected in their use by the Project. No adverse impacts to agricultural zoning or agricultural use would occur.

2. Building E Site

The Building E Site is zoned “Rural Residential ½ Acre Lot Sizes (R-R-1/2)” and “Industrial Park (I-P).” Proposed Change of Zone No. 7873 seeks to change the zoning designation on the portion of the property zoned R-R-1/2 to I-P. Thus, the Project as proposed on the Building E Site would not conflict with existing agricultural zoning or agricultural use.



No property in the surrounding area is currently being used for agricultural production as a primary use. In addition, the Building E Site is physically separated on all but one side from A-1-1 zoned property by an EMWD water tank (the water tank site is also zoned A-1-1), it is unlikely and highly speculative that Project implementation on the Building E Site could adversely affect off-site agriculturally zoned property. The Tentative Parcel Map proposed on the Building E Site suggests a grading concept that would create a manufactured slope measuring up to 14 feet in height on the west side of the proposed development pad, and facing east into the Building E Site, which would physically separate development on the Building E Site from off-site properties zoned A-1-1. This physical feature, a large manufactured slope, would further preclude any potential for development on the Building E Site from physically effecting agriculturally zoned lands to the west. For these reasons, impacts to agricultural zoning and agricultural use would be less than significant.

Agriculture

Threshold c) Would the Project cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 “Right-to-Farm”)?

Properties immediately to the west, south, and southwest of the Project site are zoned A-1-1, although they are not used for agricultural production. When proposed grading of the Building D Site is complete, the building pad on the Building D Site would sit between three and 17 feet below the ground elevation of abutting A-1-1 zoned property to the south. When grading of the Building E Site is complete, the building pad would be approximately 14 feet lower in elevation than off-site A-1-1 zoned property to the west. Taking into consideration that agricultural operations do not occur on the adjacent A-1-1 zoned properties and the proposed building pads would be physically separated from the off-site adjacent A-1-1 zoned property by a manufactured slope and retaining wall, the Project has no potential to result in off-site indirect effects on agriculturally zoned properties to the south, west, and southwest.

In the unlikely event that agricultural activity commences on the properties immediately to the west and south of the Project site that are zoned A-1-1, and continues for at least three years before the Project site is developed, the proposed Project would be required to comply with Riverside County Ordinance No. 625 (Riverside County Right-to-Farm Ordinance) (Riverside County, 1994). Ordinance No. 625 specifies that if any agricultural operation has been in place for at least three years and is not considered a nuisance operation at the time the operation began, no change in surrounding land uses may cause said operation to become a nuisance. Mandatory compliance with Ordinance 625, if necessary, would ensure that any potential conflicts between the proposed Project and existing agriculturally zoned property within 300 feet of the Project site do not occur, thereby resulting in a less-than-significant impact to existing agriculturally zoned properties located in the Project site’s vicinity. With mandatory compliance to Ordinance No. 625, as would be required by the County, impacts would be less than significant.



Agriculture

Threshold d) Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

Refer to the analyses under Agricultural Thresholds (a) and (b). Due to the lack of agricultural activity and Farmland in the Project site's vicinity, the Project has no potential to result in changes to the existing environment which, due to their location or nature, could result in the conversion of Farmland to a non-agricultural use.

Forest

Threshold a) Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g))?

The Project site is not zoned as forest land. There are no lands within the Project site's vicinity that are zoned for forest land, timberland, or Timberland Production (RCIT, 2015). As such, there is no potential for the Project to conflict with or cause the rezoning of such lands. No impact would occur.

Forest

Threshold b) Would the Project result in the loss of forest land or conversion of forest land to non-forest use?

The Project site does not contain forest land. There are no forest lands within the Project site's vicinity (Google Earth Pro, 2015) (Riverside County, 2003a, Figure OS-3). As such, there is no potential for the proposed Project to cause the loss of forest land or the conversion of forest land to non-forest use. No impact would occur.

Forest

Threshold c) Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?

Due to the absence of forest lands on the Project site and in its vicinity, there is no potential for the proposed Project to involve other changes in the existing environment which, due to their location or nature, could result in the conversion of forest land to non-forest use. No impact would occur.



4.2.5 CUMULATIVE IMPACT ANALYSIS

1. *Agriculture*

As discussed under Agriculture Threshold (a), the Project site does not contain Prime Farmland, Farmland of Statewide Importance, or Unique Farmland (“Farmland”). In addition, 81.1% of the Project site’s soils have Storie Index ratings that indicate severe limitations for crop production. Thus, the Project as proposed on the Building D Site and the Building E Site has no potential to result in a cumulatively considerable impact to Farmland as defined in CEQA Guidelines Appendix G Section II (a).

The Riverside County General Plan defines productive agricultural lands as those involved in a long-term substantial investment to agricultural use and with long-term economic viability for agricultural uses (Riverside County, 2015d, p. 4.5-1). As discussed under Threshold (b), the Project site does not contain any Williamson Act contracts or land within a Riverside County Agricultural Preserve and the Project site has not historically been used for agricultural use nor is it used for agricultural use under existing conditions. Therefore, the Project as proposed on the Building D Site and Building E Site has no potential to result in a cumulatively considerable impact to land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve.

The County of Riverside recognizes the diminishment of agricultural lands County-wide over the past several decades. Riverside County General Plan EIR No. 521, which evaluated the County’s most recent General Plan Update, determined that future development accommodated by the land use and policy changes suggested in the General Plan Update (GPA No. 960) would introduce new urban uses within 300 feet of agriculturally zoned property and contribute to the demand for additional development and infrastructure that would further fuel the conversion of agricultural lands to non-agricultural uses. (Riverside County, 2015d, p. 4.5-33) As discussed in Subsection 4.2.4, the Project as proposed on the Building D and Building E Site has less-than-significant potential to considerably contribute to a cumulatively impact associated with land zoned and/or used for agriculture. No portion of the Project site has ever been used for agricultural purposes and no agricultural uses are located on or immediately adjacent to the site under existing conditions.

As discussed under Thresholds (b) and (c), the Building D Site and Building E Site do not contain land zoned for agriculture. The Building E Site is physically separated on all but one side from other A-1-1 zoned property by an EMWD water tank (the water tank site is zoned A-1-1), it is unlikely and highly speculative that Project implementation on the Building E Site could adversely affect off-site agriculturally zoned property. Further, the Tentative Parcel Map proposed on the Building E Site suggests a grading concept that would create a manufactured slope measuring up to 14 feet in height on the west side of the proposed development pad, which would separate development on the Building E Site from off-site properties zoned A-1-1. Similarly, the southern boundary of the Project site would sit lower in elevation than adjacent A-1-1 zoned property. Due to the physical separation by manufactured slopes, any potential agricultural zoning conflict is deemed less than significant and less than cumulatively considerable. In the unlikely event that agricultural activity commences on these



off-site properties and continues for at least three years before the Project site is developed, the proposed Project would be required to comply with Riverside County Ordinance No. 625 (Riverside County Right-to-Farm Ordinance) (Riverside County, 1994). As discussed under Agriculture Threshold (c), mandatory compliance with Ordinance 625, if necessary, would ensure that any potential conflicts between the proposed Project and existing agriculturally zoned property within 300 feet of the Project site do not occur, thereby resulting in a less-than-significant impact to existing agriculturally zoned properties located in the Project site's vicinity. Compliance with Ordinance 625.1, if necessary, would prevent or reduce any potentially cumulatively considerable significant impacts.

As discussed under Agriculture Threshold (d), due to the lack of agricultural activity and Farmland in the Project site's vicinity, the Project has no potential to result in changes to the existing environment which, due to their location or nature, could result in the conversion of Farmland to a non-agricultural use. Thus, the Project as proposed on the Building D Site and the Building E Site has no potential to result in a cumulatively considerable impact associated with other changes in the existing environment which could result in conversion of Farmland, to non-agricultural use.

2. Forest

Because the Project site is not zoned as forest land, there are no lands within the Project site's vicinity that are zoned for forest land, timberland, or Timberland Production, the Project site does not contain forest land and there are no forest lands within the Project site's vicinity, the Project as proposed on the Building D Site and the Building E Site has no potential to result in a cumulatively considerable impact to forest resources.

4.2.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Agriculture

Threshold (a) for the Building D Site and the Building E Site: No Impact. The Project as proposed on the Building D Site and Building E Site would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use. There is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) on the Project site and a large majority of the on-site soils have severe limitations for agricultural crop production.

Threshold (b) for the Building D and the Building E Site: Less-than-Significant Impact. The Project as proposed on the Building D Site and the Building E Site does not contain land zoned for agriculture or land used for agricultural purposes. With mandatory compliance to Riverside County Ordinance No. 625, impacts would be less than significant.

Threshold (c) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would have less-than-significant impacts to off-site properties that are agriculturally zoned. Aspects of the Building D and Building E Sites' physical designs, including the proposed creation of manufactured slopes around the building pad perimeters, would provide a physical separation between the proposed development and off-site agriculturally zoned property. Also, no surrounding property



is currently used primarily for agricultural purposes. Should an off-site property within 300 feet become used for agriculture, mandatory compliance to Ordinance No. 625, as would be required by the County, would further ensure that impacts would be less than significant.

Threshold (d) for the Building D Site and the Building E Site: No Impact. Due to the lack of agricultural activity and Farmland in the Project vicinity, the Project has no potential to result in changes to the existing environment which, due to their location or nature, could result in the conversion of Farmland to a non-agricultural use.

Forest

Threshold (a) for the Building D Site and the Building E Site: No Impact. The Project site is not zoned as forest land and there are no lands within the Project site's vicinity that are zoned for forest land, timberland, or Timberland Production. Thus, implementation of the proposed Project on the Building D Site and the Building E Site would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production.

Threshold (b) for the Building D Site and the Building E Site: No Impact. There is no forest land on the Project site. Thus, implementation of the proposed Project on the Building D Site and the Building E Site would not result in the conversion of forest land to non-forest use.

Threshold (c) for the Building D Site and the Building E Site: No Impact. The Project site does not contain forest land. Thus, the Project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use.

4.2.7 MITIGATION

Applicable County Regulations and Design Requirements

The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- The Project is required to comply with Riverside County Ordinance No. 625, which requires that when non-residential uses are developed adjacent to properties zoned primarily for agricultural purposes (that support agricultural operations that have been in place for at least three years and not considered a nuisance operation at the time the operation began), future property owners must be notified of any agricultural operations that are on-going in the area, and acknowledge that such agricultural uses shall not be the subject of nuisance complaints.

Mitigation

Impacts would be less than significant. Mitigation is not required.



4.3 AIR QUALITY

The analysis presented in this subsection is based in part on two air quality technical reports. The air quality impact analysis prepared for the Project is titled, “Knox Business Park Air Quality Impact Analysis County of Riverside,” prepared by Urban Crossroads, Inc., dated August 5, 2016, and appended to this EIR as *Technical Appendix B1* (Urban Crossroads, Inc., 2016a). The mobile source health risk assessment prepared for the Project is titled, “Knox Business Park Mobile Source Health Risk Assessment County of Riverside,” prepared by Urban Crossroads, Inc., dated January 28, 2016 (Revised), and appended to this EIR as *Technical Appendix B2* (Urban Crossroads, Inc., 2016b). Please note that *Technical Appendix B1* and *Technical Appendix B2* were prepared prior to the Project Applicant’s decision to reduce the size of the Building E Site and the size of its proposed building to the current configurations described in EIR Section 3.0, *Project Description*. Therefore, Urban Crossroads, Inc. prepared a supplemental analysis to address the reduction in size of the Building E Site and its proposed building. The update letter, “Knox Business Park Supplemental Air Quality Impact Analysis, Greenhouse Gas Impact Analysis, & Mobile Source Health Risk Assessment” is dated February 9, 2017, and is appended to the front of *Technical Appendix B1*.

Based on the results of Urban Crossroads’ Supplemental Analysis, all of the Project’s air quality pollutant emissions and the risks to human health imposed by the Project’s mobile source emission levels would be less than the quantities disclosed in *Technical Appendix B1* and *Technical Appendix B2*. The reductions in emission levels are due to a reduction in daily traffic trips that would occur from constructing and operating a smaller building on the Building E Site than was analyzed in the 2016 reports. Thus, the Project’s 2016 Air Quality Impact Analysis (*Technical Appendix B1*) and 2016 Mobile Source Health Risk Assessment (*Technical Appendix B2*) disclose greater level of impacts that are projected to occur from the currently proposed Project. (Urban Crossroads, Inc., 2017a)

These and all other references relied upon in this Subsection are listed in EIR Section 7.0, *References*.

4.3.1 EXISTING CONDITIONS

A. Air Basin

The Project site is located in the South Coast Air Basin (SCAB, or “Basin”), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAB encompasses approximately 6,745 square miles and includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is bound by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and the Jacinto Mountains to the north and east, respectively; and the San Diego County line to the south. The Riverside County portion of the Salton Sea Air Basin, which is located southeast of the Project site, is bound by the San Jacinto Mountains in the west and spans eastward up to the Palo Verde Valley (Urban Crossroads, Inc., 2016a, p. 7)



B. Regional Climate and Meteorology

The regional climate – temperature, wind, humidity, precipitation, and the amount of sunshine – has a substantial influence on air quality. The distinctive climate of the SCAB is determined by its terrain and geographical location, which comprises a coastal plain connected to broad valleys and low hills bounded by the Pacific Ocean in the southwest quadrant with high mountains forming the remainder of the perimeter. The annual average temperatures throughout the SCAB vary from the low to middle 60s, measured in degrees Fahrenheit (F). Inland areas of the SCAB, including where the Project site is located, show more variability in annual minimum and maximum temperatures than coastal areas within the SCAB due to a decreased marine influence (Urban Crossroads, Inc., 2016a, p. 7)

The climate of the SCAB is characterized as semi-arid; however, the air near the land surface is quite moist on most days because of the presence of a marine layer. This shallow layer of sea air is an important modifier of SCAB climate. Humidity restricts visibility in the SCAB and the relative high humidity heightens the conversion of sulfur dioxide to sulfates. The marine layer provides an environment for that conversion process, especially during the spring and summer months. The annual average relative humidity within the SCAB is 71 percent along the coast and 59 percent inland. (Urban Crossroads, Inc., 2016a, p. 7)

More than 90 percent of the SCAB’s rainfall occurs from November through April. The annual average rainfall varies from approximately nine inches in Riverside to fourteen inches in downtown Los Angeles. Monthly and yearly rainfall totals are extremely variable. Summer rainfall usually consists of widely scattered thunderstorms near the coast and slightly heavier shower activity in the eastern portion of the SCAB with frequency being higher near the coast. Due to its generally clear weather, about three-quarters of available sunshine is received in the SCAB. The remaining one-quarter is absorbed by clouds. The ultraviolet portion of this abundant radiation is a key factor in photochemical reactions. (Urban Crossroads, Inc., 2016a, p. 8)

Dominant airflow direction and speed are the driving mechanisms for transport and dispersion of air pollution. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with storms moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed “Santa Anas” each year. During the dry season, which coincides with the months of maximum photochemical smog concentrations, the wind flow is bimodal, typified by a daytime onshore sea breeze and a nighttime offshore drainage wind. Summer wind flows are created by the pressure differences between the relatively cold ocean and the unevenly heated and cooled land surfaces that modify the general northwesterly wind circulation over southern California. During the nighttime, heavy, cool air descends mountain slopes and flows through the mountain passes and canyons as it follows the lowering terrain toward the ocean. (Urban Crossroads, Inc., 2016a, p. 8)

In the SCAB, there are two distinct temperature inversion structures that control vertical mixing of air pollution. During the summer, warm high-pressure descending (subsiding) air is undercut by a shallow layer of cool marine air. The boundary between these two layers of air is a persistent marine



subsidence/inversion. This boundary prevents vertical mixing which effectively acts as an impervious lid to pollutants over the entire SCAB. The mixing height for the inversion structure is normally situated 1,000 to 1,500 feet above mean sea level. A second inversion-type forms in conjunction with the drainage of cool air off of the surrounding mountains at night followed by the seaward drift of this pool of cool air. The top of this layer forms a sharp boundary with the warmer air aloft and creates nocturnal radiation inversions. These inversions occur primarily in the winter, when nights are longer and onshore flow is weakest. They are typically only a few hundred feet above mean sea level. These inversions effectively trap pollutants, such as nitrogen oxides and carbon monoxide, as the pool of cool air drifts seaward. Winter is therefore a period of high levels of primary pollutants along the coastline. (Urban Crossroads, Inc., 2016a, p. 8)

C. Air Quality Pollutants and Associated Human Health Effects

The federal government and State of California have established maximum permissible concentrations for common air pollutants that may pose a risk to human health or would otherwise degrade air quality and adversely affect the environment. These regulated air pollutants are referred to as “criteria pollutants.” An overview of the common criteria air pollutants in the SCAB, their sources, and associated effects to human health are summarized on the following pages (refer also to pages 9-13 of *Technical Appendix B1*).

- Carbon Monoxide (CO) is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest in the winter during the morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. CO is emitted directly from internal combustion engines; therefore, motor vehicles operating at slow speeds are the primary source of CO in the SCAB. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. Inhaled CO has no direct toxic effect on the lungs, but exerts its effect on tissues by interfering with oxygen transport and competing with oxygen to combine with hemoglobin present in the blood to form carboxyhemoglobin (COHb). Therefore, conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. The most common symptoms associated with CO poisoning include headache, nausea, vomiting, dizziness, fatigue, and weakness. Individuals most at risk to the effects of CO include fetuses, patients with diseases involving heart and blood vessels, and patients with chronic oxygen deficiency.
- Sulfur Dioxide (SO₂) is a colorless, extremely irritating gas or liquid. SO₂ enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal and from chemical processes occurring at chemical plants and refineries. When SO₂ oxidizes in the atmosphere, it forms sulfates (SO₄). Collectively, these pollutants are referred to as sulfur oxides (SO_x). SO₂ is a respiratory irritant to people afflicted with asthma. After a few minutes exposure to low levels of SO₂, asthma sufferers can experience breathing difficulties, including airway constriction and reduction in breathing capacity. Although healthy individuals do not exhibit similar acute breathing difficulties



in response to SO₂ exposure at low levels, animal studies suggest that very high levels of exposure can cause lung edema (fluid accumulation), lung tissue damage, and sloughing off of cells lining the respiratory tract.

- Nitrogen Oxides (NO_x) consist of nitric oxide (NO), nitrogen dioxide (NO₂) and nitrous oxide (N₂O) and are formed when nitrogen (N₂) combines with oxygen (O₂). Their lifespan in the atmosphere ranges from one to seven days for nitric oxide and nitrogen dioxide, to 170 years for nitrous oxide. Nitrogen oxides are typically created during combustion processes, and are major contributors to smog formation and acid deposition. NO₂ is a criteria air pollutant, and may result in numerous adverse health effects; it absorbs blue light, resulting in a brownish-red cast to the atmosphere, and reduced visibility. Of the seven types of nitrogen oxide compounds, NO₂ is the most abundant in the atmosphere. As ambient concentrations of NO₂ are related to traffic density, commuters in heavy traffic may be exposed to higher concentrations of NO₂ than those indicated by regional monitoring stations. Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposure to NO₂. Short-term exposure to NO₂ can result in resistance to air flow and airway contraction in healthy subjects. Exposure to NO₂ can result in larger decreases in lung functions in individuals with asthma or chronic obstructive pulmonary diseases (e.g., chronic bronchitis, emphysema), as these individuals are more susceptible to the effects of NO_x than healthy individuals.
- Ozone (O₃) is a highly reactive and unstable gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x), both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, warm temperatures, and light wind conditions are favorable to the formation of this pollutant. Short-term exposure (lasting for a few hours) to ozone at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible sub-groups for ozone effects. An increased risk for asthma has been found in children who participate in multiple sports and live in communities with high ozone levels.
- Particulate Matter less than 10 microns (PM₁₀) is a major air pollutant consisting of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols. The size of the particles (10 microns or smaller, about 0.0004 inches or less) allows them to easily enter the lungs where they may be deposited, resulting in the adverse health effects discussed below for PM_{2.5}. PM₁₀ also causes visibility reduction and is a criteria air pollutant.



- Particulate Matter less than 2.5 microns (PM_{2.5}) PM_{2.5} is a similar air pollutant to PM₁₀ consisting of tiny solid or liquid particles which are 2.5 microns or smaller (which is often referred to as fine particles). These particles are formed in the atmosphere from primary gaseous emissions that include sulfates formed from SO₂ release from power plants and industrial facilities and nitrates that are formed from NO_x release from power plants, automobiles and other types of combustion sources. The chemical composition of fine particles is highly dependent on location, time of year, and weather conditions. PM_{2.5} is a criteria air pollutant. Elevated ambient concentrations of fine particulate matter (PM₁₀ and PM_{2.5}) have been linked to an increase in respiratory infections, number, and severity of asthma attacks, and increased hospital admissions. Some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in life-span, and an increased mortality from lung cancer. Daily fluctuations in PM_{2.5} concentration levels have also been related to hospital admissions for acute respiratory conditions in children, to a decrease in respiratory lung volumes in normal children, and to increased medication use in children and adults with asthma. Recent studies show lung function growth in children is reduced with long-term exposure to particulate matter. The elderly, people with pre-existing respiratory or cardiovascular disease, and children, appear to be more susceptible to the effects of high levels of PM₁₀ and PM_{2.5}.
- Volatile Organic Compounds (VOCs) are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form ozone to the same extent when exposed to photochemical processes. VOCs often have an odor, including such common VOCs as gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include: carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. Odors generated by VOCs can irritate the eye, nose, and throat, which can reduce respiratory volume. In addition, studies have shown that the VOCs that cause odors can stimulate sensory nerves to cause neurochemical changes that might influence health, for instance, by compromising the immune system. VOCs are a precursor to O₃, which is a criteria pollutant. The SCAQMD uses the terms VOC and ROG interchangeably.
- Reactive Organic Gases (ROGs) also are precursors in forming ozone and consist of compounds containing methane, ethane, propane, butane, and longer chain hydrocarbons, which are typically the result of some type of combustion/decomposition process. Smog is formed when ROG and nitrogen oxides react in the presence of sunlight. ROGs are precursors to O₃ which is a criteria pollutant. The SCAQMD uses the terms ROG and VOC interchangeably.



- Lead (Pb) is a heavy metal that is highly persistent in the environment. Historically, the primary source of lead in the air was emissions from vehicles burning leaded gasoline. As a result of the removal of lead from gasoline, there have been no violations at any of the SCAQMD's regular air quality monitoring stations since 1982. Currently, emissions of lead are largely limited to stationary sources such as lead smelters. Lead is a criteria air pollutant. Exposure to low levels of lead can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. In adults, increased lead levels are associated with increased blood pressure. Lead poisoning can cause anemia, lethargy, seizures, and death. Fetuses, infants, and children are more sensitive than others to the adverse effects of lead exposure.

D. Existing Air Quality

Monitored air quality of the criteria pollutants discussed above is evaluated in the context of ambient air quality standards. These standards are the levels of air quality that are considered safe with an adequate margin of safety, to protect the public health and welfare. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) currently in effect, as well as health effects of each pollutant regulated under these standards, are detailed in Table 4.3-1, *Ambient Air Quality Standards*. (Urban Crossroads, Inc., 2016a, p. 13)

The determination of whether a region's air quality is healthful or unhealthful is determined by comparing contaminant levels in ambient air samples to the State and federal standards presented in Table 4.3-1. The air quality in a region is considered to be in attainment by the State of California if the measured ambient air pollutant levels for ozone (O₃), carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), inhalable particulate matter (PM₁₀), and fine particulate matter (PM_{2.5}) are not equaled or exceeded at any time in any consecutive three-year period; and the federal standards (other than O₃, PM₁₀, PM_{2.5}, and those based on annual averages or arithmetic mean) are not exceeded more than once per year. The O₃ standard is attained when the fourth highest eight-hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM₁₀, the 24-hour standard is attained when 99 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. (Urban Crossroads, Inc., 2016a, p. 13)

1. Regional Air Quality

Criteria Area Pollutants

The federal government has designated seven (7) pollutants that are pervasive enough across the nation to warrant national health standards. Called "criteria pollutants," these are O₃, NO₂, PM₁₀, PM_{2.5}, CO, Pb, and SO₂. (SCAQMD, 2015a, p. 2) The SCAQMD monitors levels of various criteria air pollutants at 30 monitoring stations throughout its jurisdiction. In 2014, the most recent year for which detailed data was available at the time the NOP for this EIR was issued (August 2015), the federal and State ambient air quality standards (NAAQS and CAQQS) were exceeded on at least one or more days for O₃, PM₁₀, and PM_{2.5}. No areas of the SCAB exceeded federal or state standards for NO₂, SO₂, CO,



SO_x and Pb. (Urban Crossroads, Inc., 2016a, p. 16) The attainment status for criteria pollutants within the SCAB is summarized in Table 4.3-2, *Attainment Status of Criteria Pollutants in the South Coast Air Quality Basin (SCAB)*.

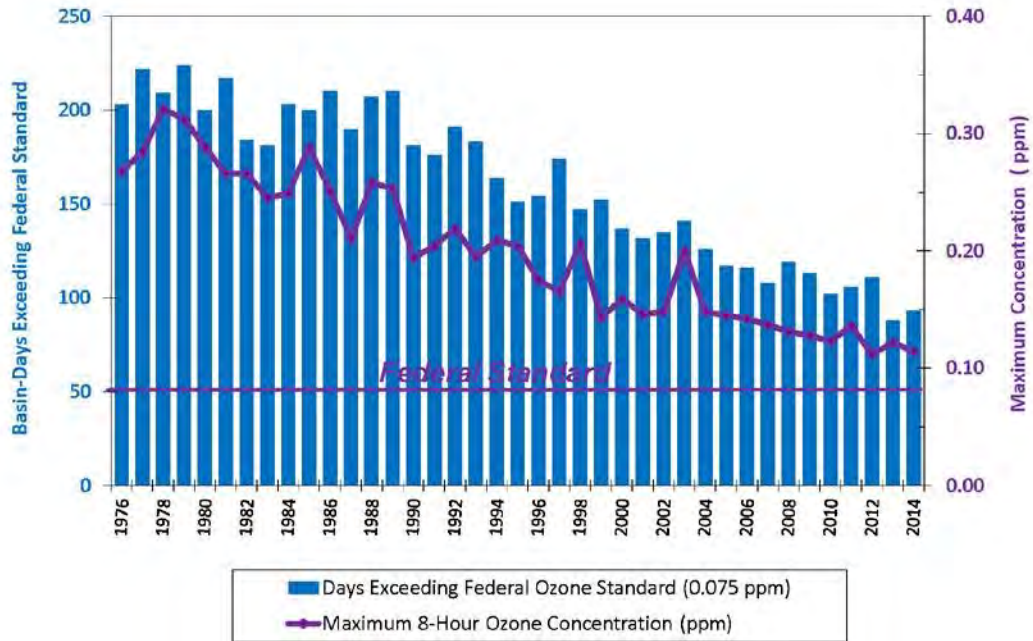
2. South Coast Air Quality Basin- Air Quality History and Air Quality Trends

The SCAB has experienced unhealthful air since World War II and is one of the most unhealthful air basins in the United States; however, as a result of the region's air pollution control efforts over the last 66 years, air pollution concentrations in the SCAB have been reduced dramatically. For example, peak ozone levels have been cut by almost three-fourths since air monitoring began in the 1950s and population exposure was cut in half during the 1980s alone (SCAQMD, 2015a, p. 2). Thus, overall air quality within the SCAB is dramatically improving as the result of regulatory programs and is expected to continue to improve in the future as government regulations become more stringent.

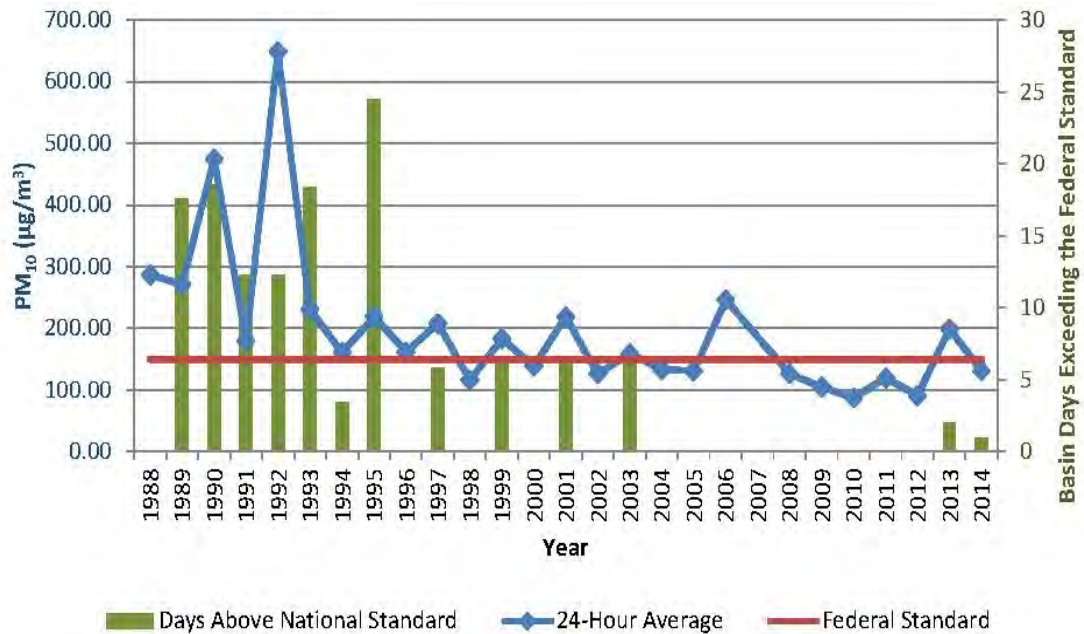
The SCAQMD's *Final 2012 Air Quality Management Plan* states, "the remarkable historical improvement in air quality since the 1970's is the direct result of Southern California's comprehensive, multiyear strategy of reducing air pollution from all sources as outlined in its AQMPs." Ozone, NO_x, VOCs, and CO have been decreasing in the Basin since 1975 and are projected to continue to decrease through 2020. These decreases result primarily from motor vehicle controls and reductions in evaporative emissions. Although vehicle miles traveled in the Basin continue to increase, NO_x and VOC levels are decreasing because of the mandated controls on motor vehicles and the replacement of older polluting vehicles with lower-emitting vehicles. NO_x emissions from electric utilities have also decreased due to use of cleaner fuels and renewable energy. Ozone contour maps show that the number of days exceeding the national 8-hour standard decreased between 1997 and 2007. The overall trends of PM₁₀ and PM_{2.5} in the air (not emissions) show an overall improvement since 1975. Direct emissions of PM₁₀ have remained somewhat constant in the Basin and direct emissions of PM_{2.5} have decreased slightly since 1975. Area wide sources (fugitive dust from roads, dust from construction and demolition, and other sources) contribute the greatest amount of direct particulate matter emissions. Ozone levels in the SCAB have decreased substantially over the last 30 years. Today, the maximum measured concentrations are approximately one-third of concentrations measured in the late 1970's. The graphs below show trend information as reported by the SCAQMD. (Urban Crossroads, Inc., 2016a, p. 20)



South Coast Air Basin Ozone Trend

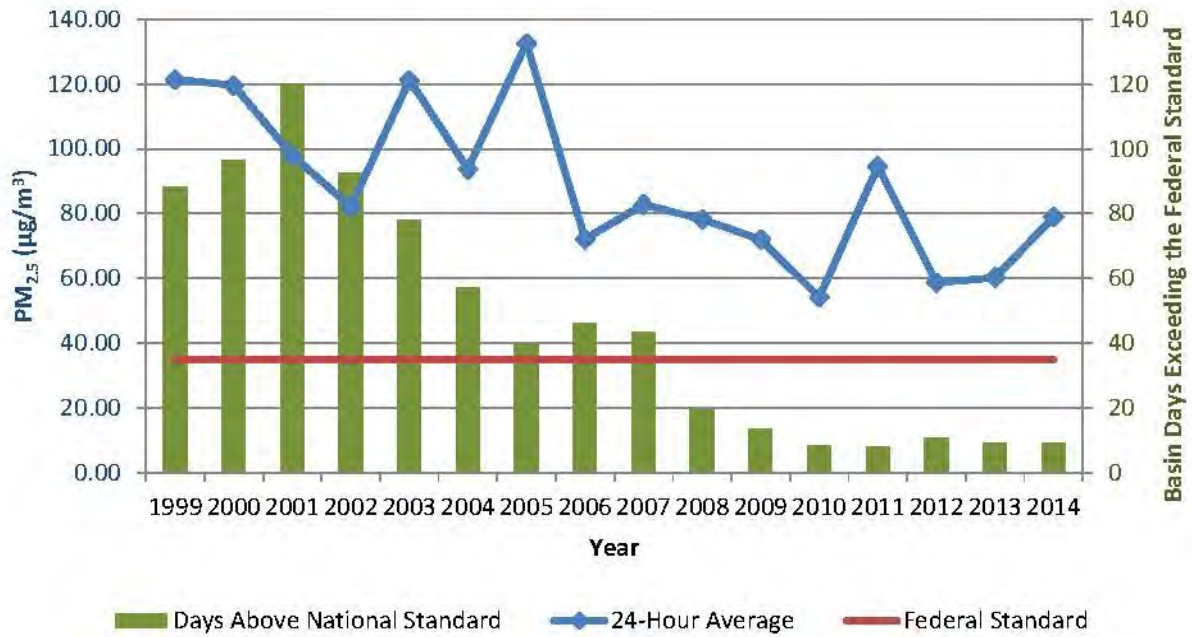


South Coast Air Basin PM₁₀ Trend

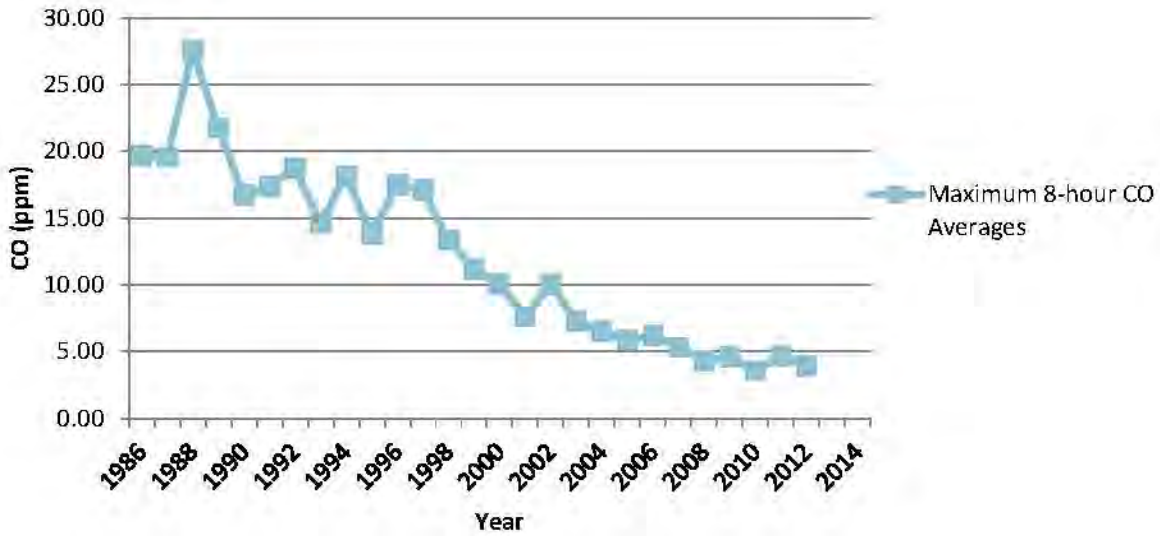




South Coast Air Basin PM_{2.5} Trend

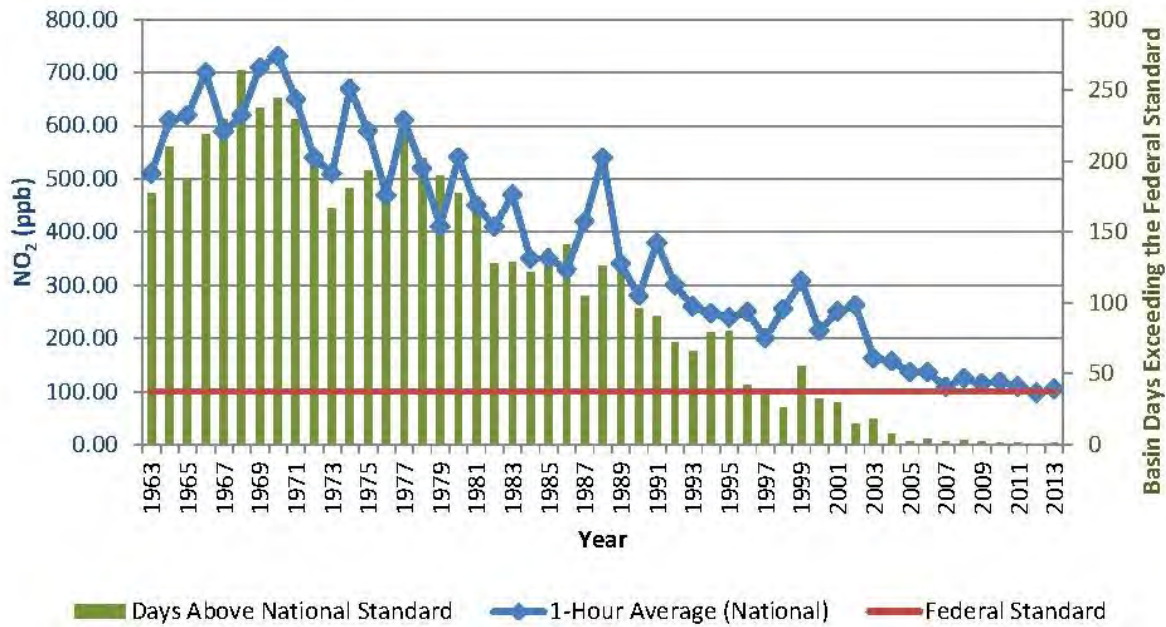


South Coast Air Basin Carbon Monoxide Trend





South Coast Air Basin Nitrogen Dioxide Trend



According to SCAQMD:

“Ozone levels have fallen by about three-quarters since peaks in the mid-1950s. Nitrogen dioxide, sulfur dioxide, and carbon monoxide levels have gone down from nonattainment to full attainment of federal health standards. In November 2008, U.S. EPA revised the lead standard from a 1.5 µg/m3 quarterly average to a 0.15 µg/m3 rolling 3-month average and added new near-source monitoring requirements. The Los Angeles County portion of the Basin has since been designated non-attainment for lead due to monitored concentrations near one facility. However, the most recent 2013 data shows that the Basin meets the current lead standard. U.S. EPA revised the 8-hour ozone standard, effective May 2008, from concentrations exceeding 0.08 ppm to concentrations exceeding 0.075 ppm. In 2013, the current federal 8-hour ozone standard was exceeded on 94 days, the second lowest number of exceedance days ever recorded, based on preliminary 2014 data. The federal ozone standard was exceeded on 88 days in 2013 and 111 days in 2012. The maximum observed ozone levels show some year-to-year variability, but have generally been decreasing over years. The highest 8-hour ozone level in the 2014 preliminary data was 0.114 ppm, compared to 0.122 ppm and 0.112 ppm in 2013 and 2012 respectively.

In 2007, the U.S. EPA formally redesignated the Basin from nonattainment to full attainment of the federal health standard for carbon monoxide. Basin-wide maximum levels of carbon monoxide have been consistently measured at more than 30% below the federal standard since 2004. In 2010, US EPA established a new NO₂ 1-hour standard at a level of 100 ppb (0.100 ppm) and SO₂ 1-hour standard at a level of 75parts per billion (ppb) (0.075 ppm). In 2014,



one site exceeded the 1-hour NO₂ standard in one day in the preliminary data; however, this does not jeopardize the attainment status.

In 2006, the U.S. EPA rescinded the annual federal standard for PM₁₀ but retained the 24-hour standard. Ambient levels of PM₁₀ in the Basin meet the federal 24-hour PM₁₀ standard. U.S. EPA has redesignated the Basin as in attainment of the health based standard for PM₁₀. PM_{2.5} levels have decreased dramatically in the Basin since the beginning of the decade; however, design value concentrations are still slightly above the federal annual and 24-hour standards at one monitoring station. While air quality in the Basin continues to improve, the South Coast Air Basin remains one of the most unhealthful areas in the nation in terms of air quality.” (SCAQMD, 2015a, pp. 3-4)

Continued improvement in air quality is expected to occur through the continued implementation of federal, State, and SCAQMD regulations such as California’s low-sulfur diesel fuel programs and renewable electricity standards. California AB 1493, enacted on July 22, 2002, required the California Air Resources Board (CARB) to develop and adopt regulations that reduce passenger vehicle and light duty truck emissions. Although the regulation was stalled by automaker lawsuits and by the U.S. EPA denial of an implementation waiver to the State of California, in June 2009, the U.S. EPA granted the waiver request. The standards are phasing in during the 2009 through 2016 vehicle model years. The CARB Truck and Bus Regulation (amended, approved 2014) requires diesel-powered trucks and buses to be upgraded to reduce emissions. The regulation applies to nearly all privately- and federally-owned diesel-fueled trucks and buses with a gross vehicle weight rating (GVWR) greater than 14,000 pounds. By January 1, 2012, heavier trucks were required to be retrofitted with PM filters. By January 1, 2015, older trucks were required to be replaced. By January 1, 2023, nearly all trucks and buses must have 2010 model year engines or equivalent. (Urban Crossroads, Inc., 2016c)

The CARB and the Ports of Los Angeles and Long Beach have adopted several iterations of regulations for diesel trucks that are aimed at reducing diesel particulate matter (DPM). Specifically, the CARB Drayage Truck Regulation, the CARB statewide On-Road Truck and Bus Regulation, and the Ports of Los Angeles and Long Beach “Clean Truck Program (CTP).” Through this program, older more polluting trucks will be replaced with newer, cleaner trucks as a function of these regulatory requirements. (Urban Crossroads, Inc., 2016a, p. 27)

A more detailed account of regional air quality improvements is contained in Section 2.8 of the Project’s Air Quality Impact Analysis (*Technical Appendix B1*).

3. Toxic Air Contaminants (TACs) Trends

In 1984, as a result of public concern for exposure to airborne carcinogens, the CARB adopted regulations to reduce the amount of air toxic contaminant emissions resulting from mobile and area sources, such as cars, trucks, stationary products, and consumer products. The *Ambient and Emission Trends of Toxic Air Contaminants in California* journal article prepared for the CARB show that between 1990-2012, ambient concentration and emission trends for the seven TACs responsible for

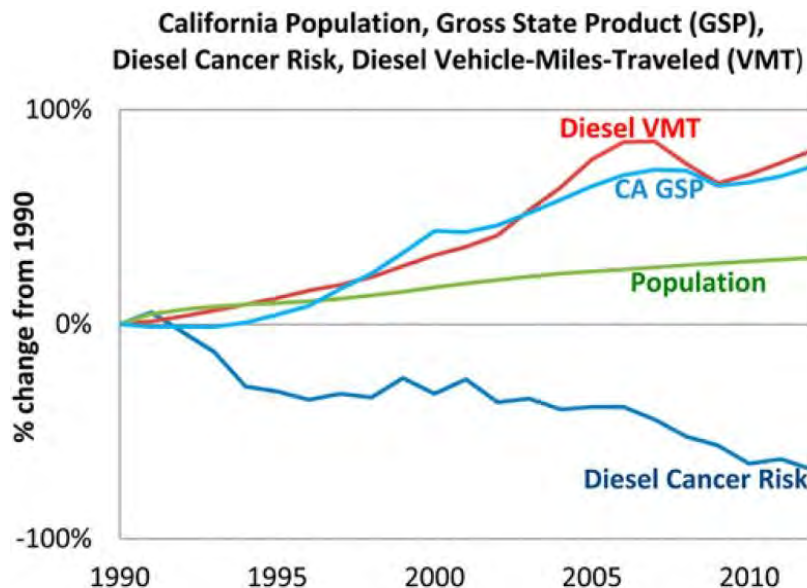


most of the known cancer risk associated with airborne exposure in California have declined substantially. The decline in ambient concentration and emission trends of these TACs are a result of various regulations CARB has implemented to address cancer risks. (Urban Crossroads, Inc., 2016a, p. 24)

Mobile Source TACs

The CARB introduced two programs aimed at reducing mobile emissions for light and medium duty trucks through vehicle emissions controls and cleaner fuel. Since 1996, light-duty vehicles sold in California are equipped with California's second-generation On-Boards Diagnostic (OBD-II) system as a result of about half of total car emissions stemming from emissions control device malfunctions. CARB's phase II Reformulated Gasoline (RFG-2) regulation, adopted in 1996, also led to a reduction in mobile source emissions. Through such regulations, benzene levels declined 88% from 1990-2012 and 1, 3 Butadiene concentrations also declined 85% from 1990-2012 as a result of motor vehicle regulations. (Urban Crossroads, Inc., 2016a, p. 25)

In 2000, CARB's Diesel Reduction Plan (DRRP) recommended the replacement and retrofit of diesel-fueled engines and the use of ultra-low sulfur (less than 15 parts per million (ppm) diesel fuel. As a result of these measures, DPM concentrations have declined 68% even though the State's population has increased 31% and the amount of diesel vehicle miles traveled increased 81% as shown in the graph below. With implementation of these diesel-related control regulations, CARB expects a DPM decline of 71% for the time period of 2000-2020. (Urban Crossroads, Inc., 2016a, p. 25)



Source: California Air Resources Board

(Urban Crossroads, Inc., 2016a)



Stationary Source TACs

In 2007, CARBs dry cleaning regulation was amended to require phase out of perchloroethylene machines by 2023 which would further reduce emission to minimal levels. Hexavalent chromium emissions began to decline in 1988 and ARB-regulated regulations contributing to more than 97% emission reduction within four years. The various regulations include prohibiting the use of hexavalent chromium in cooling towers (1989), in motor vehicle and mobile equipment coatings (2001), and in thermal spraying operations (2005). By 2005, hexavalent chromium emissions were 99.97% less than in 1987, far exceeding expectations. In 2006, hexavalent chromium emissions were further reduced with the 2006 ARB regulation requiring add-on air pollution control devices and chemical fume suppressants. (Urban Crossroads, Inc., 2016a, p. 26)

Secondary TACs

Between 1996-2012 ambient concentrations of formaldehyde and acetaldehyde declined 22% and 21% respectively. The decline in these TACs is attributed from increasingly stringent motor vehicle exhaust emission standards, vehicle fleet turnover, fuel reformulation, and the switch from MTBE (formaldehyde precursor) to ethanol in gasoline. (Urban Crossroads, Inc., 2016a, p. 27)

As discussed above, ambient and emissions levels of TACs have reduced substantially from 1990-2012. The overall declining trend in TACs is expected to continue in California from implementation of toxic air controls. (Urban Crossroads, Inc., 2016a, p. 27)

4. *Multiple Air Toxics Exposure Trends*

In 1998, following a 10-year scientific assessment process, the CARB identified particulate matter from diesel-fueled engines as a toxic air contaminant. Subsequently, in 2000, the SCAQMD prepared a comprehensive urban toxic air pollution study, called MATES-II (Multiple Air Toxics Exposure Study in the South Coast Air Basin). The SCAQMD concluded that diesel particulate matter (DPM) accounted for more than 70 percent of the identified cancer risk. SCAQMD updated their urban toxic air pollution survey twice since 2000, with the 2008 (MATES-III) and 2014 updates (MATES-IV) showing a decrease in the average cancer risk within the SCAB as compared to MATES-II. (Urban Crossroads, Inc., 2016a, p. 27)

MATES-IV study represents the baseline health risk for a cumulative analysis. MATES IC calculated cancer risks based on monitoring data collected at ten fixed sites within the SCAB. None of the fixed monitoring sites are within the local area of the Project site. However, MATES-IV has extrapolated the excess cancer risk levels throughout the basin by modeling specific grids. MATES-IV modeling predicted an excess cancer risk of 538.56 in one million for the Project area. DPM is included in this cancer risk along with all other TAC sources. DPM accounts for 68% of the total risk shown in MATES-IV. (Urban Crossroads, Inc., 2016a, pp. 27-28)



5. Local Air Quality

Relative to the Project site, the nearest long-term air quality monitoring site for O₃ and PM₁₀ is the SCAQMD Perris Monitoring Station (SRA 24), located approximately 6.0 miles south of the Project site. Data for CO, NO₂ and PM_{2.5} was obtained from the Metropolitan Riverside County 2 Monitoring Station (SRA 23), located approximately 12.0 miles northwest of the Project site. It is noted that SRA23 was utilized in lieu of SRA 24 only in instances where data was not available from SRA 24. (Urban Crossroads, Inc., 2016a, p. 16)

Table 4.3-3, *Project Area Air Quality Monitoring Summary 2012-2014*, provides a summary of ambient air quality conditions in the general vicinity of the Project site over the most recent three-year period for which air quality data is available, that being the years of 2012-2014. It is noted that data for SO₂ was omitted because the SCAB regularly attains the applicable NAAQS and CAAQS and few monitoring stations measure SO₂ concentrations. (Urban Crossroads, Inc., 2016a, p. 16)

E. Applicable Environmental Regulations

1. Federal Regulations

The EPA is responsible for setting and enforcing the NAAQS for O₃, CO, NO_x, SO₂, PM₁₀, and Pb. The U.S. EPA has jurisdiction over emissions sources that are under the authority of the federal government including aircraft, locomotives, and emissions sources outside state waters (Outer Continental Shelf). The U.S. EPA also establishes emission standards for vehicles sold in states other than California. Automobiles sold in California must meet the stricter emission requirements of the CARB. (Urban Crossroads, Inc., 2016a, p. 18)

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years. The CAA establishes the federal air quality standards, the NAAQS, and specifies future dates for achieving compliance. The CAA also mandates that states submit and implement State Implementation Plans (SIPs) for local areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards will be met. (Urban Crossroads, Inc., 2016a, p. 18)

The 1990 amendments to the CAA that identify specific emission reduction goals for areas not meeting the NAAQS, require a demonstration of reasonable further progress toward attainment and incorporate additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA most directly applicable to the development of the Project site include Title I (Non-Attainment Provisions) and Title II (Mobile Source Provisions). Title I provisions were established with the goal of attaining the NAAQS for the following criteria pollutants: O₃, NO₂, SO₂, PM₁₀, CO, PM_{2.5}, and Pb. The NAAQS were amended in July 1997 to include an additional standard for O₃ and to adopt a NAAQS for PM_{2.5}. Table 4.3-1 provides the NAAQS within the SCAB. (Urban Crossroads, Inc., 2016a, p. 18/)

Mobile source emissions are regulated in accordance with CAA Title II provisions. These provisions require the use of cleaner burning gasoline and other cleaner burning fuels such as methanol and natural



gas. Automobile manufacturers are also required to reduce tailpipe emissions of hydrocarbons and NO_x, which is a collective term that includes all forms of nitrogen oxides (NO, NO₂, NO₃) which are emitted as byproducts of the combustion process. (Urban Crossroads, Inc., 2016a, p. 18)

2. State Regulations

The California Air Resources Board (CARB), which became part of the California EPA in 1991, is responsible for ensuring implementation of the CAA (AB 2595), responding to the federal CAA, and for regulating emissions from consumer products and motor vehicles. The California CAA mandates achievement of the maximum degree of emissions reductions possible from vehicular and other mobile sources in order to attain the state ambient air quality standards by the earliest practical date. The CARB established the CAAQS for all pollutants for which the federal government has NAAQS and, in addition, established standards for sulfates, visibility, hydrogen sulfide, and vinyl chloride. At this time, however, hydrogen sulfide and vinyl chloride are not measured at any monitoring stations in the SCAB because they are not considered to be a regional air quality problem. Generally, the CAAQS are more stringent than the NAAQS. (Urban Crossroads, Inc., 2016a, p. 18)

Local air quality management districts, such as the SCAQMD, regulate air emissions from commercial and light industrial facilities. All air pollution districts have been formally designated as attainment or non-attainment for each CAQQS. (Urban Crossroads, Inc., 2016a, p. 19)

Non-attainment areas are required to prepare air quality management plans that include specified emission reduction strategies in an effort to meet clean air goals. However, air basins may use alternative emission reduction strategy that achieves a reduction of less than 5 percent per year under certain circumstances. (Urban Crossroads, Inc., 2016a, p. 19)

3. Air Quality Management Planning

Currently, the NAAQS and CAAQS are exceeded in most parts of the SCAB. The NAAQS are exceeded for O₃ and PM_{2.5} and the CAQQS are exceeded for O₃, PM₁₀, and PM_{2.5}. In response, the SCAQMD has adopted a series of air quality management plans (AQMPs) to meet the state and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution on the economy. (Urban Crossroads, Inc., 2016a, p. 19)

Each version of the plan is an update of the previous plan and has a 20-year horizon with a revised baseline. The most recent AQMP was adopted by the AQMD Governing Board on December 7, 2012. The *Final 2012 Air Quality Management Plan* published by the Southern California Association of Governments (SCAG) incorporates the latest scientific and technological information and planning assumptions, including the *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)* and updated emission inventory methodologies for various source categories. The *2012 AQMP* is based on assumptions provided by the 2011 Emission FACTor model (EMFAC2011) developed by CARB for motor vehicle information and assumptions provided by SCAG for



demographics. The air quality levels projected in the *Final 2012 Air Quality Management Plan* are based on the assumption that development associated with general plans, specific plans, residential projects, and wastewater facilities will be constructed in accordance with population growth projections identified by SCAG in its *2012 RTP/SCS*. The *Final 2012 Air Quality Management Plan* also assumes that such development projects will implement strategies to reduce emissions generated during the construction and operational phases of development. (Urban Crossroads, Inc., 2016a, p. 49)

4.3.2 METHODOLOGY FOR ESTIMATING PROJECT-RELATED AIR QUALITY IMPACTS

On October 2, 2013, the SCAQMD released the latest version of the California Emissions Estimator Model™ (CalEEMod™) v2013.2.2, which was the most recent model available at the time the NOP for this EIR was released for public review (August 2015) and at the time this EIR was prepared. Urban Crossroads, Inc. used this model to calculate Project-construction-source and Project-operational-source criteria pollutants NO_x, VOC, PM₁₀, PM_{2.5}, SO_x, and CO and greenhouse gas (GHG) emissions. (Urban Crossroads, Inc., 2016a, p. 30)

A. Methodology for Calculating Project Construction Emissions

Construction-related emissions would be expected from the following construction activities:

- Demolition
- Grading/Blasting/Crushing
- Underground Utilities
- Building Construction
- Landscape
- Paving and Site Finishes
- Architectural Finishes

The assumptions for each phase of Project construction were input by Urban Crossroads, Inc. into the CalEEMod model using anticipated construction characteristics (e.g., construction activities, construction equipment list, and anticipated construction schedule provided by the Project Applicant, and an estimated opening year of 2017). Based on phasing information provided by the Project Applicant, no overlap of construction phases would occur. (Urban Crossroads, Inc., 2016a, p. 31)

Dust is typically a major concern during rough grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called “fugitive emissions.” Fugitive dust emissions rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). Urban Crossroads, Inc. used the CalEEMod to calculate fugitive dust emissions resulting from the construction phase of activity. The calculations assumed the proposed Project would require approximately 2,500 s.f. of demolition. Haul trips associated with the demolition phase is based on CalEEMod model defaults. (Urban Crossroads, Inc., 2016a, p. 31)



A list of the construction equipment and anticipated construction schedule assumed in the analysis of Project-related construction emissions is provided in EIR Section 3.0, *Project Description*. Refer to Section 3.4 *Construction Emissions* of the Air Quality Impact Analysis (*Technical Appendix B1*) for more detail on the methodology utilized to estimate Project-related construction emissions. Refer to Appendix 3.2 of *Technical Appendix B1* for specific detailed modeling inputs/outputs used in the analysis.

1. Construction Localized Pollutant Emissions

Localized emissions associated with Project-related construction activities were estimated and evaluated in accordance with SCAQMD's *Final Localized Significance Threshold Methodology*. The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or state ambient air quality standards (NAAQS/CAAQS). Collectively these are referred to as Localized Significance Thresholds (LSTs). (Urban Crossroads, Inc., 2016a, p. 41)

SRA 24 was used as the baseline LST for ambient air quality because it is the closest monitoring station to the Project site for which air quality data is available. LSTs apply to CO, NO₂, PM₁₀, and PM_{2.5}. In order to determine the appropriate methodology for determining localized impacts that could occur as a result of Project-construction, the following process was undertaken by Urban Crossroads, Inc.:

- The CalEEMod model is utilized to determine the maximum daily on-site emissions that will occur during construction activity.
- The SCAQMD's Fact Sheet for Applying CalEEMod to LSTs is used to determine the maximum site acreage that is actively disturbed based on the construction equipment fleet and equipment hours as estimated in CalEEMod.
- If the total acreage disturbed is less than or equal to five acres per day, then the SCAQMD's screening look-up tables are utilized to determine if a Project has the potential to result in a significant impact (the SCAQMD recommends that Projects exceeding the screening look-up tables undergo dispersion modeling to determine actual impacts). The look-up tables establish a maximum daily emissions threshold in pounds per day that can be compared to CalEEMod outputs.
- For projects that exceed 5 acres, the 5-acre LST look-up values can be used as a screening tool to determine which pollutants require detailed analysis. This approach is conservative as it assumes that all on-site emissions would occur within a 5-acre area and would over-predict potential localized impacts (i.e., more pollutant emissions occurring within a smaller area and within closer proximity to potential sensitive receptors). If the project exceeds the LST look-up values, then the SCAQMD recommends that project specific air quality modeling be performed. (Urban Crossroads, Inc., 2016a, pp. 41-42)



Based on the SCAQMD's LST look-up tables, the proposed Project could actively disturb approximately 11.0 acres per day during the grading phase of construction. As such, dispersion modeling is utilized to calculate emissions for LSTs for peak grading activity which represents a conservative "worst-case" analytical scenario for purposes of construction LSTs. SCAQMD's *Final Localized Significance Threshold Methodology* clearly states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs". Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod on-site emissions outputs were considered. (Urban Crossroads, Inc., 2016a, pp. 41-43)

In order to calculate localized pollutant concentrations resulting from Project construction, the SCAQMD-approved AERMOD dispersion model was utilized. As discussed above, construction activity is anticipated to disturb a maximum area of approximately 11.0 acres on any given day (during peak rough grading activity), thus it was conservatively estimated that emissions would be concentrated over this area. It is noted that in order to model worst-case conditions, the highest daily peak emissions resulting from grading activity were utilized. In order to model fugitive dust emissions (PM₁₀ and PM_{2.5}) resulting from Project grading activity, an area source of 11.0 acres was utilized. Per SCAQMD LST methodology, a ground level release height of 1.0 meter (approximately 3.28 feet) initial vertical dimension were utilized in order to account for vertical spread of emissions. In order to account for equipment exhaust emissions of PM₁₀, PM_{2.5}, and CO, a total of 25 volumes sources measuring 45 meters by 45 meters were spread over an area of approximately 11.0 acres. In order to represent equipment exhaust emissions, a release height of 5.0 meters was utilized, which is consistent with SCAQMD's LST guidance. (Urban Crossroads, Inc., 2016a, p. 43)

The nearest sensitive receptor land uses (defined as a place where an individual who might have respiratory difficulties could remain for 24-hours) are the residential structures located approximately 191 feet (58 meters) south of the Project site boundary. For purposes of analysis performed for the Air Quality Impact Analysis (*Technical Appendix B1*) and presented herein, a 50 meter sensitive receptor distance is utilized to determine LSTs for PM₁₀ and PM_{2.5}. (Urban Crossroads, Inc., 2016a, pp. 43-44)

In order to account for meteorological conditions at the Project site, as mentioned above, data from the Perris monitoring station was utilized, as this is the nearest station to the Project site for which meteorological data is available. Additionally, per SCAQMD's LST methodology, a receptor height of 2.0 meters and regulatory default options, and the urban dispersion coefficient were utilized. (Urban Crossroads, Inc., 2016a, p. 44)

B. Methodology for Calculating Project Operational Emissions

1. Operational Regional Pollutant Emissions

Operational activities associated with the proposed Project would result in emissions of VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}. Operational emissions would be expected from the following primary sources (Urban Crossroads, Inc., 2016a, p. 34):

- Area Source Emissions



- Energy Source Emissions
- Mobile Source Emissions
- On-Site Equipment Emissions

Architectural Coatings

Over a period of time, the buildings that are part of this Project will be subject to emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings as part of Project maintenance. The emissions associated with architectural coatings were calculated using the CalEEMod model. (Urban Crossroads, Inc., 2016a, p. 35)

Consumer Products

Consumer products include, but are not limited to detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds which when released in the atmosphere can react to form ozone and other photochemically reactive pollutants. The emissions associated with use of consumer products were calculated based on defaults provided within the CalEEMod model. (Urban Crossroads, Inc., 2016a, p. 35)

Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. The emissions associated with landscape maintenance equipment were calculated based on assumptions provided in the CalEEMod model. (Urban Crossroads, Inc., 2016a, p. 35)

Combustion Emissions Associated with Natural Gas and Electricity

Electricity and natural gas are used by almost every project. Criteria pollutant emissions are emitted through the generation of electricity and consumption of natural gas. However, because electrical generating facilities for the Project area are located either outside the region (state) or offset through the use of pollution credits (RECLAIM) for generation within the SCAB, criteria pollutant emissions from offsite generation of electricity is generally excluded from the evaluation of significance and only natural gas use is considered. The emissions associated with natural gas use were calculated using the CalEEMod model. (Urban Crossroads, Inc., 2016a, p. 35)

On-Site Equipment Emissions

It is common for buildings with loading docks to use cargo handling equipment to move empty containers and empty chassis around on the property. The most common type of cargo handling equipment is the yard truck which is designed for moving cargo containers. Yard trucks are also known as yard goats, utility tractors (UTRs), hustlers, yard hostlers, and yard tractors. Yard trucks have a horsepower (hp) range of approximately 175 hp to 200 hp. Based on the latest available information from SCAQMD; high-cube warehouse projects typically have 3.6 yard trucks per one million square



feet of building space. For the air quality impact analysis of the proposed Project, Urban Crossroads, Inc. analyzed the use of five (5) yard tractors operating at 4 hours a day for 365 days of the year interior to the buildings. In addition, five (5) 89 hp yard forklifts operating at 4 hours a day for 365 days of the year were analyzed. For purposes of the air quality impact analysis (*Technical Appendix B1*), forklifts were not included in Urban Crossroad's health risk calculations since there is no diesel exhaust associated with the forklifts as they are assumed to be non-diesel consistent with industry standards. (Urban Crossroads, Inc., 2016a, pp. 38-39)

As part of the Project's design, all on-site outdoor cargo handling equipment (CHE) (i.e., yard trucks, hostlers, yard goats, pallet jacks, forklifts, and other on-site equipment) would be powered by diesel fueled engines that comply with CARB/U.S. EPA Tier IC Engine standards for off-road vehicles or better (defined as less than or equal to 0.015 g/bhp-hr. for PM₁₀) and all on-site indoor forklifts shall be powered by electricity, compressed gas, or propane. Because the Project's building occupants are currently unknown, it is unknown and speculative whether or not the Project would consist of additional on-site sources, such as boilers, and/or generators. (Urban Crossroads, Inc., 2016a, p. 39)

Vehicles

Air pollutant emissions would result from the operation of motor vehicles by building occupants, visitors, employees, and customers. Project-related vehicular air pollutant emissions are dependent on both overall daily vehicle trip generation and the effect of the Project on peak hour traffic volumes and traffic operations. Project-related operational air quality impacts derive primarily from mobile sources (vehicles). Information related to the Project's daily vehicle trip generation and vehicle trip characteristics was obtained from the Project's Traffic Impact Analysis contained as *Technical Appendix J1* to this EIR. (Urban Crossroads, Inc., 2016a, p. 35)

The trip generation rates, as derived from the Project's traffic impact analysis (*Technical Appendix J1*) are based upon data collected by the ITE for high-cube warehouse/distribution center (ITE Land Use Code 152) in their published Trip Generation Manual, 9th Edition, 2012. (Urban Crossroads, Inc., 2016a, p. 36)

The ITE Trip Generation manual includes data regarding the types of vehicles that are generated (passenger cars and trucks), but provides no guidance on vehicle mix (different sizes of trucks). While trucks, as a percentage of total traffic was based on the ITE Trip Generation Manual, data regarding the vehicle mix was obtained from the SCAQMD's draft "Warehouse Truck Trip Study." The SCAQMD is currently recommending the use of trip rates from the ITE Trip Generation manual and the use of vehicle mix data from the SCAQMD's draft Warehouse Truck Trip Study, which calculates truck mix by axle-type, for warehouse and distribution projects. (SCAQMD, 2014). This recommended procedure was utilized for the purposes of the analysis herein and in *Technical Appendix B1*. (Urban Crossroads, Inc., 2016a, p. 36)

A limitation inherent in calculating the projected vehicle emissions associated with any project is related to the estimation of trip length and vehicle miles traveled (VMT). VMT for a given project is



calculated by the total number of vehicle trips to/from the Project multiplied by average trip length. This method of estimating VMT for use in calculating vehicle emissions likely results in the over-estimation and double-counting of emissions because for business park warehouse buildings, such as those proposed by the Project, the land use is likely to attract (divert) existing vehicle trips that are already on the circulation system as opposed to generating new trips. In this regard, the Project would, to a large extent, redistribute existing mobile-source emissions rather than generate additional emissions within the Basin. As such, the estimation of the Project's vehicular-source emissions is likely overstated in that no credit for, or reduction in, emissions is assumed based on diversion of existing trips. (Urban Crossroads, Inc., 2016a, pp. 36-37)

The CalEEMod™ and the URBan EMISsions models use a default trip length of approximately 12.6 miles. However, 12.6 miles is not representative of the actual average trip length for large buildings with loading docks. SCAQMD asserts that most of the heavy-duty trucks would be hauling consumer goods, often from the Ports of Long Beach and Los Angeles (POLA and POLB) and/or to other long-haul destinations. For this reason, SCAQMD generally recommends the use of a 40-mile one-way trip length. (Urban Crossroads, Inc., 2016a, p. 37)

In comparison, SCAG's most recent (2008) transportation validation for the 2003 Regional Model indicates the average internal truck trip length for the SCAG region is 5.92 miles for Light Duty Trucks, 13.06 miles for Medium Duty Trucks, and 24.11 miles for Heavy Duty Trucks. (Urban Crossroads, Inc., 2016a, p. 37)

Trip lengths and VMT estimates employed in the air quality impact analysis (*Technical Appendix B1*) generate vehicular-source emissions that would represent a maximum impact scenario. To maintain analytic consistency and establish the maximum impact scenario noted above, the following approach was utilized by Urban Crossroads, Inc. in calculating emissions associated with vehicles accessing the Project: For passenger car trips, the CalEEMod default for a one-way trip length of 16.6 miles was assumed. For heavy duty trucks, an average trip length was derived from distances from the Project site to the far edges of the SCAB as follows. It is appropriate to stop the VMT calculation at the boundary of the SCAB because any activity beyond that boundary would be speculative. This approach is also consistent with professional industry practice. (Urban Crossroads, Inc., 2016a, pp. 37-38)

- Project site to the Port of Los Angeles/Long Beach: 80 miles;
- Project site to East on State Route 60: 30 miles;
- Project site to San Diego County line: 60 miles;
- Project site to Inland Empire: 50 miles;
- Project site to Perris destinations: 10 miles;
- Project site to Moreno Valley destinations: 10 miles;

Based on reasonably foreseeable directional truck travel for the Project as determined by the Riverside County Transportation Department and documented in the Project's Traffic Impact Analysis Scoping



Agreement, it is assumed that 50% of all truck delivery trips will travel to and from the Project site and the Port of Los Angeles/Long Beach, 10% will go east on State Route 60 (SR-60), 20% will go to San Diego County, 10% will go to the Inland Empire, 5% will go to Perris destinations and 5% will go to Moreno Valley destinations, resulting in an average truck trip length of 61 miles. (Urban Crossroads, Inc., 2016a, p. 38)

Two separate model runs were utilized. The first model run analyzed passenger car emissions, which incorporated a default trip length of 16.6 miles for passenger cars and a fleet mix of 100% Light-Duty-Auto vehicles (LDA). The second model run analyzed truck emissions, which incorporated an average truck trip length of 61 miles and a fleet mix of 22.03% Light-Heavy-Duty Trucks (LHD), 17.66% Medium-Heavy-Duty Trucks (MHD), and 60.31% Heavy-Duty Trucks (HHD). Detailed emission calculations are provided in Appendix 3.2 of *Technical Appendix B1*. (Urban Crossroads, Inc., 2016a, p. 38)

Fugitive Dust from Vehicular Travel

Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust inclusive of tire wear particulates. The emissions estimates for travel on paved roads were calculated using the CalEEMod model. (Urban Crossroads, Inc., 2016a, p. 38)

2. Operational Localized Pollutant Emissions

For operational LSTs, on-site passenger car and truck travel emissions were modeled in AERMOD using emission factors for CO, NO₂, PM₁₀, and PM_{2.5} generated with the 2014 version of the Emission FACTor model (EMFAC) developed by the ARB. EMFAC 2014 is a mathematical model that was developed to calculate emission rates from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the ARB to estimate changes in future emissions from on-road mobile sources. Outputs from the model runs for operational LSTs are provided in Appendix 3.3 of *Technical Appendix B1*. For this Project, criteria pollutant emission factors were generated by running EMFAC 2014 in EMFAC Mode for vehicles in the SCAQMD within Riverside County. The EMFAC Mode generates emission factors in terms of grams of pollutant emitted per vehicle activity and can calculate a matrix of emission factors at specific values of temperature, relative humidity, and vehicle speed. The model was run for speeds traveled in the vicinity of the Project. The vehicle travel speeds for each segment modeled are summarized below.

- Idling – assumed 15 minutes of idling per two-way vehicle trips for passenger cars and trucks
- 5 miles per hour – on-site vehicle movement including driving and maneuvering

Additionally, on-site equipment (cargo handling equipment and forklifts) were modeled using area sources encompassing the Project's loading docks adjacent to the Project's building boundaries. (Urban Crossroads, Inc., 2016a, p. 45)



3. Diesel Particulate Emissions

Vehicle DPM emissions were calculated using emission factors for PM₁₀ generated with the 2014 version of the EMFAC developed by the CARB. Refer to Section 2.2 *Emission Estimation*, of the Project's Mobile Source Health Risk Assessment (*Technical Appendix B2*) for a detailed description of the model inputs and equations used in the estimation of the Project-related DPM emissions.

The potential health effects of Project-related DPM emissions were quantified in accordance with the guidelines in the SCAQMD's *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*. Pursuant to SCAQMD's recommendations, emissions were quantified using the U.S. EPA's AERMOD model. Refer to Section 2.3, *Exposure Quantification*, of the Mobile Health Risk Assessment (*Technical Appendix B2*) for a detailed description of the model inputs and equations used in the calculation of average particulate concentrations associated with operations at the Project site. (Urban Crossroads, Inc., 2016b, p. 13)

Excessive health risks associated with exposure to DPM emissions are defined in terms of the probability of developing cancer or adverse, chronic non-cancer health effects as a result of exposure to DPM emissions at a given concentration. The cancer and non-cancer risk probabilities are determined through a series of equations to calculate unit risk factor, cancer potency factor, and chronic daily intake. Excess cancer risks are estimated as the upper bound incremental probability that an individual will develop cancer over a lifetime as a direct result of exposure to potential carcinogens over a specified exposure duration. A risk level of 1 in 1,000,000 implies a likelihood that up to one person, out of 1,000,000 equally exposed people, would contract cancer if exposed continuously (24 hours per day, 365 days a year) to the levels of toxic air contaminants over a specified duration of time. This risk would be an excess cancer risk that is in addition to any cancer risk borne by a person not exposed to these air toxics. Based on the SCAQMD guidance document noted earlier, this analysis applies a risk threshold of 10 in 1,000,000 as the incremental level of cancer risk considered to be significant. The equations and input factors utilized in the Project analysis were obtained from the California EPA, Office of Environmental Health Hazard (Urban Crossroads, Inc., 2016b, p. 18). Refer to Section 2.4, *Carcinogenic Chemical Risk*, of the Project's Mobile Source Health Risk Assessment (*Technical Appendix B2*) for a detailed description of the variable inputs and equations used in the estimation of receptor population health risks associated with Project operations.

Potential receptor population health risks were calculated for the maximally exposed residential receptor (MEIR), the maximally exposed individual worker (MEIW), and the maximally exposed school child (MEISC). The residential land use with the greatest potential exposure to Project DPM source emissions is located approximately 191 feet south of the Project site. The worker receptor land use with the greatest potential exposure to Project DPM source emissions is located to the east, immediately adjacent to the Project site. The school site land use with the greatest potential exposure to Project DPM is located at Thomas Rivera Middle School located approximately 1.0 mile (5,280 feet) southwest of the Project site. (Urban Crossroads, Inc., 2016b, pp. 20-21)



4.3.3 BASIS FOR DETERMINING SIGNIFICANCE

The proposed Project would result in a significant impact to air quality if the Project or any Project-related component would:

- a) *Conflict with or obstruct implementation of the applicable air quality plan;*
- b) *Violate any air quality standard or contribute substantially to an existing or projected air quality violation;*
- c) *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);*
- d) *Expose sensitive receptors which are located within 1.0 mile of the project site to project substantial point source emissions;*
- e) *Involve the construction of a sensitive receptor located within one mile of an existing substantial point source emitter;*
- f) *Create objectionable odors affecting a substantial number of people.*

Within the context of the above threshold considerations, emissions generated by a development project would be significant under Thresholds (a) and (b) if emissions are projected to exceed the regional and localized thresholds established by the SCAQMD for criteria pollutants as shown on Table 4.3-4, *Maximum Daily Regional Emissions Thresholds*. Based on the SCAQMD's CEQA Air Quality Significance Thresholds (March 2015) indicate that any projects in the SCAB with daily or localized emissions that exceed any of the indicated thresholds shall be considered as having an individually and cumulatively significant air quality impact. (Urban Crossroads, Inc., 2016a, p. 29)

The significance of localized emissions impacts depends on whether ambient levels in the vicinity of any given project are above or below State standards. In the case of CO and NO₂, if ambient levels are below the standards, a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. If ambient levels already exceed a state or federal standard, then project emissions are considered significant if they increase ambient concentrations by a measurable amount. This would apply to PM₁₀ and PM_{2.5} both of which are non-attainment pollutants and have thresholds that have an allowable measurable change of 10.4 µg/m³ for construction-source and 2.5 µg/m³ for operational-source emissions. (Urban Crossroads, Inc., 2016a, pp. 41-42)

The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the Federal and/or State Ambient Air Quality Standards. Applicable localized thresholds as follows:

- California State 1-hour CO standard of 20.0 ppm;
- California State 8-hour CO standard of 9.0 ppm;



- California State 1-hour NO₂ standard of 0.18 ppm;
- California State Annual NO₂ standard of 0.03 ppm;
- SCAQMD 24-hour operational PM₁₀ LST of 2.5 µg/m³;
- SCAQMD Annual-operational PM₁₀ LST of 1.0 µg/m³;
- SCAQMD 24-hour operational PM_{2.5} LST of 2.5 µg/m³

Pursuant to SCAQMD guidance, any development project in the SCAB with daily emissions that would exceed any of the indicated thresholds would be considered to have a significant impact on both a direct (individual) and cumulatively considerable basis.

The SCAQMD published a report titled *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*. The report provides direction on how to address cumulative impacts from air pollution. In the *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, the AQMD states in Appendix D, *Cumulative Impact Analysis Requirements Pursuant to CEQA*:

“...the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for toxic air contaminant (TAC) emissions. The project specific (project increment) significance threshold is $HI \geq 1.0$ while the cumulative (facility-wide) is $HI \geq 3.0$. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.

Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.” (SCAQMD, 2003)

Given this direction from the SCAQMD, the proposed Project evaluated in this EIR would result in a significant impact under Threshold (d) if it would emit toxic air contaminants, like DPM, to such a degree that it would expose sensitive receptor populations to an incremental cancer risk of greater than 10 in 1,000,000.

The SCAQMD has also established non-carcinogenic risk parameters. Non-carcinogenic risks are quantified by calculating a “hazard index (HI)” expressed as the ratio between the ambient pollutant concentration and its toxicity or Reference Exposure Level (REL). An REL is a concentration at or below which health effects are not likely to occur. A HI less than one (1.0) means that adverse health



effects are not expected. (Urban Crossroads, Inc., 2016b, p. 3) Thus, non-carcinogenic exposure of less than 1.0 are considered less-than-significant on a direct and cumulatively considerable basis under Threshold (d).

4.3.4 IMPACT ANALYSIS

Threshold a) Would the Project conflict with or obstruct implementation of the applicable air quality plan?

The SCAQMD *Final 2012 Air Quality Management Plan* estimates long-term air quality conditions for the SCAB. Although the SCAQMD approved the 2016 AQMP in March 2017, it was not approved at the time the NOP for this EIR was released for public review (August 2015). Thus, the 2012 AQMP is the applicable air quality plan for analysis herein. The criteria for determining consistency with either the 2012 AQMP or the 2016 AQMP (evaluated below) are the same, based on the SCAQMD's *CEQA Air Quality Handbook*. The air quality conditions presented in the *Final 2012 AQMP* are based in part on the growth forecasts identified by SCAG in its *2012-2035 RTP/SCS*. The *RTP/SCS* assumes that development in the various incorporated and unincorporated areas within the SCAB will occur in accordance with the adopted general plans for these areas. In addition, the air quality conditions presented in the *Final 2012 Air Quality Management Plan* are based on the assumption that future development projects will implement strategies to reduce emissions generated during the construction and operational phases of development (Urban Crossroads, Inc., 2016a, p. 49). Accordingly, if a proposed project is consistent with these growth forecasts, and if available emissions reduction strategies are implemented as effectively as possible on a project-specific basis, then the project is considered to be consistent with the *Final 2012 Air Quality Management Plan*.

The SCAQMD has established criteria for determining consistency with the *Air Quality Management Plan*. These criteria are defined in Chapter 12, Sections 12.2 and 12.3 of the SCAQMD's *CEQA Air Quality Handbook* and are discussed below.

- *Consistency Criterion No. 1: The proposed project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.*

Consistency Criterion No. 1 refers to violations of the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if LSTs or regional significance thresholds were exceeded. As evaluated under Threshold (d) (below), the Project's localized construction-source emissions would exceed applicable LSTs. Therefore, the Project has the potential to conflict with the AQMP according to this criterion and a significant impact would occur associated with consistency with the AQMP.

- *Consistency Criterion No. 2: The proposed project will not exceed the assumptions in the AQMP based on the years of project buildout phase.*



The growth forecasts used in the AQMP to project future emissions levels are based in part on land use data provided by lead agency general plan documentation. Projects that propose to increase the intensity of use on a subject property may result in increased stationary area source emissions and/or vehicle source emissions when compared to the AQMP assumptions. If a project does not exceed the growth projections in the applicable local general plan, then the project is considered to be consistent with the growth assumptions in the AQMP.

As shown in EIR Section 2.0, *Environmental Setting*, Figure 2-2, *Existing General Plan Land Use Designations*, the Riverside County General Plan and Mead Valley Area Plan designate the majority of the Building D Site for “Community Development–Light Industrial (CD-LI)” land uses and the southwest portion of the Building D Site for “Community Development-Business Park (CD-BP)” land uses. As shown in EIR Section 2.0, *Environmental Setting*, Figure 2-3, *Existing Zoning Designations*, the Building D Site is zoned “Manufacturing – Medium (M-M),” “Rural Residential (R-R),” and “Industrial Park (I-P).” The Building E Site is zoned “Rural Residential 1/2-Acre Lot Sizes (R-R-1/2)” and “Industrial Park (I-P).”

The Project proposes two General Plan Amendment (GPA) applications. Proposed GPA 1151 would change the land use designation of the portion of the Building D Site designated CD-BP to CD-LI so that the entire Building D Site is designated CD-LI. Proposed GPA 1152 would change the land use designation of the portion of the Building E Site designated CD-BP to CD-LI. The Project proposes to incorporate contemporary energy-efficient technologies and operational programs and comply with SCAQMD emissions reductions and control requirements that act to reduce stationary-source air emissions. These Project attributes are consistent with and support AQMP air pollution reduction strategies and generally promote timely attainment of AQMP air quality standards. Furthermore, the Project would comply with the applicable objectives and policies established in the Air Quality Element of the County of Riverside General Plan. (Urban Crossroads, Inc., 2016a, pp. 49-50) Because the proposed Project would provide a similar level of building intensity on the Project site compared to the intensity of building anticipated by the Riverside County General Plan, the Project would be consistent with Consistency Criterion No. 2. Although two GPA applications are proposed to change portions of the site from CD-BP to CD-LI, the amount of building and Project would generate less traffic intensity (and thereby less, area, energy, and mobile source emissions) would be similar, if not less intense than would occur from CD-BP land uses due to a higher traffic generation rate per building square foot for the CD-BP designation compared to the Project’s proposed high cube warehouse buildings under the proposed CD-LI designation.

Although the Project would be consistent with Criterion 2, it would be inconsistent with Criterion 1, resulting in a significant air quality impact due to inconsistency with the SCAQMD’s AQMP.



Threshold b) *Would the Project violate any air quality standard or contribute substantially to an existing or projected air quality violation?*

Threshold c) *Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?*

A. Construction Emissions Impact Analysis

For purposes of analysis, the air quality impact analysis (*Technical Appendix B1*) and the analysis herein assumes that construction would commence in January 2016 and last through November 2017. A detailed description of the Project's analyzed construction schedule and construction activities is provided in EIR Section 3.0, *Project Description*. Knowing that construction activities would occur at a later date than assumed by the analysis presented in the air quality impact analysis (*Technical Appendix B1*) and herein, emission quantities associated with construction equipment exhaust would be less than disclosed in *Technical Appendix B1* and herein, due to the application of more restrictive regulatory requirements for construction equipment and on-going replacement of older construction fleet equipment with newer, lower emission equipment by construction contractors. The estimated maximum daily construction emissions associated with the Project's construction phase are shown in Table 4.3-5, *Emissions Summary of Overall Construction (Without Mitigation)*. Detailed construction-related emissions model inputs are provided in Appendix 3.2 of *Technical Appendix B1* to this EIR.

As identified in Table 4.3-5, Project-related construction emissions would not exceed criteria standards pollutant thresholds for VOC's, CO, SO_x, PM₁₀, and PM_{2.5}. However, the Project-related construction emissions would exceed criteria standards pollutant thresholds established by the SCAQMD for NO_x. NO_x is a precursor for ozone, a pollutant for which the SCAB does not attain federal or State standards (refer to Table 4.3-2). Accordingly, the Project would emit substantial concentrations of NO_x during construction, primarily associated with combustion exhaust from construction equipment engines that would cause or contribute to an existing or projected air quality violation, on both a direct and cumulatively considerable basis. Thus, a significant impact would occur. It is noted that impacts without Best Available Control Measures (BACMs) do not take credit for reductions achieved through BACMs and standard regulatory requirements (SCAQMD's Rule 403). (Urban Crossroads, Inc., 2016a, pp. 33-34) Refer to Subsection 4.3.7 for standard regulatory requirements and the recommended mitigation measures provided to reduce the Project's construction-related emissions of NO_x. Regardless, a significant impact would continue to occur.

B. Operational Emissions Impact Analysis

For purposes of analysis, the analysis herein assumes the Project to be fully operational at the end of 2017. Emissions associated with Project operations (assuming a larger sized Building E than is currently proposed) are presented in Table 4.3-6, *Summary of Peak Operational Emissions*. Detailed emission model outputs are presented in Appendices 3.2 and 3.3 of *Technical Appendix B1*. Detailed emission model outputs for the Project considering the currently proposed (smaller) size of Building E



are contained as Attachment A to a supplemental analysis prepared to address the smaller building, which is appended to the front of *Technical Appendix B1*.

As shown on Table 4.3-6, the Project would exceed SCAQMD's regional criteria for VOCs and NO_x during long-term operation of the Project. These emissions are primarily associated with combustion exhaust from on- and off-road vehicles. Therefore, during long-term operation, the Project's emissions of VOCs and NO_x would be a significant impact to the environment on both a direct and cumulatively considerable basis. Refer to Subsection 4.3.7 for regulatory requirements and recommended mitigation measures to reduce the Project's operational-related emissions of VOCs and NO_x.

Threshold d) Would the Project expose sensitive receptors which are located within 1.0 mile of the project site to project substantial point source emissions?

A. Construction-Related Localized Emissions Impact Analysis

As discussed in Subsection 4.3.1, the nearest sensitive receptor land use are the residential uses located approximately 191 feet (58 meters) south of the Project site boundary. Table 4.3-8, *Localized Significance Summary* summarizes the Project's localized emissions during peak construction activity. As shown in Table 4.3-8, the Project's construction-related emissions would exceed the SCAQMD's localized significance thresholds for emissions of NO_x, PM₁₀, and PM_{2.5} at the nearest receptor location in the vicinity of the Project site. Thus, the impact is significant and applicable regulatory requirements and mitigation measures are listed in Subsection 4.3.7, including the mandatory requirements comply with SCAQMD Rule 403 and California Air Resources Board, Title 13, Chapter 10, Section 2485, Division 3 of the California Code of Regulations.

B. Operational-Related Localized Emissions Impact Analysis

Criteria Pollutant Emissions

Table 4.3-9, *Localized Significance Summary Operations*, presents the Project's calculated daily localized emissions during long-term operation. Detailed operational localized emissions model outputs are presented in Appendix 3.2 and 3.3 of *Technical Appendix B1*. As shown in Table 4.3-9, the Project's estimated operational localized emissions associated with CO, NO₂, PM₁₀ and PM_{2.5} would not exceed localized thresholds established by the SCAQMD. Accordingly, long-term operation of the proposed Project would not expose any sensitive receptors which are located within 1.0 mile of the Project site to substantial point source emissions on a direct or cumulatively considerable basis. Impacts are less than significant. Although the Project would not generate substantial point source emissions on a direct or cumulatively considerable basis, mitigation measures are provided in Subsection 4.3.7 that would further reduce the levels disclosed in Table 4.3-9.

CO Hot Spot Impact Analysis

A CO "hot spot" would occur if an exceedance of the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur. A CO "hot spot" analysis was not performed by Urban



Crossroads, Inc. to evaluate the effect of Project-related vehicular emissions of CO because CO attainment was thoroughly analyzed as part of SCAQMD's 2003 AQMP and the *1992 Federal Attainment for Carbon Monoxide (1992 CO Plan)*. As identified in the SCAQMD's 2003 AQMP and the *1992 CO Plan*, peak carbon monoxide concentrations in the SCAB were a result of unusual meteorological and topographical conditions and not a result of congestion at a particular intersection. To establish a more accurate record of baseline CO concentrations affecting the SCAB, a CO "hot spot" was conducted in 2003 at four busy intersections in Los Angeles at the peak morning and afternoon periods. The busiest intersection had a daily traffic volume of 100,000 vehicles per day. The 2003 AQMP estimated that the CO 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day. In comparison, at buildout of the proposed Project, the highest average daily trips on a segment of road would be 31,300 daily trips on Harley Knox Boulevard east of I-215 which is lower than the daily trip volumes studies by SCAQMD that had no impact. (Urban Crossroads, Inc., 2016a, pp. 46-47)

Similar considerations are also employed by other Air Districts when evaluating potential CO concentration impacts. The Bay Area Air Quality Management District (BAAQMD) concluded that in order to generate a significant CO impact under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour or 24,000 vehicles per hour where vertical and or horizontal air does not mix. The proposed Project would not produce the volume of traffic required to generate a CO "hot spot" either in the context of the Los Angeles "hot spot" study or based on representative BAAQMD CO threshold considerations. (Urban Crossroads, Inc., 2016a, pp. 46-47). Accordingly, Project-related vehicular emissions would not result in a substantial contribution of CO concentrations at intersections in the vicinity of the Project site and sensitive receptors would not be exposed to substantial CO concentrations generated by the Project's vehicular traffic.

Diesel Particulate Emissions Impact Analysis

The Project's operational activities would generate/attract diesel-fueled trucks that produce DPM as a by-product of fuel combustion. To evaluate the Project's potential to expose nearby sensitive receptors so substantial amounts of DPM during long-term operation, a Mobile Source Health Risk Assessment was prepared for the proposed Project by Urban Crossroads, Inc. and is included as *Technical Appendix B2* (assuming a larger sized Building E than is currently proposed). Detailed model outputs for the Project considering the currently proposed (smaller) size of Building E are contained as Attachment A to a supplemental analysis prepared to address the smaller building, which is appended to the front of *Technical Appendix B1*.

The closest residential land use is located approximately 191 feet south of the Project site. At the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project DPM source emissions is calculated to be 6.19 in 1,000,000 (assuming the resident(s) would stay at their home 24 hours a day, 350 days per year for 70 years), which is less than the SCAQMD cancer risk threshold of 10 in 1,000,000. With the smaller currently proposed Building E, the DPM



source emissions at the MEIR is reduced to 5.97 in 1,000,000 (Urban Crossroads, Inc., 2017a). At the same location, non-cancer risks are calculated to be 0.004, which would not exceed the applicable threshold of 1.0. (Urban Crossroads, Inc., 2016b, p. 1)

The closest worker receptor land use is located to the east, immediately adjacent to the Project site. At the maximally exposed individual worker (MEIW), the maximum incremental cancer risk impact at this location is 0.91 in 1,000,000 (assuming the worker(s) would stay at their work site 12 hours a day, 245 days per year for 40 years) which is less than the threshold of 10 in 1,000,000. Maximum non-cancer risks at this same location are calculated to be 0.003, which would not exceed the applicable threshold of 1.0. (Urban Crossroads, Inc., 2016b, p. 1)

The nearest school is Thomas Rivera Middle School which is located approximately 1.0 mile (5,280 feet) southwest of the Project site. At the maximally exposed individual school child (MEIS), the maximum incremental cancer risk impact at this location is 0.01 in 1,000,000 (assuming the school child(ren) would stay at their school 10 hours a day, 180 days per year for nine years) which is less than the threshold of 10 in 1,000,000. Maximum non-cancer risks at this location are estimated to be 0.00007 which would not exceed the applicable threshold of 1.0. (Urban Crossroads, Inc., 2016b, p. 1)

Accordingly, long-term operations at the Project site would not directly cause or contribute in a cumulatively considerable manner to the exposure of the MEIR, MEIW, or MEIS to substantial DPM emissions. Therefore, implementation of the proposed Project would result in a less-than-significant impact to expose MEIR, MEIW, and MEIS which are located within 1.0 mile of the Project site to project substantial point source DPM emissions. Although implementation of the Project would result in a less-than-significant impact associated with DPM emissions, the mitigation measures required in EIR Subsection 4.3.7 to reduce the Project's operational air quality impacts would further reduce DPM emissions associated with long-term operation of the Project.

Threshold e) Would the Project involve the construction of a sensitive receptor located within one mile of an existing substantial point source emitter?

The Project proposes to develop the property with two business park warehouse buildings which would not contain sensitive receptors or land uses that would be considered point source emitters; therefore, no impact would occur.

Threshold f) Would the Project create objectionable odors affecting a substantial number of people?

Under existing conditions, the Project site is mostly undeveloped and vacant, with exception of the southwest corner of the site which contains a mobile home and a concrete pad that is used for storage of construction equipment. Accordingly, the Project does not contain land uses typically associated with emitting objectionable odors. The Project could produce odors during proposed construction



activities resulting from construction equipment exhaust, application of asphalt, and/or the application of architectural coatings; however, standard construction practices would minimize odor emissions and their associated impacts. Furthermore, any odors emitted during construction activities would be temporary, short-term, and intermittent in nature, and would cease upon completion of construction activities. In addition, construction activities on the Project site would be required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions that would create a public nuisance. Accordingly, the proposed Project would not create objectionable odors affecting a substantial number of people during construction activities. Therefore, implementation of the Project would result in less-than-significant odor impacts during short-term construction activities. Thus, no mitigation is required.

Under long-term operational conditions, the Project would include business park warehouse land uses, which are not typically associated with objectionable odors. The temporary storage of refuse associated with the Project's long-term operational use could be a potential source of odor; however, Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the County's solid waste regulations, thereby precluding any significant odor impact. Furthermore, the Project would be required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions that would create a public nuisance during long-term operation of the Project. As such, long-term operation of the proposed Project would not create objectionable odors affecting a substantial amount of people. Thus, a less-than-significant impact would occur.

4.3.5 CUMULATIVE IMPACT ANALYSIS

The cumulative study area for air emissions impacts is the SCAB using the summary of projections approach based on General Plan buildout. Also, the SCAQMD considers all impacts that are significant and direct to also be cumulatively considerable. As discussed in the analysis of Threshold (a), the Project would not be consistent with the SCAQMD's AQMP because SCAQMD localized significance thresholds would be exceeded during Project construction, and the light industrial land use proposed by the Project on a portion of the Building E Site would be more intense than the rural residential land use assumed for a portion of the Building E Site by the Riverside County General Plan, which was relied upon by the SCAQMD for the 2012. Other development projects in the SCAB will be under construction at the same time that the Project is under construction, and amendments to General Plans are occurring throughout the SCAB to increase development intensity. As such, there is a cumulative impact associated with AQMP inconsistency and the Project's contribution to this inconsistency is cumulatively considerable.

As discussed in the analysis of Thresholds (b) and (c), Project-related construction emissions would exceed criteria standards pollutant thresholds established by the SCAQMD for NO_x. The Project also would exceed SCAQMD's regional criteria for VOCs and NO_x during long-term operation of the Project. VOCs and NO_x are precursors for ozone, a pollutant for which the SCAB is in non-attainment under both federal and State criteria. The SCAQMD considers all impacts that are significant on a direct basis to also be cumulatively considerable because the SCAB does not attain State and federal air quality standards for several pollutants, including ozone.



As discussed in the analysis of Threshold (d), the Project's construction-related emissions would exceed the SCAQMD's localized significance thresholds for emissions of NO_x, PM₁₀, and PM_{2.5}. Because other development projects affecting the same sensitive receptors have the potential to be under construction at the same time as the proposed Project, impacts are also considered to be cumulatively considerable. The Project's estimated operational localized emissions of all air pollutants would not exceed localized thresholds established by the SCAQMD. As also discussed in the analysis of Threshold (d), Project-related vehicular emissions would not result in a substantial contribution of CO concentrations at intersections in the vicinity of the Project site and sensitive receptors would not be exposed to substantial CO concentrations generated by the Project's vehicular traffic. Based on existing and projected traffic volumes at intersections, there are no known CO hotspot locations in the Project's traffic study area, nor are any CO hotspots expected to occur in the foreseeable future. As such, there would be no significant cumulative impact.

As also discussed in the analysis of Threshold (d), long-term operations at the Project site would not directly cause or contribute in a cumulatively considerable manner to the exposure of the MEIR, MEIW, or MEIS to substantial DPM emissions. The SCAQMD considers impacts that are not significant on a direct level to also not be cumulatively considerable. Accordingly, a cumulatively considerable impact would not occur as the result of the proposed Project. (Urban Crossroads, Inc., 2016a, p. 30)

For informational purposes, it is noted that stationary (loading dock) and mobile source emissions from cumulative projects and from future development on currently undeveloped or undeveloped parcels within 0.25 mile radius of the Project site and projects beyond 0.25 mile radius that add mobile sources to the same roadway segments as the proposed Project's truck route, have the potential to increase health risks in the Project vicinity associated with air pollution. (Urban Crossroads, Inc., 2016b, p. 30) As indicated in Table 4.3-10, *Cumulative Carcinogenic Heath Risk*, the total estimated cancer risk associated with the cumulative projects is estimated to be 213.5 in 1,000,000. As indicated in Table 4.3-10, the highest total cumulative with Project cancer risk for MEIR is 758.25 in 1,000,000 for MEIR. The Project's maximum incremental contribution to the cumulative health risk for MEIR in the Project area is 6.19 in 1,000,000 (assuming the larger sized Building E and 5.97 in 1,000,000 considering the currently proposed size of Building E) which is below the 10 in 1,000,000 incremental threshold set by SCAQMD. The highest cumulative with Project cancer risk for MEIW is 752.97 in one million. The Project's maximum incremental contribution to the cumulative health risk for MEIW in the Project area is 0.91 in 1,000,000 which below the 10 in 1,000,000 threshold set by the SCAQMD. The Project's highest cumulative with Project cancer risk for MEIS is 752.07 in 1,000,000. The Project's maximum incremental contribution to the cumulative health risk for MEIS in the Project area is 0.01 in 1,000,000 which is below the 10 in 1,000,000 incremental threshold set by SCAQMD. Therefore, pursuant to SCAQMD cumulative impact criteria, the Project's MEIR, MEIW, and MEIS impacts would be less than significant on a direct basis and less than cumulatively considerable. (Urban Crossroads, Inc., 2016b, pp. 30-31 and Table 2-7)



As discussed in the analysis of Threshold (e), the Project proposes to develop the property with two business park warehouse buildings which would not contain sensitive receptors or land uses that would be considered point source emitters. Accordingly, a cumulatively considerable impact would not occur.

As discussed in the analysis of Threshold (f), there are no components of the proposed Project's construction or long-term operation that would result in the exposure of a substantial number of sensitive receptors to objectionable odors. Accordingly, a cumulatively considerable impact would not occur.

4.3.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold (a) for the Building D Site and the Building E Site: Significant Direct and Cumulatively Considerable Impact. Project construction-source emissions would exceed localized significance thresholds for NO_x, PM₁₀, and PM_{2.5}. Therefore, the proposed Project would conflict with the implementation of the AQMP on a significant direct and cumulatively considerable basis.

Thresholds (b) and (c) for the Building D Site and the Building E Site: Significant Direct and Cumulatively Considerable Impact. The Project would emit concentrations of NO_x during construction that would cause or contribute to an existing or projected air quality violation, on both a direct and cumulatively considerable basis. During long-term operation, the Project would exceed SCAQMD's regional criteria for daily VOC and NO_x emissions which would result in a significant impact to the environment on both a direct and cumulatively considerable basis.

Threshold (d) for the Building D Site and the Building E Site: Significant Direct and Cumulatively Considerable Impact. The Project's construction-related emissions would exceed the SCAQMD's localized significance thresholds for emissions of NO_x, PM₁₀, and PM_{2.5}. The Project's emissions would not create a CO hotspot. Long-term operation of the Project would cause less-than-significant direct and less-than-significant cumulatively considerable human health impacts due to the exposure of residents, workers, and school children to diesel particulate matter.

Threshold (e) for the Building D Site and the Building E Site: No Impact. The Project proposes to develop the property with two business park warehouse buildings which would not contain sensitive receptors that could be exposed to point source emissions. The Project does not propose land uses that would be considered point source emitters.

Threshold (f) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would not produce unusual or substantial construction-related odors. Odors associated with long-term operation of the Project would be minimal and less than significant. The Project would be required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions that would create a public nuisance.



4.3.7 MITIGATION

Applicable County Regulations and Design Requirements

The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- The Project is required to comply with the provisions of the South Coast Air Quality Management District (SCAQMD) Rule 403 "Fugitive Dust." Rule 403 requires implementation of best available dust control measures during construction activities that generate fugitive dust, such as earth moving, grading, and construction equipment travel on unpaved roads. To comply with Rule 403, and prior to grading permit issuance, the County of Riverside shall verify that notes are specified on the Project's grading plans requiring Rule 403 compliance. Project construction contractors would be required to ensure compliance with the notes and permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. To comply with Rule 403:
 1. In order to limit fugitive dust emissions, all clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 miles per hour (mph) per SCAQMD guidelines.
 2. The construction contractor(s) shall ensure that all disturbed unpaved roads and disturbed areas within the Project site are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three (3) times a day, preferably in the mid-morning, afternoon, and after work is done for the day.
 3. The construction contractor(s) shall ensure that traffic speeds on unpaved roads and the Project site area are reduced to 15 miles per hour or less.
- The Project is required to comply with the provisions of the South Coast Air Quality Management District (SCAQMD) Rule 1113 "Table of Standards" pertaining VOC emissions by using zero-Volatile Organic Compounds paints (no more than 100 gram/liter of VOC) and/or High Pressure Low Volume (HPLV) applications. Prior to building permit final inspection, the County of Riverside shall verify a note requiring Rule 1113 compliance is specified on all building plans. Project contractors would be required to comply with the note and maintain written records of such compliance that can be inspected by the County of Riverside or its designee upon request.
- The Project's construction activities are required to comply with the provisions of the South Coast Air Quality Management District (SCAQMD) Rule 1186 "PM₁₀ Emissions from Paved and Unpaved Roads and Livestock Operations," which requires the use of a street sweeper



certified by the Air Quality Management District (AQMD), and the use of non-toxic chemical stabilizers for dust control.

- Project construction activities are required to comply with the California Manual on Uniform Traffic Control Devices, which specify that temporary traffic controls shall be provided during construction, such as a flag person, during all phases of construction to facilitate the flow of construction traffic on streets abutting the Project site.
- The Project is required to comply with the provisions of the South Coast Air Quality Management District (SCAQMD) Rule 402, “Nuisance” which requires that a person shall not discharge air contaminants or other materials that would cause health or safety hazards to any considerable number of persons or the public.
- The Project is required to comply with the California Green Building Standards Code (CALGreen), including all Nonresidential Mandatory Measures, including but not limited to requirements for bicycle parking, parking for clean air vehicles, charging stations, lighting, water conservation, waste reduction, and building maintenance. The provisions of CALGreen reduce energy use and fossil fuel use, which reduce air pollutant emissions.
- Diesel-fueled vehicles at the Project site are required to comply with the California Air Resources Board (CARB) idling restriction requirements, which currently restrict vehicles from idling for more than 5 minutes. Prior to building permit final inspection, the County of Riverside shall verify that signs are posted in the Project’s truck courts specifying the idling restriction requirement.

Mitigation Measures

The following mitigation measures are required to reduce the Project’s significant impacts associated with construction-related emissions of NO_x, PM₁₀, PM_{2.5}, and NO_x.

- MM 4.3-1 Prior to grading permit issuance, the County of Riverside shall verify that the following notes are included on the grading plans. Project contractors shall be required to ensure compliance with these notes and permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. These notes also shall be specified in bid documents issued to prospective construction contractors.
- a) Onsite electrical hook-ups to a power grid shall be provided for electric construction tools including saws, drills, and compressors, where feasible, to reduce the need for diesel powered electric generators.



- b) All Heavy-Heavy Duty Haul Trucks (HHD) accessing the Project site shall use year 2010 or newer engines during all construction activities to the extent such HHD are commercially available.
- c) All excavators, graders, and rubber-tired dozers shall be CARB Tier 3 Certified or better.
- d) All scrapers shall be CARB Tier 4 Certified or better.
- e) The total horsepower-hours per day for all on-site equipment shall not exceed 46,344 horsepower hours per day.
- f) The maximum daily disturbance area (actively graded area) shall not exceed 11.0 acres per day.
- g) The use of diesel-powered generators during construction shall be prohibited.
- h) Construction contractors shall notify their workers about Riverside County's Rideshare Program.
- i) The use of construction equipment with pollution control devices such as high-pressure injectors is highly encouraged to reduce air pollution emissions.
- j) The use of construction vehicles equipped with pollution control devices such as catalytic converters is highly encouraged to reduce air pollutant emissions.
- k) Construction activities shall be suspended during Stage 2 Smog Alerts issued by the South Coast Air Quality Management District (SCAQMD).

MM 4.3-2 Construction equipment shall be properly maintained according to manufacturer specifications and all contractors shall turn off all construction equipment and delivery vehicles when not in use, or limit onsite idling to no more than ~~five~~ three (3) minutes in any one hour. Onsite electrical hook-ups to a power grid shall be provided for electric construction tools including saws, drills, and compressors, where feasible, to reduce the need for diesel powered electric generators. Construction contractors shall keep construction equipment maintenance records and data sheets of equipment design specifications (including the emission control tier of the equipment) onsite during construction and subject to inspection by the County of Riverside.

In an effort to further reduce idling, MM 4.3-2 is supplemented with MM 4.3-2(A) below.



MM 4.3-2 (A) During construction activities, Project contractors shall post signs on the site that instruct operators to turn off equipment when not in use and limit idling to a maximum of three (3) minutes.

The following mitigation measures are required to reduce the Project's significant impacts to regional operation-source emissions associated with NO_x and VOC.

- MM 4.3-3 Within six months of building occupancy, signs shall be posted at the building informing truck drivers about the health effects of diesel particulates, the California Air Resources Board diesel-fueled vehicle idling regulations, and the importance of being a good neighbor by not parking in residential areas. Developer and all successors shall include this obligation in all leases of the Project so that all tenants shall fulfill the terms and conditions of this County condition of approval.
- MM 4.3-4 Within six months of building occupancy, signs shall be posted in all dock and delivery areas containing the following: truck drivers shall turn off engines when not in use; trucks shall not idle for more than three (3) five minutes; telephone numbers of the building facilities manager and the California Air Resources Board to report violations. Developer and all successors shall include the provisions of the requirements of these obligations in all leases of the Project so that all tenants shall fulfill the terms and conditions of this County condition of approval.
- MM 4.3-5 Owner users and tenants of the Project shall maintain records on its fleet equipment and vehicle engine maintenance to ensure that its Heavy-Heavy Duty Haul Trucks (HHD) fleet serving the warehouses within the Project are in good condition, and in proper tune pursuant to manufacturer's specifications. Owner users and tenants shall ensure that all HHD accessing the Project site shall comply with 13 California Code of Regulations Section 2025, as may be amended (the "Regulations"), and that all HHD accessing the Project site shall comply with the required registration and reporting provisions of the Regulations. Developer and all successors shall include the provisions of the requirements of these obligations in all leases of the Project so that all tenants shall fulfill the terms and conditions of this County condition of approval.
- MM 4.3-6 Site enforcement staff in charge of monitoring for excess vehicle idling shall be trained/certified in diesel health effects and technologies, for example, by requiring attendance at California Air Resources Board approved courses. Developer and all successors shall include this obligation in all leases of the Project so that all tenants shall fulfill the terms and conditions of this County condition of approval.
- MM 4.3-7 All owner users and future tenants shall participate in Riverside County's Rideshare Program. The purpose of this program is to discourage single-occupancy vehicle trips and encourage other alternative modes of transportation. Carpooling opportunities and



public transportation information shall be advertised to employees of the building tenant. Developer and all successors shall include the provisions of this obligation in all leases of the Project so that all tenants shall fulfill the terms and conditions of this County condition of approval.

- MM 4.3-8 Prior to the issuance of a building permit, the County shall verify that the building's roof is designed to accommodate a minimum 1 KW photovoltaic (PV) solar array taking into consideration limitations imposed by other rooftop equipment, roof warranties, building and fire code requirements, and other physical or legal limitations. The building shall be constructed with the necessary electrical system and other infrastructure to accommodate PV arrays in the future. The electrical system and infrastructure shall be clearly labeled with noticeable and permanent signage which informs future occupants/owners of the existence of this infrastructure.
- MM 4.3-9 Developer and all successors shall include information in building lease agreements that inform tenants about the air quality benefits associated with water-based or low volatile organic compounds (VOC) cleaning products.
- MM 4.3-10 Developer and all successors shall include information in building lease agreements that inform tenants about the benefits of becoming SmartWay Shippers and SmartWay Carriers. SmartWay is a federal EPA program that advances supply chain sustainability.
- MM 4.3-11 Developer and all successors shall stipulate in building lease and sale agreements that yard trucks shall not be fueled with diesel.
- MM 4.3-12 Prior to the issuance of building permits, the County shall verify that the Project's building plans require the installation of a primary roofing material that has a solar reflective index (SRI) value of at least 39 percent.

4.3.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold (a) for the Building D Site and the Building E Site: Significant and Unavoidable Direct and Cumulatively Considerable Impact. Although compliance with regulatory requirements and Mitigation Measures MM 4.3-1 through ~~MM 4.3-10~~ MM 4.3-12 would reduce the Project's air pollutant impacts and thus its inconsistency with SCAQMD's 2012 AQMP, the Project's inconsistency with the AQMP would remain significant and unavoidable. There are no feasible mitigation measures that can reduce the Project's impacts to below a level of significance.

Threshold (b) and (c) for the Building D Site and the Building E Site: Significant and Unavoidable Direct and Cumulatively Considerable Impact. As indicated in Table 4.3-11, *Emissions Summary of Overall Construction (With Mitigation)*, mitigation measures would reduce the Project's short-term construction emissions associated with NO_x to below the SCAQMD regional thresholds. As indicated



in Table 4.3-12, *Summary of Peak Operational Emissions (With Mitigation)*, even with mitigation, the Project's operational emissions associated with VOCs and NO_x would still exceed the SCAQMD's regional threshold. The Project would comply with all regulatory requirements and this EIR recommends feasible mitigation to reduce VOCs; however, there is no mitigation available to reduce VOCs below the SCAQMD's regional threshold. Emissions of NO_x are primarily a result of mobile source emissions (i.e., vehicles traveling to and from the Project site), which are regulated by state and federal emissions and fuel use standards, and beyond the direct control of the Project Applicant and/or future users of the Project site's buildings. No other mitigation is available for NO_x emissions from vehicle tailpipes that is feasible for the Project Applicant to implement and the County of Riverside to enforce that would have a proportional nexus to the Project's level of impact. As such, it is concluded that the Project's long-term emissions of VOCs and NO_x would cumulatively contribute to an existing air quality violation in the SCAB (i.e., ozone and NO_x), as well as cumulatively contribute to the net increase of criteria pollutants for which the SCAB is in non-attainment (federal and state ozone concentrations). Effects to human health resulting from NO_x concentrations include respiratory illness, including but not limited to asthma and chronic obstructive pulmonary diseases (e.g., chronic bronchitis, emphysema). Effects to human health resulting from VOC concentrations include but are not limited to irritation to the eye, nose, and throat, which can reduce respiratory volume as, well as sensory nerve stimulation that can compromise the immune system. Accordingly, the Project's long-term operational emissions associated with VOCs and NO_x are concluded to result in a significant and unavoidable impact on both a direct and cumulatively considerable basis.

Threshold (d) for the Building D Site and the Building E Site: Less-than-Significant Impact. Implementation of Mitigation Measures MM 4.3-1 and MM 4.3-2, combined with mandatory compliance with SCAQMD Rule 403 and California Air Resources Board, Title 13, Chapter 10, Section 2485, Division 3 of the California Code of Regulations, would reduce the emissions during Project construction to below the SCAQMD's localized significance thresholds. Refer to Table 4.3-8, *Localized Significance Summary Peak Construction (With Mitigation)*.



Table 4.3-1 Ambient Air Quality Standards

| Pollutant | Averaging Time | California Standards ¹ | | National Standards ² | | |
|--|-------------------------|------------------------------------|--|---|-----------------------------------|---|
| | | Concentration ³ | Method ⁴ | Primary ^{3,5} | Secondary ^{3,6} | Method ⁷ |
| Ozone (O ₃) | 1 Hour | 0.09 ppm (180 µg/m ³) | Ultraviolet Photometry | — | Same as Primary Standard | Ultraviolet Photometry |
| | 8 Hour | 0.070 ppm (137 µg/m ³) | | 0.075 ppm (147 µg/m ³) | | |
| Respirable Particulate Matter (PM ₁₀) ⁸ | 24 Hour | 50 µg/m ³ | Gravimetric or Beta Attenuation | 150 µg/m ³ | Same as Primary Standard | Inertial Separation and Gravimetric Analysis |
| | Annual Arithmetic Mean | 20 µg/m ³ | | — | | |
| Fine Particulate Matter (PM _{2.5}) ⁸ | 24 Hour | — | — | 35 µg/m ³ | Same as Primary Standard | Inertial Separation and Gravimetric Analysis |
| | Annual Arithmetic Mean | 12 µg/m ³ | Gravimetric or Beta Attenuation | 12.0 µg/m ³ | 15 µg/m ³ | |
| Carbon Monoxide (CO) | 1 Hour | 20 ppm (23 mg/m ³) | Non-Dispersive Infrared Photometry (NDIR) | 35 ppm (40 mg/m ³) | — | Non-Dispersive Infrared Photometry (NDIR) |
| | 8 Hour | 9.0 ppm (10 mg/m ³) | | 9 ppm (10 mg/m ³) | — | |
| | 8 Hour (Lake Tahoe) | 6 ppm (7 mg/m ³) | | — | — | |
| Nitrogen Dioxide (NO ₂) ⁹ | 1 Hour | 0.18 ppm (339 µg/m ³) | Gas Phase Chemiluminescence | 100 ppb (188 µg/m ³) | — | Gas Phase Chemiluminescence |
| | Annual Arithmetic Mean | 0.030 ppm (57 µg/m ³) | | 0.053 ppm (100 µg/m ³) | Same as Primary Standard | |
| Sulfur Dioxide (SO ₂) ¹⁰ | 1 Hour | 0.25 ppm (655 µg/m ³) | Ultraviolet Fluorescence | 75 ppb (196 µg/m ³) | — | Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method) |
| | 3 Hour | — | | — | 0.5 ppm (1300 µg/m ³) | |
| | 24 Hour | 0.04 ppm (105 µg/m ³) | | 0.14 ppm (for certain areas) ¹⁰ | — | |
| | Annual Arithmetic Mean | — | | 0.030 ppm (for certain areas) ¹⁰ | — | |
| Lead ^{11,12} | 30 Day Average | 1.5 µg/m ³ | Atomic Absorption | — | — | High Volume Sampler and Atomic Absorption |
| | Calendar Quarter | — | | 1.5 µg/m ³ (for certain areas) ¹² | Same as Primary Standard | |
| | Rolling 3-Month Average | — | | 0.15 µg/m ³ | | |
| Visibility Reducing Particles ¹³ | 8 Hour | See footnote 13 | Beta Attenuation and Transmittance through Filter Tape | No National Standards | | |
| Sulfates | 24 Hour | 25 µg/m ³ | Ion Chromatography | | | |
| Hydrogen Sulfide | 1 Hour | 0.03 ppm (42 µg/m ³) | Ultraviolet Fluorescence | | | |
| Vinyl Chloride ¹¹ | 24 Hour | 0.01 ppm (26 µg/m ³) | Gas Chromatography | | | |

Source: (Urban Crossroads, Inc., 2016a, Table 2-1)



Table 4.3-2 Attainment Status of Criteria Pollutants in the South Coast Air Quality Basin (SCAB)

| Criteria Pollutant | State Designation | Federal Designation |
|-------------------------|-------------------|-------------------------|
| Ozone - 1 hour standard | Nonattainment | No Standard |
| Ozone - 8 hour standard | Nonattainment | Nonattainment |
| PM ₁₀ | Nonattainment | Attainment |
| PM _{2.5} | Nonattainment | Nonattainment |
| Carbon Monoxide | Attainment | Unclassified/Attainment |
| Nitrogen Dioxide | Attainment | Unclassified/Attainment |
| Sulfur Dioxide | Attainment | Attainment |
| Lead ¹ | Attainment | Attainment |

Source: State/Federal designations were taken from <http://www.arb.ca.gov/desig/adm/adm.htm>.

Note: See Appendix 3.1 of Technical Appendix B1 for a detailed map of State/National Area Designations within the SCAB.

Source: (Urban Crossroads, Inc., 2016a, Table 2-2)



Table 4.3-3 Project Area Air Quality Monitoring Summary 2012-2014

| POLLUTANT | STANDARD | YEAR | | |
|--|-------------------------|-------|-------|-------|
| | | 2012 | 2013 | 2014 |
| Ozone (O ₃) ^a | | | | |
| Maximum 1-Hour Concentration (ppm) | | 0.111 | 0.108 | 0.117 |
| Maximum 8-Hour Concentration (ppm) | | 0.093 | 0.090 | 0.094 |
| Number of Days Exceeding State 1-Hour Standard | > 0.09 ppm | 28 | -- | -- |
| Number of Days Exceeding State 8-Hour Standard | > 0.07 ppm | 64 | -- | -- |
| Number of Days Exceeding Federal 1-Hour Standard | > 0.12 ppm | 0 | 0 | -- |
| Number of Days Exceeding Federal 8-Hour Standard | > 0.075 ppm | 46 | 34 | 38 |
| Number of Days Exceeding Health Advisory | ≥ 0.15 ppm | 0 | 0 | -- |
| Carbon Monoxide (CO) ^b | | | | |
| Maximum 1-Hour Concentration (ppm) | | -- | 4.5 | 2 |
| Maximum 8-Hour Concentration (ppm) | | 1.5 | 1.4 | 1.4 |
| Number of Days Exceeding State 1-Hour Standard | > 20 ppm | 0 | 0 | 0 |
| Number of Days Exceeding Federal / State 8-Hour Standard | > 9.0 ppm | 0 | 0 | 0 |
| Number of Days Exceeding Federal 1-Hour Standard | > 35 ppm | 0 | 0 | 0 |
| Nitrogen Dioxide (NO ₂) ^b | | | | |
| Maximum 1-Hour Concentration (ppm) | | 0.060 | 0.053 | 0.056 |
| Annual Arithmetic Mean Concentration (ppm) | | 0.017 | -- | -- |
| Number of Days Exceeding State 1-Hour Standard | > 0.18 ppm | 0 | 0 | 0 |
| Particulate Matter ≤ 10 Microns (PM ₁₀) ^a | | | | |
| Maximum 24-Hour Concentration (µg/m ³) | | 62 | 70 | 87 |
| Number of Samples | | 60 | 57 | 60 |
| Number of Samples Exceeding State Standard | > 50 µg/m ³ | 1 | -- | -- |
| Number of Samples Exceeding Federal Standard | > 150 µg/m ³ | 0 | 0 | 0 |
| Particulate Matter ≤ 2.5 Microns (PM _{2.5}) ^b | | | | |
| Maximum 24-Hour Concentration (µg/m ³) | | 30.2 | 33.4 | 30.9 |
| Annual Arithmetic Mean (µg/m ³) | | 11.4 | 11.6 | -- |
| Number of Samples Exceeding Federal 24-Hour Standard | > 35 µg/m ³ | 0 | -- | -- |

-- data not available from either SCAQMD or EPA

^a Data for ozone and PM10 was obtained from the Perris monitoring station (SRA 24)

^b Data for CO, NO₂, and PM_{2.5} was obtained from the Metropolitan Riverside County monitoring station (SRA 23)

Source: (Urban Crossroads, Inc., 2016a, Table 2-3)



Table 4.3-4 Maximum Daily Regional Emissions Thresholds

| Pollutant | Construction | Operations |
|-----------------------------|---------------|-----------------------------------|
| Regional Thresholds | | |
| NOx | 100 lbs/day | 55 lbs/day |
| VOC | 75 lbs/day | 55 lbs/day |
| PM10 | 150 lbs/day | 150 lbs/day |
| PM2.5 | 55 lbs/day | 55 lbs/day |
| Sox | 150 lbs/day | 150 lbs/day |
| CO | 550 lbs/day | 550 lbs/day |
| Lead | 3 lbs/day | 3 lbs/day |
| Localized Thresholds | | |
| NOx | 302 lbs/day | 0.18 ppm |
| PM10 | 40 lbs/day | 2.50 µg/m ³ |
| PM2.5 | 10 lbs/day | 2.50 µg/m ³ |
| CO | 2,178 lbs/day | 20 ppm (1-Hour); 9.0 ppm (8-Hour) |

Source: (Urban Crossroads, Inc., 2016a, Table 3-1)

Table 4.3-5 Emissions Summary of Overall Construction (Without Mitigation)

| Year | Emissions (pounds per day) | | | | | |
|--------------------------------|----------------------------|---------------|---------------|-------------|--------------|--------------|
| | VOC | NOx | CO | SOx | PM10 | PM2.5 |
| 2016 | 22.35 | 264.67 | 170.94 | 0.23 | 51.04 | 28.15 |
| 2017 | 48.06 | 71.12 | 100.97 | 0.22 | 14.82 | 6.53 |
| Maximum Daily Emissions | 48.06 | 264.67 | 170.94 | 0.23 | 51.04 | 28.15 |
| SCAQMD Regional Threshold | 75 | 100 | 550 | 150 | 150 | 55 |
| Threshold Exceeded? | NO | YES | NO | NO | NO | NO |

Source: (Urban Crossroads, Inc., 2016a Table 3-4)



Table 4.3-6 Summary of Peak Operational Emissions

| Operational Activities – Summer Scenario | Emissions (pounds per day) | | | | | |
|--|----------------------------|-----------------|---------------|-----------------|------------------|-------------------|
| | VOC | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
| Area Source | 49.48 | 3.28e-3 | 0.35 | 3.00e-5 | 1.25e-3 | 1.25e-3 |
| Energy Source | 0.07 | 0.61 | 0.51 | 3.63e-3 | 0.05 | 0.05 |
| Mobile (Trucks) | 18.42 | 400.49 | 171.81 | 1.25 | 47.59 | 18.23 |
| Mobile (Passenger Cars) | 2.58 | 2.71 | 37.33 | 0.12 | 11.77 | 3.16 |
| On-Site Equipment | 1.48 | 17.75 | 7.38 | 0.02 | 0.81 | 0.74 |
| Maximum Daily Emissions | 72.03 | 421.56 | 217.38 | 1.39 | 60.22 | 22.18 |
| SCAQMD Regional Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| Threshold Exceeded? | YES | YES | NO | NO | NO | NO |

| Operational Activities – Winter Scenario | Emissions (pounds per day) | | | | | |
|--|----------------------------|-----------------|---------------|-----------------|------------------|-------------------|
| | VOC | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
| Area Source | 49.48 | 3.28e-3 | 0.35 | 3.00e-5 | 1.25e-3 | 1.25e-3 |
| Energy Source | 0.07 | 0.61 | 0.51 | 3.63e-3 | 0.05 | 0.05 |
| Mobile (Trucks) | 18.73 | 417.22 | 180.90 | 1.25 | 47.59 | 18.24 |
| Mobile (Passenger Cars) | 2.41 | 2.87 | 31.99 | 0.11 | 11.77 | 3.16 |
| On-Site Equipment | 1.48 | 17.75 | 7.38 | 0.02 | 0.81 | 0.74 |
| Maximum Daily Emissions | 72.17 | 438.45 | 221.13 | 1.38 | 60.22 | 22.19 |
| SCAQMD Regional Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| Threshold Exceeded? | YES | YES | NO | NO | NO | NO |

Source: (Urban Crossroads, Inc., 2016a, Table 3-6)

Note: The numerical values shown in Table 4.3-6 were calculated prior to the Project Applicant’s decision to reduce the size of the Building E Site and the size of its proposed building to the current configurations described in EIR Section 3.0, *Project Description*. Therefore, Urban Crossroads, Inc. prepared a supplemental analysis to address the reduction in size of the Building E Site and its proposed building. The update letter, “Knox Business Park Supplemental Air Quality Impact Analysis, Greenhouse Gas Impact Analysis, & Mobile Source Health Risk Assessment” is dated February 9, 2017, and is appended to the front of *Technical Appendix B1*. (Urban Crossroads, Inc., 2017a).



Table 4.3-7 Localized Significance Summary Peak Construction (Without Mitigation)

| Peak Construction | CO | | NO ₂ | PM ₁₀ | PM _{2.5} |
|---|----------------|-------------|-----------------|------------------|-------------------|
| | Averaging Time | | | | |
| | 1-Hour | 8-Hour | 1-Hour | 24-Hours | 24-Hours |
| Peak Day Localized Emissions | 0.42 | 0.07 | 0.31 | 23.51 | 11.68 |
| Background Concentration ^A | 4.5 | 1.5 | 0.06 | | |
| Total Concentration | 4.92 | 1.57 | 0.37 | 23.51 | 11.68 |
| SCAQMD Localized Significance Threshold | 20 | 9 | 0.18 | 10.4 | 10.4 |
| Threshold Exceeded? | NO | NO | YES | YES | YES |

^A Highest concentration from the last three years of available data

Note: PM₁₀ and PM_{2.5} concentrations are expressed in µg/m³. All others are expressed in ppm.

(Urban Crossroads, Inc., 2016a, Table 3-9)

Table 4.3-8 Localized Significance Summary Peak Construction (With Mitigation)

| Peak Construction | CO | | NO ₂ | PM ₁₀ | PM _{2.5} |
|---|----------------|-------------|-----------------|------------------|-------------------|
| | Averaging Time | | | | |
| | 1-Hour | 8-Hour | 1-Hour | 24-Hours | 24-Hours |
| Peak Day Localized Emissions | 0.28 | 0.05 | 0.08 | 8.89 | 4.28 |
| Background Concentration ^A | 4.5 | 1.5 | 0.06 | | |
| Total Concentration | 4.78 | 1.55 | 0.14 | 8.89 | 4.28 |
| SCAQMD Localized Significance Threshold | 20 | 9 | 0.18 | 10.4 | 10.4 |
| Threshold Exceeded? | NO | NO | NO | NO | NO |

^A Highest concentrations from the last three years of available date.

Note: PM₁₀ and PM_{2.5} concentrations are expressed in µg/m³. All others are expressed in ppm.

Source: (Urban Crossroads, Inc., 2016a, Table 3-10)



Table 4.3-9 Localized Significance Summary Operations

| Operation | CO | | NO ₂ | | PM ₁₀ | | PM _{2.5} |
|---|----------------|-------------|-----------------|-------------|------------------|-------------|-------------------|
| | Averaging Time | | | | | | |
| | 1-Hour | 8-Hour | 1-Hour | Annual | 24-Hours | Annual | 24-Hours |
| Peak Day Localized Emissions | 0.016 | 0.011 | 0.022 | 0.004 | 0.68 | 0.22 | 0.62 |
| Background Concentration ^A | 4.5 | 1.5 | 0.06 | 0.017 | | | |
| Total Concentration | 4.52 | 1.51 | 0.08 | 0.02 | 0.68 | 0.22 | 0.62 |
| SCAQMD Localized Significance Threshold | 20 | 9 | 0.18 | 0.03 | 2.5 | 1 | 2.5 |
| Threshold Exceeded? | NO | NO | NO | NO | NO | NO | NO |

^A highest concentrations from the last three years of available data.

Note: PM₁₀ and PM_{2.5} concentrations are expressed in µg/m³. All others are expressed in ppm.

Source: (Urban Crossroads, Inc., 2016a, Table 3-11)

Table 4.3-10 Cumulative Carcinogenic Health Risk

| | Cancer Risk as Maximum Sensitive Receptor (risk in one million) | | | |
|--|---|--------------|---------------------|-----------------------|
| | Existing | Project Site | Cumulative Projects | Total Cumulative Risk |
| Maximum Impact to All Receptors Without Project | 538.56 | | 213.5 | 752.06 |
| Maximum Impact to Nearest Residential With Project | 538.56 | 6.19 | 213.5 | 758.25 |
| Maximum Impact to Nearest Worker With Project | 538.56 | 0.91 | 213.5 | 752.97 |
| Maximum Impact to Nearest School With Project | 538.56 | 0.01 | 213.5 | 752.07 |
| Source: MATES IV Carcinogenic Risk Interactive Map (SCAQMD 2015). | | | | |

Note: Although cumulative impacts typically represent a General Plan Buildout Scenario, there is no such data available for the quantification of DPM emissions impacts at General Plan Buildout. The background risk, however, would likely overstate, rather than understate future DPM impacts and is assumed to be inclusive of future growth. It should be noted that due to improved DPM emissions control technologies and increasingly stringent DPM emissions regulations, the cancer risk incidence in the seven (7) years between the Mates III and Mates IV studies declined by approximately 50% even as population and business growth occurred throughout the region. Similar future declines in area-wide DPM source emissions are anticipated pursuant to enactment of further emissions regulations, including but not limited to anticipated greenhouse gas (GHG) reduction and control measures to be implemented by the State (see also: emissions regulatory measures discussed within the Project's Air Quality Impact Analysis (*Technical Appendix B1*) and the Project's Greenhouse Gas Analysis (*Technical Appendix B3*) (Urban Crossroads, Inc., 2016b, p. 35)

Source: (Urban Crossroads, Inc., 2016b, Table 2-7)



Table 4.3-11 Emissions Summary of Overall Construction (With Mitigation)

| Year | Emissions (pounds per day) | | | | | |
|--------------------------------|----------------------------|-----------------|---------------|-----------------|------------------|-------------------|
| | VOC | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
| 2016 | 13.46 | 80.10 | 110.59 | 0.23 | 18.72 | 9.78 |
| 2017 | 48.06 | 71.12 | 100.97 | 0.22 | 14.81 | 6.53 |
| Maximum Daily Emissions | 48.06 | 80.10 | 110.59 | 0.23 | 18.72 | 9.78 |
| SCAQMD Regional Threshold | 75 | 100 | 550 | 150 | 150 | 55 |
| Threshold Exceeded? | NO | NO | NO | NO | NO | NO |

Source: (Urban Crossroads, Inc., 2016a, Table 3-5)

Table 4.3-12 Summary of Peak Operational Emissions (With Mitigation)

| Operational Activities – Summer Scenario | Emissions (pounds per day) | | | | | |
|--|----------------------------|-----------------|---------------|-----------------|------------------|-------------------|
| | VOC | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
| Area Source Emissions | 49.48 | 3.28e-3 | 0.35 | 3.00e-5 | 1.25e-3 | 1.25e-3 |
| Energy Source Emissions | 0.06 | 0.58 | 0.48 | 3.45e-3 | 0.04 | 0.04 |
| Mobile Emissions (Trucks) | 18.42 | 400.49 | 171.81 | 1.25 | 47.59 | 18.23 |
| Mobile Emissions (Passenger Cars) | 2.57 | 2.69 | 36.99 | 0.12 | 11.65 | 3.13 |
| On-Site Equipment | 1.48 | 17.75 | 7.38 | 0.02 | 0.81 | 0.74 |
| Maximum Daily Emissions | 72.01 | 421.51 | 217.01 | 1.39 | 60.09 | 22.14 |
| SCAQMD Regional Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| Threshold Exceeded? | YES | YES | NO | NO | NO | NO |

| Operational Activities – Winter Scenario | Emissions (pounds per day) | | | | | |
|--|----------------------------|-----------------|---------------|-----------------|------------------|-------------------|
| | VOC | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
| Area Source Emissions | 49.48 | 3.28e-3 | 0.35 | 3.00e-5 | 1.25e-3 | 1.25e-3 |
| Energy Source Emissions | 0.06 | 0.58 | 0.48 | 3.45e-3 | 0.04 | 0.04 |
| Mobile Emissions (Trucks) | 18.73 | 417.22 | 180.90 | 1.25 | 47.59 | 18.24 |
| Mobile Emissions (Passenger Cars) | 2.41 | 2.85 | 31.72 | 0.11 | 11.65 | 3.13 |
| On-Site Equipment | 1.48 | 17.75 | 7.38 | 0.02 | 0.81 | 0.74 |
| Maximum Daily Emissions | 72.16 | 438.40 | 220.83 | 1.38 | 60.09 | 22.15 |
| SCAQMD Regional Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| Threshold Exceeded? | YES | YES | NO | NO | NO | NO |

Source: (Urban Crossroads, Inc., 2016a, Table 3-7)

Note: The numerical values shown in Table 4.3-12 were calculated prior to the Project Applicant’s decision to reduce the size of the Building E Site and the size of its proposed building to the current configurations described in EIR Section 3.0, *Project Description*. Therefore, Urban Crossroads, Inc. prepared a supplemental analysis to address the reduction in size of the Building E Site and its proposed building. The update letter, “Knox Business Park Supplemental Air Quality Impact Analysis, Greenhouse Gas Impact Analysis, & Mobile Source Health Risk Assessment” is dated February 9, 2017, and is appended to the front of *Technical Appendix B1*. Based on the results of Urban Crossroads’ Supplemental Analysis, all of the Project’s air pollutant emissions would be less than the quantities disclosed in Table 4.3-12 (Urban Crossroads, Inc., 2017a).



4.4 BIOLOGICAL RESOURCES

This subsection assesses the proposed Project's potential to impact sensitive biological resources. Sensitive biological resources are habitats and individual plant and wildlife species that have special recognition by federal, state, and/or local conservation agencies as being endangered, threatened, or rare, and/or fall under the jurisdiction of the United States Fish and Wildlife Service (USFWS), United States Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), Regional Water Quality Control Board (RWQCB), and/or are afforded protections under applicable Habitat Conservation Plans (HCPs) or the Riverside County Municipal Code.

As discussed in Section 3.0, *Project Description*, the Project proposes the development of two properties located south of Oleander Avenue and both east and west of Ellsworth Avenue (also called "Decker Road" in this EIR and its associated Technical Appendices) totaling approximately 58.6 acres. The Building D Site is located on approximately 37.1 acres east of Ellsworth Street and the Building E Site is located on approximately 21.5 acres west of Ellsworth Street. Both properties are collectively referred to as the "Project site." For purposes of evaluation herein, the two properties are referred to individually as the "Building D Site" and the "Building E Site."

The information and analysis presented in this Subsection is based on several site-specific biological technical reports.

The biological technical reports prepared for the Building D Site include the following:

- "Final Draft General MSHCP Habitat Assessment, Regulatory Constraints Analysis, and Consistency Analysis for the 37.08 Acre Decker I Parcels Project Site, Unincorporated Western Riverside County, California," prepared by Cadre Environmental (herein "Cadre"), dated April 28, 2015, and appended to this EIR as *Technical Appendix C1* (Cadre, 2015a).
- "MSHCP Focused Burrowing Owl Surveys for the 37.08 Acre Decker Parcels I Project Site, Unincorporated Western Riverside County, California," prepared by Cadre, dated April 28, 2015, and appended to this EIR as *Technical Appendix C2* (Cadre, 2015b).
- "Jurisdictional Delineation Parcel Map No. 36950, Planning Case No. 36950 (GPA 01151, EA 42802, CFG 06184, CZ 07872)," prepared by Hernandez Environmental Services (herein "HES"), dated August 2015, and appended to this EIR as *Technical Appendix C3* (HES, 2015a).
- "Determination of Biologically Equivalent or Superior Preservation, Parcel Map No. 36950, Plot Plan No. 25838 (GPA 01151, EA 42802, CFG 06184, CZ 07872)," prepared by HES, dated July 2016, and appended to this EIR as *Technical Appendix C7* (HES, 2016a).



The biological technical reports prepared for the Building E Site include the following:

- “Habitat Assessment Update for Parcel Map No. 36962,” prepared by HES, dated February 10, 2017 and appended to this EIR as *Technical Appendix C4*. (HES, 2017b)
- “Burrowing Owl Survey Report for Decker Parcels II,” prepared by HES, dated April 28, 2015, and appended to this EIR as *Technical Appendix C5* (HES, 2015c).
- “Jurisdictional Delineation Update for Parcel Map No. 36962”, prepared by HES, dated February 10, 2017, and appended to this EIR as *Technical Appendix C6* (HES, 2017c).
- “Determination of Biologically Equivalent or Superior Preservation Parcel Map No. 36962, Plot Plan No. 25837 (GPA 01151, EA 42802, CFG 06184, CZ 07872, LLA 05524)”, prepared by HES, dated December 2015 (Revised February 2017), and appended to this EIR as *Technical Appendix C8* (HES, 2017a)

Refer to *Technical Appendices C1* through *C8* for detailed descriptions of the field survey dates, scopes of study, and research and survey methodologies used for each report.

4.4.1 EXISTING CONDITIONS

A. Habitat Classifications and Sensitive Plant Communities

1. Building D Site

The plant communities and habitat classifications observed on the Building D Site were documented by Cadre during their field surveys on August 21 and August 25, 2014 as: Disturbed (31.04 acres), Gravel Road/Splay (5.36 acres), Structure (0.37 acres), Non-Native Olive Trees (0.22 acres), Peruvian Pepper Trees (0.07 acres), and Mexican Palo Verde Trees (0.02 acres). None of these habitats are considered sensitive plant communities. (Cadre, 2015a, pp. 8-9) Refer to Figure 4.4-1, *Building D Site Biological Resources*, for an exhibit showing the distribution of the habitat communities and other biological resources present on the Building D Site.

2. Building E Site

The plant communities and habitat classifications observed on the Building E Site were documented by HES during their field survey on December 19, 2014 as: Disturbed Non-Native Vegetation Habitat (20.43 acres), Disturbed Non-Vegetated Habitat (0.67 acres), and Granitic Rock Outcrops (0.31 acres). In addition, HES documented a 0.11-acre swale dominated by upland plant species. None of these habitats are considered sensitive plant communities. (HES, 2017b, pp. 2-3) Refer to Figure 4.4-2, *Building E Site Biological Resources*, for an exhibit showing the distribution of the habitat communities and other biological resources present on the Building E Site.



B. Sensitive Plant Species

Neither the Building D Site nor the Building E Site occur within a predetermined Survey Area for Western Riverside County Multiple Species Habitat Conservation Program (MSHCP) narrow endemic plant species or for MSHCP Criteria Area plant species. Therefore, narrow endemic plant surveys are not required. Observations of sensitive plant species that Cadre and HES documented during their general biological field surveys are reported below.

1. Building D Site

One special-status plant species, paniculate tarplant (*Deinandra paniculata*), was detected on the Building D Site in 2014, with over 1,000 paniculate tarplant individuals present on the property as estimated by Cadre. Because Cadre had indicated that paniculate tarplant was observed on the Building D Site in 2014 during the plant's blooming season, the plant is assumed to be present. However, as a follow-up to Cadre's 2014 site visit, in March 2016 HES visited the Building D Site specifically to look for the paniculate tarplant. At the time of the visit, the Building D Site appeared to have been recently disced (within the last 3 months) and new plants other than paniculate tarplant were starting to establish. At the time of their 2016 site visit, HES did not observe paniculate tarplant on the Building D Site. It is noted that the flowering period for the tarplant is known to occur between April and November. (HES, 2016c)

Paniculate tarplant is not considered to be endangered, threatened, or rare by the USFW or the CDFW, but the species is a California Native Plant Society (CNPS) Category 4.2 species, which is a "watch list" category designed to monitor vulnerable or declining species that have limited distribution in California (i.e., naturally rare in the wild), but whose existence does not appear to be susceptible to threat. (Cadre, 2015a, pp. 14-16) Based on California Natural Diversity Database (CNDDDB) records, although this species has a limited distribution throughout a broader area in California, the vulnerability or susceptibility to endangerment is low at this time; the plant is not "rare" from a statewide perspective. (CDFW, 2016, p. 44). In addition, paniculate tarplant is not an MSHCP Covered Species, nor was paniculate tarplant considered for coverage under the MSHCP. Thus, paniculate tarplant is not considered to be a sensitive species on the Project site.

2. Building E Site

No sensitive plant species were observed by HES during their field survey of the Building E Site (HES, 2017b, p. 3).

C. Sensitive Animal Species

The Building D Site and Building E Site occur within a Western Riverside County MSHCP predetermined Survey Area for the western burrowing owl (*Athene cunicularia*). Results of surveys conducted for this species are provided below.



1. *Building D Site*

A single burrowing owl was recorded on the Building D Site in 2006. Based on this historic observation and the presence of suitable habitat documented during Cadre's habitat assessment, four (4) focused surveys were conducted by Cadre on August 28, August 29, August 30, and August 31, 2014. Cadre documented suitable habitat throughout the Building D Site and a concentration of potential burrow structures within or near rock outcrops. In addition, a single adult burrowing owl was detected foraging and utilizing a network of burrow sites within the Building D Site. (Cadre, 2015b, pp. 2, 6, and 8)

The Building D Site does not occur within a predetermined Survey area for amphibian or mammal species; however, two (2) San Diego black-tailed jackrabbit individuals, a CDFW California Species of Concern (CSC), were identified by Cadre on the Building D Site during their general biological field surveys. (Cadre, 2015a, p. 16) A CSC is an administrative designation applied by the CDFW that carries no formal legal status. The CDFW's intent of designating CSCs is to focus attention on animals at conservation risk. The San Diego black-tailed jackrabbit is a Western Riverside County MSHCP Covered Species.

2. *Building E Site*

Based on the historic observation of a single burrowing owl on the adjacent Building D Site, and the observation of suitable habitat on the Building E Site during the HES habitat assessment conducted on December 19, 2014, four focused burrowing owl surveys were conducted by HES on March 29, April 9, April 19, and April 28, 2015. HES checked and recorded 65 burrows, the majority of which were made by small mammals and appeared to be active. A single burrowing owl was observed outside of its burrow in the north central portion of the Building E Site. In addition, an owl pellet was found on a rock used for perching which was located in the northeastern portion of the Building E Site which led HES to determine that the Building E Site also is used by burrowing owl to forage. (HES, 2017b, pp. 3-4)

D. *Migratory Nesting Birds and Raptors*

1. *Building D Site*

As documented by Cadre during their field survey of the Building D Site, the property contains Non-Native Olive trees, Peruvian Pepper trees, and Mexican Palo Verde trees, all of which could provide habitat for migratory birds or raptors for nesting. No nests were reported at the time of the field surveys. (Cadre, 2015a, pp. 8-9)

2. *Building E Site*

As documented by HES during their field reconnaissance of the Building E Site, the property contains trees and shrubs that can be used by migratory birds or raptors for nesting. In addition, shrubs and an area adjacent to the western property boundary contain habitat for nesting birds. No nests were reported on the Building E Site at the time of the field surveys. (HES, 2017b, p. 4)



E. Jurisdictional Wetlands and Waters

1. Building D Site

On October 3, 2014 HES conducted a field survey of the Building D Site to delineate potential jurisdictional drainages and potential wetland resources associated with jurisdictional drainages. HES observed one (1) ephemeral drainage feature dominated by upland plant species, encompassing a total area of 0.09-acre (approximately 677 feet in length). HES observed the drainage feature to be the remnants of a historical feature that previously conveyed water. The upstream terminus of the drainage was created by a man-made berm and Ellsworth Street, which impedes downstream flows from upstream hydrologic sources. Flows from hydrologic features upstream of the drainage feature flow north on Ellsworth Street and east on Oleander Avenue, away from the Building D Site. The on-site drainage feature contains no signs of recent hydrologic flow and periodic maintenance of Ellsworth Street keeps the feature inactive. HES also observed a large stormwater inlet located on the northeast corner of the Building D Site; however, no defined bed, bank, or channel was observed to be connected to the inlet. HES concluded that this stormwater inlet collects flood waters from upland sheet flow during large storm events. (HES, 2015a, p. 9)

HES determined that the 0.09-acre drainage feature located on the Building D Site does not connect to any jurisdictional stream upstream or downstream of the Building D Site and is an isolated drainage feature. HES observed that the main hydrologic flow was cut-off upstream of the drainage feature and appears to be mainly sheet flow, which ponds in the lower depressional areas of the Building D Site during storm events. The depressional areas were evaluated by HES for wetland features and no wetland features were identified. HES concluded that the depressional features rarely receive water and ponding within these areas does not occur long enough to form hydric soils, or allow the colonization of hydrophytic plants. HES concluded that the drainage inlet located in the northeast corner of the Building D Site was most likely installed to collect flows during these large storm events. (HES, 2015a, p. 10) The United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) defines a “hydric soil” as a soil that formed under conditions of saturation, flooding or ponding long enough during the growing season to develop anaerobic conditions in the upper part (USDA NRCS, 2015). No vernal pools are present.

Because the depressional areas contained no hydrophytic vegetation and the soils were not characterized as wetland soils, HES determined that the Building D Site contains no wetlands or vernal pools as defined by the 1987 Corps of Engineers Wetland Delineation Manual. In addition, HES concluded that the Building D Site contains no “waters of the United States” under federal jurisdiction. The drainage feature is an isolated, remnant feature which receives no hydrologic flow. It consists of a shallow feature in the landscape that may convey water across upland areas during and following storm events. The drainage feature is not a tributary and does not have a significant nexus (biological, chemical, or physical connection) to a traditional navigable “waters of the United States.” (HES, 2015a, p. 10)



Although the 0.09-acre (677 linear feet) drainage feature is an isolated, remnant drainage feature which rarely receives hydrologic flow, because the bank of the drainage feature is dominated by upland plant species, it is considered a CDFW jurisdictional drainage feature. (HES, 2015a, p. 10) Additionally, because the feature is considered an ephemeral Water of the State, discharges to the drainage feature fall under the jurisdiction of the RWQCB. (HES, 2015a, p. 10).

2. *Building E Site*

On February 24, 2015 HES performed a jurisdictional delineation on the Building E Site to delineate potential jurisdictional drainages and potential wetland resources associated with jurisdictional drainages. HES observed the Building E Site to contain an approximately 0.11-acre drainage feature vegetated with non-native upland plant species. The drainage feature appears to be a remnant of a historical drainage feature that previously conveyed water. The upstream off-site portion of the drainage feature was created by a man-made passage that appears to reach under the existing off-site EMWD water tank. At the off-site upstream point, the swale forks and another swale continues east for approximately 500 feet where it terminates. On the Building E Site, the ephemeral drainage feature flows from west to east for approximately 690 feet. The drainage feature terminates approximately 120 feet west of the Building E Site boundary and Ellsworth Street. HES observed that the drainage feature appears to rarely convey water. At the point of termination, the drainage feature no longer contains a definable bed, bank, or channel. Although the drainage feature is an isolated, remnant drainage feature that appears to rarely receive hydrologic flow, the feature is considered a CDFW jurisdictional drainage feature. (HES, 2017c, p. 3)

HES concluded that the Building E Site contains no “waters of the United States” under federal jurisdiction. The drainage feature does not exhibit an ordinary high water mark (OHWM) and the drainage is an isolated, remnant feature which receives no hydrologic flow. It contains a shallow feature in the landscape that may convey water across upland areas during storm events. The drainage feature is not a tributary and it does not have a significant nexus (biological, chemical, or physical connection) to traditional navigable “waters of the United States.”

The Building E Site contains no “waters of the United States.” However, the Building E Site contains approximately 0.11 acres (690 linear feet) of ephemeral waters of the State. Discharges to the drainage feature have the potential to result in impacts to water quality of State waters. Therefore, the RWQCB could potentially require review of the Building E Site under the Porter Cologne Water Quality Control Act to insure the Project conforms to the State water quality requirements. (HES, 2017c, p. 3)

F. *Riparian/Riverine Resources*

1. *Building D Site*

The Building D Site contains one ephemeral drainage feature that meets the MSHCP definition of a riparian/riverine feature only because it receives fresh water flow during all or a portion of the year. The drainage lacks any semblance of riparian vegetation structure typically provided by riparian tree species such as cottonwood (*Populus sp.*), valley oak (*Quercus lobata*), sycamore (*Platanus*



racemosa), and willow (*Salix spp.*). No additional riparian/riverine areas or vernal pools were identified on the Building D Site during the field surveys. (HES, 2016a, pp. 6-7)

During the field surveys, a habitat assessment was conducted for the required MSHCP riparian/riverine wildlife species. As discussed above, the drainage feature lacks a riparian vegetation component and does not support suitable habitat for least Bell's vireo, southwestern willow flycatcher, or western yellow-billed cuckoo. Due to the absence of suitable habitat, no focused surveys were required for these avian species. Additionally, the Building D Site does not support vernal pool or other seasonal wetland habitats. Therefore, focused surveys for Riverside fairy shrimp, Santa Rosa Plateau fairy shrimp, and vernal pool fairy shrimp also were not required. (HES, 2016b, p. 7)

2. *Building E Site*

The Building E Site contains one small, isolated ephemeral drainage feature that meets the MSHCP definition of a riparian/riverine feature only because it receives fresh water flow during all or a portion of the year. The drainage feature lacks any semblance of riparian vegetation structure typically provided by riparian tree species. No additional riparian/riverine areas or vernal pools were identified on the Building E Site during the field survey. (HES, 2017a, p. 6)

Plant species observed by HES were upland species. HES observed that the drainage feature appears to be a remnant of a historical drainage that previously conveyed water. The drainage feature terminates approximately 120 feet west of Ellsworth Street. At the point of termination, the drainage feature no longer contains a definable bed, bank, or channel. The drainage feature has no downstream connection, as it terminates prior to reaching Ellsworth Street. (HES, 2017a, p. 6)

During the field survey, a habitat assessment was conducted for the required MSHCP riparian/riverine wildlife species. HES determined that the drainage feature does not support suitable habitat for least Bell's vireo, southwestern willow flycatcher, or western yellow-billed cuckoo. Due to the absence of suitable habitat, no focused surveys were required for these avian species. Additionally, the Building E Site does not support vernal pool or other seasonal wetland habitats. Therefore, focused surveys for Riverside fairy shrimp, Santa Rosa fairy shrimp, and vernal pool fairy shrimp were also not required. (HES, 2017a, p. 6)

4.4.2 REGULATORY SETTING

The Project site is subject to State and federal regulations associated with a number of regulatory programs. Provided below is an overview of applicable federal, State, and regional laws, regulations, and requirements that are applicable to the Project site. Refer to *Technical Appendices C1 through C8* for a detailed summary of applicable regulations related to biological resources.

A. *Federal Endangered Species Act*

The Federal Endangered Species Act of 1973 (FESA) provides definitions for endangered species and threatened species of the U.S. Under provisions of Section 9(a)(1)(B) of the FESA it is unlawful to



“take” any listed species. “Take” is defined in Section 3(18) of FESA: “...harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” Further, the USFWS, through regulation, has interpreted the terms “harm” and “harass” to include certain types of habitat modification that result in injury to, or death of species as forms of “take.” These interpretations, however, are generally considered and applied on a case-by-case basis and often vary from species to species. In a case where a property owner seeks permission from a federal agency for an action that could affect a federally listed plant and animal species, the property owner and agency are required to consult with USFWS. Section 9(a)(2)(b) of the FESA addresses the protections afforded to listed plants.

Federal authorizations of impacts to or incidental take of a listed species by a private individual or other private entity can be granted in one of the following ways:

- Section 7(a)(2) of the FESA of 1973, as amended (16 U.S.C. 1536(a)(2) stipulates that any federal action that may affect a species listed as threatened or endangered requires a formal consultation with USFWS to ensure that the action is not likely to jeopardize the continued existence of the listed species or result in destruction or adverse modification of designated critical habitat.
- In 1982, the FESA was amended to give private landowners the ability to develop Habitat Conservation Plans (HCPs) pursuant to Section 10(a) of the FESA. Upon development of an HCP, the USFWS can issue incidental take permits for listed species where the HCP specifies at minimum, the following: (1) the level of impact that will result from the taking, (2) steps that will minimize and mitigate the impacts, (3) funding necessary to implement the plan, (4) alternative actions to the taking considered by the applicant and the reasons why such alternatives were not chosen, and (5) such other measures that the Secretary of the Interior may require as being necessary or appropriate for the plan.

B. State of California Endangered Species Act

California’s Endangered Species Act (CESA) provides definitions for endangered species, threatened species, and candidate species of California. Listed endangered and threatened species are protected by the CESA and candidate species may be afforded temporary protection as though they were already listed as threatened or endangered at the discretion of the Fish and Game Commission. Article 3, Sections 2080 through 2085, of the CESA address the taking of threatened, endangered or candidate species by stating “No person shall import into this state, export out of this state, or take, possess, purchase, or sell within this state, any species, or any part or product thereof that the commission determines to be an endangered species or a threatened species, or attempt any of those acts, except as otherwise provided.” Under the CESA, “take” is defined as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” Exceptions authorized by the state to allow “take” require permits or memoranda of understanding and can be authorized for endangered species, threatened species, or candidate species for scientific, educational, or management purposes and for



take incidental to otherwise lawful activities. Sections 1901 and 1913 of the California Fish and Game Code provide that notification is required prior to disturbance.

State authorizations of impacts to or incidental take of a listed species by a private individual or other private entity can be granted as follows:

- Sections 2090-2097 of the California Endangered Species Act (CESA) require that the state lead agency consult with CDFW on projects with potential impacts on state-listed species. These provisions also require CDFW to coordinate consultations with USFWS for actions involving federally listed as well as state-listed species. In certain circumstances, Section 2080.1 of the California Fish and Game Code allows CDFW to adopt the federal incidental take statement or the 10(a) permit as its own based on its findings that the federal permit adequately protects the species under state law.

C. Western Riverside County MSHCP

The Western Riverside County MSHCP, a regional HCP, was adopted on June 17, 2003, and an Implementing Agreement (IA) was executed between the USFWS, CDFW, and participating entities including the County of Riverside. The intent of the Western Riverside County MSHCP is to preserve native vegetation and meet the habitat needs of multiple species, rather than focusing preservation efforts on one species at a time. As such, the Western Riverside County MSHCP is intended to streamline review of individual projects with respect to the species and habitats addressed in the Western Riverside County MSHCP and to provide for an overall Conservation Area that would be of greater benefit to biological resources than would result from a piecemeal regulatory approach. The Western Riverside County MSHCP provides coverage (including take authorization for listed species) for special-status plant and animal species, as well as mitigation for impacts to sensitive species.

Through agreements with the USFWS and the CDFW, the Western Riverside County MSHCP designates 146 special-status animal and plant species that receive some level of coverage under the plan. Of the 146 “Covered Species” designated under the Western Riverside County MSHCP, the majority of these species have no additional survey/conservation requirements. In addition, through compliance with the Western Riverside County MSHCP, the MSHCP provides mitigation for project-specific impacts to Covered Species so that the impacts would be reduced to below a level of significance pursuant to CEQA.

The Project site is not located within an MSHCP Criteria Cell, Area Plan Subunit, or Linkage, which means that the property is not targeted by the MSHCP for habitat conservation. (RCIT, 2015) (Cadre, 2015a, p. 4) (HES, 2015b, p. 9) Proposed activities outside the MSHCP Criteria Area are required to be reviewed for consistency with the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pool guidelines, the Protection of Narrow Endemic Plant Species guidelines, and the Additional Survey Needs and Procedures included in Sections 6.1.2, 6.1.3 and 6.3.2, respectively, of the MSHCP document (County of Riverside, 2003).



Although the Project site is not located within any Criteria Cells, Narrow Endemic Plant Species Survey Areas, or proposed Conservation Areas, and is not subject to the focused species surveys associated with those areas, all projects within the MSHCP area require evaluation of potential impacts on riparian/riverine areas and vernal pools, and the protected species associated with those habitats. Riparian/riverine areas and vernal pools are defined in the MSHCP as follows:

- Riparian/riverine areas include lands that contain habitat dominated by trees, shrubs, persistent emergents, or emergent mosses and lichens, which occur close to or which depend upon soil moisture from a nearby fresh water source, or areas with fresh water flow during all or a portion of the year.
- Vernal pools are seasonable wetlands that occur in depression areas that have wetland indicators of all three parameters (soils, vegetation, and hydrology) during the wetter portion of the growing season. Obligate hydrophytes and facultative wetland plants species are normally dominant during the wetter portion of the growing season, while upland species (annuals) may be dominant during the drier portion of the growing season. (HES, 2016a, p. 4)

As previously indicated, the Project site does not contain vernal pools but does contain riparian/riverine areas, although these areas do not support habitat for riparian birds (HES, 2016b, pp. 4-5).

The Project site is located within the Western Riverside County MSHCP burrowing owl survey area, which requires site-specific surveys for the species because it is designated as a “Covered Species not yet adequately conserved” (Volume I, Section 6.1.2 of the Western Riverside County MSHCP document). The MSHCP’s Urban/Wildlands Interface Guidelines are intended to address indirect effects associated with locating development in proximity to the MSHCP Conservation Area, which do not apply to the Project site because the site is not located in the immediate proximity of a Conservation Area.

Ordinance No. 810 requires the payment of a per-acre mitigation fee to disturb property located in the MSCHP coverage area.

D. Stephens’ Kangaroo Rat Habitat Conservation Plan

The Stephens’ Kangaroo Rat HCP is a comprehensive, multi-jurisdictional HCP focusing on the conservation of the endangered Stephens’ Kangaroo Rat and its habitat. The Stephens’ Kangaroo Rat HCP was adopted in August 1990 and an Implementing Agreement (IA) was executed between the USFWS, CDFW, and participating entities (including the County of Riverside). The Stephens’ Kangaroo Rat HCP provides for the permanent establishment, mitigation, and monitoring of a reserve network for the Stephens’ Kangaroo Rat. The Project site is not located within the Stephens’ Kangaroo Rat survey area but is located within the Stephens’ Kangaroo Rat mitigation fee area.



Ordinance No. 633 is an ordinance of the County of Riverside pertaining to the Stephens' Kangaroo Rat HCP. (Riverside County, 2003e) The ordinance requires the payment of a per-acre mitigation fee to disturb property located in the Stephens' Kangaroo Rate HCP coverage area.

E. Regulations Related to Jurisdictional Waters and Wetlands

1. United States Army Corps of Engineers

Pursuant to Section 404 of the Federal Clean Water Act (CWA), the U.S Army Corps of Engineers (ACOE) regulates the discharge of dredged and/or fill material into waters of the United States. The term "waters of the United States" is defined in ACOE regulations at 33 CFR Part 328.3(a) and generally includes waters used in interstate or foreign commerce; all interstate waters and interstate wetlands; waters that would adversely affect foreign commerce in the instance of their destruction; impoundments of waters of the United States; or tributaries of the aforementioned waters. The term "wetlands" (a subset of "waters of the United States") is defined in 33 CFR 328.3(b) as that inundated or saturated by surface or ground water at a frequency and duration sufficient to support a prevalence of vegetation typically adapted for life in saturated soil conditions. In the absence of wetlands, the limits of ACOE jurisdiction in non-tidal waters, such as intermittent streams, extend to the ordinary high water mark (OHWM) which is defined in 33 CFR 328.3(e). Two legal decisions that clarified the definition of USACE jurisdiction are "Solid Waste Agency of Northern Cook County v. United States Army Corps of Engineers, et al." and "Rapanos v. United States and Carabell v. United States."

2. California Department of Fish and Wildlife

Pursuant to Division 2, Chapter 6, Section 1602 of the California Fish and Wildlife Code, the CDFW regulates all diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake, which supports fish or wildlife. CDFW requires an entity to notify CDFW of any proposed activity that may modify a river, stream, or lake if the activity will:

- Substantially divert or obstruct the natural flow of any river, stream, or lake;
- Substantially change or use any material from the bed, channel, or bank if, any river, stream or lake; or
- Deposit or dispose of debris, waste, or other material containing crumbled, flakes, or ground pavement where it may pass into any river, stream or lake.

This notification requirement applies to any work undertaken in or near a river, stream, or lake that flows at least intermittently through a bed or channel. It may also apply to work undertaken within the floodplain of a body of water (CDFW, 2014a).

3. Regional Water Quality Control Board

The Clean Water Act (CWA) Section 401 requires federal agencies to obtain a Water Quality Certification from the RWQCB before issuing permits that would result in increased pollutant loads to a water body. A Section 401 certification can be issued only if increased pollutant loads would not cause or contribute to exceedances of water quality standards. Subsequent to the legal decision in



“Solid Waste Agency of Northern Cook County v. United States Army Corps of Engineers, et al.,” the Chief Counsel for the State Water Resources Control Board issued a memorandum that addressed the effects of that decision on the Section 401 Water Quality Certification Program.

“California’s right and duty to evaluate certification requests under section 401 is pendant to (or dependent upon) a valid application for a section 404 permit from the Corps, or another application for a federal license or permit. Thus, if the Corps determines that the water body in question is not subject to regulation under the COE’s 404 program, for instance, no application for 401 certification will be required...”

4.4.3 BASIS FOR DETERMINING SIGNIFICANCE

Environmental impacts to biological resources are assessed using impact significance threshold criteria, which reflect the policy statement contained in CEQA, § 21001(c) of the California Public Resources Code. Accordingly, the State Legislature has established it to be the policy of the State of California to:

“Prevent the elimination of fish or wildlife species due to man’s activities, ensure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities...”

In the development of thresholds of significance for impacts to biological resources, CEQA provides guidance primarily in § 15065, Mandatory Findings of Significance, and the CEQA Guidelines, Appendix G, Environmental Checklist Form. CEQA Guidelines § 15065(a) states that a project may have a significant effect where:

“The project has the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or wildlife community, reduce the number or restrict the range of an endangered, rare, or threatened species”

Therefore, for the purpose of analysis in this EIR, the proposed Project would result in a significant impact to biological resources if the Project or any Project-related component would:

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- a) *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan; or*
- b) *Have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12); or*



- c) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U. S. Wildlife Service; or*
- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites; or*
- e) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service; or*
- f) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means; or*
- g) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.*

4.4.4 IMPACT ANALYSIS

Wildlife and Vegetation

Threshold a) Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?

Two adopted HCPs apply to the Project site. The Project site is located in the Stephens' Kangaroo Rat HCP and the Western Riverside County MSHCP.

The Riverside County Municipal Code contains provisions for the protection of the Stephens' Kangaroo Rat pursuant to the Stephens' Kangaroo Rat HCP (refer to Riverside County Ordinance No. 633). The Project site is not located within an identified reserve area for the Stephens' Kangaroo Rat and the species has a low to moderate potential to occur on the Project site. Regardless, because the Project site is located within the HCP boundary, the Project Applicant is required to pay a mandatory mitigation fee pursuant to Riverside County Ordinance No. 663, which requires a per-acre mitigation fee payment to assist the County in implementing the Stephens' Kangaroo Rat HCP. With mandatory compliance with standard regulatory requirements (i.e., payment of the development mitigation fee), the proposed Project would not conflict with any County policies or ordinances related to the Stephens' Kangaroo Rat HCP. Impacts would be less than significant.

The Project site also is subject to the Western Riverside County MSHCP. According to Riverside County GIS and the MSHCP Conservation Summary Report Generator, the Project site is not located within any MSHCP Criteria Cells; thus, the subject property is not targeted for conservation under the MSHCP. The nearest area subject to a MSHCP Criteria Cell is located approximately 1.2 miles south



of the Project site (Cell No. 2334). (RCIT, 2015) (Riverside County, 2015a) Regardless, because the Project site is located in the MSHCP area, the Project Applicant is required to pay a local development impact and mitigation fee pursuant to County Ordinance No. 810, which requires a per-acre local development mitigation fee payment to assist the County in implementing the MSHCP.

In addition, development projects such as the proposed Project that are proposed outside the MSHCP Criteria Area are required to be reviewed for consistency with several MSHCP provisions, including the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pool guidelines, the Protection of Narrow Endemic Plant Species guidelines, and the Additional Survey Needs and Procedures included in Sections 6.1.2, 6.1.3 and 6.3.2 of the MSHCP document, respectively (County of Riverside, 2003). Each of these provisions are addressed below as they pertain to the Building D Site and the Building E Site. As concluded below, the Project would not conflict with any provisions of the MSHCP.

Pursuant to Section 6.1.2 of the MSHCP, because the proposed Project would impact a riparian/riverine area on both the Building D Site and the Building E Site, as described below, a Determination of Biologically Equivalent or Superior Preservation (DBESP) analysis was required and subsequently prepared for both the Building D Site and the Building E Site. All projects within the MSHCP area are required to prepare a DBESP when project alternatives that would avoid sensitive riparian/riverine resources are not feasible. The goal of the DBESP is to demonstrate that, with the implementation of the proposed Project's design features and mitigation measures, the proposed Project would result in an alternative that is biologically equivalent or superior to the impacted riparian/riverine resources, and to ensure that any lost functions and values of habitat for species covered by MSHCP are replaced. The DBESP reports are contained as *Technical Appendices C7 and C8* to this EIR. (HES, 2016a, p. 2) (HES, 2017a)

1. Building D Site

The Building D Site is not located in a MSHCP special linkage area, nor is the Building D Site located within the Criteria Area Species Survey Area (CASSA) for amphibian species, mammals, or narrow endemic plants (pursuant to MSHCP Section 6.3.2). Thus, no impact regarding these MSHCP provisions would occur.

The Building D Site is located within the CASSA for the western burrowing owl, pursuant to MSHCP Section 6.3.2. (Riverside County, 2015a). Therefore, four focused surveys were conducted by Cadre on August 28, August 29, August 30, and August 31, 2014. Cadre observed a single (1) adult burrowing owl foraging and utilizing a network of burrow sites within the Building D Site. (Cadre, 2015b, pp. 2, 6, and 8) Given the observed occurrences of the species and the migratory nature of the species, it is possible that burrowing owl could be present on the Building D Site at the time construction activities commence, resulting in potential impacts to the species. If burrowing owls are located on the Building D Site prior to ground-disturbing activities on the Building D Site, the impact would be significant. As outlined in the MSHCP, regardless if burrowing owl are detected during onsite during focused survey efforts, a 30-day preconstruction survey (condition of approval) is



required to be conducted prior to initiation of construction to ensure protection for the species and compliance with the conservation goals as outlined in the MSHCP. (HES, 2016a, p. 8) Riverside County Ordinance No. 810 requires the payment of a per-acre mitigation fee to disturb property located in the MSHCP coverage area, which would adequately offset Project-related impacts to burrowing owl habitat, but not to individuals if any burrowing owl individuals are present. Mitigation for the potential impacts to individual burrowing owls is provided in Subsection 4.4.7, below.

The Building D Site is not located within the Narrow Endemic Plant Species Survey Area (NEPSSA) and is not subject to focused surveys for special-status plants (pursuant to MSHCP Section 6.3.2), The Building D Site is also not subject to the MSHCP Urban/Wildland Interface Guidelines (pursuant to MSHCP Section 6.1.4), because the Building D Site is not located near any MSHCP conservation areas. Thus, no impacts regarding these MSHCP provisions would occur.

The Building D Site contains 0.09-acre (677 linear feet) of an ephemeral drainage feature dominated by upland plant species that qualifies as a MSHCP riverine resource because it receives fresh water flow during all or a portion of the year (HES, 2015a, p. 4). As required by the MSHCP, a Determination of Biologically Equivalent or Superior Preservation (DBESP) analysis was required and is attached to this EIR as *Technical Appendix C7*. The proposed Project would permanently impact the entire 0.09 acre (677 linear foot) on-site ephemeral drainage, which is a significant impact requiring mitigation. While the drainage feature meets the definition of a riparian/riverine area according to the MSHCP, the channel lacks a riparian vegetation component and does not support suitable habitat for least Bell's vireo, southwestern willow flycatcher, or western yellow-billed cuckoo. The Building D Site does not contain vernal pools, and as such, proposed development on the Building D Site would not result in impacts to Riverside fairy shrimp, Santa Rosa Plateau fairy shrimp, and vernal pool fairy shrimp. (HES, 2016a, p. 8)

In conclusion, development proposed on the Building D Site would result in a significant direct and cumulatively considerable impact associated with compliance to the Western Riverside County MSHCP due to the potential to impact western burrowing owl individuals if the species is present on the site when construction activities commence. In addition, the Building D Site Project would result in the loss of an ephemeral drainage (0.09-acre (677 linear feet)) which qualifies as a MSHCP riverine resource and which requires compensatory mitigation to ensure the replacement of any lost functions and values as it relates to plant and wildlife species covered by the MSHCP.

2. Building E Site

Similar to the Building D Site, the Building E Site is not located in a MSHCP special linkage area, nor is the Building E Site located within the CASSA for amphibian species, mammals, or narrow endemic plants (pursuant to MSHCP Section 6.3.2). Thus, no impact regarding these MSHCP provisions would occur.

The Building E Site is located within the CASSA for the western burrowing owl, pursuant to MSHCP Section 6.3.2. (Riverside County, 2015a). Therefore, four focused surveys were conducted by HES



on March 29, April 9, April 19, and April 28, 2015. A single burrowing owl was observed outside of its burrow in the north central portion of the Building E Site and there was evidence that the species uses the site to forage. (HES, 2017b, pp. 4-5) Given the observed occurrences of the species and the migratory nature of the species, it is possible that burrowing owl could be present on the Building E Site at the time construction activities commence, resulting in potential impacts to the species. If burrowing owls are located on the Building E Site prior to ground-disturbing activities on the Building E Site, the impact would be significant. Riverside County Ordinance No. 810 requires the payment of a per-acre mitigation fee to disturb property located in the MSCHP coverage area, which would adequately offset Project-related impacts to burrowing owl habitat, but not to individuals if any burrowing owl individuals are present. Mitigation for the potential impacts to individual burrowing owls is provided in Subsection 4.4.7, below.

The Building E Site is not located within the Narrow Endemic Plant Species Survey Area (NEPSSA) and is not subject to focused surveys for special-status plants (pursuant to MSHCP Section 6.3.2), The Building E Site also is not subject to the MSHCP Urban/Wildland Interface Guidelines (pursuant to MSHCP Section 6.1.4), because the Building E Site is not located near any MSHCP conservation areas. Thus, no impacts regarding these MSHCP provisions would occur.

The Building E Site contains one small, isolated ephemeral drainage feature that does not support riparian vegetation. There is no riparian/riverine habitat within the Building E Site. No depressions or areas where water could pool were observed within the Building E Site. No vernal pools occur within the Building E Site and there is no suitable habitat for fairy shrimp to occur. None of the riparian/riverine species listed in Section 6.1.2 of the MSHCP were found on the Building E Site. (HES, 2017b, p. 5)

The Building E Site contains 0.11-acre (690 linear feet) of an isolated ephemeral drainage feature that flows from west to east across the property. (HES, 2017c, p. 3) The drainage feature is vegetated with non-native upland plant species. Development of the Building E Site as proposed by the Project would permanently impact 0.11-acre (690 linear feet) of ephemeral waters of the State, which is a significant impact requiring mitigation.

During the field survey, a habitat assessment was conducted for the required MSHCP riparian/riverine wildlife species. HES determined that the drainage feature does not support suitable habitat for least Bell's vireo, southwestern willow flycatcher, or western yellow-billed cuckoo (HES, 2017a, p. 7). Due to the absence of suitable habitat, no focused surveys were required for these avian species. Additionally, the Building E Site does not support vernal pool or other seasonal wetland habitats. Therefore, focused surveys for Riverside fairy shrimp, Santa Rosa fairy shrimp, and vernal pool fairy shrimp were also not required.

In conclusion, development proposed on the Building E Site would result in a significant direct and cumulatively considerable impact associated with compliance to the Western Riverside County MSHCP due to the potential to impact western burrowing owl individuals if the species is present on



the site when construction activities commence. In addition, the Building E Site Project would result in the loss of an ephemeral drainage (0.11-acre (690 linear feet)) which qualifies as a MSHCP riverine resource and which requires compensatory mitigation to ensure the replacement of any lost functions and values as it relates to plant and wildlife species covered by the MSHCP.

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Threshold b) Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?

Threshold c) Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U. S. Wildlife Service?

The list of plants designated by the Fish and Game Commission as endangered, threatened, or rare is contained in the California Code of Regulations, Title 14, as Section 670.2. Threatened, Endangered, or Candidate Species includes all species listed by the California Fish and Game Commission (see Title 14 CCR, Section 670.5), and by the federal government under the Endangered Species Act (ESA). Title 50 Code of Federal Regulations Section 17.11 covers endangered and Threatened Wildlife. Title 50 Code of Federal Regulations covers Endangered and Threatened Plants.

A. Sensitive Plant Communities and Plant Species

The Building D Site and the Building E Site do not occur within a predetermined Survey Area for MSHCP narrow endemic plant species or for MSHCP area plant species (Cadre, 2015a, pp. 14-16) (HES, 2015b, p. 8). No sensitive plant communities were observed on the Building D Site or the Building E Site during biological field surveys. However, one special-status plant species, paniculate tarplant (*Deinandra paniculata*), was detected on the Building D Site. As discussed in Subsection 4.4.1, paniculate tarplant is listed as CNPS California Rare Plant Rank (CRPR) 4 category which is a “watch list” designed to monitor vulnerable or declining species which are not rare, threatened, or endangered in California. (CNPS, 2015) Although paniculate tarplant is not a MSHCP-covered species, because the plant species is not rare, threatened, or endangered, because its range is sufficiently broad, because the CNPS listing for the species is relatively low for the species, and because habitat for this species is preserved elsewhere within the MSHCP boundaries, the loss of the species on the Project site is considered less than significant. (HES, 2016c) Loss of individual plants on the Project site would not threaten the species as a whole. The Project would not have a substantial adverse effect, either directly or through habitat modifications, on any other endangered or threatened species, candidate, sensitive, or special status species. Thus, impacts would be less than significant.



B. Sensitive Wildlife Species

The Building D Site and Building E Site occur within a Western Riverside County MSHCP predetermined Survey Area for the western burrowing owl. Based on focused surveys conducted on the Building E Site by Cadre in 2014 and focused surveys conducted on the Building E Site by HES in 2015, a single adult burrowing owl was detected on each site. (Cadre, 2015b, pp. 2, 6, and 8) As discussed under the impact analysis for Threshold (a), if the burrowing owl is present on the Project site at the time construction activities commence, potential impacts to the species would occur; thus, the impact would be significant and require mitigation.

Although no sensitive bird species were reported on the Project site during general biological field surveys conducted on the Building D Site and the Building E Site, both properties contain trees and shrubs, which could provide habitat for migratory bird species protected under the MBTA. If active nests are present at the time the nesting habitat is removed for any MBTA protected species, impacts to active nests during the breeding season would be considered a significant impact.

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Threshold d) Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The Building D Site and the Building E Site do not contain any water bodies that could support fish; therefore, there is no potential for the Project as proposed on the Building D Site or the Building E Site to interfere with the movement of any resident or migratory fish.

The Project Site does not serve as an established migratory wildlife corridor, nor is it connected to an established corridor. Also, there are no wildlife nursery sites on or adjacent to the Building D Site or the Building E Site. Thus, no impact would occur. The Building D Site is bound by residential development to the south, industrial areas to the northeast and open space to the east, west, and north. I- 215 is located approximately 2,300 feet to the east of the Building D Site. The Building E Site is surrounded by human activity in the form of residences, agricultural uses, warehouses, and I-215. Therefore, the Building D Site and the Building E Site do not represent a travel route, wildlife corridor, or wildlife crossing. (Cadre, 2015a, p. 11)

Wildlife movement corridors in Western Riverside County are addressed by the conservation requirements specified in the Western Riverside County MSHCP, and the Building D Site and the Building E Site are not identified for conservation as part of the MSHCP. Accordingly, the Building D Site and the Building E Site are not considered to be part of a wildlife movement corridor. Thus, no impact would occur to the movement of any resident or migratory fish or wildlife species, established wildlife corridor, or native wildlife nursery sites as a result of implementation of the Project as proposed on the Building D Site or the Building E Site.



The Project as proposed on the Building D Site and the Building E Site has the potential to impact nesting birds if vegetation is removed during the nesting season (February 1 through August 31). Impacts to nesting birds are prohibited by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. With the Project's mandatory compliance with the MBTA and Mitigation Measure 4.4-2, a less-than-significant impact would occur associated with Project impacts on migratory birds.

Wildlife and Vegetation

Threshold e) Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?

Threshold f) Would the Project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

1. Building D Site

The proposed Project would permanently impact the 0.09-acre (677 linear foot) on-site ephemeral drainage on the Building D Site. The drainage feature meets the definition of a riparian/riverine area according to the MSHCP and in the context the impact is significant which requires mitigation. The channel lacks a riparian vegetation component, however, and does not support suitable habitat for least Bell's vireo, southwestern willow flycatcher, or western yellow-billed cuckoo. Additionally, vernal pools are not present on the Building D Site so surveys were not required for Riverside fairy shrimp, Santa Rosa Plateau fairy shrimp, and vernal pool fairy shrimp, because there is no potential for these species to be present. (HES, 2016a, p. 8)

Because the depressional areas contained no hydrophytic vegetation and the soils were not characterized as wetland soils, HES determined that the Building D Site contains no wetlands or vernal pools as defined by the 1987 Corps of Engineers Wetland Delineation Manual. In addition, HES concluded that the Building D Site contains no "waters of the United States" under federal jurisdiction. The drainage feature is an isolated, remnant feature which receives no hydrologic flow and does not provide any downstream biological resource benefits. It consists of a shallow feature in the landscape that may convey water across upland areas during and following storm events. The drainage feature is not a tributary and does not have a significant nexus (biological, chemical, or physical connection) to a traditional navigable "waters of the United States." (HES, 2015a, p. 10) Therefore, the Project as proposed on the Building D Site would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Refer to the jurisdictional delineation report attached to this EIR as *Technical Appendices C3*. No impact to federal wetlands or waters would occur from implementing the Project as proposed on the Building D Site.



2. *Building E Site*

HES concluded that the Building E Site contains no “waters of the United States” under federal jurisdiction. The drainage feature does not exhibit an ordinary high water mark (OHWM) and the drainage is an isolated, remnant feature which receives no hydrologic flow. It contains a shallow feature in the landscape that may convey water across upland areas during storm events. The drainage feature is not a tributary and it does not have a significant nexus (biological, chemical, or physical connection) to traditional navigable “waters of the United States.”

Although the Building E Site contains no “waters of the United States,” the Building E Site contains approximately 0.11 acres (690 linear feet) of ephemeral waters of the State. Discharges to the drainage feature have the potential to result in impacts to water quality of State waters. Therefore, the RWQCB could potentially require review of the Building E Site under the Porter Cologne Water Quality Control Act to insure the Project conforms to the State water quality requirements. (HES, 2017c, p. 3)

The Building E Site contains one small, isolated ephemeral drainage feature that meets the MSHCP definition of a riparian/riverine feature only because it receives fresh water flow during all or a portion of the year. The drainage feature lacks any semblance of riparian vegetation structure typically provided by riparian tree species. No additional riparian/riverine areas or vernal pools were identified on the Building E Site during the field survey. (HES, 2017a, p. 6) Dominant plant species observed by HES include red brome and summer mustard. HES observed that the drainage feature appears to be a remnant of a historical drainage that previously conveyed water. The drainage feature terminates approximately 120 feet west of Ellsworth Street. At the point of termination, the drainage feature no longer contains a definable bed, bank, or channel. The drainage feature has no downstream connection, as it terminates prior to reaching Ellsworth Street. (HES, 2017a, p. 6)

During the field survey, a habitat assessment was conducted for the required MSHCP riparian/riverine wildlife species. HES determined that the drainage feature does not support suitable habitat for least Bell’s vireo, southwestern willow flycatcher, or western yellow-billed cuckoo. Due to the absence of suitable habitat, no focused surveys were required for these avian species. Additionally, the Building E Site does not support vernal pool or other seasonal wetland habitats. Therefore, focused surveys for Riverside fairy shrimp, Santa Rosa fairy shrimp, and vernal pool fairy shrimp were also not required, because there is no potential for these species to be present. (HES, 2017a, p. 6)

Wildlife and Vegetation

Threshold g) Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Other than the Western Riverside County MSHCP, which is addressed above under the Impact Analysis for Threshold (a), the only local policies or ordinances protecting biological resources within the Project area are County Ordinance No. 559 (Regulating the Removal of Trees) and the County’s Oak Tree Management Guidelines. As discussed in Subsection 4.4.1, the Building D Site and the Building E Site do not contain oak trees. Therefore, the Riverside County Oak Tree Management



Guidelines are not applicable to the Project. As discussed in Subsection 4.4.2, Ordinance No. 559 pertains to parcels or property located above 5,000 feet in elevation. The Building D Site and the Building E Site do not reach an elevation of 5,000 feet; therefore, Ordinance No. 559 is also not applicable to the Project site. Thus, because the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, no impact would occur as a result of implementation of the Project as proposed on the Building D Site and the Building E Site.

4.4.5 CUMULATIVE IMPACT ANALYSIS

This cumulative impact analysis considers development of the Project as proposed on the Building D Site and the Building E Site in conjunction with other development projects in the geographic area covered by the Western Riverside County MSHCP based on a summary of projections approach resulting from full General Plan buildout in Riverside County and other jurisdictions in the region within the boundaries of the Western Riverside County MSHCP.

The primary effects of the proposed Project, when considered with the build out of long range plans in the geographic area covered by the Western Riverside County MSHCP, would be the cumulative loss habitat for sensitive species. With respect to special-status species, although the habitat offered on the Project site is of substantially lesser quality than habitat that is found in designated MSHCP Criteria Cells within the geographic area covered by the Western Riverside County MSHCP, it still provides open spaces for foraging, refuge, nesting, and areas that can be used for species reproduction.

Anticipated cumulative impacts to biological resources are addressed within the Western Riverside County MSHCP cumulative study area. The Western Riverside County MSHCP, as currently adopted, addresses 146 “Covered Species” that represent a broad range of habitats and geographical areas within Western Riverside County, including threatened and endangered species and regionally- or locally-sensitive species that have specific habitat requirements and conservation and management needs. The Western Riverside County MSHCP addresses biological impacts for take of Covered Species within the MSHCP area. Impacts to Covered Species and establishment and implementation of a regional conservation strategy and other measures included in the Western Riverside County MSHCP address the federal, state, and local mitigation requirements for these species and their habitats. Specifically, Section 4.4 of the Western Riverside County MSHCP states that:

“The MSHCP was specifically designed to cover a large geographical area so that it would protect numerous endangered species and habitats throughout the region. It is the projected cumulative effect of future development that has required the preparation and implementation of the MSHCP to protect multiple habitats and multiple endangered species.”

It goes on to state that:

“The LDMF [Local Development Mitigation Fee] is to be charged throughout the Plan Area to all future development within the western part of the County and the Cities in order to



provide a coordinated conservation area and implementation program that will facilitate the preservation of biological diversity, as well as maintain the region's quality of life."

The reason for the imposition of the Mitigation Fee over the entire region is that the loss of habitat for endangered species is a regional issue resulting from the cumulative effect of continuing development throughout all of the jurisdictions in Western Riverside County. Finally, Section 5.1 of the Western Riverside County MSHCP states that:

"It is anticipated that new development in the Plan Area will fund not only the mitigation of the impacts associated with its proportionate share of regional development, but also the impacts associated with the future development of more than 332,000 residential units and commercial and industrial development projected to be built in the Plan Area over the next 25 years."

As the construction of buildings, infrastructure, and all alterations of the land within areas that are outside of the Criteria Area are permitted under the Western Riverside County MSHCP (see MSHCP Section 2.3.7.1), cumulative impacts to biological resources with the exception of MSHCP non-covered species would be less than significant on a cumulative basis provided that the terms of the MSHCP are fully implemented (MSHCP Final EIR/EIS, Section 4.4.1.6). The Western Riverside County MSHCP database was consulted for the proposed Project and the required focused surveys for the western burrowing owl have been conducted. The Project Proponent is required to pay the required MSHCP mitigation fees pursuant to mitigation measures recommended by this EIR, (refer to Subsection 4.4.7 below). The Project would comply with the requirements of the Western Riverside County MSHCP and, thus, would not conflict with its adopted policies. Accordingly, because the proposed Project is required to comply with the Western Riverside County MSHCP and pay the required MSHCP mitigation fee, the Project as proposed on the Building D Site and the Building E Site would have less-than-significant cumulatively considerable impacts to MSHCP covered species. Regarding impacts to non-covered species, the Project would result in the direct loss of paniculate tarplant individuals. Although paniculate tarplant is not a MSHCP-covered species, because the plant species is not rare, threatened, or endangered, because its range is sufficiently broad, because the CNPS listing for the species is relatively low for the species, and because habitat for this species is preserved elsewhere within the MSHCP boundaries, the loss of the species on the Project site is considered less than significant (HES, 2016c). Loss of individual plants on the Project site would not threaten the species as a whole. The Project would not have a substantial adverse effect, either directly or through habitat modifications, on any other endangered or threatened species, candidate, sensitive, or special status species. The Project's impacts to the paniculate tarplant species would be less than significant and less than cumulatively considerable. Also, Riverside County Ordinance No. 810 requires the payment of a per-acre mitigation fee to disturb property located in the Western Riverside County MSHCP coverage area, which would adequately offset Project-related impacts to species covered by the MSHCP to less-than-significant levels.

The Project site is located within the MSHCP Burrowing Owl Survey Area but is not located within the NEPSSA, the CAPSSA, or the MSHCP Mammal and Amphibian Survey Areas. Although the



Project site occurs within the Western Riverside MSHCP, the Project site does not contain sensitive species or suitable habitat for any CASSA or NEPSSA sensitive species. Because the Project as proposed on the Building D Site and the Building E Site and all other developments within the Western Riverside County MSHCP geographic area would be required to comply with the MSHCP, Project-related impacts to MSHCP covered species would be less than significant and less than cumulatively considerable.

Although no Stephens' kangaroo rat (SKR) are known to occupy the Project site and none were observed during biological surveys of the Project site, the Project as proposed on the Building D Site and the Building E Site would impact habitat with the potential to support the Stephens' kangaroo rat (SKR). However, the Project site is located within the SKR Fee Assessment Area as established by the SKR HCP. Thus, coverage for impacts would be provided to the proposed Project through payment of the SKR fee per Riverside County Ordinance No. 633. Cumulative effects to SKR habitat is addressed through the SKR HCP and with mandatory compliance would be less than significant on a cumulatively considerable basis.

Although no sensitive bird species were reported on the Project site during general biological field surveys conducted on the Building D Site and the Building E Site, both properties contain trees and shrubs, which could provide habitat for migratory birds. If active nests are present at the time the nesting habitat is removed, impacts to active nests would be considered a direct and cumulatively significant impact. Impacts to nesting migratory birds are prohibited by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. With the Project Applicant's mandatory compliance with the MBTA, a less-than-significant impact would occur associated with migratory birds. A mitigation measure is required in Subsection 4.4.7 to ensure compliance with the MBTA. All cumulative development projects are required to comply with the MBTA, which would reduce impacts to less than significant.

Because the Project site is undeveloped, it has the potential to offer raptor foraging habitat. Direct and cumulative effects to raptor foraging habitat are addressed through the Western Riverside County MSHCP. Mandatory payment of the MSHCP fee would reduce any Project-related impact to raptor foraging habitat to below a level of significance. MSHCP Section 5.3.5, "Identifying Wildlife Habitat Types" describes the general California Wildlife Habitat Relationships (CWHR) methodology used to identify the planned MSHCP Conservation Area. The CWHR "makes predictions about a habitat's value to wildlife in terms of its capacity to fulfill reproduction, foraging, and cover needs of wildlife" (MSHCP Volume 1, Section 5.3.5). Thus, the MSHCP accounts for foraging and cumulative impacts would be less than significant.

The burrowing owl is fairly ubiquitous within the Project vicinity; as such, it is reasonable to conclude that impacts to habitat for this species are occurring throughout the cumulative study area. As such, cumulative impacts are assumed significant and the proposed Project's potential impacts to burrowing owls that may be located on the Building D Site and the Building E Site prior to Project construction



would be cumulatively considerable and mitigation would be required. Refer to Subsection 4.4.7 for recommended mitigation to address impacts to the burrowing owl.

An ephemeral drainage occurs on the Building D Site (0.09-acre (677 linear feet)) and the Building E Site (0.11-acre (690 linear feet)), which is dominated by upland plant species that qualifies as a MSHCP riverine resource because it receives fresh water flow during all or a portion of the year. The loss of 0.09-acre (677 linear feet) of this resource on the Building D Site and 0.11-acre (690 linear feet) of this resource on the Building E Site (690 linear feet) would be a direct and cumulatively considerable impact associated with the loss of riverine resources in the Western Riverside County MSHCP area. As required by the MSHCP, a Determination of Biologically Equivalent or Superior Preservation (DBESP) analysis was required for the Building D Site and the Building E Site, and the DBESP reports are attached to this EIR as *Technical Appendices C7 and C8*. Mitigation in compliance with the DBESP reports is provided below in Subsection 4.4.7 below. No wetlands, vernal pools, or “waters of the United States” occur on either the Building D Site or the Building E Site, nor would any of these resources occurring off-site in other areas of Riverside County be affected by the proposed Project. Therefore, the Project has no potential to result in a cumulatively considerable impact to wetlands, vernal pools, or “waters of the United States.” The Project is required by law to comply with site-specific Water Quality Management Plans (WQMPs), including Best Management Practices (BMPs) that address the quality of storm water runoff. As such, changes in the quality of discharged water from the site would have no potential to cumulatively impact biological functions and values as it relates to downstream resources.

The Project as proposed on the Building D Site and the Building E Site would not significantly impact wildlife movement corridors because such corridors already are accommodated by the Western Riverside County MSHCP and the Project site is not targeted for conservation as part of any proposed or existing linkages by the MSHCP. In addition, there are no native wildlife nursery sites within the Project vicinity. While Western Riverside County is becoming increasingly suburbanized, which could restrict wildlife movement, the MSHCP, and the Conservation Areas established therein, was developed with several goals that specifically support wildlife movement. Accordingly, cumulative impacts to wildlife movement are less than significant. As concluded by the MSHCP’s Final EIR/EIS, “The MSHCP provides for the movement of native resident and migratory species and for genetic flow identified for Covered Species. Therefore, impacts related to cores and linkages resulting from the Plan are considered less than significant” (MSHCP Volume 4: Final EIR/EIS, Section 4.1.5). As such, the Project as proposed on the Building D Site and the Building E Site would not result in cumulatively considerable impacts to wildlife movement corridors or native wildlife nursery sites.

No other local policies or ordinances protecting biological resources are applicable to the Project site other than the Western Riverside County MSHCP and the SKR HCP. Accordingly, the Project would have no potential to contribute to cumulative effects associated with to other local policies and ordinances protecting biological resources. No impact would occur.



4.4.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold (a) for the Building D Site and the Building E Site: Significant Direct and Cumulatively Considerable Impact. The Project is subject to compliance with two Habitat Conservation Plans (HCPs): The Western Riverside County Multiple Species Conservation Program (MSHCP) and the Stephens' Kangaroo Rat (SKR) HCP. The Project site is not located in a planned conservation area of either HCP, and is required by the Riverside County Municipal Code to pay MSHCP and SKR HCP mitigation fees. Regarding applicable MSHCP provisions for properties located outside of conservation areas, the Project would result in significant direct and cumulatively considerable impacts to the western burrowing owl if the species is present on the site when construction activities commence. The Project also would result in the loss of an ephemeral drainage that occurs on the Building D Site (0.09-acre (677 linear feet)) and the Building E Site (0.11-acre (690 linear feet)), which qualifies as a MSHCP riverine resource because it receives fresh water flow during all or a portion of the year. The loss of this resource on the Project site would be a direct and cumulatively-considerable impact associated with the loss of riverine resources in the Western Riverside County MSHCP area. Complete avoidance of the riparian/riverine resources is not feasible. Because there are no feasible avoidance alternatives available, the MSHCP requires the Project to provide compensatory mitigation to ensure the replacement of any lost functions and values as it related to the plan and wildlife species covered by the MSHCP.

Thresholds (b) and (c) for the Building D Site and the Building E Site: Significant Direct and Cumulatively Considerable Impact. The Project would result in less-than-significant impacts to sensitive plant species. No sensitive plant communities are located on the Project site. Although paniculate tarplant is not a MSHCP-covered species, because the plant species is not rare, threatened, or endangered, because its range is sufficiently broad, because the CNPS listing for the species is relatively low for the species, and because habitat for this species is preserved elsewhere within the MSHCP boundaries, the loss of the species on the Project site is considered less than significant. Loss of individual plants on the Project site would not threaten the species as a whole. Thus, the Project's impacts to the species would be less than significant and less than cumulatively considerable. In regards to sensitive wildlife species, the Project would significantly impact the western burrowing owl if the species is present on the Project site at the time construction activities commence. In addition, migratory bird species protected by the MBTA would be impacted by the Project if active nests are present on the site at the time that nesting habitat (trees and shrubs) are removed. These impacts would be direct and cumulatively considerable.

Threshold (d) for the Building D Site and the Building E Site: Significant Direct and Cumulatively Considerable Impact. The Project has the potential to impact nesting migratory birds if active nests are disturbed during the nesting season (February 1 to August 31). The Project would not substantially interfere with the movement of any other native resident or migratory fish or wildlife species, would not interfere with a migratory wildlife corridors, and would not impede the use of native wildlife nursery sites.



Threshold (e) and (f) for the Building D Site: Significant Direct and Cumulatively Considerable Impact. The Project as proposed on the Building D Site would result in the direct loss of 0.09-acre (677 linear feet) of an ephemeral drainage feature dominated by upland plant species that receives fresh water flow during all or a portion of the year. The drainage feature qualifies as a Western Riverside County MSHCP riverine resource and falls under the jurisdiction of the CDFW. No impact to riparian habitats, vernal pools, State or federal wetlands, “waters of the United States,” or other sensitive natural communities would occur.

Threshold (e) and (f) for the Building E Site: Significant Direct and Cumulatively Considerable Impact. The Project as proposed on the Building E Site would result in the direct loss of 0.11-acre (690 linear feet) of an ephemeral drainage feature dominated by upland plant species that receives fresh water flow during all or a portion of the year. The drainage feature qualifies as a Western Riverside County MSHCP riverine resource and falls under the jurisdiction of the CDFW. No impact to riparian habitats, vernal pools, State or federal wetlands, waters of the United States, or other sensitive natural communities would occur.

Threshold (g) for the Building D Site and the Building E Site: No Impact. Other than the Western Riverside County MSHCP and SKR HCP, which are addressed under Threshold (a), there no other local policies or ordinances protecting biological resources that are applicable to resources present on the Project site. No impact would occur.

4.4.7 MITIGATION

Applicable County Regulations and Design Requirements

The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA’s definition for mitigation, they are listed below for information purposes.

- The Project Applicant shall comply with County of Riverside Ordinance No. 810 (Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Fee Program Ordinance), which requires a per-acre local development impact and mitigation fee payment prior to the issuance of a building permit.
- The Project Applicant shall comply with County of Riverside Ordinance No. 663 (Stephens’ Kangaroo Rat Mitigation Fee Ordinance) which requires a per-acre local development and mitigation fee payment prior to the issuance of a grading permit.
- The Project Applicant shall comply with the federal Migratory Bird Treaty Act (MBTA).



Mitigation Measures

The following mitigation measures are applicable to the Building D Site and the Building E Site:

MM 4.4-1 Pursuant to Objectives 5, 6, and 7 of the Species Account for the Burrowing Owl ~~included~~ in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), within 30 days prior to the issuance of a grading permit, a pre-construction presence/absence survey for the burrowing owl shall be conducted by a qualified biologist who holds a Memorandum of Understanding (MOU) with the County. ~~and~~ The the survey results shall be provided in writing to the Environmental Programs Department/County Biologist. If the grading permit is not obtained within 30 days of the survey, a new survey shall be required. If it is determined that the project site is occupied by the burrowing owl, take of "active" nests shall be avoided pursuant to the MSHCP and the Migratory Bird Treaty Act (MBTA). ~~However, when the Burrowing Owl is present,~~ relocation shall only be allowed to take place outside of the burrowing owl nesting season (March 1 through August 31) and is required to be performed by a qualified biologist familiar with relocation methods. ~~shall be required.~~ The County Biologist shall be consulted to determine appropriate type of relocation (active or passive) and potential translocation sites. Burrowing Owl Protection and Relocation Plans and Biological Monitoring Plans are required to be reviewed and approved by the in accordance with California Department of Fish and Wildlife (CDFW) guidelines. ~~In the event that burrowing owls are occupying the Project site at the time of the pre-construction survey, passive relocation shall not be allowed.~~

If it is determined during the 30-day preconstruction survey that burrowing owls have colonized the Project site prior to initiation of construction, the Project Proponent will immediately inform the Riverside County Biologist, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, and the Regional Conservation Authority, and would need to retain a Biologist that holds a Memorandum of Understanding (MOU) with the County of Riverside to prepare a Burrowing Owl Protection and Relocation Plan for approval by the County of Riverside and Wildlife Agencies prior to initiating ground disturbance. The relocation plan will include the following: -A grading permit may be issued once the species has been relocated. If the grading permit is not obtained within 30 days of the survey, a new survey shall be required.

- The locations of the nests and owls proposed for relocation.
- The locations of the proposed relocation sites.
- The numbers of adult owls and juveniles proposed for relocation.
- The time of year when relocation is proposed to take place.
- The name of the biologist proposed to supervise the relocation, and the details of his/her previous experience capturing, handling, and relocating borrowing owls, including the outcomes of the previous relocation efforts (survival/mortality rates and site-fidelity rates of the relocated owls), and relevant permits held.



- A detailed description of the proposed method of capture, transport, and acclimation of the current project's owls on the proposed relocation site.
- A detailed description of relocation site preparations (e.g., the design and dimensions of the artificial release burrows and hacking cage, duration of hacking activities (including food and water provision).
- Description of the monitoring methods and monitoring duration to be employed to verify survival of the relocated owls and their long-term retention on the relocation site.

MM 4.4-2 As a condition of grading permits, a migratory nesting bird survey of all trees to be removed shall be conducted by a qualified biologist within 10 days prior to initiating tree removal or vegetation clearing within 500 feet of a mature tree. A copy of the migratory nesting bird survey results report shall be provided to the Riverside County Environmental Programs Department (EPD). If the survey identifies the presence of active nests, then the qualified biologist shall provide the Riverside County EPD with a copy of maps showing the location of all nests and an appropriate buffer zone around each nest sufficient to protect the nest from direct and indirect impacts. The size and location of all buffer zones, if required, shall be subject to review and approval by the Riverside County EPD and shall be no less than a 300-foot radius around the nest for non-raptors and a 500-foot radius around the nest for raptors. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved buffer zone shall be marked in the field with construction fencing, within which no vegetation clearing or ground disturbance shall commence until the qualified biologist and Riverside County EPD verify that the nests are no longer occupied and the juvenile birds can survive independently from the nests.

The following mitigation measure is applicable to the Building D Site:

MM 4.4-3 To mitigate for permanent impacts to a 0.09-acre (677 linear foot) ephemeral drainage feature on the Building D Site, the Project Applicant shall pay into the Riverside Corona Resource Conservation District in-lieu fee program, at a 2:1 ratio, totaling 0.18 acre. Evidence of fee payment shall be supplied to the Riverside County Environmental Programs Department (EPD) prior to issuance of a grading permit.

The following mitigation measure is applicable to the Building E Site:

MM 4.4-4 To mitigate for permanent impacts to a 0.11-acre (690 linear feet) ephemeral drainage feature on the Building E Site, the Project Applicant shall pay into the Riverside Corona Resource Conservation District in-lieu fee program, at a 2:1 ratio, totaling 0.22-acre. Evidence of fee payment shall be supplied to the Riverside County Environmental Programs Department (EPD) prior to issuance of a grading permit.



4.4.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold (a) for the Building D Site and the Building E Site: Less-than-Significant with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.4-1 and MM 4.4-2 would ensure that pre-construction surveys are conducted and appropriate actions are taken to avoid significant impacts to the western burrowing owl. Implementation of Mitigation Measures MM 4.4-3 and MM 4.4-4 would represent a biologically equivalent or superior preservation alternative to avoidance of MSHCP riparian/riverine resources because the in-lieu mitigation fee would result in the restoration and preservation of an equivalent acreage of habitat with higher values in comparison to the drainage features impacted by the Project. In general, in lieu programs provide funding to enhance, restore, establish, and/or preserve aquatic habitats. Unlike the on-site isolated drainage features, these aquatic resource projects typically include large areas of land with contiguous wetland habitats and natural upland buffers that provide many of the habitat components required by the MSHCP. (HES, 2016a, p. 8) (HES, 2017a, pp. 7-9)

Threshold (b) and (c) for the Building D Site and the Building E Site: Less-than-Significant with Mitigation Incorporated. Implementation of Mitigation Measures MM 4.4-1, MM 4.4-2, and MM 4.4-3 would ensure that the Project's impacts to sensitive wildlife species are reduced to below levels of significance. In addition, the Project Applicant would be required as a mandatory regulatory requirement to pay applicable and mandatory mitigation fees for Western Riverside County MSHCP and SKR HCP compliance. With implementation of the required mitigation, potential direct and cumulatively considerable impacts to the burrowing owl and birds protected by the MBTA would be reduced to below a level of significance.

Threshold (d) for the Building D Site and the Building E Site: Less than-Significant with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.4-2 would ensure compliance with the MBTA and mitigate potential impacts associated with the movement of migratory birds.

Threshold (e) and (f) for the Building D Site and the Building E Site: Less-than-Significant with Mitigation. Implementation of Mitigation Measures MM 4.4-3 and MM 4.4-4 would represent a biologically equivalent or superior preservation alternative to avoidance of MSHCP riparian/riverine resources because the in-lieu mitigation fee would result in the restoration and preservation of an equivalent acreage of habitat with higher values in comparison to the existing drainage features impacted by the Project.

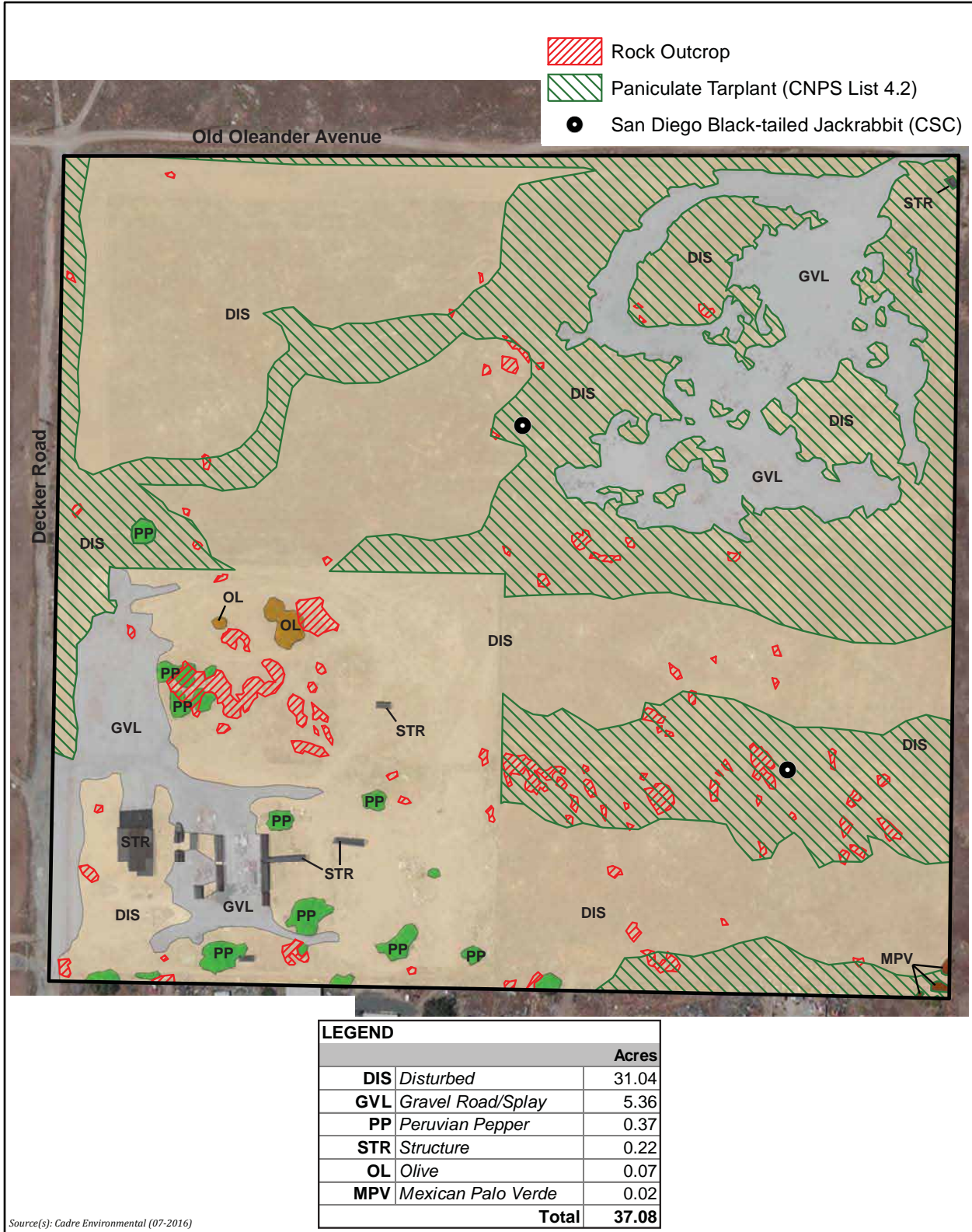


Figure 4.4-1



NOT TO SCALE



BUILDING D SITE BIOLOGICAL RESOURCES

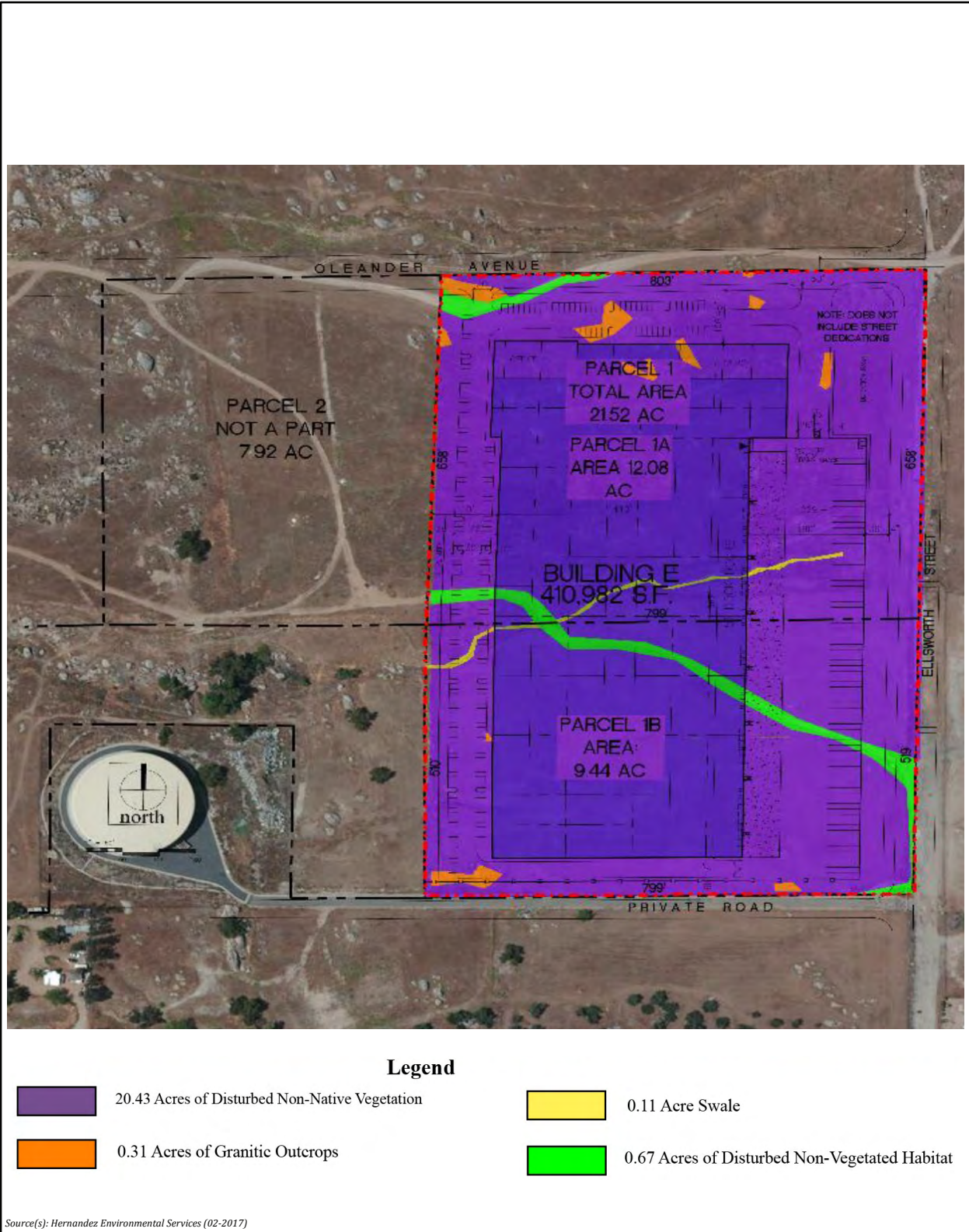


Figure 4.4-2



NOT TO SCALE



BUILDING E SITE BIOLOGICAL RESOURCES



4.5 CULTURAL RESOURCES

NOTE: Information specific to the topic of tribal cultural resources is stricken from this subsection of the Final EIR and moved to Subsection 4.18, *Tribal Cultural Resources*.

As discussed in Section 3.0, *Project Description*, the proposed Project involves the development of two properties located south of Oleander Avenue and both east and west of Ellsworth Street (also called “Decker Road” in this EIR and its associated Technical Appendices) totaling approximately 58.6 acres. The Building D Site is located on approximately 37.1 acres east of Ellsworth Street, and the Building E Site is located on approximately 21.5 acres west of Ellsworth Street. Both properties are collectively referred to in this EIR as the “Project site.” For purposes of evaluation herein, the two properties are referred to individually as the “Building D Site” and the “Building E Site.”

The analysis in this Subsection is based in part on two site-specific cultural resources assessments. The cultural resources assessment prepared for the Building D Site is titled, “A Phase I and II Cultural Resources Assessment for the Decker Parcels I Project,” prepared by Brian F. Smith and Associates, Inc., (hereafter BFSa) dated June 24, 2015, and appended to this EIR as *Technical Appendix D1* (BFSa, 2015a). The cultural resources assessment prepared for the Building E Site is titled, “A Phase I and II Cultural Resources Assessment for the Decker Parcels II Project,” prepared by BFSa, dated April 29, 2016, and appended to this EIR as *Technical Appendix D2* (BFSa, 2016a). Please note that *Technical Appendix D2* was prepared prior to the Project Applicant’s decision to reduce the size of the Building E Site to its current configuration; therefore, the report covers additional acreage (12.1 acres west of the Building E Site) that is no longer in the Project site boundary and is not applicable to the discussion herein of potential on-site impacts.

All references used in this Subsection are included in EIR Section 7.0, *References*. Confidential information has been redacted from *Technical Appendices D1 and D2* for purposes of public review. ~~In addition, much of the written and oral communication between Native American tribes, the County of Riverside, and BSFA is considered confidential in respect to places that have tribal cultural significance (Gov. Code § 65352.4), and although relied upon in part to inform the preparation of this EIR Subsection, those communications are treated as confidential and are not available for public review.~~ Under existing law, environmental documents must not include information about the location of archeological sites or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act (Cal. Code Regs. § 15120(d)).

4.5.1 EXISTING CONDITIONS

A. *Cultural Setting of the Project Site*

The two site-specific cultural resources assessments prepared for the Project site detail the prehistoric and historic setting of the Project area. The prehistoric context summarizes the history of the Project area (starting with the early pre-historic period), the known archaeology of the Project area, and the known indigenous culture of the Project area. The historic context provides a summary of the distinctive historic periods of the Project area, and identifies Native American habitation and land uses,



other historic ethnic group settlement and land uses, and historic land granting, homesteading, or other Native American or non-Native American settlement methods and patterns, and land uses. A brief summary of the prehistoric and historic setting of the Project area is provided below. Refer to *Technical Appendices D1 and D2* for more detail.

Paleo Indian, Archaic Period Milling Stone Horizon, and the Late Prehistoric Shoshonean groups are the three general cultural periods represented in western Riverside County, the area in which the Project site is located. Because these culture sequences have been used to describe archaeological events, actions, or objects in the region, the following discussion references the cultural chronology of the Project area, which is associated with the following geologic divisions of time (epochs): Late Pleistocene, the early Holocene, the middle Holocene, and the late Holocene. Refer to Table 2.3-1 of *Technical Appendices D1 and D2* for a summary of the regional chronologies in relationship to the geologic framework. The Late Prehistoric component in the area of western Riverside County was represented by the Luiseño with influences from the Gabrielino, Cahuilla, and Serrano Indians. (BFSA, 2015a, pp. 2.0-5 through 2.07) (BFSA, 2016a, pp. 2.0-5 through 2.0-7)

1. Late Pleistocene / Paleo Indian Period (11,500 to circa 9,000 YBP)

In North America, the Paleo Indian Period began at approximately 11,500 years before present (YBP) with the Clovis culture. Large, fluted points in addition to knives, scrapers, choppers, perforators, and casual flake tools characterize the Clovis culture as big game hunters. Clovis sites have not been identified in the Project area, although isolated Clovis-like fluted points have been found in a variety of settings in southern California including passes in the Cuyamaca and Tehachapi mountains, valleys in the Mojave Desert and Owen Valley, and shorelines of Little Lake, Searles Lake, Panmint Lake, and ancient Lake Mojave. The recovery of isolated fluted points would suggest that at the end of the Pleistocene, small groups of people, which shared Clovis-like traits, were present in southern California. The recovery of fluted points in a variety of settings would suggest that Paleo Indians were likely attracted to multiple habitat types including mountains, marshlands, estuaries, and lakeshores. Rather than being big-game hunters, these people likely subsisted using a more generalized hunting, gathering, and collecting adaption utilizing a variety of resources including birds, mollusks, and large and small mammals. (BFSA, 2015a, p. 2.0-6) (BFSA, 2016a, pp. 2.0-6)

2. Early and Middle Holocene / Archaic Period (circa 9,000 to 1,300 YBP)

The Archaic Period in southern California is associated with a number of different cultures, complexes, traditions, or horizons including Western Pluvial Lakes, San Dieguito, La Jolla, Encinitas, Milling Stone, Pauma, and Sayles (BFSA, 2015a, P. 2.0-9) (BFSA, 2016a, p. 2.0-9).

Archaeological research indicates that southern California was occupied between 9,000 to 1,300 YBP by population(s) that utilized a wide range of both marine and terrestrial resources. Overlapping radiocarbon dates and artifact types between sites identified as Western Pluvial lakes, San Dieguito, La Jolla, Encinitas, Milling Stone, Sayles, and/or Pauma suggest a generalized hunting and gathering pattern that was employed for over 8,000 years. The large amount of marine shell and fish along with some mammal bone next to coastal lagoons changes as one moves inland and an increase in flakes,



tools, and bone is seen at these sites along with a decrease in shell. This transition in sites and artifact assemblages is believed to reflect the same people moving along drainages between the coast and mountains, exploiting both marine (fish and mollusks) and terrestrial (small and large game, plants, and stone materials) resources. (BFSA, 2015a, pp. 2.0-16 through 2.0-17) (BFSA, 2016a, pp. 2.0-16 through 2.0-17)

3. *Late Holocene / Late Prehistoric / San Luis Rey Period (1,300 YBP to 1769)*

Approximately 1,350 YBP, a Shoshone-speaking group from the Great Basin moved into Riverside County, marking the transition to the Late Prehistoric Period. This period is characterized by higher population densities and the expansion of social, political, and technological systems. Economic systems diversified and intensified during this period with the continued growth of trade networks, the use of shell-bead currency, and the appearance of more labor-intensive, yet effective, technological innovations such as the bow and arrow. This period is divided into two phases, the San Luis Rey I and San Luis Rey II, the division of which is based on the introduction of pottery. The introduction of pottery and the initiation of San Luis Rey II began at approximately A.D. 1300. San Luis Rey I is characterized by the use of portable, shaped or unshaped slab metates (milling stones), shaped or unshaped manos and pestles, and non-portable bedrock milling features. Cremations, bone awls, and stone and shell ornaments are also prominent in the material culture. Ceramic cooking and storage vessels, cremation urns, and multi-color (polychrome) rock art images created by the means of painting using dyes and pigments (pictographs) augment the later San Luis Rey II assemblage. The fluorescence of rock art likely appeared as the result of increased populations and sedentism. Flaked stone dart points were the dominant flaked stone tool utilized for cutting, scraping, and carving but serrated styles were also used. Subsistence is thought to have focused on the utilization of acorns, a storable species that allowed sedentism and increased population densities. (BFSA, 2015a, pp. 2.0-17 and 2.0-18) (BFSA, 2016a, p. 2.0-17)

4. *Late Holocene / Protohistoric Period / Ethnographic Groups (1790 to Present)*

Evidence indicates that three Shoshonean-speaking groups occupied portions of Riverside County including the Cahuilla, the Gabrielino, and the Luiseño. The geographic boundaries of these groups in pre-and proto-historic times are difficult to place but the Project site is well within the borders of Luiseño territory. This group was a seasonal hunting and gathering people with cultural elements that were very distinct from Archaic Period peoples. These distinctions include cremation of the dead, the use of the bow and arrow, and the exploitation of the acorn as the main food staple. Along the coast, the Luiseño made use of available marine resources by fishing and collecting mollusks for food. Seasonally available terrestrial resources, including acorns and game, were also sources of nourishment for Luiseño groups. Elaborate kinship and clan systems between the Luiseño and other groups facilitated a wide-reaching network that included trade of Obsidian Butte obsidian and other resources from the eastern deserts, as well as steatite from the Channel Islands. The primary settlements of late Prehistoric Luiseño Indians in the San Jacinto Plain were represented by *Ivah* and *Soboba* near Soboba Springs, *Jusipah* near the town of San Jacinto, *Ararah* in Webster's Canyon en route to Idyllwild, *Pahsitha* near Big Springs Ranch southeast of Hemet, and *Corova* in Castillo Canyon. These locations share features such as the availability of food and water resources. Features of this land use include



petroglyphs and pictographs, as well as widespread milling, which is evident in bedrock and portable implements. (BFSA, 2015a, p. 2.0-18) (BFSA, 2016a, p. 2.0-18)

5. *Ethnohistoric Period (1769 to Present)*

European exploration along the California coast began in 1542 with the landing of Juan Rodriguez Cabrillo and his men at San Diego Bay. Sixty years after the Cabrillo expeditions, an expedition under the leadership of Sebastian Viscaïno made an extensive and thorough exploration of the Pacific coast. These early European voyages observed Native Americans living in villages along the coast. At the time of contact, the Luiseño population was estimated to have ranged from 4,000 to as many as 10,000 individuals. (BFSA, 2015a, p. 2.0-26) (BFSA, 2016a, p. 2.0-26)

6. *Historic Period*

The historic background of the Project area began with the Spanish colonization of Alta California. The first Spanish colonizing expedition reached southern California in 1769 with the intention of converting and civilizing the indigenous populations, as well as expanding the knowledge of and access to new resources in the region. In the late eighteenth century, the San Gabriel (Los Angeles County), San Juan Capistrano (Orange County), and San Luis Rey (San Diego County) missions began colonizing southern California and gradually expanded their use of the interior valley (into what is now western Riverside County) for raising grain and cattle to support the missions. The San Gabriel Mission claimed lands in what is now identified as Jurupa, Riverside, San Jacinto, and the San Gorgonio Pass, while the San Luis Rey Mission claimed land in what is now identified as Lake Elsinore, Temecula, and Murrieta. The indigenous groups who occupied these lands were recruited by missionaries and put to work in the missions. Throughout this period, Native American populations were reduced in number by introduced diseases, a drastic shift in diet resulting in poor nutrition, and social conflicts due to the introduction of an entirely new social order. (BFSA, 2015a, pp. 2.0-26 through 2.0-27) (BFSA, 2016a, pp. 2.0-26 through 2.0-27)

In the mid-to-late 1770's Juan Bautista de Anza passed through much of Riverside County while searching for an overland route from Sonora, Mexico to San Gabriel and Los Angeles. Juan Bautista de Anza described the environment of what is now Riverside County, as fertile valleys, lakes, and sub-desert areas. In 1797, Father Presidente Lausen, Father Norberto de Santiago, and Corporal Pedro Lisalde led an expedition from Mission San Juan Capistrano through southwestern Riverside County in search of a new mission site before constructing Mission San Luis Rey in northern San Diego County. While no missions were built in what is now Riverside County, many mission outposts, or *asistencias*, were established in the early years of the nineteenth century to extend the missions' influence to the backcountry. Two such mission outposts that were located in Riverside County include San Jacinto and Temecula. In 1822, Mexico gained independence and in 1832, the missions were desecularized, signifying the end of the Mission Period. By this time the missions owned some of the best and most fertile land in southern California. The new government began distributing the vast mission holdings to wealthy and politically connected Mexican citizens. The "grants" were called "ranchos," of which Jurupa, El Rincon, La Sierra, El Sobrante de San Jacinto, La Laguna (Lake Elsinore), Santa Rosa, Temecula, Pauba, San Jacinto Nuevo y Potrero, and San Jacinto Viejo were



located in present-day Riverside County. Rancho Jurupa, the first grant located in present-day Riverside County, was given to Juan Bandini in 1838. These ranchos were all located in the valley environments of western Riverside County. During the Rancho Period, most of the Native Americans were forced off their land or put to work on the now privately-owned ranchos. At that point in time, Native American culture had been disrupted to the point where they could no longer rely on prehistoric subsistence and social patterns. (BFSA, 2015a, pp. 2.0-27 through 2.0-28) (BFSA, 2016a, pp. 2.0-27 through 2.0-28)

In 1846, war erupted between Mexico and the United States. In 1848, with the signing of the Treaty of Guadalupe Hidalgo, the region was annexed as territory of the United States, leading California to become a state in 1850. These events generated a steady flow of settlers to the area. With the completion of the transcontinental railroad in 1869, land speculators, developers, and colonists began to invest in southern California. A few years later, the navel orange was planted and found to be such a success that it quickly became the agricultural staple of the region. Riverside County was formed in 1883 at a time in which it was the wealthiest city per capita in the country due to the successful cultivation of the navel orange. (BFSA, 2015a, pp. 2.0-28 through 2.0-29) (BFSA, 2016a, pp. 2.0-28 through 2.0-29)

B. Historic Resources

County of Riverside EIR No. 521 was prepared in association with County General Plan Update No. 960 and contains the most recent information regarding historical sites and resources in Riverside County. According to County of Riverside EIR No. 521, Table 4.9-A *Cultural Resources of Riverside County*, no resources recognized by the National Register of Historic Places (NHRP), California Registered Historic Landmarks Architecture (CRHL), California Points of Historic Interest (CPHI), or Riverside County Historical Landmarks (RCHL) are located on the Building D Site or the Building E Site. In addition, Figure 4.9.2, *Historical Resources*, of the County's EIR No. 521, does not identify historical resources on the Building D Site or the Building E Site (Riverside County, 2015d, Figure 4.9.2).

1. Building D Site

Under existing conditions, the Building D Site is generally vacant with the exception of a single mobile home residence and associated outbuildings that are modern and do not to meet the definition of an historical resource pursuant to California Code of Regulations (CCR) Section 15064.5. (BFSA, 2015a, p. 4.0-8)

2. Building E Site

Under existing conditions, the Building E Site is vacant. A large majority of the Building E Site has been disturbed by previous periodic plowing and disking and the construction of an off-site water tank. (BFSA, 2016a, p. 2.0-5) Site RIV-1330/H was previously recorded on the Building E Site as being associated with a small historic component. However, during BFSA's field investigations in 2015, the concrete cistern was observed to be barely visible and filled with dirt and BFSA was unable to link the



cistern with the Val Verde Tunnel feature (as linked in previous studies) or with any adjacent historic land use. The feature was recorded in 1978; however, the age of the feature could not be confirmed by BFSa. The actual location of the Val Verde Tunnel is approximately 1.0 mile south of the Building E Site. The projection of past studies that the “tunnel” feature associated with Site RIV-1330/H was part of the Val Verde Tunnel project could not be substantiated by BFSa. The feature which was referred to in past studies as being linked to the Val Verde Tunnel was observed off-site and west of the Building E Site by BFSa as a hole approximately 4-feet in diameter that at one time extended approximately 100 feet into the hillside but is now filled with dirt and is inaccessible. Lacking any clear association with the water conduit system, BFSa determined that the feature has no linkage with the historic water project and is therefore not considered significant under CEQA. (BFSa, 2016a, p. 5.0-1)

C. Archaeological Resources

An archaeological records search of previously recorded archaeological sites, conducted at the Eastern Information Center, reported that 73 cultural resource properties are located within a one-mile radius of the Building D Site and the (formerly larger) Building E Site. The 73 cultural resources recorded within a one-mile radius of the Building D Site and Building E Site (not including the Project site and the 12.1 acres of the formerly larger Building E site that are studied in detail in *Technical Appendix D2* (BFSa, 2016a).), include ~~62-64~~ bedrock milling sites, two historic railroad tracks, one historic debris site, three historic residences, one World War II barracks, one historic trash deposit and one historic steel pipeline. Brief descriptions of the recorded sites located within one-mile of the Building D Site and the (formerly larger) Building E Site are provided in Table 4.1-1 of the Building D Site and Building E Site cultural resources assessment reports prepared by BFSa (*Technical Appendices D1 and D2*).

The records search indicates that 50 cultural resource studies were previously conducted within a one-mile radius of the Building D Site and the (formerly larger) Building E Site. The previous studies conducted within one-mile of the Building D Site and (formerly larger) Building E Site are referenced in Table 4.1-2 of *Technical Appendices D1 and D2*. The archaeological records search results are bound separately as Appendix C to *Technical Appendices D1 and D2* as Confidential Appendices. (BFSa, 2015a, pp. 4.0-1 through 4.0-8) (BFSa, 2016a, pp. 4.0-1 through 4.0-8) The results are confidential because the California Government Code § 6254(r) does not require the disclosure of records of Native American graves, cemeteries, and sacred places and records of Native American places, features, and objects described in § 5097.9 and § 5097.993 of the Public Resources Code maintained by or in the possession of, the NAHC, another state agency, or a local agency.

In addition, BFSa requested a review of the Sacred Lands File (SLF) by the Native American Heritage Commission (NAHC) to determine if any recorded Native American sacred sites or locations of religious or ceremonial importance are present within one-mile of the Building D Site or the (formerly larger) Building E Site. The NAHC SLF search did not indicate the presence of any sacred sites within the search radius. BFSa’s analysis of site components and artifacts did not indicate Native American religious, ritual, or other special activities on the Building D Site or the (formerly larger) Building E



Site. A list of Native American contacts was provided by the NAHC and the original correspondence is contained in Appendix D of *Technical Appendices D1 and D2*. (BFSa, 2015a, p. 3.0-5) (BFSa, 2016a, p. 3.0-3)

As part of the SB18 and AB52 consultation processes (refer to Subsection 4.18, *Tribal Cultural Resources, for more information*), the County of Riverside received information from the Pechanga Band of Luiseño Indians asserting that the Project area is part of a) tribal cultural landscape extending several miles around the Project site and consisting of related archaeological sites associated with either the village of *Qazaalku* or a smaller (unnamed) village. The Tribe cited Tribal knowledge, oral history, internal Tribe records, ethnological documentation, and the archaeological research conducted for the Building D Site and (formerly larger) Building E Site by BFSa as the basis of this assertion, although a large majority of the documentation submitted by the Tribe to Riverside County contained a summary of Tribal knowledge and oral tradition, supported by limited scientific analysis and ethnographic data. (Pechanga, 2015; Pechanga, 2016) While it is acknowledged that the archaeological resources identified on the Project site (discussed below) are part of Luiseño settlement and subsistence history, substantial evidence required by CEQA has not been provided by the Tribe or other party, or is known to Riverside County, to distinguish the Project site or the presumed larger tribal cultural landscape as unique or significant among the many other lands inhabited by Native Americans across California and North America. The Tribe refers to a cultural landscape generally, and has not provided geographic definition as to its scope and boundaries. Further, a possible cultural landscape is not necessarily a tribal cultural resource (TCR) as defined under AB 52. AB 52 does not provide that all cultural landscapes qualify as TCRs unless the landscape meets the definition given in Public Resources Code § 21074(b). While the Project site may or may not have some association to a village as asserted by the Pechanga Tribe, the Tribe has not supplied the substantial evidence necessary for the County to conclude that the individual resources on the Project site, or the wider landscape, qualifies as a significant archaeological resource or TCR as defined by the Public Resources Code and State CEQA Guidelines. Nonetheless, the information supplied by the Tribe in written form (Pechanga, 2015; Pechanga, 2016) and in oral form during consultation meetings with the County and field visits in County staff's presence, Native American tribes that was important to the County's deliberative process and was taken into consideration by the County when determining the potential significance of the on-site archaeological resources (according to the criteria presented in Subsection 4.5.2, below), and in determining the significance of the proposed Project's impacts to these resources. In addition, the presence of archaeological resources of concern to the Tribe west of the currently-proposed western boundary of the Building E Site was a contributing factor to the Project Applicant's decision to reduce the size of the Building E Site (by 12.1 acres) compared to the size of the Building E Site studied in *Technical Appendix D2*.

1. *Building D Site*

The methodology employed by BFSa for the cultural resources assessment of the Building D Site consisted of an institutional records search at the Eastern Information Center, an intensive pedestrian survey, significance testing of two prehistoric milling sites (one of which contained a historic trash scatter), and additional field visits accompanied by the County Geologist, County Archaeologist, and



representatives of the Pechanga Band of Luiseño Indians and Soboba Band of Luiseño Indians. Refer to *Technical Appendix DI* for a detailed description of the archaeological records search, the field methodology, and the laboratory methods employed by BFSa for the Building D Site. (BFSa, 2015a, Section 3.0 Methodology)

An archaeological records search for the Building D Site and the surrounding area within a one-mile radius was conducted by the Eastern Information Center (EIC) at the University of California, Riverside (UCR). The EIC reported that two cultural resources (Site RIV-8401 and Site RIV-8402) were previously recorded as occurring within the Building D Site. Although the Building D Site was never formally surveyed in the past, both Site RIV-8401 and Site RIV-8402 were recorded in 2007 as part of a proposed Plot Plan for a different project. Records are not clear where the Plot Plan was located and no significance testing was conducted at that time. (BFSa, 2015a, p. 4.0-11)

The Building D Site is relatively flat, with elevations that range from 1,558 above mean sea level (ASML) at the property's northeast corner to 1,607 ASML at its southwest corner. Highly weathered and deteriorating bedrock outcrops are scattered throughout the Building D Site. During the pedestrian survey conducted by BFSa on September 4, 2014, the Building D Site was observed as disturbed by previous agricultural use, gravel dispersal, and the use of a rural residence with associated outbuildings. Subsequent field visits in 2015 and 2016 affirmed these findings. The majority of the Building D Site appeared to have been cleared and tilled in the past. This characterization of the Building D Site as moderately to severely disturbed is relevant to the consideration of the presence of cultural resources within the Project area; disturbance can result in the damage and removal of resources and/or can make visually obscured resources more visible. The source of previous disturbance appears to be the result of farming, general land clearing, and residential use. The survey conducted by BFSa confirmed the presence of the two previously recorded bedrock milling sites (RIV-8401 and RIV-8402) and identified a historic trash scatter located within Site RIV-8402. (BFSa, 2015a, p. 4.0-8) A site significance testing program was undertaken by BFSa to evaluate Site RIV-8401 and Site RIV-8402 under CEQA for significance, as described below. (BFSa, 2015a, p. 1.0-2)

~~When considering the association of RIV 8401 and RIV 8402 to a possible cultural landscape, the County determined that the Pechanga Tribe has not provided geographical definition to a tribal cultural landscape encompassing the Building D Site in terms of the size and scope of the landscape. Further, there is a lack of substantial evidence upon which the County can conclude that RIV 8401 and RIV 8402 are individually or collectively unique archaeological resource(s) that significantly contribute to the integrity of a possible cultural landscape. The preponderance of evidence provided in *Technical Appendix DI* and in confidential communications between Riverside County, the Pechanga Tribe, and BFSa, indicate that RIV 8401 and RIV 8402 are not significant under CEQA. In addition, there is a lack of substantial evidence to consider the landscape a TCR as defined by Public Resources Code § 21074 and § 5024.1. AB 52, Section 21074(b), requires that for a cultural landscape to be a TCR, the landscape must meet the criteria of a TCR and be defined in terms of "size and scope of the landscape." Because the substantial evidence that is needed to conclude that the subject property is a cultural landscape is lacking, the Project site is not deemed by Riverside County to be part of a cultural~~



landscape or a TCR under AB 52. Additional information is provided below about each site to support this conclusion.

Site RIV-8401

Site RIV-8401 was recorded in 2007 as a single bedrock milling feature, which consisted of three milling slicks on a single granite boulder. The 2014 investigation conducted by BFSa confirmed the presence of the bedrock milling feature recorded in 2007 and identified three additional milling features. The testing program employed by BFSa for Site RIV-8401 consisted of recording the four bedrock milling features and conducting subsurface investigations. During BFSa's testing program, eight shovel test pits (STPs) were placed in the vicinity of the bedrock milling features. No subsurface cultural materials were encountered during BFSa's testing program. Because the study of Site RIV-8401 did not produce any artifacts or evidence of a subsurface deposit, BFSa determined that Site RIV-8401 is not unique and not significant under CEQA criteria due to a lack of both subsurface deposit and the ability to provide any further research potential. (BFSa, 2016a, pp. 4.0-11 and 4.0-12 and 4.0-14 through 4.0-19)

Site RIV-8402

Site RIV-8402 was recorded in 2007 and characterized as four milling slicks on three granitic outcrops. The 2014 investigation conducted by BFSa confirmed the presence of the bedrock milling features recorded in 2007 and identified two additional milling features and a historic trash scatter. The testing program for Site RIV-8402 consisted of recording the five bedrock milling features, collecting a sample of the historic diagnostic artifacts from the trash scatter and conducting subsurface investigations. During the testing program, 11 STPs were placed in the vicinity of the bedrock milling features. Subsurface cultural materials were encountered in one STP, which was placed within the historic trash scatter. Recovery from the STP included broken glass, metal fragments, a glass vessel fragment, and stoneware and earthenware ceramic fragments. (BFSa, 2015a, p. 4.0-11)

BFSa collected 43 historic artifacts from the historic trash scatter located within Site RIV-8402. The analysis of the assemblage identified refuse deposition from primarily one period of dumping with the highest level of intensity correlating between the 1880s and 1910s. Based on the components of the assemblage (consumer and household items), BFSa concluded that it is likely that the materials represent a sample of refuse generated by a nearby household. BFSa concluded that the historic component of Site RIV-8402 is not significant, as single episodes of historic dumping are common for rural areas and the items discarded could not be associated with any specific household or group of people. (BFSa, 2015a, p. 4.0-34)

Based upon BFSa's surface inspection across the Building D Site and the STP results, Site RIV-8402 is characterized as a temporary seasonal prehistoric milling location that lacks any encampment or long-term use. These milling features are common to Late Prehistoric subsidence patterns for the region and match the pattern of milling stations to the north and west of the Building D Site. (BFSa, 2015a, p. 4.0-34) For these reasons, BFSa determined that Site RIV-8402 is not unique and not significant under CEQA.



2. *Building E Site*

The methodology employed by BFSA for the cultural resources assessment of the Building E Site consisted of an institutional records search at the Eastern Information Center, an intensive pedestrian survey, significance testing of three prehistoric milling sites, and additional field visits accompanied by the County Geologist, County Archaeologist, and representatives of the Pechanga Band of Luiseño Indians and Soboba Band of Luiseño Indians. Refer to *Technical Appendix D2* for a detailed description of the archaeological records search, the field methodology, and the laboratory methods employed by BFSA for the Building E Site (BFSA, 2016a, Section 3.0 Methodology). Please note that the area of study covered by *Technical Appendix D2* includes 12.1 acres that are no longer within the Building E Site boundary because *Technical Appendix D2* was prepared prior to the Project Applicant's decision to reduce the size of the Building E Site to its current configuration. As such, information contained in *Technical Appendix D2* that pertains to these 12.1 acres (west of the currently-proposed Building E Site) and that are no longer in the Project site boundary is not applicable to the discussion herein of potential on-site impacts. An archaeological records search for the (formerly larger) Building E Site and the surrounding area within a one-mile radius was conducted by the EIC at UCR. The EIC reported that two cultural resources (RIV-1330/H and RIV-8901) were previously recorded as occurring within the (formerly larger) Building E Site, which still fall within the currently-proposed smaller Building E Site. (BFSA, 2016a, pp. 3.0-1 and 4.0-1)

The topography of the Building E Site is characterized by an east-facing slope on the west side of the property and an ephemeral drainage in the southwestern corner. With the exception of the east-facing slope, the remainder of the property is flat. During the pedestrian survey conducted by BFSA on December 29, 2014, the Building E Site was observed as disturbed by past agricultural use and the property appeared to have been cleared and tilled in the past. Subsequent field visits in 2015 and 2016 affirmed these findings. This characterization of a disturbed agricultural landscape is relevant to the consideration of the presence of cultural resources within the area; disturbance can result in the damage and removal of resources and/or can make visually obscured resources more visible. Many areas in and around the Building E Site have been disturbed by agricultural use and to a lesser extent by the construction of the water tank adjacent to the southwest corner of the Building E Site. (BFSA, 2016a, p. 4.0-8)

As mentioned above, the records searches for the (formerly larger) Building E Site identified two cultural resources (RIV-1330/H and RIV-8901) on the Building E Site and both of the sites were recorded as continuing off the Building E Site to adjacent properties. As a result of BFSA's 2014 field survey, RIV-1330/H and RIV-8901 were confirmed to be present. In addition, one prehistoric milling station site was discovered. DPR primary site record forms were prepared by BFSA for the discovered prehistoric milling station (RIV-11,874) and site update forms were prepared for sites RIV-1330/H and RIV-8901. A site significance testing program was undertaken by BFSA to evaluate Site RIV-1330/H, Site RIV-8901, and Site RIV-11,874 under CEQA criteria for significance, as described below. (BFSA, 2016a, p. 1.0-2)



~~When considering the association of RIV 1330/H, RIV 8901, and RIV 11,874 to a possible cultural landscape, the County determined that the Pechanga Tribe has not provided geographical definition to a cultural landscape encompassing the Building E Site in terms of the size and scope of the landscape. Further, there is a lack of substantial evidence upon which the County can conclude that RIV 1330/H, RIV 8901, and RIV 11,874 are individually or collectively unique archaeological resource(s) that significantly contribute to the integrity of a possible cultural landscape. The preponderance of evidence provided in *Technical Appendix D2* and in confidential communications between Riverside County, the Pechanga Tribe, and BSFA, indicate that RIV 1330/H, RIV 8901, and RIV 11,874 are not significant under CEQA. In addition, there is a lack of substantial evidence to consider the landscape a TCR as defined by Public Resources Code § 21074 and § 5024.1. AB 52, Section 21074(b), requires that for a cultural landscape to be a TCR, the landscape must meet the criteria of a TCR and be defined in terms of “size and scope of the landscape.” Because the substantial evidence that is needed to conclude that the subject property is a cultural landscape is lacking, the Project site is deemed by Riverside County as part of neither a cultural landscape nor a TCR under AB 52. Additional information is provided below about each site to support this conclusion.~~

Site RIV-1330/H

BSFA identified 13 milling features within the formerly larger Building E Site, scattered on various exposed bedrock outcrops. Within the currently-proposed Building E Site, there are only three milling features. Due to the disturbance of a large portion of the Building E Site by the modern construction of the existing off-site water tank, fewer recorded milling features were recorded during the 2014 study than in previous studies. BSFA observed and collected only three surface artifacts consisting of a mano, and two metate fragments. Due to the fact that all subsurface tests were negative and long berms of mounded dirt are located along the east side of the Building E Site, BSFA reached the conclusion that grading and clearing activities conducted in conjunction with the site preparation for the new off-site water tank resulted in the scraping away of the topsoil within Site RIV-1330/H to create soil berms downslope of the water tank. The berms are thought to have been intended to be erosion control features. The grading of the topsoil within Site RIV-1330/H into berms resulted in the removal of any artifact-containing soil in areas where past studies indicated that artifacts were discovered. The original site form for Site RIV-1330/H previously recorded (Swenson, 1978), noted the possibility of rock art at this location. It was unclear in 1978 if rock art was actually present on the site due to the high level of graffiti that was present at that time, and which continues to this day. BSFA did not observe any rock art at Site RIV-1330/H during their field visits and verified that the possible rock art is absent from the site.

Because Site RIV-1330/H did not produce any evidence of subsurface cultural deposits as part of BSFA’s study, BSFA concluded that Site RIV-1330/H is not significant under CEQA criteria due to the lack of both a subsurface deposit and the ability to provide any further research potential. (BSFA, 2016a, pp. 4.0-29 through 4.0-42)

After a review of *Technical Appendix D2*, and in consultation with the Pechanga Tribe as part of the AB 52 consultation process, the County of Riverside required that prior to the initiation of any grading



for the Building E Site, that pollen and protein residue analyses be conducted for existing bedrock milling features. Although BFSa determined that superficially the milling features of RIV-1330/H appeared to be poor candidates for this type of test, BFSa completed the analysis to assure the County and Native American community that all possible research efforts were exhausted prior to the removal of the milling features during development of the Building E Site. Residue analyses are used to identify the presence of prehistoric and historic food and plants that may have been exploited by the native inhabitants of a given site. The pollen and protein residues identified by the analysis process include those present in plant tissues and animals. (BFSa, 2016a, p. 5.0-1)

For Site RIV-1330/H, pollen and protein residue analyses were conducted to investigate potential evidence of floral remains, plant proteins, and animal proteins still present on the milling features identified within the Building E Site. The goal was to provide paleoenvironmental and dietary data for Site RIV-1330/H, which is assumed to be representative of other milling features on the Project site. Thirteen (13) milling features were identified at RIV-1330/H (on- and off-site of the currently proposed Building E Site) with a total of forty-two (42) separate milling elements. These elements include four mortars, one basin, four rubs, and 33 slicks. Based upon the frequency of milling features and the condition of those features, the Riverside County Archaeologist suggested the sampling of eight milling elements and a single (1) artifact (i.e., mano). All sampling was conducted by BFSa and the samples were submitted to PaleoResearch Institute, Inc. in Golden, Colorado for analysis. (BFSa, 2016a, pp. 4.0-42 and 4.0-44). The analysis identified a range of potential protein residues and pollens, which were prehistorically present within Site RIV-1330/H (BFSa, 2016a, p.5.0-1). The analysis results are included as Appendix F of *Technical Appendix D2*. Although the results provided environmental information about the plants and animal species that were once present in the area, the analyses did not reveal any information that would indicate that RIV-1330/H is unique or significant among other similar sites found throughout southern California that had similar environmental conditions. Further data analysis is not warranted, as it would only add similar information to the current body of knowledge.

Site RIV-8901

The portion of Site RIV-8901 that extends into the formerly larger Building E Site consists of 10 bedrock milling features situated on a moderate, east-facing slope. Within the currently-proposed Building E Site, there is only one milling feature. The elements of Site RIV-8901 previously identified off-site were recorded with the same characteristics as scattered bedrock outcrops with occasional evidence of minimal milling use. Aside from the milling features observed, no surface artifacts or evidence of potential cultural deposits was detected by BFSa. (BFSa, 2016a, p. 4.0-45) A series of 24 STPs were excavated around the milling feature in order to determine if any associated surface artifacts were present. None of the STPs produced any artifacts or evidence of a subsurface cultural deposit. Based upon the surface inspection across Site RIV-8901 and the STP results, Site RIV-8901 is characterized by BFSa as a temporary seasonal milling location that lacks any evidence of encampment or long-term use. This type of site is common to the Late Prehistoric subsistence pattern for the region and matches the pattern of milling stations to the north and east of the Building E Site. Because the study of Site RIV-8901 did not produce any artifacts or evidence of a subsurface deposit,



it was evaluated as not significant under CEQA criteria due to a lack of both a subsurface deposit and the ability to provide any further research potential. (BFSA, 2016a, pp. 1.0-3 and 4.0-45 through 4.0-61)

Site RIV-11,874

Site RIV-11,874 is an isolated milling station that is part of the pattern of milling stations reported in the surrounding area. Site RIV-11,874 is located on a single bedrock exposure on the Building E Site. Aside from the milling feature observed, no surface artifacts or evidence of potential cultural deposits were detected by BFSA. This is consistent with the information for Site RIV-8901 to the north and east, where milling stations lacked any artifact collection. The single milling feature at Site RIV-11,874 contained a single slick. Three STPs were excavated around the milling feature in order to determine if any subsurface deposits were present. None of the STPs produced any artifacts or evidence of a subsurface cultural deposit. Based upon the surface inspection across Site RIV-11,874 and the results of the STPs, Site RIV-11,874 is determined by BFSA as a temporary seasonal milling location that lacks any evidence of encampment or long-term use. This type of site is common to the Late Prehistoric subsistence pattern for the region and matches the pattern of the milling station to the north and east of the Building E Site. (BFSA, 2016a, pp. 4.0-62 through 4.0-66) For this reason, BFSA concluded that Site RIV-11,874 is not significant under CEQA.

4.5.2 APPLICABLE REGULATORY SETTING

California Code of Regulations (CCR) Title 14, Chapter 3, § 15064.5

California Code of Regulations, Title 14, Chapter 3, § 15064.5, “Determining the Significance of Impact to Archaeological and Historical Resources,” establishes the procedure for determining the significance of impacts to archeological and historical resources in CEQA compliance documents, as well as classifying the type of resource. The evaluation of cultural resources under CEQA in this EIR is based upon the definitions of resources provided in § 15064.5. According to CEQA § 15064.5(a), the term “historical resources” shall include the following:

- (1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources.*
- (2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.*
- (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's*



determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852) including the following:

(A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

(B) Is associated with the lives of persons important in our past;

(C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

(D) Has yielded, or may be likely to yield, information important in prehistory or history.

(4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

California Health and Safety Code, Division 7, Chapter 2, § 7050.5

California Health and Safety Code § 7050.5 makes it illegal for persons to knowingly mutilate or disinter, disturb, or willfully remove any human remains in or from any location other than a dedicated cemetery without authority of law, except as provided in § 5097.99 of the Public Resources Code. Section 5097.94 also establishes procedures for the identification and appropriate handling of human remains, should they be discovered inadvertently. The procedures require notice to the coroner of the county in which the human remains are discovered. If the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the corner is required to contact the California Native American Heritage Commission (NAHC).

California Public Resources Code, Division 5, Chapter 1.75, § 5097.98

In the event of discovery of Native American human remains, California Public Resources Code § 5097.98 requires the California NAHC to contact the most likely descendant of the deceased Native American within 48 hours of discovery. California Public Resources Code § 5097.98 also establishes procedures to allow the most likely descendant to inspect the remains and recommend a means of disposition.

~~**California Senate Bill 18 (SB18) (Chapter 905, Statutes of 2004)**~~

~~The California Office of Planning and Research (OPR) is required to implement various long range planning and research policies and goals that are intended to shape statewide development patterns and~~



~~influence the quality of the state's environment. California Senate Bill (SB) 18 required that the OPR guidelines contain advice, developed in consultation with the NAHC for consulting with California Native American tribes for the preservation of, or the mitigation of impacts to, specified Native American places, features, and objects. SB18 also required those guidelines to address procedures for identifying the appropriate California Native American tribes, for consultation. SB18 requires that, prior to the adoption or amendment of a city or county's general plan, the city or county conduct consultations with California Native American tribes for the purpose of preserving specified places, features, and objects (known as Traditional Tribal Cultural Places) that are located within the city or county's jurisdiction. (See Senate Bill 18 Chapter 905 for full context) (California State Legislature, 2004). The consultation process must be completed prior to project approval. Because the proposed Project includes a General Plan Amendment, the County of Riverside as the CEQA lead agency for the proposed Project is subject to all requirements associated with the SB-18 process for Native American consultation.~~

~~□ California Assembly Bill No. 52 (AB52), 2014~~

~~California Assembly Bill 52 (AB52) Chapter 532 is an act to amend Section 5097.94 of, and add Sections 21073, 21074, 21080.3.1, 21080.3.2, 21802.3, 21083.09, 21084.2 and 21084.3 to the California Public Resources Code, relating to Native Americans. AB 52 Chapter 532 was approved by the California Governor on September 25, 2014. (Assembly Bill No. 52 Chapter 532, 2014)~~

~~If the tribes desire notification of proposed projects in that area that may cause a substantial adverse change in the significance of a cultural resource, AB52 requires that Native American tribes send written notice of their geographic areas of traditional and cultural affiliation to CEQA lead agencies. The CEQA lead agency is then required to provide such notification and consult with the tribe(s) if the tribe(s) requests consultation.~~

~~The provisions listed in AB52 are applicable to projects that have a notice of preparation or a notice of negative declaration filed on or after July 1, 2015. By requiring the CEQA lead agency to consider the effects relative to cultural resources and to conduct consultation with California Native American tribes, AB52 imposes a state-mandated local program. AB52 additionally requires the NAHC to provide each California Native American tribe, as defined, on or before July 1, 2016, with a list of all public agencies that may be a lead agency within a geographic area in which the tribe is traditionally or culturally affiliated; the contact information of those agencies; and information on how the tribe may request those public agencies to notify the tribe of projects within the jurisdiction of those public agencies for the purposes of requesting consultation. See AB52 Chapter 532 for full context (Assembly Bill No. 52 Chapter 532, 2014).~~

According to CEQA Statute § 21074:

~~(a) "Tribal cultural resources" are either of the following:~~

~~(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:~~



~~(A) — Included or determined to be eligible for inclusion in the California Register of Historical Resources.~~

~~(B) — Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.~~

~~(2) — A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.~~

~~(b) — A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.~~

~~(c) — A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).~~

4.5.3 BASIS FOR DETERMINING SIGNIFICANCE

For purposes of definition herein, the terms “site” and “resource” can be used interchangeably. An archaeological site, meaning a specific physical place where artifacts or features are present, is a cultural resource; however, “cultural resources” is a broader term and can include non-archaeological sites such as landscapes, historic districts, transportation systems, etc. (BFSA, 2016a). The proposed Project would result in a significant impact to cultural resources if the Project or any Project-related component would:

Historic Resources

- a) Alter or destroy an historic site; or
- b) Cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations, Section 15064.5;

Archaeological Resources

- a) Alter or destroy an archaeological site;
- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations, Section 15064.5; or
- c) Disturb any human remains, including those interred outside of formal cemeteries.
- ~~d) Restrict existing religious or sacred uses within the potential impact area; or~~
- ~~e) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074.~~



4.5.4 IMPACT ANALYSIS

Historic Resources

Threshold a) Would the Project alter or destroy an historic site?

Threshold b) Would the Project cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations, Section 15064.5?

According to County of Riverside EIR No. 521 Table 4.9-A, *Cultural Resources of Riverside County*, the Project site does not contain any federal, State, and/or county resource as recorded by the National Register of Historic Places (NHRP), California Registered Historic Landmarks Architecture (CRHL), California Points of Historic Interest (CPHI), or Riverside County Historical Landmarks (RCHL). In addition, according to County of Riverside EIR No. 521 Figure 4.9.2, *Historical Resources*, no known historic resources are located on the Project site. (Riverside County, 2015d, Table 4.9-A and Figure 4.9.2).

1. Building D Site

Under existing conditions, the Building D Site is generally vacant with the exception of a single mobile home residence and associated outbuildings that are modern and do not meet the definition of an historical resource pursuant to California Code of Regulations (CCR) Section 15064.5. (BFSa, 2015a, p. 4.0-8). A field survey of the Building D Site by BFSa identified two prehistoric sites (RIV-8401 and RIV-8402). Site RIV-8402 was determined by BFSa to have a small historic component consisting of a trash scatter. BFSa collected and analyzed 43 historic artifacts from the historic trash scatter and identified the scatter as refuse disposition from primarily one period of dumping from a nearby household with the highest level of intensity correlating between the 1880s and 1910s. Single episodes of historic refuse dumping are common for rural areas and the items discarded could not be associated with any specific household or group of people or any intact deposit; therefore, based on the criteria listed in CEQA Guidelines, the trash scatter associated with Site RIV-8402 does not meet the definition of historical resources as defined in California Code of Regulations § 15064.5. (BFSa, 2015a, p. 4.0-34 through 4.0-35) For these reasons, the Project as proposed on the Building D Site would not alter or destroy an historic site and would not cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations Section 15064.5. Impacts are less-than-significant and no mitigation is required.

2. Building E Site

Under existing conditions, the Building E Site is vacant. Site RIV-1330/H was previously recorded on the Building E Site as being associated with a small historic component associated with the Val Verde Tunnel, a historic water project located approximately 1.0 mile south of the Building E Site. However, during BFSa's field investigations in 2015, the concrete cistern previously identified on the formerly larger Building E Site (and off-site under the currently-proposed smaller Building E Site) was observed to be barely visible and filled with dirt. As such, BFSa was unable to link the cistern with



the Val Verde Tunnel (as linked in previous studies) or with any adjacent historic land use. Lacking any clear association with the water conduit system, BFSA determined that the feature has no linkage with the historic water project and, therefore, is not considered a significant historic resource under CEQA as defined in California Code of Regulations § 15064.5. (BFSA, 2016a, p. 5.0-1) For these reasons, the Project as proposed on the Building E Site would not alter or destroy an historic site and would not cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations Section 15064.5. Impacts are less-than-significant and no mitigation is required.

Archaeological Resources

Threshold a) Would the Project alter or destroy an archaeological site?

Threshold b) Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations, Section 15064.5?

1. Building D Site

As described in Subsection 4.5.1, two archaeological sites are located on the Building D Site. Site RIV-8401 (a bedrock milling feature) and Site RIV-8402 (four milling slicks on three granitic outcrops) are recorded as prehistoric resource collection and food processing sites with no subsurface components and reduced integrity due to agricultural use of the surrounding land. Based on the definition of a significant historic resource as listed in CEQA Guidelines § 15064.5, BFSA determined that neither Site RIV-8401 or Site RIV-8402 are currently listed in or eligible for listing in the California Register (Criteria 1 and 2). Also, Site RIV-8401 and Site RIV-8402 do not meet the criteria to be deemed significant under § 15064.5, because Site RIV-8401 and Site RIV-8402 do not contain information of public interest needed to answer important scientific research questions, do not have special and particular qualities, and are not directly associated with a scientifically recognized important prehistoric or historic event or person. In addition, the resources are not unique. CEQA Statute §21083.2 states that an archaeological resource is not unique if there is not a high probability that it contains information of public interest needed to answer important scientific research questions; does not have special and particular qualities such as being the oldest of its type or the best available example of its type; and is not directly associated with a scientifically recognized important prehistoric or historic event or person. (BFSA, 2015a, p. 5.0-1)

Significance testing conducted by BFSA revealed that Site RIV-8401 lacks subsurface artifacts, subsurface deposits, and further research potential. Although Site RIV-8402 contained a historic trash scatter, an evaluation of the scatter by BFSA determined that the scatter is associated with an unidentifiable household common to Riverside County in the time period of the 1880s to 1910s and is not unique or significant under CEQA. Site RIV-8402 is characterized as a temporary seasonal prehistoric milling location that lacks any encampment or long-term use. These milling features are common to Late Prehistoric subsidence patterns for the region and match the pattern of milling stations to the north and west of the Building D Site. (BFSA, 2015a, p. 4.0-34) For these reasons, BFSA



determined that Site RIV-8402 is not unique and not significant under CEQA. Therefore, based on the criteria listed in CEQA Guidelines § 15064.5, the Project as proposed on the Building D Site would not alter or destroy a known, unique archaeological site or cause a substantial adverse change in the significance of a unique archaeological resource. The Project's direct impacts to Site RIV-8401 and Site RIV-8402 would be less than significant and mitigation is not required.

As previously discussed, the majority of the Building D Site has been disturbed. As such, there is a potential that once-present surface artifacts have become buried or otherwise obscured from sight. The Project's mass grading and excavation activities would disturb the entire Building D Site and there is a potential that buried archaeological resources may be unearthed. If archaeological resources are unearthed during Project construction that meet the definition of a significant archaeological resource as defined by California Code of Regulations § 15064.5, there is a potential that the resource(s) would be significantly impacted if not properly identified and treated. Thus, there is a potential for the Project to cause significant impacts to previously undiscovered significant archaeological resources on the Building D Site. Refer to Subsection 4.5.7 for applicable mitigation measures.

2. *Building E Site*

As described in Subsection 4.5.1, three archaeological resources are located on the Building E Site. Site RIV-1330/H (three bedrock milling features scattered on various exposed bedrock outcrops), Site RIV-8901 (one bedrock milling feature situated on a moderate, east-facing slope) and Site RIV-11,874 (an isolated milling station) were all determined by BFSa to not meet the definition of a significant resource under CEQA Guidelines § 15064.5, because they do not contain information of public interest needed to answer important scientific research questions; do not have special and particular qualities; and are not directly associated with a scientifically recognized important prehistoric or historic event or person. Also, these sites are not unique; under CEQA Statute §21083.2 states that an archaeological resource is not unique if there is not a high probability that it contains information of public interest needed to answer important scientific research questions; does not have special and particular qualities such as being the oldest of its type or the best available example of its type; and is not directly associated with a scientifically recognized important prehistoric or historic event or person. The historic component of RIV-1330/H was also determined not to be significant and not unique. (BFSa, 2016a, p. 6.0-1)

The milling features that are part of Site RIV-1330/H, Site RIV-8901, and Site RIV-11,874 located within the Building E Site's grading footprint would be directly impacted by the Project. These impacts are less-than-significant because the resources do not meet the definition of a significant resource under CEQA Guidelines § 15064.5 or the definition of a unique resource under CEQA Statute §21083.2.

As previously discussed, the majority of the Building E Site has been disturbed. As such, there is a potential that once-present surface artifacts have become buried or otherwise obscured from sight. The Project's mass grading and excavation activities would disturb the 21.5-acre Building E Site and there is a potential that buried archaeological resources may be unearthed. If archaeological resources are unearthed during Project construction that meet the definition of a significant archaeological resource



as defined by California Code of Regulations § 15064.5, there is a potential that the resource would be significantly impacted if not properly identified and treated. Thus, there is a potential for the Project to cause significant impacts to previously undiscovered significant archaeological resources on the Building E Site. Refer to Subsection 4.5.7 for applicable mitigation measures.

Archaeological Resources

Threshold c) Would the Project disturb any human remains, including those interred outside of formal cemeteries?

Neither the Building D Site nor the Building E Site contain a cemetery and no known formal cemeteries are located in the immediate vicinity of the Project site. Also, there are no known human remains on the Project site. The proposed Project's mass grading and excavation (utility trenching) activities would disturb the entire Building D Site and the Building E Site. During ground-disturbing construction activities, there is a remote potential that human remains may be unearthed. This same potential for the discovery of human remains occurs on nearly every construction site that disturbs an undeveloped ground surface.

If human remains are encountered during Project construction, the construction contractor would be required by law to comply with California Health and Safety Code, Section 7050.5 "Disturbance of Human Remains" and Public Resources Code Section 5097.98. Pursuant to § 7050.5(b) and (c), if human remains are discovered, the County Coroner must be contacted and if the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner is required to contact the NAHC by telephone within 24 hours. Pursuant to California Public Resources Code § 5097.98, whenever the NAHC receives notification of a discovery of Native American human remains from a county coroner, the NAHC is required to immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work, the means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants are required to complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. According to Public Resources Code § 5097.94(k), the NAHC is authorized to mediate disputes arising between landowners and known descendants relating to the treatment and disposition of Native American human burials, skeletal remains, and items associated with Native American burials.

With mandatory compliance to California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, any potential impacts to human remains, including human remains of Native American descent, would be reduced to less than significant.



Archaeological Resources

Threshold d) — Would the Project restrict existing religious or sacred uses within the potential impact area?

BFSA's analysis of the historic and archaeological site components and artifacts identified on the Building D Site and the Building E Site identified in Subsections 4.5.1B and 4.5.1C, did not identify any Native American religious, ritual, or other special activities. In addition, BFSA requested a review of the Sacred Lands File (SLF) by the NAHC to determine if any recorded Native American sacred sites or locations of religious or ceremonial importance are present within one mile of the Building D Site and the formerly larger Building E Site. The NAHC SLF did not indicate the presence of a sacred site within the search radius. A list of Native American contacts was also provided by the NAHC and non-confidential correspondence letters are contained in Appendix D of *Technical Appendix D1*. (BFSA, 2015a, p. 3.0-5) BFSA did not receive any direct responses to these inquiries.

As part of the SB18 and AB52 consultation processes required by State law, Riverside County sent notification of the proposed Building D Site project and formerly larger Building E Site project to the following Native American tribes with possible traditional or cultural affiliation to the area: Agua Caliente Band of Cahuilla Indians; San Manuel Band of Mission Indians, Pala Band of Mission Indians, Morongo Band of Mission Indians, Pechanga Band of Luiseño Indians; Rincon Band of Luiseño Indians; and the Soboba Band of Luiseño Indians. The Pechanga Band of Luiseño Indians and the Soboba Band of Luiseño Indians requested consultation. The Pechanga Band of Luiseño Indians stated in their written responses that the Project site is located in a culturally sensitive area within the Pechanga's aboriginal territory and part of Payómkawichum (Luiseño). (Pechanga, 2015) Field visits conducted by the County Archaeologist in the presence of Pechanga Band of Luiseño Indians and the Soboba Band of Luiseño Indians representatives did not reveal any religious or sacred uses of the property. Residue test results from milling sites in Building E Site revealed that some of the milled materials may have had medicinal purposes, but there is no evidence to suggest that there was religious or sacred use of the property.

The proposed Project's mass grading and excavation activities would disturb the entire Building D Site and the entire Building E Site. During ground-disturbing construction activities, there is a remote potential that religious or sacred resources may be unearthed, the potential impacts to which are evaluated above under Threshold (b). Because the property is not used for religious or sacred purposes, development of the proposed Project has no potential to restrict a religious or sacred use. Thus, no impact would occur.

Archaeological Resources

Threshold e) — Would the Project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?

As part of the SB18 and AB52 consultation processes required by State law, Riverside County sent notification of the proposed Building D Site project and formerly larger Building E Site project to the



following Native American tribes with possible traditional or cultural affiliation to the area: Agua Caliente Band of Cahuilla Indians; San Manuel Band of Mission Indians, Pala Band of Mission Indians, Morongo Band of Mission Indians, Pechanga Band of Luiseño Indians; Rincon Band of Luiseño Indians; and the Soboba Band of Luiseño Indians. The Pechanga Band of Luiseño Indians and the Soboba Band of Luiseño Indians responded and requested consultation. The Pechanga Band of Luiseño Indians asserted in their initial written response that the Project site is located in a culturally sensitive area within the Pechanga's aboriginal territory as evidenced by Payómkawichum (Luiseño) cultural resources in the area. (Pechanga, 2015)

Field visits of the Project site conducted by the County Archaeologist in the presence of the Pechanga Band of Luiseño Indians and the Soboba Band of Luiseño Indians representatives did not reveal any additional cultural resources on the Project site beyond those identified by BFSA as follows: Site RIV-8401 (a bedrock milling feature) and Site RIV-8402 (four milling slicks on three granitic outcrops) on the Building D Site, and Site RIV-1330/H (three milling features scattered on various exposed bedrock outcrops), Site RIV-8901 (one bedrock milling feature situated on a moderate, east-facing slope) and Site RIV-11,874 (an isolated milling station) on the Building E Site.

BFSA subsequently performed a pollen and residue analysis of bedrock milling features for Site RIV-1330/H, the results of which are contained in Appendix F of *Technical Appendix D2* (BFSA, 2016a, p.5.0-1). Although the results provided environmental information about the plants and animal species that were once present in the area, the analyses did not reveal any information that would indicate that RIV-1330/H or other nearby sites are unique or significant among other similar sites found throughout southern California that had similar environmental conditions. Further data analysis is not warranted, as it would only add similar information to the current body of knowledge which indicates that the archaeological resources present on the Project site do not meet the definition of a significant archaeological resource under CEQA Guidelines § 15064.5. Although the Pechanga Band and Soboba Band of Luiseño Indians consider these features as important links to their ancestors, the Tribes have not provided substantial evidence that the on-site features qualify as significant tribal cultural resources under the law.

According to CEQA Statute § 21074(a), "Tribal cultural resources" are either of the following:

- (1) *Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:*
 - (A) *Included or determined to be eligible for inclusion in the California Register of Historical Resources.*
 - (B) *Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.*

As indicated earlier in this subsection, the archaeological resources on the Project site have cultural value to Native American tribes, but are not listed in a local register of historical resources or in the



California Register of Historic Places. Further, there is no substantial evidence to indicate that the resources are eligible for listing in the California Register. To be eligible for the Register, (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852), the resource must have including the following:

(A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

(B) Is associated with the lives of persons important in our past;

(C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

(D) Has yielded, or may be likely to yield, information important in prehistory or history.

The archaeological resources on the Project site do not meet any of the four criteria listed above to be eligible for the California Register. The Pechanga Tribe opined in communications with the County that the archaeological sites recorded on the property and a larger presumed tribal cultural landscape are eligible under Criteria C and D.

Regarding Criterion C, a resource must embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of an important creative individual, or possesses high artistic values. None of the archaeological sites on the Project site meet this criterion. The resources are comprised of milling features and a historic trash scatter that are not significant or unique when considered in context with other similar sites throughout southern California and the surrounding landscape. Repeated review of the property over the past several years has noted the absence of rock art, although possible rock art was noted at the site in a prior survey. If rock art was ever present at the site, it no longer exists. There is no evidence of “the work of an important creative individual” or “high artistic value” because a pictograph must be present in order to be evaluated, and none are present. Because the pictograph no longer exists, if it ever did, it lacks any form of integrity, and as a result, cannot be evaluated as a significant resource under Criterion C.

Regarding Criterion D, the Pechanga Tribe opined that because the area once contained archaeological resources in addition to those that are currently present, it will offer additional information that could add to the current body of information already available regarding land use, settlement patterns and the prehistoric lifeways of the region's traditional people. However, the archaeological evidence gathered during the field investigations at the subject property and documented in *Technical Appendices D1 and D2* has provided the substantial evidence from which to conclude that the research potential for each site has been exhausted. Although additional data may be available, that data would not substantially improve or change the understanding of the sites and would only produce data for data's sake. Additionally, no subsurface cultural resource deposits were identified within the Project site during the archaeological field surveys documented in *Technical Appendices D1 and D2*.



~~(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.~~

~~Section 5024.1 of the Public Resources Code states that a cultural landscape is a TCR if the landscape is geographically defined in terms of the size and scope of the landscape and if it meets the definition of a “tribal cultural resource” as stated in CEQA Section 21074. As stated:~~

~~(b) A cultural landscape that meets the criteria of subdivision (a) [CEQA Statute § 21074(a)] is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.~~

~~(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a) [CEQA Statute § 21074(a)].~~

~~As noted above, the TCR must meet the eligibility criteria for the California Register of Historic Resources, which the Project site and resources on the Project site do not. Further, the size and scope of a potential cultural landscape that includes the Project site not been defined by the Tribe or any other entity. Thus, there is no substantial evidence to indicate that the Project site is a TCR.~~

~~Implementation of the proposed Project would directly impact Site RIV 8401 and Site RIV 8402 on the Building D Site and Site RIV 11,874 on the Building E Site, and a portion of Site RIV 1330/H and a portion of Site RIV 8901 on the Building E Site. The Project Applicant has also agreed to attempt to move some of the milling features within the Project’s impact footprint into proposed landscaped areas on the Building D Site and Building E Site. The physical feasibility of moving the rocks that contain these features has been evaluated by the Riverside County Geologist, and mapping of the features that may be possible to move without damage has been provided to the Tribes. Because there is a lack of substantial evidence of a TCR being located on the property, impacts to tribal cultural resources would be less than significant.~~

4.5.5 CUMULATIVE IMPACT ANALYSIS

This cumulative impact analysis considers development of the Project site in conjunction with other development projects in the vicinity of the Project site resulting from full General Plan buildout in the parts of the Riverside County General Plan covered by the Harvest Valley/Winchester Area Plan (HVWAP), the Lakeview/Nuevo Area Plan (LNAP), and the Mead Valley Area Plan (MVAP), in addition to the City of Moreno Valley, the City of Perris, and the City of Riverside. An archaeological resources search conducted by BFSa reported that 73 cultural resources are located within a one-mile radius of the Building D Site and the formerly larger Building E Site. The 73 cultural resources include



63 64 bedrock milling sites, two historic railroad tracks, one historic debris site, three historic residences, one World War II barracks, one historic trash deposit and one historic steel pipeline.

Record searches and field surveys of the Project site indicate the absence of significant historical sites and resources on the Project site. Therefore, the Project has no potential to contribute towards a significant cumulative impact to historical sites and resources, as defined in California Code of Regulations, § 15064.5.

Regarding archaeological resources, the proposed Project would directly impact Site RIV-8401 and Site RIV-8402RIV on the Building D Site and Site RIV-11,874 on the Building E Site, and a portion of Site RIV-1330/H and a portion of Site RIV-8901 on the Building E Site. The Project Applicant has offered to attempt the relocation of several milling sites into landscaped areas on Building D Site and Building E Site. Because none of the on-site cultural resources that would be impacted by the Project meet the definition of a significant or unique cultural resource pursuant to CEQA Guidelines § 15064.5, or are identified as a religious or scared use, the direct loss of these resources would be less than significant.

~~Notwithstanding the fact that the on-site archaeological sites are found to be not unique and not significant under CEQA, the Native American tribal groups from this area consider these features as important links to their ancestors. As part of the SB18 and AB52 consultation processes, the County of Riverside received information from the Pechanga Band of Luiseño Indians asserting that the Project area is part of a tribal cultural landscape extending several miles around the Project site and consisting of related archaeological sites associated with either the village of Qazáalku or a smaller (unnamed) village. The Tribe cited Tribal knowledge, oral history, internal Tribe records, ethnological documentation, and the archaeological research conducted for the Building D Site and formerly larger Building E Site by BFSa as the basis of this assertion, although a large majority of the documentation submitted by the Pechanga Tribe to Riverside County contained a summary of Tribal knowledge and oral tradition, supported by limited scientific analysis and ethnographic data. (Pechanga, 2015; Pechanga, 2016) While it is acknowledged that the archaeological resources identified on the Project site are part of Luiseño settlement and subsistence history, the substantial evidence that is required by CEQA to distinguish the Project site or the presumed larger cultural landscape as unique or significant among the many other lands inhabited by Native Americans across California and North America has not been provided. In AB 52 consultation communications with Riverside County, the Tribe refers to a tribal cultural landscape generally, but does not provide geographic definition as to the scope and boundaries of the landscape. Therefore, an analysis of cumulative effects on a geographically undefined landscape is speculative. Based upon a simple aerial photographic review of the Project site and the properties surrounding the Project site for several miles, any possible cultural landscape (the scale of which is undefined by the Pechanga Tribe) would lack integrity under existing conditions. This is evident based upon the amount of development, general environmental change, agriculture, and historic settlement that has occurred in and surrounding the Project site for the last 150 years. Integrity is a property's historic/prehistoric identity evidenced by the survival of physical characteristics from the property's historic or prehistoric period. The seven qualities of integrity are: location, setting, feeling, association, design, workmanship, and materials. Together, evaluations of significance and integrity, when combined with historic research, documentation of existing conditions, and analysis findings, influence later treatment and interpretation decisions. AB 52, Section 21084.3(2A) states that integrity is of high importance when considering TCRs and their protection under CEQA. If the~~



~~resources within the Project site, or on adjacent properties, do not meet the threshold for integrity, then the conclusion that an area is a cultural landscape that qualifies as a TCR cannot be made.~~

~~Further, a possible cultural landscape is not necessarily a tribal cultural resource (TCR) as defined under AB 52. AB 52 does not provide that all cultural landscapes qualify as TCRs unless the landscape meets the definition given in Public Resources Code § 21074(b). The preponderance of factual evidence available to Riverside County indicates that the resources present on the Project site do not meet the minimum thresholds under Public Resources Code § 21074(b) to qualify as a cultural landscape or TCR. Considering the fact that a cultural landscape and TCR are not present based on the definitions given in Public Resources Code § 21074(b), development of the Project as proposed, when considered in context with other cumulative development in the area, would have a less than cumulatively considerable impact on the cultural landscape.~~

In the unlikely event that significant archaeological resources are buried beneath the surface of the Project site, unearthed during Project construction activities, and not properly treated, the Project would significantly impact archeological resources. Other projects within the region would similarly have the potential to impact significant archaeological resources during ground-disturbing activities. Therefore, the Project's potential to directly impact subsurface archaeological deposits is a potential cumulatively considerable impact for which mitigation is required. Refer to Subsection 4.5.7 for applicable mitigation measures.

Finally, due to mandatory compliance required of all ground-disturbing construction activities with the provisions of California Health and Safety Code § 7050.5 as well as Public Resources Code § 5097 et. seq., human remains would be assured proper treatment if encountered. Because all other development projects within the region similarly would be required to comply with State law, any cumulative impact associated with human remains discovery would be reduced to below a level of significance.

4.5.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Historic Resources

Thresholds (a) and (b) for the Building D Site and Building E Site: Less-than-Significant Impact. The Project as proposed on the Building D Site would not alter or destroy an historic site and would not cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations, § 15064.5.

Archaeological Resources

Threshold (a) and (b) for the Building D and Building E Site: Significant Direct and Cumulatively Considerable Impact. Five archaeological sites are located on the Project site, of which three would be fully impacted by the Project and two would be partially impacted by the Project. None of the five sites meet the definition of a significant historic resource listed in CEQA Guidelines § 15064.5. Therefore, the Project would not alter or destroy an unique archaeological site or cause a substantial adverse change in the significance of a known, unique archaeological resource. Regardless, mitigation is provided herein to further reduce the already less-than-significant impacts. Project-related construction activities have the potential to unearth and adversely impact significant archaeological



resources that may be buried beneath the ground surface and discovered during Project construction activities. Impacts would be significant on a direct and cumulatively considerable basis if discovered resources during construction are determined to be significant and are not properly identified and treated.

Threshold (c) for the Building D Site and Building E Site: Less-than-Significant Impact. There are no known human remains on the Project site. In the unlikely event that human remains are discovered during Project grading or other ground disturbing activities, compliance with the applicable provisions of the California Health and Safety Code § 7050.5 and California Public Resources Code § 5097 et. seq. is required. Mandatory compliance with State law would ensure that human remains, if encountered, are appropriately treated and would preclude the potential for significant impacts to Native American remains.

~~Threshold (d) for the Building D Site and Building E Site: No Impact.~~ The Project has no potential to restrict a religious or sacred use.

~~Threshold (e) for the Building D Site and Building E Site: Less than Significant Impact.~~ Five archaeological sites are located on the Project site, of which three would be fully impacted by the Project and two would be partially impacted by the Project. None of the five sites meet the definition of a significant resource listed in CEQA Guidelines § 15064. In addition, because there is a lack of substantial evidence to conclude that the subject property is part of a cultural landscape, the Project site is deemed by Riverside County as part of neither a cultural landscape nor a TCR under AB 52. As such, tribal cultural resources as defined in Public Resources Code 21074 are not present on the Project site and impacts would be less than significant.

4.5.7 MITIGATION

Applicable County Regulations and Design Requirements

The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- Pursuant to California Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b), human remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. In the event that the remains are determined to be of Native American origin, the Native American Heritage Commission (NAHC) shall be contacted by the Coroner within the period specified by law (24 hours). Subsequently, the NAHC shall identify the "Most Likely Descendant." The Most Likely Descendant shall then make recommendations and engage in consultation with the property owner concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. Human remains from other ethnic/cultural groups with



recognized historical associations to the project area shall also be subject to consultation between appropriate representatives from that group and the County Archaeologist.

Mitigation Measures

- MM 4.5-1 Prior to the issuance of grading permits, the developer/permit applicant shall enter into a monitoring agreement with the Pechanga and Soboba Native American Tribes. A Native American monitor shall be on-site during all initial ground disturbing activities and excavation of each portion of the Project site including clearing, grubbing, tree removals, and trenching. In conjunction with an Archaeological Monitor, the Native American Monitor shall have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The developer/permit applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this condition.
- MM 4.5-2 Building D Site: In accordance with the letter dated February 2, 2017 to Heather Thomson, County Archaeologist from Project Archaeologist Brian F. Smith and Associates, regarding “Relocation of Bedrock Milling Features Located Within Knox Business Park (Decker Parcels I and II) and as a condition of the grading permit for the Building D Site (Planning Case No. 36950), before construction activities are allowed to start, and using professional archaeological methods, any visible artifacts associated with Sites CA-RIV-8401 and CA-RIV-8402 shall be recovered and recorded by the Archaeological Monitor and Native American Monitors, and photo documentation of each ~~site~~ site shall occur. The current Department of Parks and Recreation forms for the sites shall be updated by the Project Archaeologist, detailing which features were relocated, the process through which this was done, and updated maps using sub meter GIS technology to document the new location of each feature. The relocation information shall be included in a Phase IV Monitoring Report (See Mitigation Measure MM 4.5-8).
- MM 4.5-3 Building E Site: In accordance with the letter dated February 2, 2017 to Heather Thomson, County Archaeologist from Project Archaeologist Brian F. Smith and Associates, regarding “Relocation of Bedrock Milling Features Located Within Knox Business Park (Decker Parcels I and II) and as a condition of the grading permit for the Building E Site (Planning Case No. 36962), before construction activities are allowed to start, and using professional archaeological methods, any visible artifacts associated with Sites CA-RIV-1330H, CA-RIV-8901 and CA-RIV-11874 shall be recovered and recorded by the Archaeological Monitor and Native American Monitors, and photo documentation of each ~~site~~ site shall occur. The current Department of Parks and Recreation forms for the sites shall be updated by the Project Archaeologist, detailing which features were relocated, the process through which this was done, and updated maps using sub meter GIS technology to document the new location of each feature.



The relocation information shall be included in a Phase IV Monitoring Report (See Mitigation Measure MM 4.5-8).

MM 4.5-4 Building E Site: Prior to issuance of a grading permit for Planning Case No. 36962, the developer/permit applicant shall provide evidence to the County Archaeologist that the following notes have been provided on the Grading Plan: “Temporary fencing shall be provided for the protection of the off-site parcel located to the immediate west during any grading activities within 100 feet of the western property boundary. The fence shall be installed under the supervision of the County approved archaeologist and Native American monitors prior to commencement of grading or brushing and be removed only after grading operations have been completed. If a breach in the fence occurs, it shall be immediately repaired by on-site personnel and archaeological monitors shall be notified by the construction contractor within 24-hours to verify that the breach has been repaired and no impacts beyond the fence have resulted from the breach.”

MM 4.5-5 Prior to the issuance of grading permits, the developer/permit applicant shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist has been contracted to implement a Cultural Resource Monitoring Program. A Cultural Resource Monitoring Plan shall be developed by the Archaeological Monitor and Native American Monitors that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with this project. This document shall be provided to the County Archaeologist for review and approval prior to issuance of the grading permit who will assure that the Native American representatives have had adequate time to review and comment prior to finalization. These measures shall include, but shall not be limited to, the following:

- a) Archaeological Monitor: An adequate number of qualified archaeological and Native American monitors shall be present to ensure that all earth moving activities are observed; the monitors shall be on-site during all grading activities for areas to be monitored including any off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist in consultation with the Native American monitors.
- b) Cultural Sensitivity Training: The Project Archaeologist and a representative designated by the Tribe shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all Construction Personnel. Training will include a brief review of the cultural sensitivity of the Project site and the surrounding area; what resources could potentially be identified during



earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. This is a mandatory training and all construction personnel must attend prior to beginning work on the Project site. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.

- c) Building D Site Controlled Grading: Several bedrock milling features at cultural sites CA-RIV-8401 and CA-RIV-8402 will be impacted during construction activities and the soils surrounding them will be disturbed. A controlled grading program will be developed by the Project Archaeologist, in consultation with the Native American representatives, and included in the Cultural Resources Monitoring Program. The controlled grading program shall require the systematic removal of the ground surface to allow for the identification, documentation and recovery of any subsurface cultural deposits. Results of the controlled grading program shall be included in the Phase IV Monitoring Report (see Mitigation Measure MM 4.5-8).

Building E Site Controlled Grading: Several bedrock milling features at cultural sites CA-RIV-8901, CA-RIV-1330/H and CA-RIV-11874 will be impacted during construction activities and the soils surrounding them will be disturbed. A controlled grading program will be developed by the Project Archaeologist, in consultation with the Native American representatives, and included in the Cultural Resources Monitoring Program. The controlled grading program shall require the systematic removal of the ground surface to allow for the identification, documentation and recovery of any subsurface cultural deposits. Results of the controlled grading program shall be included in the Phase IV Monitoring Report (see Mitigation Measure MM 4.5-8).

MM 4.5-6 If during ground disturbance activities, unanticipated cultural resources are discovered, the following procedures shall be followed:

- a) All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the applicant shall call the County Archaeologist immediately upon discovery of the cultural resource*. A meeting shall be convened between the developer, the project archaeologist**, the Native American tribal representative (or other appropriate ethnic/cultural group representative), and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery; avoidance, etc.) for the cultural resource.



- b) Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.
- * A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to sacred or cultural importance.
 - **An archaeological monitor is required per Mitigation Measure MM 4.5-5; however, if not already employed by the project developer, a County approved archaeologist shall be employed by the project developer to assess the value/importance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary.

MM 4.5-7 Prior to building final, provide evidence to the satisfaction of the County Archaeologist that all archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project; such as testing of archaeological sites that took place years ago), have been curated at the Western Science Center, a Riverside County Curation facility that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers and tribal members for further study. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.

MM 4.5-8 Upon completion of the implementation phase, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with the grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the [Transportation & Land Management Agency \(TLMA\)](#) website. The report shall include results of any feature relocation or residue analysis required as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting. A report documenting the field and analysis results and interpretation of the artifact and research data within the research context shall be completed and submitted to the satisfaction of the Lead Agency (County of Riverside) prior to issuance of any building permits. The report will include Department of Parks and Recreation (DPR) and Primary Archaeological Site Forms. A final copy shall be submitted to the Eastern Information Center (EIS) and Native American tribes that request a copy.

4.5.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION



Thresholds (a) and (b) for the Building D Site and the Building E Site: Less-than-Significant with Mitigation Incorporated. Implementation of Mitigation Measures MM 4.5-1 and MM 4.5-5 through MM 4.5-8 would ensure that, if significant archaeological resources are unearthed during ground-disturbing construction activities, those resources are properly identified and appropriately treated as recommended by a qualified archaeologist and approved by the County Archaeologist. Also, Mitigation Measures MM 4.5-2 through MM 4.5-5 would further reduce the already less-than-significant impacts associated with known resources on the site that are not significant and not unique under CEQA. With implementation of the required mitigation, the Project's potential to impact significant archaeological resources would be reduced to less than significant.



4.6 GEOLOGY AND SOILS

As discussed in EIR Section 3.0, *Project Description*, the proposed Project involves the development of two properties located south of Oleander Avenue and both east and west of Ellsworth Street (also called “Decker Road” in this EIR and its associated Technical Appendices) totaling approximately 58.6 acres. The Building D Site is located on approximately 37.1 acres east of Ellsworth Street, and the Building E Site is located on approximately 21.5 acres west of Ellsworth Street. Both properties are collectively referred to herein as the “Project site.” For purposes of evaluation herein, the two properties are referred to individually as the “Building D Site” and the “Building E Site.”

The analysis in this Subsection is based upon the following technical reports. All other sources used in this Subsection are listed in EIR Section 7.0, *References*.

The technical reports prepared for the Building D Site include the following:

- “Geotechnical Investigation, Infiltration Study, and Rock Rippability Report for the Proposed Decker Assemblage Industrial Site, Located at the Southeast Corner of Oleander Avenue and Decker Road,” prepared by Matrix Geotechnical Consulting Inc., (hereafter, “Matrix”) dated September 30, 2014, and appended to this EIR as *Technical Appendix E1* (Matrix, 2014).
- “Change of Engineer of Record, Response Report and Plan Review,” prepared by Southern California Geotechnical (hereafter, SoCalGeo), dated June 16, 2016, and appended to this EIR as *Technical Appendix E2* (SoCalGeo, 2016a).

The technical reports prepared for the Building E Site include the following. Please note that these reports were prepared prior to the Project Applicant’s decision to reduce the size of the Building E Site to its current configuration; therefore, the following reports cover additional acreage (west of the Building E Site) that is no longer in the Project boundary. The currently proposed Building E Project was reviewed by the geotechnical engineer of record, with findings documented in a technical supplement placed in the front of *Technical Appendix E4*.

- “Geotechnical Investigation and Rock Rippability Report for the Proposed Decker II Assemblage Industrial Site, Located at the Southwest Corner of Oleander Avenue and Decker Road,” prepared by Matrix, dated February 19, 2015, and appended to this EIR as *Technical Appendix E3* (Matrix, 2015).
- “Change of Engineer of Record, Response Report and Plan Review”, prepared by SoCalGeo, dated August 2, 2016, and appended to this EIR as *Technical Appendix E4* (SoCalGeo, 2016b).
- “Geotechnical Report Update and Plan Review,” prepared by SoCalGeo, dated January 27, 2017 and appended to this EIR at the front of *Technical Appendix E4* (SoCalGeo, 2017a).



4.6.1 EXISTING CONDITIONS

A. Regional Geologic Setting

The Project site is situated within a natural geomorphic province in southwestern California known as the Peninsular Ranges. The Peninsular Ranges province consists of several northwesterly-trending ranges truncated to the north by the east-west trending Transverse Ranges. Prior to the mid-Mesozoic, the region was covered by seas and thick marine sedimentary and volcanic sequences were deposited. The bedrock geology that dominates the elevated areas of the Peninsular Ranges consists of high-grade metamorphic rocks intruded by Mesozoic plutons. During the Cretaceous Period, extensive mountain building occurred during the emplacement of the southern California batholith. The Peninsular Ranges have been substantially disrupted by Tertiary and Quaternary strike-slip faulting along the Elsinore and San Jacinto faults. This tectonic activity has resulted in the present terrain (SoCalGeo, 2016a, p. 3) (SoCalGeo, 2016b, p. 3).

The primary available geologic reference applicable to the Project site is the Geologic Map of the Steel Park Quadrangle, Riverside County, California, published by Santa Barbara Museum of Natural History, 2003. A portion of the map relevant to the Project site is included as Plate 3 of *Technical Appendix E2*. The map indicates that the majority of the Project site is underlain by quartz diorite rocks of Cretaceous age. The quartz diorite rocks are described as gray to light gray, massive to more commonly gneissoid, composed mostly of plagioclase feldspar with the remainder of quartz, biotite, and hornblende. A portion of the northeastern corner of the Project site is mapped as older surficial sediments. These soils are described as alluvial sand and gravel. (SoCalGeo, 2016a, p. 3) (SoCalGeo, 2016b, p. 3)

The Project site is situated along the Perris Block, an eroded mass of Cretaceous and older crystalline rock. Thin sedimentary and volcanic units mantle the bedrock in a few places with alluvial deposits filling in the lower valley areas. The Perris Block, approximately 20 miles by 50 miles in extent, is bounded by the San Jacinto Fault Zone to the northeast, the Elsinore Fault Zone to the southwest, the Cucamonga Fault Zone to the northwest, and to the southeast by the fringes of the Temecula basin, where the boundary is ill-defined. The Perris Block in its entirety has been repeatedly uplifted and occasionally depressed since the beginning of Pliocene time (5.3± million years before present). These episodic movements have led to internal fracturing, shearing, and faulting, that are discontinuous and sporadic. (Matrix, 2015, Appendix E p. 2).

B. Soils and Bedrock

1. Building D Site

Artificial Fill

The northeast and southwest portions of the Building D Site contain undocumented artificial fill up to depths of six-to-seven feet below ground surface. The artificial fill in the northeastern portion of the Building D Site contains a substantial amount of crushed gravel and a dirt roadway surrounding the



crushed gravel area. The artificial fill in the southwestern portion of the property contains primarily fill soils of sands and silty sands (Matrix, 2014, p. 4).

Alluvium

Quaternary very old alluvial fan deposits exist directly below the fill materials in the northeastern and southwestern portions of the Building D Site and at the surface throughout the central-western and eastern portions of the property. These materials are comprised of permeable to non-permeable, light-pale brown to brown in color, medium dense to dense silts, clayey sands and silty sands. (Matrix, 2014, p. 8).

Near Surface Bedrock

Bedrock (Val Verde Tonalite) underlies most of the Building D Site beneath the veneer of artificial fill and alluvium (as described above). Observed bedrock was white-gray to gray and moderately hard to very hard. In isolated areas, the upper five to 24 feet of bedrock is weathered and soft to moderately hard. (Matrix, 2014, p. 9)

2. Building E Site

Artificial Fill

Artificial fill is located at the ground surface of the Building E Site, mainly within the southwestern, southern, and northeastern portions of the property. The fill is characterized as light-brown to brown, dry to damp, and loose to medium dense silty sands, sands, silts, and boulders that extend to depths ranging from two to 6.5 feet below the existing ground surface (Matrix, 2015, p. 6).

Alluvium

Quaternary alluvial fan deposits (both youthful and older alluvium) are located directly below the fill materials and at the surface throughout the majority of the Building E Site. The alluvial materials are characterized as silt, clayey sand, and silty sand, permeable to nonpermeable, light pale brown to brown in color, medium dense to dense, and were interfingered with caliche stringers, alluvial horizons directly above the bedrock, and colluvial deposits of silty-clayey material in the banks of the ephemeral drainages onsite. (Matrix, 2015, p. 6)

Near Surface Bedrock

Bedrock (Val Verde Tonalite) underlies most of the Building E Site beneath the veneer of artificial fill and alluvium (as described above). Several large granitic boulders are located in the western portion of the Building E Site. Val Verde Tonalite was observed to be white-gray to gray and was found to be in a moderately hard to very hard state. In select areas, the upper 5 to 24 feet was more weathered and considered to be in a soft to moderately hard state. (Matrix, 2015, p. 7)



C. Topography

The general topography of the Project site is sloping from west to east, with minor grade changes from north to south. The high point of the Project site is in the western portion of the Building E Site, at approximately 1,665 feet above mean sea level (AMSL), and the low-point of the Project site is in the eastern portion of the Building D Site at approximately 1,556 feet AMSL. The Project site's topographic conditions are illustrated on Figure 2-6, *USGS Topographic Map*, in Section 2.0, *Environmental Setting*.

1. *Building D Site*

The topography of the Building D Site is slightly sloping from west to east, with subtle grade changes from south to north. From west to east, the Building D Site descends from a high point of approximately 1,600 feet AMSL to 1,556 feet AMSL. From south to north, the Building D Site descends from a high point of approximately 1,580 feet AMSL to 1,575 feet AMSL. The topographic relief of the Building D Site is approximately 44-feet from west to east and approximately 5-feet from south to north. (Matrix, 2014, p. 5).

2. *Building E Site*

The topography of the Building E Site is moderately sloping from west to east, with subtle grade changes from north to south. From west to east, the Building E Site descends from a high point of approximately 1,665 feet AMSL to a low point of approximately 1,600 feet AMSL for a topographic relief of approximately 65-feet. The Building E Site has negligible topographic relief from north to south. (Matrix, 2015, p. 4).

D. Groundwater

The groundwater encountered during the geotechnical investigations of the Building D Site and the Building E Site is considered to be perched on the underlying impermeable bedrock and not representative of regional groundwater levels (SoCalGeo, 2016a, p. 4) (SoCalGeo, 2016b, p. 4). Regional groundwater levels are approximately 20 feet deep.

E. Seismic Hazards

The Project site is located in an area of southern California that is subject to strong ground motions due to seismic events (i.e., earthquakes). The geologic structure of southern California is dominated by northwest-trending faults associated with the San Andreas Fault system. As depicted on Figure 4.6-1, *Earthquake Fault Zones*, the nearest known active fault to the Project site is the San Jacinto fault, which is a major branch of the San Andreas Fault system, located approximately 8.9 miles northeast of the Project site. (Matrix, 2015, p. 8; Matrix, 2014, p. 10) (SoCalGeo, 2016a, p. 4) (SoCalGeo, 2016b) An active fault is defined by the United States Geological Survey (USGS) as a fault that is likely to have another earthquake sometime in the future. Faults are commonly considered active if they have moved one or more time in the last 10,000 years. (USGS, 2012) The largest event within 100

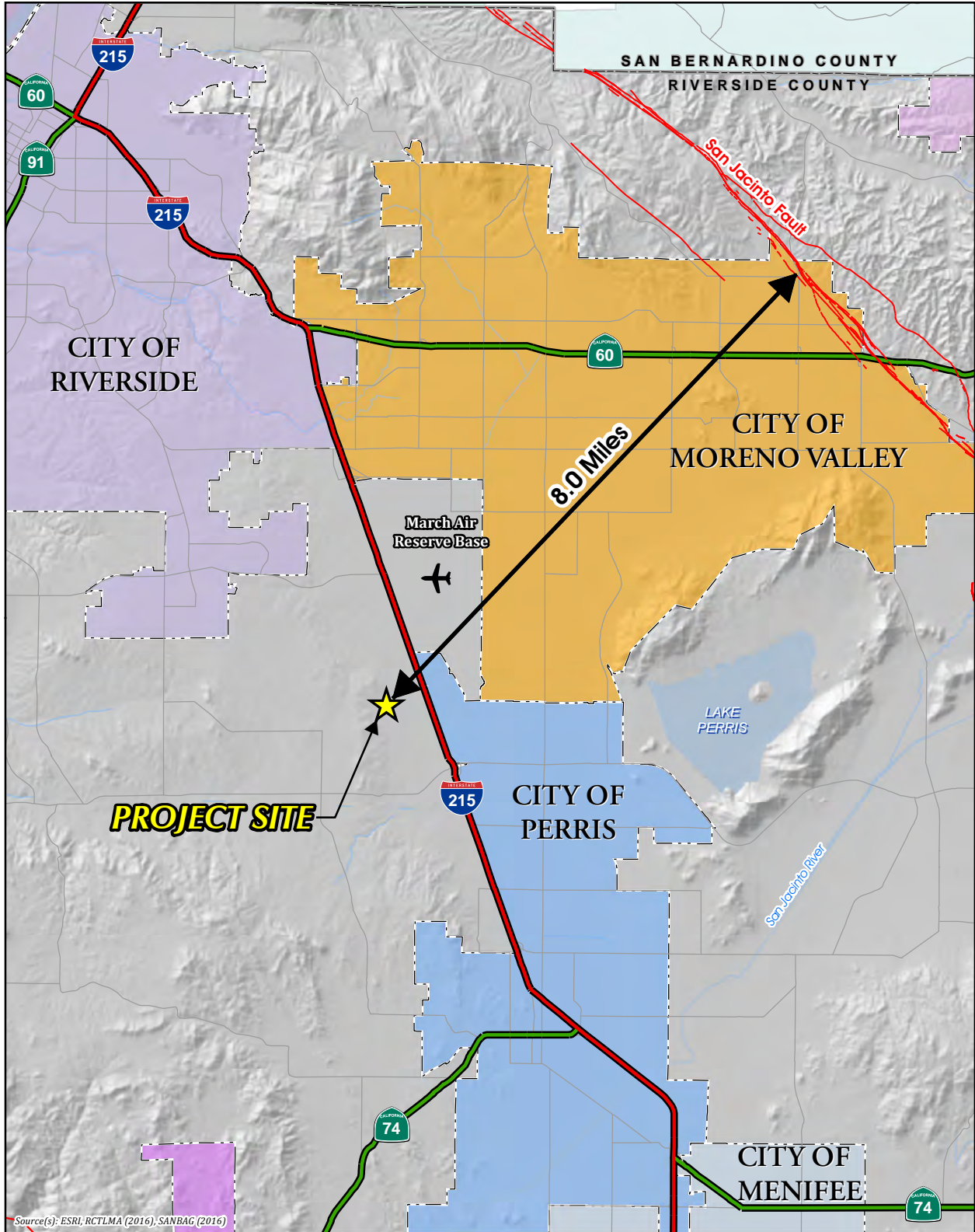
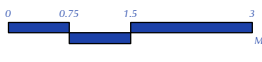


Figure 4.6-1



EARTHQUAKE FAULT ZONES



kilometers (km) (62 miles) of the Project site was a 6.4 magnitude located 7 km (4.3 miles) west-northwest of Newport Beach in Orange County, on March 11, 1993. (SoCalGeo, 2016a, p. 4) (SoCalGeo, 2016b, p. 4) Refer to *Technical Appendix E2* and *Technical Appendix E4* Enclosures Plates E-1 and E-2: Seismic Design Parameters; a table that identifies the known faults, the distance to the Project site, and the maximum earthquake magnitude; and a table that identifies recent significant seismic events within 100 km (62 miles) of the Project site.

Historical aerial photographs (1996, 1978, 1994, 2002, 2005, 2009, and 2012) of the Project site were reviewed by SoCalGeo to characterize any potential hazard such as fault scarps, fault line scarps, landslides, etc. (SoCalGeo, 2016a, p. 4) (SoCalGeo, 2016b, p. 4) Based on SoCalGeo's review of the historical aerial photographs, no evidence of linear features (i.e. fault lines, fault line scarps) indicative of faulting was observed transecting the Project site or the surrounding area. (SoCalGeo, 2016a, p. 4)

Secondary hazards associated with seismic events include surface rupture, ground failure, liquefaction, and landslide and rockfalls, as briefly discussed below. The potential for these secondary hazards to affect the Project site is described below.

Fault Rupture / Ground Motion

Fault rupture can occur along pre-existing, known active fault traces; however, fault rupture also can splay from known active faults or rupture along unidentified fault traces. SoCalGeo determined that the peak ground acceleration (PGAM) for the Project site is 0.50g (SoCalGeo, 2016a, p. 11) (SoCalGeo, 2016b, p. 10).

Building D Site

The Building D Site is not located within an Alquist-Priolo Earthquake Fault Zone and there are no active or potentially active faults on the Building D Site. The nearest Alquist-Priolo Earthquake Fault Zone is the San Jacinto Fault Zone located approximately 8.0 miles northeast of the Project site. Therefore, the potential for surface rupture is not anticipated to occur. (Matrix, 2014, pp, 10 and 15)

Building E Site

The Building E Site is not located within an Alquist-Priolo Earthquake Fault Zone and there are no active or potentially active faults on the Building E Site (Matrix, 2015, pp. 4, 8, and 10). The nearest Alquist-Priolo Earthquake Fault Zone is the San Jacinto Fault Zone located approximately 8.0 miles northeast of the Project site. Therefore, the potential for surface rupture is considered unlikely.

Liquefaction

Liquefaction is a phenomenon in which loose, saturated, relatively cohesion-less soil deposits lose shear strength during strong ground motions, which causes the soil to behave as a viscous liquid. Liquefaction is generally limited to the upper 50 feet of subsurface soils. Research and historical data indicate that loose granular soils of Holocene to late Pleistocene age below a near-surface groundwater table are most susceptible to liquefaction, while ground motions do not substantially affect most clayey



soils (Southern California Earthquake Center, 1999, pp. 5-6). Therefore, in order for the potential effects of liquefaction to occur at the ground surface, soils generally must be Holocene to late Pleistocene age, granular, loose to medium dense, relatively saturated near the ground surface, and be subjected to a sufficient magnitude and duration of ground shaking.

Building D Site

According to Riverside County GIS data, a small area in the eastern portion of the Building D Site has a “moderate” susceptibility to liquefaction (RCIT, 2015). However, based on a survey of the Building D Site, including a laboratory analysis of site soils, the property contains cohesive soil and the potential for liquefaction to occur on the property is very low (Matrix, 2014, p. 12). The perched groundwater was considered during the liquefaction assessment. However, due to the dense to very dense alluvium and older alluvium underlain by very dense bedrock, liquefaction is not considered a necessary design consideration for the Building D Site. (SoCalGeo, 2016a, p. 4)

Building E Site

Based on an analysis of soils from the Building E Site, the property contains cohesive soils that are not susceptible to liquefaction (Matrix, 2015, p. 10). Similarly, Riverside County mapping data does not identify the Building E Site within an area susceptible to liquefaction (RCIT, 2015). The perched groundwater was considered during the liquefaction assessment. However, due to the dense to very dense alluvium and older alluvium underlain by very dense bedrock, liquefaction is not considered a necessary design consideration for the Building E Site. (SoCalGeo, 2016a, p. 4)

Landslides and Rockfalls

The Building D Site and the Building E Site do not contain any steep natural slopes or manufactured slopes. The surface rocks on the Building D Site and the Building E Site are embedded in the ground and do not present landslide or rockfall hazards (Matrix, 2014, p. 15). (Matrix, 2015, p. 13).

F. Slope and Soil Instability Hazards

Soil Erosion

Erosion is the process by which the upper layers of the surface (such as soils) are worn and removed by the movement of water or wind. Soils with characteristics such as low permeability and/or low cohesive strength are more susceptible to erosion than those soils having higher permeability and cohesive strength. For water erosion, the slope gradient on which a given soil is located contributes to the soil’s resistance to erosive forces because water is able to flow faster down steeper gradients. Wind erosion can damage land and natural vegetation by removing soil from one place and depositing it in another. It mostly affects dry, sandy soils in flat, bare areas, but wind erosion may occur wherever soil is loose, dry, and finely granulated.



According to the *Riverside County 2015 General Plan Update Draft EIR*, soils on the Building D Site and the Building E Site are “moderately susceptible” to erosion (Riverside County, 2015, Figure 4.12-6).

Shrinkage/Subsidence Potential

Subsidence is a gradual settling or sudden sinking of the ground surface (i.e., loss of elevation). The principal causes of subsidence are aquifer-system compaction, drainage of organic soils, underground mining, and natural compaction. Shrinkage is the reduction in volume in soil as the water content of the soil drops (i.e., loss of volume).

Based on the conditions encountered at subsurface testing locations at the Building D Site and the Building E Site, removal and re-compaction of the soils on the property would result in shrinkage ranging from 0 to 15 percent. Minor ground subsidence is expected to occur in the soils below the zone of removal, due to settlement during construction activities on the property (Matrix, 2014, p. 18). (Matrix, 2015, p. 16). Therefore, the soils on the Building D Site and Building E Site have the potential for shrinkage and subsidence.

Soil Expansion Potential

Expansive soils are soils that exhibit cyclic shrink and swell patterns in response to variations in moisture content. Laboratory testing indicated that the soils on the Building D Site and the Building E Site have a very low expansion potential (Matrix, 2014, p. 15) (Matrix, 2015, p. 13).

Landslide Potential

The Project site and immediately surrounding properties are either flat or gently sloping and contain no steep natural or manufactured slopes; thus, there is no potential for landslides to occur on or immediately adjacent to the site.

G. Applicable Environmental Regulations

Federal Water Pollution Control Act (Clean Water Act)

The Federal Water Pollution Control Act (also known as the Clean Water Act (CWA)) is the principal federal statute that addresses water resources. The provision of the CWA applicable to geology and soils is CWA Section 402, which applies to all construction sites of over one acre in size and, in part, serves to control the potential impacts of erosion. CWA Section 402 authorizes the National Pollutant Discharge Elimination System (NPDES) permit program that covers point sources of pollution discharging to a water body. The NPDES program requires operators of construction sites one acre or larger to prepare a Storm Water Pollution Prevention Plan (SWPPP) and obtain authorization to discharge storm water under an NPDES construction storm water permit.



State Water Resources Control Board (SWRCB)

The State Water Resources Control Board adopts statewide water quality control plans and its nine Resource Water Quality Control Boards (RWQCBs) are required to develop and adopt regional water quality control plans that conform to state water quality policy. The Santa Ana RWQCB's Santa Ana River Basin Water Quality Control Plan is applicable to the Project site; it designates beneficial uses of water bodies to be protected and establishes water quality objectives.

South Coast Air Quality Management District, Rule 403

The South Coast Air Quality Management District (SCAQMD) is responsible for enforcing air pollution control measures in the South Coast Air Basin, within which the Project site is located. Rule 403 addresses blowing dust from construction sites and is applicable to the Project due to the potential for wind erosion during Project grading and construction activities.

Alquist-Priolo Earthquake Fault Zoning Act (CA Pub. Res. Code § 2621 et Seq.)

The Alquist-Priolo Special Studies Zone Act was signed into law in 1972 and renamed the Alquist-Priolo Earthquake Fault Zoning Act in 1994. The primary purpose of the Alquist-Priolo Act is to mitigate the hazard of fault rupture by prohibiting the location of structures for human occupancy across the trace of an active fault.

Neither the Building D Site nor the Building E Site is located in or near a designated Alquist-Priolo Earthquake Fault Zone (Matrix, 2014, p. 10; Matrix, 2015, p. 8).

Seismic Hazards Mapping Act (CA Pub. Res. Code § 2690 et Seq.)

The Seismic Hazards Mapping Act of 1990 is a statewide seismic hazard mapping and technical advisory program in California to assist cities and counties in fulfilling their responsibilities for protecting the public health and safety from the effects of strong ground shaking, liquefaction, landslides, or other ground failure and other seismic hazards caused by earthquakes. The California Geologic Survey (CGS) is the principal State implementing agency that mapped seismic zones requiring the completion of site-specific geotechnical investigations prior to construction of a development project.

California Building Standards Code, Title 24

The California Green Building Standards Code (CCR, Title 24), also known as the CBSC or CalGreen, is the standard from which California buildings derive appropriate building design standards. The International Building Code (IBC) used by the International Conference of Building Officials establishes design and construction standards for buildings and facilities. The CBSC incorporates the IBC as well as other uniform codes into its code standards. All development projects in California are required to comply with the CBSC.



County of Riverside Building Code

The Riverside County Building Codes is adapted from the California Building Standards Code (CCR Title 24). This code establishes site-specific investigation requirements, construction standards, and inspection procedures to ensure that development authorized by the County of Riverside does not pose a threat to the health, safety, or welfare of the public including conditions related to geologic soil hazards. The CBSC contains minimum baseline standards to guard against unsafe development. The County also adopts, in some cases, local amendments for stricter standards than the CBSC (fire, building, plumbing, electrical, etc.). The Riverside County Department of Building and Safety provides technical expertise in reviewing and enforcing these codes (Riverside County, 2015, p. 4.12-25).

4.6.2 BASIS FOR DETERMINING SIGNIFICANCE

The proposed Project would result in a significant impact to geology and soils if the Project or any Project-related component would:

Alquist-Priolo Earthquake Fault Zone or County Fault Zone

- a) *Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death; or*
- b) *Be subject to rupture of a known earthquake fault, as delineated by the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on substantial evidence of a known fault.*

Liquefaction Zone Potential

- a) *Be subject to seismic-related ground failure, including liquefaction.*

Ground-Shaking Zone

- a) *Be subject to strong seismic ground shaking.*

Landslide Risk

- a) *Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards.*

Ground Subsidence

- a) *Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in ground subsidence.*

Other Geologic Hazards

- a) *Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard.*

Slopes

- a) *Change topography or ground surface relief features;*
- b) *Create cut or fill slopes greater than 2:1 or higher than 10 feet; or*



- c) *Result in grading that affects or negates subsurface sewage disposal systems.*

Soils

- a) *Result in substantial soil erosion or loss of topsoil;*
b) *Be located on expansive soil, as defined in Section 1802.3.2 of the California Building Code (2007), creating substantial risks to life or property; or*
c) *Have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.*

Erosion

- a) *Change deposition, siltation, or erosion that may modify the channel of a river or stream or the bed of a lake; or*
b) *Result in any increase in water erosion either on or off site.*

Wind Erosion and Blowsand

- a) *Be impacted by or result in an increase in wind erosion and blowsand, either on or off site.*

4.6.3 IMPACT ANALYSIS

Alquist-Priolo Earthquake Fault Zone or County Fault Zone

Threshold a) Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death?

Threshold b) Would the Project be subject to rupture of a known earthquake fault, as delineated by the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on substantial evidence of a known fault?

A. Alquist-Priolo or County Fault Zone

Neither the Building D Site nor the Building E Site is located within an Alquist-Priolo Earthquake Fault Zone (Matrix, 2014, p. 10; Matrix, 2015, p. 8). Additionally, neither the Building D Site nor the Building E Site is located within a Riverside County-designated fault zone (RCIT, 2015). The nearest fault zone is the San Jacinto Fault Zone located approximately 8.0 miles northeast of the Project site. Therefore, there is no potential for implementation of the Project to expose people or structures to substantial adverse effects, including the risk of loss, injury, or death, related to hazards from an Alquist-Priolo Earthquake Fault Zone or County Fault Zone. No impact would occur.

B. Fault Rupture

Building D Site

There are no known active or potentially active faults on the Building D Site; therefore, there is no potential for ground rupture related to a known fault. No impact would occur.



Building E Site

There are no known active or potentially active faults on the Building E Site; therefore, there is no potential for ground rupture related to a known fault. No impact would occur.

Liquefaction Zone Potential

Threshold a) Would the Project be subject to seismic-related ground failure, including liquefaction?

According to available mapping data and soil conditions encountered by Matrix during testing on the Building D Site and Building E Site, because the soils contained on the Building D Site and the Building E Site are dense and cohesive they are not subject to a significant risk associated with seismic-related ground failure, including liquefaction (Matrix, 2014, p. 12; Matrix, 2015, p. 10).

The CBSC and County of Riverside Building Code provide standards that must be met to safeguard life or limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all buildings and structures, and have been specifically tailored for California earthquake conditions. In addition, the CBSC (Chapter 18) and the County of Riverside require development projects to prepare geologic engineering reports to identify site-specific geologic and seismic conditions and provide site-specific recommendations to preclude adverse effects involving unstable soils and strong seismic ground-shaking, including, but not limited to, recommendations related to ground stabilization, selection of appropriate foundation type and depths, and selection of appropriate structural systems. The Project Applicant has prepared such reports, which are included as *Technical Appendices E1 through E4* to this EIR.

Building D and Building E are required to be designed and constructed in accordance with the latest applicable seismic safety guidelines, including the standard requirements of the CBSC (Chapter 18) and County of Riverside Building Code. The County of Riverside would also impose the site-specific grading and construction recommendations contained within the geotechnical reports mentioned above (*Technical Appendices E1 and E2*) as conditions of Project approval to further reduce the risk of seismic-related ground failure due to liquefaction. As such, implementation of the Project would result in less-than-significant impacts associated with seismic-related ground failure and/or liquefaction hazards.

Ground-Shaking Zone

Threshold a) Would the Project be subject to strong seismic ground shaking?

The Building D Site and the Building E Site are located in a seismically active area of southern California that is expected to experience moderate to severe ground shaking during future seismic events. This risk is not substantially different than the risk experienced by other properties in the southern California area. As noted above, as a mandatory condition of Project approval, Building D and Building E would be required to be constructed in accordance with the CBSC, also known as California Code of Regulations (CCR), Title 24 (Part 2), and the County of Riverside Building Code.



Furthermore, the Building D Site and the Building E Site would be required to comply with the site-specific grading and construction recommendations contained within the Project's geotechnical reports (*Technical Appendices E1 through E4*, respectively), which the County would impose as conditions of Project approval, to further reduce the risk of adverse effects related to strong seismic ground shaking. With the Project's mandatory compliance with these standard and site-specific design and construction measures, potential impacts related to seismic ground shaking would be less than significant.

Landslide Risk

Threshold a) Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards?

Ground Subsidence

Threshold a) Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in ground subsidence?

Neither the Building D Site nor the Building E Site contain substantial natural or man-made slopes under existing conditions. Construction of Building D and Building E would result in the creation of slopes around the perimeter of both building sites and within the proposed water quality detention basins. In addition, the Building D Site would contain an approximately 16-foot-high slope along the western portion of the site that abuts Ellsworth Street. The Building E Site would contain an approximately 14-foot-high slope along the western site boundary. The proposed manufactured slopes would be engineered for long-term stability and would be required to be constructed in accordance with the site-specific recommendations contained within the Building D and Building E geotechnical reports (*Technical Appendices E1 through E4*). Blasting associated with Project construction is expected to occur in hard rock areas of the southern portion of the Building D Site boundaries, in proximity to existing residential homes and business enterprises located south of the Project site. Blasting proposed on the Project site would utilize small, highly controlled explosive charges that are covered with overburden to minimize vibration. Potential effects from blasting would be limited solely to the immediate area where rock breaking/blasting activities are occurring and would not extend beyond the boundaries of the Project site (i.e., off-site). In addition, a blasting vibration monitoring and abatement plan for the Project is required to be approved by Riverside County prior to the commencement of blasting activities which would further limit the groundborne vibration levels. Accordingly, the proposed construction activities on the Building D Site and the Building E Site would result in less-than-significant impacts associated with on- and/or off-site landslide hazards.

Lateral spreading is primarily associated with liquefaction hazards. As noted above under the Impact Analysis for Liquefaction Zone Potential, Threshold (a), the potential for liquefaction at the Building D Site and the Building E Site is considered low based on a site-specific analysis. The site-specific analysis also indicated that "lateral spreading does not appear to present a causative hazard to the site



and the effects of lateral spreading on the site are considered to be nil,” (Matrix, 2014, p. 12; Matrix, 2015, p. 10). Accordingly, impacts associated with lateral spreading would not occur.

As previously discussed, the Building D Site and the Building E Site and surrounding area are either flat or slope gently from west to east; and they do not contain any substantial cliffs or slopes that would cause rockfall hazards. Accordingly, there is no potential for the Building D Site or the Building E Site to be subject to rockfall hazards and associated impacts would not occur.

In conclusion, neither Building D nor Building E would be located on geologic units or soils that are unstable, or that would become unstable as a result of implementation of the Project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards. Impacts would be less than significant.

Based on the conditions encountered at subsurface testing locations at the Building D Site and the Building E Site, removal and re-compaction of the near surface native soils would result in shrinkage of zero to 15-percent (Matrix, 2014, p. 18; Matrix, 2015, p. 16). The Riverside County GIS mapping system indicates that neither the Building D Site nor the Building E Site is located within an area that is susceptible to subsidence or collapse (collapse occurs as a result of sudden subsidence) (RCIT, 2015). Furthermore, the Project’s geotechnical reports contain recommendations for site preparation that would minimize the risks associated with subsidence, which would be imposed as standard conditions of approval for each building (Matrix, 2014, pp. 16-30; Matrix, 2015, pp. 14-27). In addition, Building D and Building E would comply with all State and County Regulations, including the CBSC and all applicable County policies. As such, implementation of the Project would result in less-than-significant impacts associated with soil shrinkage/subsidence and collapse.

Other Geologic Hazards

Threshold a) Would the Project be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?

No steep hillsides subject to mudflow and no volcanoes are located on or near the Building D Site or the Building E Site (Google Earth, 2015; Riverside County, 2015, Figure S-5). The nearest large body of surface water is the Perris Reservoir, located approximately 4.1 miles east of the Project site. However, neither the Building D Site nor the Building E Site is located within the dam inundation zone for the Perris Reservoir, indicating that the Project site is not be subject to any seiche hazards associated with the Perris Reservoir (Riverside County, 2014a, Figure S-10). The Project site’s slopes would be planted with stabilizing vegetation, which would preclude the potential for mudflow. Therefore, there is no potential for the Project to be subject to hazards associated with seiches, mudflows, and/or volcanic hazards. No impact would occur.



Slopes

Threshold a) Would the Project change topography or ground surface relief features?

Threshold b) Would the Project create cut or fill slopes greater than 2:1 or higher than 10 feet?

Under existing conditions, the Project site consist of gently sloping topography, with elevations ranging from 1,556 feet AMSL at the northeastern portion of the Building D Site to 1,665 feet AMSL at the western boundary of the Building E Site. To accommodate the proposed Project, the topography would be altered and manufactured slopes would be created, as described below.

Building D Site

Grading would occur over the entire Building D Site; no portion of the site would be left undisturbed. When grading is complete, the building pad would sit approximately 17 feet below the ground elevation of Ellsworth Street and abutting property to the south, and the property would have a slight west-to-east-slope. Refer to Figure 3-6, *Conceptual Grading Plan – Building D Site*. After grading, the highest point of the property would be its southwest corner (approximately 1,602 AMSL) and the lowest point of the property would be its northeast corner (approximately 1,560 AMSL). To accommodate the proposed grading concept, manufactured slopes measuring up to 17 feet in height with a maximum incline of 47.8% would be required, as would retaining walls ranging in height from four to 12 feet tall along the southern and western portions of the property. The proposed grading plan and the creation of manufactured slopes on the Building D Site would result in less-than-significant impacts to geology and soils because the slopes would be stable and not lead to any geologic or soil hazard. As a standard condition of Project approval, the Project would be required to comply with the site-specific recommendations contained in the geotechnical reports prepared for the Building D Site, including recommendations related to site preparation, soil compaction, and manufactured slope design that would minimize potential hazards associated with manufactured slope failure (Matrix, 2014, pp. 16-30). Although manufactured slopes would occur over 10 feet in height, the slopes would be landscaped and comply with the recommendations of the Building D Site’s geotechnical reports (refer to *Technical Appendices E1 and E2*). Deep-rooted, low water use plant materials are proposed on the slopes to aid in stability, as shown on the Building D Site’s Conceptual Landscaping Plan in Section 3.0, *Project Description*, of this EIR. For these reasons, the Project as proposed on the Building D Site would not create a substantial adverse effect associated with changes in topography. Impacts would be less than significant.

Building E Site

Grading would occur over the entire 21.5-acre Building E Site. When grading is complete, the building pad would range from being approximately 24 feet above to approximately 14 feet below the ground elevation of abutting property, and the Building E property would have a slight west-to-east-slope. Refer to Figure 3-13, *Conceptual Grading Plan – Building E Site*. After grading, the highest point of the property would be its southwest corner (approximately 1,627 AMSL) and the lowest point of the



property would be at the bottom of the water quality basin (approximately 1,588 AMSL). To accommodate the proposed grading concept, manufactured slopes measuring up to 14 feet in height with a maximum incline of 2:1 (vertical: horizontal) would be required, as would retaining walls ranging in height from one to seven feet tall along the southwest, east, and northeast portions of the property. Also, a mechanically stabilized earth wall up to 18 feet in height is proposed along the west and south sides of the proposed water quality basin. The proposed grading plan and the creation of manufactured slopes on the Building E Site would result in less-than-significant impacts to geology and soils because the slopes would be stable and not lead to any geologic or soil hazard. As a standard condition of Project approval, the Project would be required to comply with the site-specific recommendations contained in the geotechnical reports for the Building E Site, including recommendations related to site preparation, soil compaction, and manufactured slope design that would minimize potential hazards associated with manufactured slope failure (Matrix, 2015, pp. 14-27) (SoCalGeo, 2017a). Although manufactured slopes would occur over 10 feet in height, the slopes would be landscaped and comply with the recommendations of the Building E Site's geotechnical reports (*Technical Appendices E3 and E4*). Deep-rooted, low water use plant materials are proposed on the slopes to aid in stability, as shown on the Building E Site's Conceptual Landscaping Plan in Section 3.0, *Project Description*, of this EIR. For these reasons, the Project would not create a substantial adverse effect associated with changes in topography. Impacts would be less than significant.

Slopes

Threshold c) Would the Project result in grading that affects or negates subsurface sewage disposal systems?

Building D Site

Under existing conditions, the Building D Site contains a subsurface sewage disposal system that is associated with one mobile home. The Project proposes to remove the subsurface sewage disposal system prior to grading activities on the Building D Site in accordance with all applicable County of Riverside rules and regulations; therefore, because the subsurface sewage disposal system present on the Building D Site under existing conditions would be removed prior to grading, the Project would not result in grading that affects or negates subsurface sewage disposal systems. In addition, the Building D Site does not serve as a leach field for any off-site properties; therefore, the Project also would not affect or negate any off-site subsurface sewage disposal systems. Accordingly, impacts would be less than significant.

Building E Site

The Building E Site does not contain any subsurface sewage disposal systems under existing conditions. The Building E Site does not serve as a leach field for any off-site properties and has no potential to affect or negate subsurface sewage disposal systems. No impact would occur.



Soils

Threshold a) Would the Project result in substantial soil erosion or loss of topsoil?

Implementation of the Project has the potential to result in soil erosion. The analysis below summarizes the likelihood of the Project to result in substantial soil erosion during temporary construction activities and/or long-term operation.

1. *Impact Analysis for Temporary Construction-Related Activities*

Proposed demolition, grading, and construction activities on the Building D Site and the Building E Site would expose underlying soils and disturb surficial soils on the respective properties. Exposed soils would be subject to erosion during rainfall events or high winds due to the removal of stabilizing vegetation and exposure of these erodible materials to wind and water.

Pursuant to the requirements of the State Water Resources Control Board, the Project Applicant is required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activities, including proposed grading. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one (1) acre of total land area. The County's Municipal Separate Storm Sewer System (MS4) NPDES Permit requires the Project Applicant to prepare and submit to the County for approval a Project-specific Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would identify a combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate sediment discharge to surface water from storm water and non-storm water discharges during construction. In addition, proposed construction activities would be required to comply with SCAQMD Rule 403, which would reduce the amount of particulate matter in the air and minimize the potential for wind erosion. Rule 403 requires that certain construction practices be followed that limit dust and dirt from leaving the construction site. For example, no dust is allowed to be visible in the air beyond the property line of the construction site, and no dirt is allowed to be tracked out of the site by more than 25 feet. With mandatory compliance to the requirements noted in the Project's SWPPP, as well as mandatory compliance to applicable regulatory requirements including but not limited to SCAQMD Rule 403, the potential for water and/or wind erosion impacts during Project construction would be less than significant and mitigation is not required.

2. *Impact Analysis for Long-Term Operational Activities*

Following construction, wind and water erosion on the Building D Site and the Building E Site would be minimal, as the areas disturbed during construction would be landscaped or covered with impervious surfaces and drainage would be controlled through a storm drain system. All of the Project site's storm water would flow into a storm water drainage system managed by the Riverside County Flood Control and Water Conservation District (RCFCWCD) with one exception. As an interim measure until lines associated with the RCFCWCD's Perris Valley Master Drainage Plan (MDP) are installed to the south and east of the Project site (namely, Lateral 3), upstream flows from off-site properties to the south and southwest would be captured by a storm drain line installed along the



southern portion of the Building D Site which would collect upstream flows and discharge at an outlet with energy dissipater near the southeast corner of the Building D Site. Energy dissipaters help reduce the velocity of storm water flow to ensure impacts to downstream properties or facilities remain less than significant. The installation of an energy dissipater would preclude the potential for substantial soil erosion (SoCalGeo, 2016a, p. 4).

Furthermore, the County's MS4 NPDES Permit requires the Project Applicant to prepare and submit to the County for approval a Water Quality Management Plan (WQMP, Ordinance 754). The WQMP is required to identify an effective combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate sediment discharge to surface water from storm water and non-storm water discharges. The WQMPs for the Building D Site and the Building E Site are required to incorporate Best Management Practices, including water quality/detention basins and vegetative swales, which are effective at removing silt and sediment from storm water runoff. WQMPs also require post-construction maintenance and operational measures to ensure on-going erosion protection. Compliance with the WQMPs for the Building D Site and the Building E Site would be required as conditions of Project approval as would the long-term maintenance of water quality features. Therefore, implementation of the proposed Project would not result in substantial erosion or loss of top soil during long-term operation. The Project's impact would be less than significant for both Building D and Building E.

Soils

Threshold b) Would the Project be located on expansive soil, as defined in Section 1802.3.2 of the California Building Code (2007), creating substantial risks to life or property?

Laboratory tests determined that the near-surface soils on both the Building D Site and the Building E Site have a very low expansion potential (Matrix, 2014, p. 15; Matrix, 2015, p. 13). Accordingly, the Project would not create substantial risks to life or property from exposure to expansive soils. Impacts would be less than significant.

Soils

Threshold c) Would the Project have soils incapable of adequately supporting use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The Project does not propose the use of septic tanks or alternative wastewater disposal systems for either Building D or Building E. Accordingly, no impact associated with septic tanks or alternative waste water systems would occur with implementation of the Project.



Erosion

Threshold a) Would the Project change deposition, siltation, or erosion that may modify the channel of a river or stream or the bed of a lake?

Threshold b) Would the Project result in any increase in water erosion either on or off site?

Neither the Building D Site nor the Building E Site contain any active streams or rivers and no streams or rivers are located in close proximity to the properties. Therefore, implementation of the Project has no potential to modify the channel of a river or stream or the bed of a lake.

As discussed in the impact analysis for Soils Threshold (a), the Project has the potential to result in soil erosion. However, during construction the Project would be required to obtain a NPDES permit as well as prepare and comply with a SWPPP. Compliance with these requirements would ensure that construction of Building D and Building E would not result in substantial erosion. Following construction, the majority of the Building D Site and the Building E Site would be landscaped or developed with impervious surfaces. Development of both sites would require compliance with WQMPs to control erosion and sedimentation. Compliance with the WQMPs would be required as conditions of building permit approval and long-term maintenance of on-site water quality features would be required to ensure their long-term effectiveness. Therefore, storm water runoff flows leaving the Building D Site and the Building E Site would not carry substantial amounts of sediment that could modify the channel of a river or stream or the bed of a lake. Construction and operation of Building D and Building E would not result in any increase in water erosion on site or off site. Impacts would be less than significant.

Wind Erosion and Blowsand

Threshold a) Would the Project be impacted by or result in an increase in wind erosion and blowsand, either on or off site?

According to the Riverside County General Plan, the Building D Site and the Building E Site are located in an area with a “Moderate” susceptibility to wind erosion (Riverside County, 2008, Figure S-8). During construction, existing vegetative cover would be removed from a majority of the subject property, soils would be exposed, and the potential for wind-induced erosion and blowsand would increase as compared to existing conditions. However, as previously discussed, the Project would be required to comply with SCAQMD Rule 403 that requires implementation of best available dust control measures during construction activities that generate fugitive dust, such as earth moving, grading, and construction equipment travel on unpaved roads. Following development of the Project, soils on the Building D Site and the Building E Site would be covered with impervious surfaces and landscaping and no longer exposed to wind; thus, wind erosion and the loss of topsoil under long-term conditions would be substantially reduced as compared to existing conditions. With mandatory compliance to applicable regulatory requirements, the potential for the Project to result in an increase in wind erosion and blowsand, either on or off site, would be less than significant and mitigation is not required.



4.6.4 CUMULATIVE IMPACT ANALYSIS

The cumulative study area for seismic effects and erosion and sedimentation is the southern California region, as seismic activity is detectable at considerable distances up to several hundred miles. Similarly, erosion and sedimentation effects can extend considerable distances in surface water bodies reaching discharge points such as the Pacific Ocean. As such, a summary of projections approach was used in this analysis of cumulative effects for seismic hazards and erosion. Other potential geologic and soils effects are inherently restricted to the areas proposed for on-site development and as such, there is no potential for the Project to contribute to cumulative impacts that require study. Regarding seismic effects, the proposed Project has no potential to cause a seismic event or affect the magnitude of a seismic event. As such, the project has no potential to contribute to a cumulatively significant seismic impact.

As discussed in the impact analysis for Soil Threshold (a), Erosion Thresholds (a) and (b), and Wind Erosion Threshold (a), measures would be incorporated into the Project design during construction and long-term operation to ensure that significant erosion impacts do not occur on the Building D Site or the Building E Site or off-site resulting from Project implementation. Other development projects in the southern California region would be required to comply with similar regulatory requirements as the Project as required by State law and RWQCB requirements to preclude substantial adverse erosion impacts, including mandatory compliance with NPDES requirements and the resulting SWPPPs and WQMPs. All development projects in the vicinity of the Project also would be required to comply with SCAQMD Rule 403, which would preclude wind-related erosion hazards during construction. In addition, erosion on the Project site would be further controlled by the creation of manufactured slopes planted with stabilizing vegetation that would slope inward toward the Building D Site and the Building E Site. Therefore, because the Project would not result in significant erosion impacts on either the Building D Site or the Building E Site, and because other projects within the cumulative study area would be subject to similar requirements to control erosion hazards during construction and long-term operation, cumulative impacts associated with wind and water erosion hazards are evaluated as less than significant.

4.6.5 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Alquist-Priolo Earthquake Fault Zone or County Fault Zone

Thresholds (a) and (b) for the Building D and the Building E Site: Less-than-Significant Impact. Development on the Building D Site and the Building E Site would not expose people or structures to substantial adverse seismic risks. The Building D Site and the Building E Site are not located within a mapped Alquist-Priolo Earthquake Fault Zone and there are no known active or potentially active faults on the Project site or trending toward the Project site; therefore, the Project site is not subject to risk of fault rupture. Mandatory compliance with local and state regulatory requirements related to building construction would ensure that Building D and Building E are developed as required to attenuate the seismic risk to people or structures to less-than-significant levels.



Liquefaction Zone Potential

Threshold (a) for the Building D Site and Building E Site: Less-than-Significant Impact. The Building D Site and the Building E Site have a low potential for liquefaction and seismic-related ground failure. Accordingly, liquefaction impacts would be less than significant.

Ground-Shaking Zone

Threshold (a) for the Building D Site and the Building E Site: Less-than-Significant Impact. As with all properties within the southern California region, the Project site is subject to seismic ground shaking associated with earthquakes; however, mandatory compliance with local and state ordinances and building codes including but not limited to the CBSC (Chapter 18) and County of Riverside Building Code would ensure that the proposed structures are developed as required to preclude adverse effects involving strong seismic ground-shaking. Impacts would be less than significant.

Landslide Risk

Threshold (a) for the Building D Site and Building E Site: Less-than-Significant Impact. There is no potential for Building D or Building E to cause on- or off-site landslides or lateral spreading. Potential hazards associated with soils on the Project site that have the potential for lateral spreading and collapse would be precluded through use of non-explosive rock breaking/blasting techniques during Project construction, mandatory adherence to recommendations given in the Building D Site and the Building E Site geotechnical reports, and mandatory compliance with applicable regulations. The Project would create stable manufactured slopes that would not be subject to rockfall hazards. The potential to result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards would be less than significant.

Ground Subsidence

Threshold (a) for the Building D Site and the Building E Site: Less-than-Significant Impact. Ground subsidence has the potential to occur on the Building D and Building E sites. However, mandatory adherence to recommendations given in the Building D Site and the Building E Site geotechnical reports and mandatory compliance with applicable regulations would ensure proper grading techniques such that impacts related to ground subsidence would be less than significant.

Other Geologic Hazards

Threshold (a) for the Building D Site and the Building E Site: No Impact. The Project site has no potential to be subjected to geologic hazards such as seiche, mudflow, or volcanic hazards.

Slopes

Threshold (a) for the Building D Site and the Building E Site: Less-than-Significant Impact. Development of the Building D Site and the Building E Site would change topography and ground surface relief features as compared to existing conditions. However, as a standard condition of Project approval, the Project would be required to comply with the site-specific recommendations contained



in the geotechnical report for the Building D Site and the Building E Site, including recommendations related to site preparation, soil compaction, and manufactured slope design that would minimize potential hazards associated with manufactured slope failure. Impacts would be less than significant.

Threshold (b) for the Building D Site and the Building E Site: Less-than-Significant Impact. Building D and Building E would create cut or fill slopes higher than 10 feet and greater than 2:1. Both buildings, as part of the conditions of approval, would be required to comply with the recommendations in the geotechnical reports to ensure the stability of these slopes, as well as all other applicable regulations. Deep-rooted, low water use, plant material is proposed on the slopes to further aid in stability. Compliance with the recommendations and applicable regulations would reduce impacts associated with slope construction to less than significant.

Threshold (c) for the Building D Site: Less-than-Significant Impact. The existing septic system associated with the existing mobile home would be removed in accordance with all applicable rules and regulations. With mandatory compliance with all applicable County rules and regulations, the Project would not result in grading that affects or negates subsurface sewage disposal systems. Impacts would be less than significant.

Threshold (c) for the Building E Site: No Impact. The Building E Site contains no subsurface sewage systems. As such, development of the Building E Site would not affect or negate subsurface sewage disposal systems. No impact would occur.

Soils

Threshold (a) for the Building D Site and Building E Site: Less-than-Significant Impact. The Project would not result in substantial soil erosion or the loss of topsoil. The Project Applicant is required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activities as well as adhere to SCAQMD Rule 403 during Project construction. With mandatory compliance to these regulatory requirements, the potential for soil erosion impacts during construction would be less than significant. Following construction, soil erosion on the Project site would be minimized, as the areas disturbed during construction would be landscaped or covered with impervious surfaces and drainage would be controlled through a storm drain system. Furthermore, Building D and Building E are required by law to implement a WQMP during operation, which would preclude substantial erosion impacts in the long-term.

Threshold (b) for the Building D Site and Building E Site: Less-than-Significant Impact. Soils on the Project site have a very low expansion potential. Accordingly, soil expansion impacts would be less than significant.

Threshold (c) for the Building D Site and Building E Site: No Impact. The Project would not install septic tanks or alternative wastewater disposal systems. Accordingly, no impact would occur associated with soil compatibility for wastewater disposal systems.



Erosion

Threshold (a) for the Building D Site and Building E Site: No Impact. The Project site does not contain any active streams or rivers, no streams or rivers are located in close proximity to the Project site, and the Project would not discharge water directly to an active stream or river. The Project would be required to prepare and comply with NPDES permits, SWPPPs, and WQMPs, which would treat and filter runoff to reduce erosion. Therefore, no impact to deposition, siltation, or erosion that may modify the channel of a river or stream or the bed of a lake would occur.

Threshold (b) for the Building D Site and Building E Site: Less-than-Significant Impact. Buildout of the Project site would result in an increase in impervious surfaces. Storm water falling on the developed portions of the Project site would be collected and treated on-site before being discharged into the storm drain system to be constructed as part of the Project. An energy dissipater is proposed to be installed at the southeast corner of the Building D Site to reduce off-site erosion potential to less than significant. Storm water runoff with the potential to result in water erosion would thus be reduced by the Project and a less-than-significant impact would occur.

Wind Erosion and Blowsand from Project either on or off-site

Threshold (a) for the Building D Site and Building E Site: Less-than-Significant Impact. The Project site would be exposed to wind erosion during construction, but would be required to implement BMPs as part of the NPDES permit, and would be required to comply with all other applicable regulations related to wind erosion, including Rule 403. Following development of the Project site, soils on the developed portions of the Project site would be covered with impervious surfaces and landscaping and no longer exposed to wind; thus, wind erosion and the loss of topsoil would be substantially reduced as compared to existing conditions. Impacts would be less than significant.

4.6.6 MITIGATION

Applicable County Regulations and Design Requirements

The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- The Project is required by law to comply with the California Building Standards Code and the County of Riverside Building Code, which address construction standards including those related to geologic and soil conditions.
- As a standard condition of Project approval, the Project will be required to comply with the site-specific recommendations contained in the geotechnical reports prepared for the Building D Site and the Building E Site, included as DEIR *Technical Appendices E1 through E4*.



Mitigation

Impacts would be less than significant. Mitigation is not required.

4.6.7 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Impacts would be less than significant; therefore, mitigation is not required.



4.7 GREENHOUSE GAS EMISSIONS

The analysis in this Subsection is based in part on a greenhouse gas analysis prepared for the Project titled, “Knox Business Park Greenhouse Gas Analysis County of Riverside,” prepared by Urban Crossroads, Inc., dated January 28, 2016 and appended to this EIR as *Technical Appendix F*. (Urban Crossroads, Inc., 2016c) Please note that *Technical Appendix F* was prepared prior to the Project Applicant’s decision to reduce the size of the Building E Site and the size of its proposed building to their current configurations. To address the change in building size, Urban Crossroads, Inc. prepared a supplemental analysis and reported its findings in a report titled, “Knox Business Park Supplemental Air Quality Impact Analysis, Greenhouse Gas Impact Analysis, & Mobile Source Health Risk Assessment” dated February 9, 2017, and which is appended to the front of *Technical Appendix B1*. Based on the results of Urban Crossroads Supplemental Analysis, no additional impacts would occur as a result of the reduction in the size of Building E. As shown on Table 2, *Project Greenhouse Gas Emissions*, in the Supplemental Analysis (*Technical Appendix B1*), the reduction in the size of Building E would result in fewer greenhouse gas (GHG) emissions than what was previously analyzed and disclosed in *Technical Appendix F*. The reduction in GHG emissions is due primarily to the fact that the smaller building would result in approximately 12% fewer Project-related vehicle trips and consequently fewer mobile source GHG emissions.

All references used in this Subsection are listed in EIR Section 7.0, *References*.

4.7.1 EXISTING CONDITIONS

B. Introduction to Global Climate Change

Global Climate Change (GCC) refers to change in average meteorological conditions on the Earth with respect to temperature, wind patterns, precipitation, and storms. Debate exists within the scientific community regarding the extent to which GCC is occurring naturally or as a result of human activity. Some data suggests that GCC has occurred naturally over the course of thousands or millions of years and that these historical changes to the Earth’s climate have occurred naturally without human influence, as in the case of an ice age. However, many scientists believe that the climate shift taking place since the Industrial Revolution (1900s) is occurring at a quicker rate and magnitude than in the past as a result of human activity and industrialization. Some scientists believe evidence suggests that GCC is the result of increased concentrations of greenhouse gases in the earth’s atmosphere, including carbon dioxide, methane, nitrous oxide, and fluorinated gases. Many scientists believe that this increased rate of climate change is the result of greenhouse gases resulting from human activity and industrialization over the past 200 years. (Urban Crossroads, Inc., 2016c, p. 6)

Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, carbon dioxide (CO₂), nitrous oxide (N₂O), methane (CH₄), hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride. These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the Earth’s atmosphere, but prevent radioactive heat from escaping, thus warming the Earth’s atmosphere. Gases that trap heat in the atmosphere are often referred to as greenhouse gases



(GHGs). GHGs are released into the atmosphere by both natural and anthropogenic (human) activity. Without the natural greenhouse gas effect, the Earth’s average temperature would be approximately 61° Fahrenheit (F) cooler than current conditions. (Urban Crossroads, Inc., 2016c, pp. 7-8)

It is not possible for an individual project like the proposed Project to generate enough GHG emissions to make a discernible change in global climate. However, the proposed Project may participate in the potential for GCC through its incremental contribution of GHG emissions when considered in combination with other worldwide sources of GHGs. (Urban Crossroads, Inc., 2016c, p. 8)

C. Greenhouse Gases

Carbon dioxide (CO₂), methane (CH₄), and Nitrous Oxide (N₂O) emissions are the focus of evaluation in this Subsection because these gases are the primary contributors to GCC from development projects. Although other substances such as fluorinated gases also contribute to GCC, sources of fluorinated gases are not well defined and no accepted emissions factors or methodology exist to accurately calculate these gases. (Urban Crossroads, Inc., 2016c, p. 8)

Greenhouse gases have varying global warming potential (GWP) values; GWP values represent the potential of a gas to trap heat in the atmosphere. CO₂ is used as the reference gas for GWP, and thus has a GWP of 1. The atmospheric lifetime and GWP of selected GHGs are summarized in Table 4.7-1, *Global Warming Potential and Atmospheric Lifetime of Select GHGs*. As shown in Table 4.7-1, GWP ranges from 1 for CO₂ to 22,800 for sulfur hexafluoride (SF₆). (Urban Crossroads, Inc., 2016c, p. 8)

Table 4.7-1 Global Warming Potential and Atmospheric Lifetime of Select GHGs

| Gas | Atmospheric Lifetime (years) | Global Warming Potential (100 year time horizon) |
|--|------------------------------|--|
| Carbon Dioxide | 50-200 | 1 |
| Methane | 12 ± 3 | 25 |
| Nitrous Oxide | 120 | 298 |
| HFC-23 | 264 | 14,800 |
| HFC-134a | 14.6 | 1,430 |
| HFC-152a | 1.5 | 124 |
| Sulfur Hexafluoride (SF ₆) | 3,200 | 22,800 |

Source: (Urban Crossroads, Inc., 2016c, Table 2-2)

Provided below is a description of the various gases that contribute to GCC. For more information about these gases and their associated human health effects, refer to Section 2.4, *Greenhouse Gases*, of *Technical Appendix F* and the reference sources cited therein.



1. *Water Vapor (H₂O)*

Water Vapor (H₂O) is the most abundant, important, and variable GHG in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere it maintains a climate necessary for life. Changes in its concentration are primarily considered to be a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. The feedback loop in which water is involved is critically important to projecting future climate change. As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to ‘hold’ more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. The warmer atmosphere can then hold more water vapor and so on and so on. This is referred to as a “positive feedback loop.” The extent to which this positive feedback loop will continue is unknown as there are also dynamics that hold the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it will eventually also condense into clouds, which are more able to reflect incoming solar radiation, thereby allowing less energy to reach the Earth’s surface and heat it up. There are no human health effects from water vapor itself; however, when some pollutants come in contact with water vapor, they can dissolve and the water vapor can then act as a pollutant-carrying agent. The main source of water vapor is evaporation from the oceans (approximately 85 percent). Other sources include: evaporation from other water bodies, sublimation (change from solid to gas) from sea ice, and snow, and transpiration from plant leaves. (Urban Crossroads, Inc., 2016c, p. 9)

2. *Carbon Dioxide (CO₂)*

Carbon dioxide (CO₂) is an odorless and colorless GHG that is emitted from natural and anthropogenic (man-made) sources. Natural sources include: the decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Man-made sources include: the burning of coal, oil, natural gas, and wood. CO₂ is naturally removed from the air by photosynthesis, dissolution into ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks. Since the Industrial Revolution began in the mid-1700s, the sort of human activity that increases CO₂ emissions has increased dramatically in scale and distribution. As an example, prior to the Industrial Revolution, CO₂ concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30 percent. Exposure to CO₂ in high concentrations can cause human health effects, but outdoor levels are not high enough to adversely affect human health. (Urban Crossroads, Inc., 2016c, p. 10)

3. *Methane (CH₄)*

Methane (CH₄) is an extremely effective absorber of radiation, though its atmospheric concentration is less than carbon dioxide and its lifetime in the atmosphere is brief (10-12 years), compared to other GHGs. Methane has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas,



and mining coal have added to the atmospheric concentration of methane. Other anthropocentric sources include fossil-fuel combustion and biomass burning. No health effects are known to occur from exposure to methane. (Urban Crossroads, Inc., 2016c, p. 10)

4. Nitrous Oxide (N_2O)

Nitrous Oxide (N_2O) concentrations began to rise in the atmosphere at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb). Nitrous oxide is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. N_2O is used as an aerosol spray propellant, (e.g., in whipped cream bottles), in potato chip bags to keep chips fresh, and in rocket engines and in race cars. N_2O can be transported into the stratosphere, be deposited on the Earth's surface, and be converted to other compounds by chemical reaction. Also known as laughing gas, N_2O is a colorless GHG that can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses, it is considered harmless. However, in some cases, heavy and extended use can cause brain damage. (Urban Crossroads, Inc., 2016c, p. 10)

5. Chlorofluorocarbons (CFCs)

Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs were first synthesized in 1928 and have no natural source. CFCs were used for refrigerants, aerosol propellants and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and was extremely successful, so much so that levels of the major CFCs are now remaining steady or declining. However, due to their long atmospheric lifetime, some of the CFCs will remain in the atmosphere for over 100 years. (Urban Crossroads, Inc., 2016c, pp. 10-11)

6. Hydrofluorocarbons (HFCs)

Hydrofluorocarbons (HFCs) are synthetic, man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential. The HFCs with the largest measured atmospheric abundances are (in order largest to smallest), HFC-23 (CHF_3), HFC-134a (CF_3CH_2F), and HFC-152a (CH_3CHF_2). Prior to 1990, the only significant emissions were HFC-23 emissions. HFC-134a emissions are increasing due to its use as a refrigerant. The United States Environmental Protection Agency (EPA) estimates that concentrations of HFC-23 and HFC-134a are now about 10 parts per trillion (ppt) each; and that concentrations of HFC-152a are about 1 ppt. No human health effects are known to result from exposure to HFCs, which are manmade and used for applications such as automobile air conditioners and refrigerants. (Urban Crossroads, Inc., 2016c, p. 11)



7. *Perfluorocarbons (PFCs)*

Perfluorocarbons (PFCs) are primarily produced for aluminum production and semiconductor manufacture. PFCs have stable molecular structures and do not break down through chemical processes in the lower atmosphere. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF₄) and hexafluoroethane (C₂F₆). The EPA estimates that concentrations of CF₄ in the atmosphere are over 70 ppt. No human health effects are known to result from exposure to PFCs. (Urban Crossroads, Inc., 2016c, p. 11)

8. *Sulfur Hexafluoride (SF₆)*

Sulfur Hexafluoride (SF₆) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (22,800). The EPA indicates that concentrations in the 1990's were about 4 ppt. In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing. Sulfur hexafluoride is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection. (Urban Crossroads, Inc., 2016c, p. 11)

D. Greenhouse Gas Emissions Inventories

1. *Global*

Worldwide anthropogenic GHG emissions are tracked by the Intergovernmental Panel on Climate Change for industrialized nations (referred to as Annex I) and developing nations (referred to as Non-Annex I). Man-made GHG emissions data for Annex I nations is available through Year 2011. For the Year 2011, the sum of these emissions totaled approximately 25,865,994 gigagrams (Gg) of carbon dioxide equivalent (CO_{2e}), as shown in Table 4.7-2, *Top GHG Producer Countries and the European Union (EU)*. It is noted that the GHG emissions in more recent years may differ from the inventories presented in Table 4.7-2; however, the data is representative of currently available inventory data. (Urban Crossroads, Inc., 2016c, p. 6)

2. *United States*

The United States was the second-highest producer of GHG emissions in 2011. The primary GHGs emitted by human activities in the United States was CO₂, representing approximately 83-percent of the total United States' GHG emissions. Approximately 78-percent of the United States' CO₂ emissions result from fossil fuel combustion. (Urban Crossroads, Inc., 2016c, p. 7)

3. *State of California*

The California Air Resources Board (CARB) compiles GHG inventories for the State of California. Based upon the 2008 GHG inventory data (which is the most recent year for which data is available), California emitted 474 million metric tons (MMT) CO_{2e} including emissions resulting from imported electrical power. Based on the CARB inventory data and GHG inventories compiled by the World



Table 4.7-2 Top GHG Producer Countries and the European Union (EU)

| Emitting Countries | GHG Emissions (Gg CO ₂ e) |
|--------------------------------------|--------------------------------------|
| China | 10,975,500 |
| United States | 6,665,700 |
| European Union (28 member countries) | 4,544,224 |
| Russian Federation | 2,322,220 |
| India | 3,013,770 |
| Japan | 1,344,580 |
| Total | 28,865,994 |

Source: (Urban Crossroads, Inc., 2016c, Table 2-1)

Resources Institute, California's total statewide GHG emissions rank second in the United States (Texas is ranked first). (Urban Crossroads, Inc., 2016c, p. 7)

4. *Project Site*

At the time the NOP for this EIR was issued (August 31, 2015), the Project site was mostly undeveloped and vacant, with exception of the southwest corner of the site which contained a mobile home and a concrete pad that is used for storage of construction equipment. The GHG emissions from one mobile home is nominal and does not require analysis under existing conditions.

E. Potential Effects of Climate Change in California

The California Environmental Protection Agency (CalEPA) published a report titled "Scenarios of Climate Change in California: An Overview" (herein called the "Climate Scenarios report") in February 2006, that is generally instructive about effects of climate change in California. The Climate Scenarios report used a range of emissions scenarios developed by the Intergovernmental Panel on Climate Change (IPCC) to project a series of potential warming ranges (i.e., temperature increases) that may occur in California during the 21st century: lower warming range (3.0-5.5°F); medium warming range (5.5-8.0°F); and higher warming range (8.0-10.5°F). (California Climate Change Center, 2006)

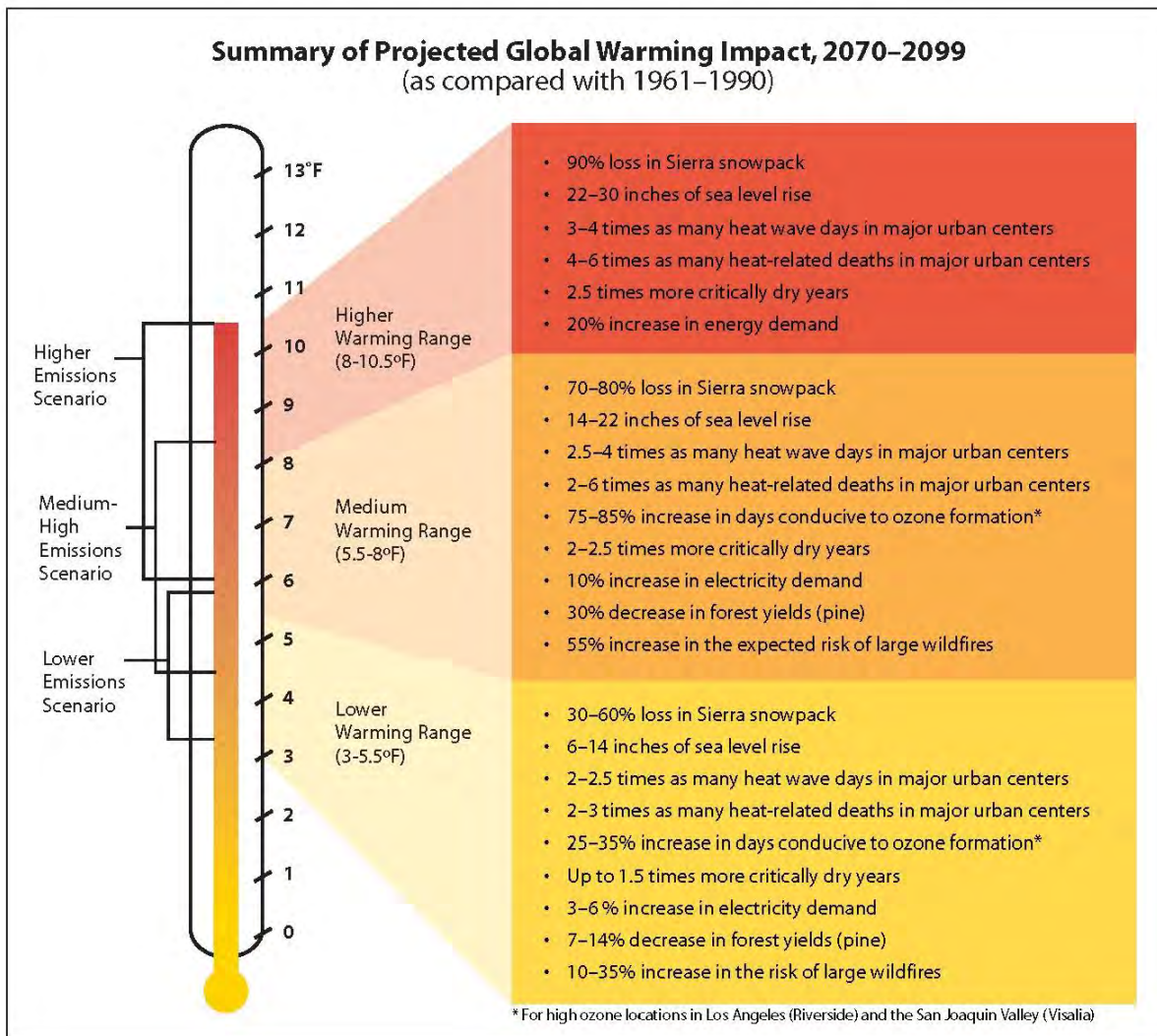
In addition, the California Natural Resources Agency adopted a "California Climate Adaptation Strategy" in 2009. This report details many vulnerabilities arising from climate change with respect to matters such as temperature extremes, sea level rise, wildfires, floods and droughts and precipitation changes, and responds to the Governor's Executive Order S-13-2008 that called on state agencies to develop California's strategy to identify and prepare for expected climate impacts (California NRA, 2009).

According to these reports, substantial temperature increases arising from increased GHG emissions worldwide could result in a variety of effects to the people, economy, and environment of California, with the severity of the effects depending upon actual future emissions of GHGs and associated degree



of warming. Table 4.7-3, *Summary of Global Warming Impact, 2070-2099 (as compared with 1961-1990)*, presents potential impacts of global warming within California.

Table 4.7-3 Summary of Global Warming Impact, 2070-2099 (as compared with 1961-1990)



Source: (Urban Crossroads, Inc., 2016c, Exhibit 2-A)

Based on the estimated scenarios presented in the Climate Scenario and California Climate Adaption Strategy reports, the climate change impacts in California have the potential to include, but are not limited to, the following areas. For more information, refer to Sections 2.4 and 2.5 of *Technical Appendix F* and the reference sources cited therein.



2. *Human Health Effects*

The potential human health effects related directly to GHG emissions (including CO₂, N₂O, and CH₄) from development projects are still being debated in the scientific community. The contribution that these GHGs make to GCC have the potential to cause adverse effects to human health in various ways. Increases in the Earth's ambient temperatures would result in more intense heat waves, causing more heat-related deaths. Scientists also purport that higher ambient temperatures would increase disease survival rates and result in more widespread disease. Climate change also could cause shifts in weather patterns, potentially resulting in devastating droughts and food shortages in some areas.

3. *Water Resource / Supply Effects*

A vast network of man-made reservoirs and aqueducts captures and transports water throughout the state from northern California rivers and the Colorado River. The current distribution system relies on Sierra Nevada snowpack to supply water during the dry spring and summer months. Rising temperatures, potentially compounded by decreases in precipitation, could severely reduce spring snowpack, increasing the risk of summer water shortages. Additionally, if temperatures continue to increase, more precipitation could fall as rain instead of snow, and the snow that does fall could melt earlier, reducing the Sierra Nevada spring snowpack by as much as 70 percent to 90 percent. The loss of snowpack could pose challenges to water managers, hamper hydropower generation, and adversely affect winter tourism. The State's water supplies are also at risk from rising sea levels. An influx of salt water could degrade California's estuaries, wetlands, and groundwater aquifers and be a major threat to the quality and reliability of water within the southern edge of the Sacramento/San Joaquin River Delta – a major fresh water supply.

4. *Agriculture Effects*

Increased temperatures could cause widespread changes to the agriculture industry reducing the quantity and quality of agricultural products statewide. California farmers could face water shortages. Crop growth and development could change, as could the intensity and frequency of pest and disease outbreaks. Faster plant growth could worsen the quantity and quality of yield for some crops such as wine grapes, fruit, and nuts. Although higher CO₂ levels can stimulate plant production and increase plant water-use efficiency, there may still be a water shortage for the agricultural industry. In addition, continued GCC could shift the ranges of existing invasive plants and weeds and alter competition patterns with native plants.

5. *Forest and Landscape Effects*

GCC has the potential to intensify the current threat to forests and landscapes by increasing the risk of wildfire and altering the distribution and character of natural vegetation. If temperatures rise into the medium warming range, the risk of large wildfires in California could increase by as much as 55-percent, which is almost twice the increase expected if temperatures stay in the lower warming range. However, since wildfire risk is determined by a combination of factors, including precipitation, winds, temperature, and landscape and vegetation conditions, future risks will not be uniform throughout the



state. Continued GCC also has the potential to alter natural ecosystems and biological diversity, including a decrease in forest productivity, as a result of increasing temperatures.

6. *Sea Level Effects*

Rising sea levels, more intense coastal storms, and warmer water temperatures could increasingly threaten the state's coastal regions. Under the higher warming range scenario, sea level is anticipated to rise 22 to 35 inches by 2100. Elevations of this magnitude would inundate low-lying coastal areas with salt water, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats. Under the lower warming range scenario, sea level could rise 12 to 14 inches by 2100.

F. Regulatory Setting

Below is an account of the regulatory programs, policies, laws, and regulations that are applicable to GHG emissions and GCC in California. For more information, refer to Section 2.7 of *Technical Appendix F* and the reference sources cited therein.

1. *International Regulation and Kyoto Protocol*

In 1988, the United Nations established the Intergovernmental Panel on Climate Change to evaluate the impacts of global warming and to develop strategies that nations could implement to curtail GCC. In 1992, the United States joined other countries around the world in signing the United Nations' Framework Convention on Climate Change (UNFCCC) agreement with the goal of controlling greenhouse gas emissions. As a result, the Climate Change Action Plan was developed to address the reduction of GHGs in the United States. The Plan currently consists of more than 50 voluntary programs for member nations to adopt. (Urban Crossroads, Inc., 2016c, p. 15)

The Kyoto Protocol is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. Some have estimated that if the commitments outlined in the Kyoto Protocol are met, global GHG emissions could be reduced an estimated 5 percent from 1990 levels during the first commitment period of 2008-2012. Notably, while the United States is a signatory to the Kyoto Protocol, Congress has not ratified the Protocol and the United States is not bound by the Protocol's commitments. In December 2009, international leaders from 192 nations met in Copenhagen to address the future of international climate change commitments post-Kyoto. (Urban Crossroads, Inc., 2016c, p. 16)

2. *Federal Regulation and the Clean Air Act*

Coinciding with the 2009 meeting of international leaders in Copenhagen, on December 7, 2009, the EPA issued an Endangerment Finding under § 202(a) of the Clean Air Act (CAA), opening the door to federal regulation of GHGs. The Endangerment Finding notes that GHGs threaten public health and welfare and are subject to regulation under the CAA. To date, the EPA has not promulgated regulations on GHG emissions, but it has begun to develop them. (Urban Crossroads, Inc., 2016c, p. 16)



Previously the EPA had not regulated GHGs under the CAA because it asserted that the Act did not authorize it to issue mandatory regulations to address GCC and that such regulation would be unwise without an unequivocally established causal link between GHGs and the increase in global surface air temperatures. In *Massachusetts v. Environmental Protection Agency et al.* (127 S. Ct. 1438 [2007]); however, the U.S. Supreme Court held that GHGs are pollutants under the CAA and directed the EPA to decide whether the gases endangered public health or welfare. The EPA had also not moved aggressively to regulate GHGs because it expected Congress to make progress on GHG legislation, primarily from the standpoint of a cap-and-trade system. However, proposals circulated in both the House of Representative and Senate have been controversial and it may be some time before the U.S. Congress adopts major climate change legislation. The EPA's Endangerment Finding paves the way for federal regulation of GHGs with or without Congress. (Urban Crossroads, Inc., 2016c, p. 16)

Although global climate change did not become an international concern until the 1980s, efforts to reduce energy consumption began in California in response to the oil crisis in the 1970s, resulting in the incidental reduction of greenhouse gas emissions. In order to manage the state's energy needs and promote energy efficiency, AB 1575 created the California Energy Commission (CEC) in 1975. (Urban Crossroads, Inc., 2016c, p. 16)

3. *Title 24 Energy Standards*

The California Energy Commission (CEC) first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the state. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods. The latest revisions (2013 Building Energy Efficiency Standards) were adopted in 2012 and became effective on July 1, 2014. The 2013 Building Energy Efficiency Standards are 25 percent more efficient than the previous Building Energy Efficiency Standards for residential construction and 30 percent more efficient than the previous Standards for nonresidential construction. (Urban Crossroads, Inc., 2016c, pp. 16-17)

Part 11 of the Title 24 is referred to as the California Green Building Standards Code (CALGreen Code). The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality." The CALGreen Code is not intended to substitute or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission (CBSC). Unless otherwise noted in the regulation, all newly constructed buildings in California are subject of the requirements of the CALGreen Code. (Urban Crossroads, Inc., 2016c, p. 17)



CALGreen contains both mandatory and voluntary measures, for non-residential land uses there are 39 mandatory measures including, but not limited to: exterior light pollution reduction, wastewater reduction by 20%, and commissioning of projects over 10,000 s.f. There are two tiers of voluntary measures for Non-Residential land uses for a total of 36 additional elective measures. (Urban Crossroads, Inc., 2016c, pp. 15-16)

The 2013 version of CALGreen (in effect when the NOP for this EIR was released in 2015) included additions and amendments to the water efficiency standards for non-residential buildings in order to comply with the reduced flow rate table. The 2013 CALGreen also was rewritten to clarify and definitively identify the requirements and applicability for residential and nonresidential buildings. (Urban Crossroads, Inc., 2016c, pp. 17-18) The 2016 version of CALGreen (currently in effect as of January 1, 2017) added additional requirements for non-residential construction related to planning and design, water efficiency and water conservation, and solid waste diversion.

4. California Assembly Bill No. 1493 (AB 1493)

AB 1493 requires CARB to develop and adopt the nation's first greenhouse gas emission standards for automobiles. The Legislature declared in AB 1493 that global warming was a matter of increasing concern for public health and environment in California. Further, the legislature stated that technological solutions to reduce GHG emissions would stimulate the California economy and provide jobs. (Urban Crossroads, Inc., 2016c, p. 18)

To meet the requirements of AB 1493, CARB approved amendments to the California Code of Regulations (CCR) adding GHG emission standards to California's existing motor vehicle emission standards in 2004. Amendments to CCR Title 13 §§ 1900 and 1961 and adoption of § 1961.1 require automobile manufacturers to meet fleet average GHG emission limits for all passenger cars, light-duty trucks within various weight criteria, and medium-duty passenger vehicle weight classes beginning with the 2009 model year. Emission limits are further reduced each model year through 2016. (Urban Crossroads, Inc., 2016c, p. 18)

In December 2004 a group of car dealerships, automobile manufacturers, and trade groups representing automobile manufacturers filed suit against CARB to prevent enforcement of CCR Title 13 §§ 1900 and 1961 as amended by AB 1493 and CCR Title 13 § 1961.1 (Central Valley Chrysler-Jeep et al. v. Catherine E. Witherspoon, in her official capacity as Executive Director of the California Air Resources Board, et al.). The suit, heard in the U.S. District Court for the Eastern District of California, contended that California's implementation of regulations that in effect regulate vehicle fuel economy violates various federal laws, regulations, and policies. In January 2007, the judge hearing the case accepted a request from the State Attorney General's office that the trial be postponed until a decision is reached by the U.S. Supreme Court on a separate case addressing GHGs. In the Supreme Court Case, Massachusetts vs. EPA, the primary issue in question is whether the federal CAA provides authority for U.S. EPA to regulate CO₂ emissions. In April 2007, the U.S. Supreme Court ruled in Massachusetts' favor, holding that GHGs are air pollutants under the CAA. On December 11, 2007, the judge in the Central Valley Chrysler-Jeep case rejected each plaintiff's arguments and ruled in



California's favor. On December 19, 2007, the U.S. EPA denied California's waiver request. California filed a petition with the Ninth Circuit Court of Appeals challenging U.S. EPA's denial on January 2, 2008. (Urban Crossroads, Inc., 2016c, p. 18)

The Obama administration subsequently directed the U.S. EPA to re-examine their decision. On May 19, 2009, challenging parties, automakers, the State of California, and the federal government reached an agreement on a series of actions that would resolve these current and potential future disputes over the standards through model year 2016. In summary, the U.S. EPA and the U.S. Department of Transportation agreed to adopt a federal program to reduce GHGs and improve fuel economy, respectively, from passenger vehicles in order to achieve equivalent or greater greenhouse gas benefits as the AB 1493 regulations for the 2012–2016 model years. Manufacturers agreed to ultimately drop current and forego similar future legal challenges, including challenging a waiver grant, which occurred on June 30, 2009. The State of California committed to (1) revise its standards to allow manufacturers to demonstrate compliance with the fleet-average GHG emission standard by “pooling” California and specified State vehicle sales; (2) revise its standards for 2012–2016 model year vehicles so that compliance with U.S. EPA-adopted GHG standards would also comply with California's standards; and (3) revise its standards, as necessary, to allow manufacturers to use emissions data from the federal Corporate Average Fuel Economy (CAFE) program to demonstrate compliance with the AB 1493 regulations. Both of these programs are aimed at light-duty auto and light-duty trucks. (Urban Crossroads, Inc., 2016c, pp. 18-19)

CARB's on-road heavy-duty diesel vehicles regulations require diesel trucks and buses that operate in California to be upgraded to reduce emissions. Heavy trucks were required to be retrofitted with PM filters beginning January 1, 2012, and older trucks started to be replaced on January 1, 2015. CARB reports that by January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. The heavy-duty vehicles regulation applies to nearly all privately- and federally-owned diesel fueled trucks and buses and to privately and publicly owned school buses with a gross vehicle weight rating (GVWR) greater than 14,000 pounds. (CaEIPA, 2015)

5. *Executive Order S-3-05*

Executive Order S-3-05, which was signed by Governor Schwarzenegger in 2005, proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce the Sierra's snow pack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, Executive Order S-3-05 established total greenhouse gas emission targets. Specifically, emissions are to be reduced to the 1990 level by 2020 and to 80-percent below the 1990 level by 2050. The Executive Order directed the Secretary of the California Environmental Protection Agency (CalEPA) to coordinate a multi-agency effort to reduce greenhouse gas emissions to the target levels. The Secretary also is required to submit biannual reports to the Governor and state Legislature describing: (1) progress made toward reaching the emission targets; (2) impacts of global warming on California's resources; and (3) mitigation and adaptation plans to combat these impacts. To comply with Executive Order S-3-05, the Secretary of the CalEPA created a Climate Action Team (CAT) made up of members from various state agencies and



commission. CAT released its first report in March 2006. The report proposed to achieve the targets by building on voluntary actions of California businesses, local government and community actions, as well as through state incentive and regulatory programs. (Urban Crossroads, Inc., 2016c, p. 19)

6. California Assembly Bill 32 (AB 32)

In September 2006, Governor Schwarzenegger signed AB 32, the California Climate Solutions Act of 2006. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by the year 2020. This reduction is to be accomplished through an enforceable statewide cap on GHG emissions that will be phased in starting in 2012. To effectively implement the cap, AB 32 directs CARB to develop and implement regulations to reduce statewide GHG emissions from stationary sources. AB 32 specifies that regulations adopted in response to AB 1493 should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then CARB should develop new regulations to control vehicle GHG emissions under the authorization of AB 32. (Urban Crossroads, Inc., 2016c, p. 19)

AB 32 required that CARB adopt a quantified cap on GHG emissions representing 1990 emissions levels and disclose how it arrived at the cap; institute a schedule to meet the emissions cap; and develop tracking, reporting, and enforcement mechanisms to ensure that the state achieves reductions in GHG emissions necessary to meet the cap. AB 32 also included guidance to institute emissions reductions in an economically efficient manner and conditions to ensure that businesses and consumers are not unfairly affected by the reductions. (Urban Crossroads, Inc., 2016c, pp. 19-20)

In November 2007, CARB completed its estimates of 1990 GHG levels. Net emission 1990 levels were estimated at 427 million metric tons (MMTs) (emission sources by sector were: transportation – 35 percent; electricity generation – 26 percent; industrial – 24 percent; residential – 7 percent; agriculture – 5 percent; and commercial – 3 percent). Accordingly, 427 MMTs of CO₂ equivalent was established as the emissions limit for 2020. For comparison, CARB’s estimate for baseline GHG emissions was 473 MMT for 2000 and 532 MMT for 2010. “Business as usual” conditions (without the reductions to be implemented by CARB regulations) for 2020 were projected to be 596 MMTs. (Urban Crossroads, Inc., 2016c, p. 20)

In December 2007, CARB approved a regulation for mandatory reporting and verification of GHG emissions for major sources. This regulation covered major stationary sources such as cement plants, oil refineries, electric generating facilities/providers, and co-generation facilities, which comprise 94 percent of the point source CO₂ emissions in the State. (Urban Crossroads, Inc., 2016c, p. 20)

On December 11, 2008, CARB adopted a scoping plan to reduce GHG emissions to 1990 levels. The Scoping Plan’s recommendations for reducing GHG emissions to 1990 levels by 2020 include emission reduction measures, including a cap-and-trade program linked to Western Climate Initiative partner jurisdictions, green building strategies, recycling and waste-related measures, as well as Voluntary Early Actions and Reductions. Implementation of individual measures must begin no later



than January 1, 2012, so that the emissions reduction target can be fully achieved by 2020. (Urban Crossroads, Inc., 2016c, p. 20)

Table 4.7-4, *CARB Scoping Plan Reduction Measures Towards 2020 Target*, shows the proposed reductions from regulations and programs outlined in the Scoping Plan. While local government operations were not accounted for in achieving the Year 2020 emissions reduction, local land use changes are estimated to result in a reduction of 5 MMTCO_{2e}, which is approximately 3 percent of the 2020 GHG emissions reduction goal. In recognition of the critical role local governments will play in successful implementation of AB 32, CARB is recommending GHG reduction goals of 15 percent of 2006 levels by 2020 to ensure that municipal and community-wide emissions match the state's reduction target. According to the Measure Documentation Supplement to the Scoping Plan, local government actions and targets are anticipated to reduce vehicle miles by approximately 2 percent through land use planning, resulting in a potential GHG reduction of 2 MMTCO_{2e} (or approximately 1.2 percent of the GHG reduction target). (Urban Crossroads, Inc., 2016c, p. 20)

Overall, CARB determined that achieving the 1990 emission level in 2020 would require a reduction in GHG emissions of approximately 28.5 percent in the absence of new laws and regulations (referred to as "Business-As-Usual" (BAU)). The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and CAT early actions and additional GHG reduction measures, identifies additional measures to be pursued as regulations, and outlines the role of the cap-and-trade program. (Urban Crossroads, Inc., 2016c, pp. 20-21)

In connection with its preparation of the August 2011 Final Supplement to the Scoping Plan's Functional Equivalent Document, CARB released revised estimates of the 2020 emissions level projection in light of the economic recession and the availability of updated information from development of measure-specific regulations. Based on the new economic data, CARB determined the 2020 emissions level projection in the BAU condition would be reduced from 596 metric tons of CO₂ equivalent (MTCO_{2e}) to 545 MTCO_{2e}. Under this scenario, achieving the 1990 emissions level in 2020 would require a reduction of GHG emissions of 118 MTCO_{2e}, or 21.7 percent (down from 28.5 percent), from the BAU condition. (Urban Crossroads, Inc., 2016c, p. 22)

When the 2020 emissions level projection also was updated to account for implemented regulatory measures, including Pavley (vehicle model-years 2009 - 2016) and the renewable portfolio standard (12% - 20%), the 2020 projection in the BAU condition was reduced further to 507 MTCO_{2e}. As a result, based on the updated economic and regulatory data, CARB determined that achieving the 1990 emissions level in 2020 would now only require a reduction of GHG emissions of 80 MTCO_{2e}, or approximately 16 percent (down from 28.5 percent), from the BAU condition. (Urban Crossroads, Inc., 2016c, p. 22)

On February 10, 2014, CARB released a Draft Proposed First Update of the Scoping Plan. The draft recalculates 1990 GHG emissions using new global warming potentials identified in the IPCC Fourth Assessment Report released in 2007. Using those GWPs, the 427 MTCO_{2e} 1990 emissions level and



2020 GHG emissions limit identified in the 2008 Scoping Plan would be slightly higher, at 431 MTCO_{2e}. Based on the revised 2020 emissions level projection identified in the 2011 Final Supplement and the updated 1990 emissions levels identified in the discussion draft of the First Update, achieving the 1990 emissions level in 2020 would require a reduction of 78 MTCO_{2e} (down from 509 MTCO_{2e}), or approximately 15.3 percent (down from 28.5 percent), from the BAU condition. (Urban Crossroads, Inc., 2016c, p. 22)

Although CARB has released an update to the Scoping Plan and reduction targets from BAU, it is still appropriate to utilize the previous 28.5% reduction from BAU since the modeling tools available are not able to easily segregate the inclusion of the renewable portfolio standards, and Pavley requirements that are now included in the revised BAU scenario. (Urban Crossroads, Inc., 2016c, p. 22)

7. *California Senate Bill No. 1368 (SB 1368)*

In 2006, the State Legislature adopted Senate Bill 1368 (SB 1368), which was subsequently signed into law by the Governor. SB 1368 directs the California Public Utilities Commission (CPUC) to adopt a greenhouse gas emission performance standard (EPS) for the future power purchases of California utilities. SB 1368 seeks to limit carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than five years from resources that exceed the emissions of a relatively clean, combined cycle natural gas power plant. Due to the carbon content of its fuel source, a coal-fired plant cannot meet this standard because such plants emit roughly twice as much carbon as natural gas, combined cycle plants. Accordingly, the new law will effectively prevent California's utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the State. Thus, SB 1368 will lead to dramatically lower greenhouse gas emissions associated with California energy demand, as SB 1368 will effectively prohibit California utilities from purchasing power from out of state producers that cannot satisfy the EPS standard required by SB 1368. (Urban Crossroads, Inc., 2016c, pp. 22-23)

8. *Executive Order S-01-07*

On January 18, 2007, California Governor Schwarzenegger, through Executive Order S-01-07, mandated a statewide goal to reduce the carbon intensity of California's transportation fuel by at least 10 percent by 2020. The order also requires that a California specific Low Carbon Fuel Standard be established for transportation fuels. (Urban Crossroads, Inc., 2016c, p. 24)

9. *Senate Bills 1078 and 107 and Executive Order S-14-08*

SB 1078 (Chapter 516, Statutes of 2002) requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. SB 107 (Chapter 464, Statutes of 2006) changed the target date to 2010. In November 2008 Governor Schwarzenegger signed Executive Order S-14-08, which expands the state's Renewable Energy Standard to 33 percent renewable power by 2020. (Urban Crossroads, Inc., 2016c, p. 24)



Table 4.7-4 CARB Scoping Plan Reduction Measures Towards 2020 Target

| <i>Recommended Reduction Measures</i> | <i>Reductions Counted toward 2020 Target of 169 MMT CO_{2e}</i> | <i>Percentage of Statewide 2020 Target</i> |
|---|---|--|
| Cap and Trade Program and Associated Measures | | |
| California Light-Duty Vehicle GHG Standards | 31.7 | 19% |
| Energy Efficiency | 26.3 | 16% |
| Renewable Portfolio Standard (33 percent by 2020) | 21.3 | 13% |
| Low Carbon Fuel Standard | 15 | 9% |
| Regional Transportation-Related GHG Targets ¹ | 5 | 3% |
| Vehicle Efficiency Measures | 4.5 | 3% |
| Goods Movement | 3.7 | 2% |
| Million Solar Roofs | 2.1 | 1% |
| Medium/Heavy Duty Vehicles | 1.4 | 1% |
| High Speed Rail | 1.0 | 1% |
| Industrial Measures | 0.3 | 0% |
| Additional Reduction Necessary to Achieve Cap | 34.4 | 20% |
| Total Cap and Trade Program Reductions | 146.7 | 87% |
| Uncapped Sources/Sectors Measures | | |
| High Global Warming Potential Gas Measures | 20.2 | 12% |
| Sustainable Forests | 5 | 3% |
| Industrial Measures (for sources not covered under cap and trade program) | 1.1 | 1% |
| Recycling and Waste (landfill methane capture) | 1 | 1% |
| Total Uncapped Sources/Sectors Reductions | 27.3 | 16% |
| Total Reductions Counted toward 2020 Target | 174 | 100% |
| Other Recommended Measures – Not Counted toward 2020 Target | | |
| State Government Operations | 1.0 to 2.0 | 1% |
| Local Government Operations | To Be Determined ² | NA |
| Green Buildings | 26 | 15% |
| Recycling and Waste | 9 | 5% |
| Water Sector Measures | 4.8 | 3% |
| Methane Capture at Large Dairies | 1 | 1% |
| Total Other Recommended Measures – Not Counted toward 2020 Target | 42.8 | NA |

Source: CARB. 2008, MMT CO_{2e}: million metric tons of CO_{2e}

¹Reductions represent an estimate of what may be achieved from local land use changes. It is not the SB 375 regional target.

²According to the Measure Documentation Supplement to the Scoping Plan, local government actions and targets are anticipated to reduce vehicle miles by approximately 2 percent through land use planning, resulting in a potential GHG reduction of 2 million metric tons of CO_{2e} (or approximately 1.2 percent of the GHG reduction target). However, these reductions were not included in the Scoping Plan reductions to achieve the 2020 Target.

Source: (Urban Crossroads, Inc., 2016c, Table 3-2)



10. Senate Bill 375 (SB 375)

SB 375, signed in September 2008 (Chapter 728, Statutes of 2008), aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocation. SB 375 requires metropolitan planning organizations (MPOs) to adopt a sustainable communities strategy (SCS) or alternative planning strategy (APS) that will prescribe land use allocation in that MPO's regional transportation plan. CARB, in consultation with MPOs, will provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets will be updated every eight (8) years but can be updated every four (4) years if advancements in emissions technologies affect the reduction strategies to achieve the targets. CARB is also charged with reviewing each MPO's SCS or APS for consistency with its assigned targets. If MPOs did not meet the GHG reduction targets, transportation projects are not eligible for funding programmed after January 1, 2012. (Urban Crossroads, Inc., 2016c, p. 24)

The Southern California Association of Governments (SCAG) *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)* is applicable to the Project area.

11. Executive Order B-30-15

On April 29, 2015, Governor Edmund G. Brown Jr. issued Executive Order B-30-15, which documents the governor's goal to reduce GHG emissions in California to 40 percent below 1990 levels by 2030. The 2030 target serves as a benchmark goal on the way to achieving the GHG reductions goal offered by Governor Schwarzenegger via Executive Order S-3-05 (i.e., 80 percent below 1990 greenhouse gas emissions levels by 2050). ~~Executive Order B-30-15 is disclosed herein for informational purposes. Executive Order B-30-15 was not adopted by a public agency through a public review process that requires analysis pursuant to CEQA Guidelines § 15064.4 and also has not been subsequently validated by a statute as an official GHG reduction target of the State of California. A regulatory requirement for statewide GHG reductions for 2030 is expected to be adopted by the California Legislature at a future date.~~

12. Senate Bill 32

On September 8, 2016 (after the NOP for this EIR was issued for public review), Governor Jerry Brown signed the Senate Bill (SB) 32 and its companion bill, Assembly Bill (AB) 197. SB 32 requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal of 1990 levels by 2020 and provides an intermediate goal to achieving S-3-05, which sets a statewide greenhouse gas reduction target of 80% below 1990 levels by 2050.

At this time, no further analysis is necessary or required by CEQA as it pertains to Executive Order B-30-15 and SB 32 because the Project's horizon (buildout) year would occur before 2020. Pursuant to guidance from the Association of Environmental Professionals (AEP), GHG emissions "...should be identified for the project horizon year and lead agencies should consider the project horizon year when applying a threshold of significance" (AEP, 2016, p. 32). Because the Project's buildout year would



occur before 2020, the Project's GHG emissions are more appropriately evaluated against the County's CAP. Demonstrating compliance with the County's CAP would show that the Project would not inhibit Riverside County's ability to achieve the 2030 target established by SB 32.

G. County of Riverside Climate Action Plan (CAP)

The County of Riverside adopted a CAP on December 8, 2015, which provides guidance on how to analyze GHG emissions and determine significance during the CEQA review of proposed development projects within the County. To address the state's requirement to reduce GHG emissions, the County prepared its CAP with the goal of reducing GHG emissions within the County by 15% below "existing" 2008 levels by the year 2020. The County's target is consistent with the AB 32 target and ensures that the County will be providing GHG reductions locally that will complement state efforts to reduce GHG emissions. Because the County's CAP addresses GHG emissions reductions and is consistent with the requirements of AB 32 and international efforts to reduce GHG emissions, compliance with the CAP fulfills the description of a project-specific mitigation found in the State CEQA Guidelines. (Urban Crossroads, 2017a, p. 33)

The CAP includes GHG inventories of community-wide and municipal sources based on the most recent data available for the year 2008. Sources of emissions include transportation, electricity and natural gas, landscaping, water and wastewater pumping and treatment and decomposition of solid waste. Riverside County's 2008 inventory amounted to 7,012,983 MTCO_{2e} community-wide and 226,753 MTCO_{2e} from municipal operations. Implementation of the CAP would reduce 4,288,863 MTCO_{2e} per year from new development by year 2020 as compared to the 2020 unmitigated conditions. (County of Riverside, 2015, p. 3)

4.7.2 METHODOLOGY FOR ESTIMATING GREENHOUSE GAS EMISSIONS

CEQA Guidelines § 15064.4(a)(1) states that a CEQA lead agency may use a model or methodology to quantify GHG emissions associated with a project. On October 2, 2013, the SCAQMD, in conjunction with the California Air Pollution Control Officers Association (CAPCOA) released the latest version (v2013.2.2.) of the California Emissions Estimator Model (CalEEMod). The purpose of this model is to estimate air quality and GHG emissions from direct and indirect sources and quantify applicable air quality and GHG reductions achieved from mitigation measures. As such, the October 2013 (v2013.2.2.) CalEEMod was used to estimate Project-related emissions to determine construction and operational air quality impacts. Output from the model runs for both Project-related construction and operational activity are provided in Appendix 3.1 of *Technical Appendix F* (Urban Crossroads, Inc., 2016c, p. 29)

Due to the lack of consensus scientific guidance on life-cycle analysis (LCA) methodology, Urban Crossroads, Inc. did not conduct a LCA, which assesses economy-wide GHG emissions from the processes in manufacturing and transporting all raw materials used in the project development and infrastructure. A LCA depends on emission factors or econometric factors that are not well established for all processes as of the date this EIR was written (2015); accordingly, a LCA would be extremely



speculative. Additionally, the science to calculate life-cycle emissions is not yet established or well defined, therefore SCAQMD has not recommended and is not requiring life-cycle emissions analysis. (Urban Crossroads, Inc., 2016c, pp. 29-30)

B. Methodology for Estimating Project-Related Construction Emissions

Construction activities associated with the proposed Project would result in emissions of CO₂ and CH₄ from construction activities. According to the Project's Air Quality Impact Analysis (*Technical Appendix B1*), construction activities associated with the proposed Project include:

- Demolition
- Grading/Blasting
- Underground Utilities
- Building Construction
- Landscape
- Paving and Site Finishes
- Architectural Finishes

Information about the Project's anticipated construction schedule and equipment fleet, as supplied by the Project Applicant, was input into the CalEEMod model and defaults for all other assumptions were utilized. Refer to Appendix 3.1 of *Technical Appendix F* to this EIR for more details on the construction emissions estimate methodology. Refer also to the specific detailed modeling inputs/outputs contained in Appendix 3.1 of *Technical Appendix F*. A summary of construction equipment assumptions by phase that were used as model inputs is provided in Section 3.0, *Project Description*.

For construction-phase Project GHG emissions, the Project's emissions were quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total greenhouse gas emissions for the construction activities, dividing it by the a 30-year project life then adding that number to the annual operational phase GHG emissions. As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions. (Urban Crossroads, Inc., 2016c, p. 30)

C. Methodology for Estimating Project-Related Operational Emissions

Operational activities associated with the proposed Project would result in emissions of CO₂, CH₄, and N₂O from the following primary sources:

- Area Source Emissions
- Energy Source Emissions
- Mobile Source Emissions
- Solid Waste
- Water Supply, Treatment, and Distribution
- On-Site Equipment Emissions



Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. The emissions associated with landscape maintenance equipment were calculated based on assumptions provided in the CalEEMod model. (Urban Crossroads, Inc., 2016c, p. 30)

Natural Gas and Electricity

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO₂ and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. Unless otherwise noted, CalEEMod™ default parameters were used in the greenhouse gas impact analysis (*Technical Appendix F*) and herein. (Urban Crossroads, Inc., 2016c, pp. 30-31)

Solid Waste

The Project would result in the generation and disposal of solid waste. A large percentage of this waste would be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted would be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material. GHG emissions associated with the disposal of solid waste associated with the proposed Project were calculated by the CalEEMod™ model using default parameters. (Urban Crossroads, Inc., 2016c, p. 34)

Water Supply, Treatment, and Distribution

Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat, and distribute water depends on the volume of water as well as the sources of the water. The amount of electricity required to convey, treat, and distribute water depends on the volume of water as well as the sources of water. Unless otherwise noted, CalEEMod default parameters were used in the greenhouse gas impact analysis (*Technical Appendix F*) and herein. (Urban Crossroads, Inc., 2016c, p. 34)

On-Site Equipment

It is common for high cube warehouse buildings to require cargo handling equipment to move empty containers and empty chassis to and from the various pieces of cargo handling equipment that receive and distribute containers. The most common type of cargo handling equipment is the yard truck that is designed for moving cargo containers. Yard trucks are also known as yard goats, utility tractors (UTRs), hustlers, yard hostlers, and yard tractors. Yard trucks have a horsepower (hp) range of approximately 175 hp to 200 hp. Because the occupants of the proposed Project's buildings are not



yet identified and operating characteristics cannot be known with certainty, this analysis relies on average on-site equipment usage for warehouse buildings in southern California. Based on the latest available information from SCAQMD, high-cube warehouse projects typically have 3.6 yard trucks per one million square feet of building space. For the air quality impact analysis of the proposed Project, Urban Crossroads, Inc. analyzed the use of on-site modeled operational equipment including five (5) 200 hp yard tractors operating at 4 hours a day for 365 days of the year. In addition, to the use of yard trucks operating at the Project site, forklifts are a common piece of equipment used in warehouse operations; therefore, Urban Crossroads, Inc. analyzed the use of five (5) 89 hp yard forklifts operating at 4 hours a day for 365 days of the year. The emissions associated with on-site equipment were calculated using the CalEEMod model. (Urban Crossroads, Inc., 2016c, p. 34)

Vehicles

A majority of the proposed Project's GHG emissions would result from mobile sources, including daily operation of motor vehicles by visitors, employees, and customers. Project-related vehicular GHG emissions are dependent on the Project's daily vehicle trip generation and the characteristics of those trips. Information related to the Project's daily vehicle trip generation and trip characteristics was obtained from the Project's traffic report contained as *Technical Appendix JI*.

As summarized in *Technical Appendix JI*, the Project would generate 2,115 actual daily vehicle trips, including 1,309 passenger cars trips and 806 truck trips based on trip generation rates specified in the Institute of Transportation Engineers (ITE) Trip Generation Manual, 9th Edition, 2012. Use of the ITE rates are standard industry practice for the calculation of projected traffic volumes in traffic studies supporting CEQA compliance documents throughout California and are recommended by the SCAQMD. It is noted that the Project's traffic impact analysis (*Technical Appendix JI*) also presents the total Project vehicle trips in terms of Passenger Car Equivalents (PCEs) in an effort to recognize and acknowledge the effects of heavy vehicles at intersections in the Project's study area and in accordance with traffic engineering best practices. The PCE trips were not used for the purposes of quantifying air pollutant emissions; rather to be more representative of actual emissions, the actual number of passenger cars (including light trucks) and heavy trucks were used in the air quality analysis. (Urban Crossroads, Inc., 2016a, p. 31)

The ITE Trip Generation manual includes data regarding the types of vehicles that are generated (passenger cars and trucks), but provides no guidance on vehicle mix (different sizes of trucks). While trucks, as a percentage of total traffic, was based on the ITE Trip Generation manual, data regarding the vehicle mix was obtained from a separate report- the SCAQMD recent Warehouse Truck Trip Study. The SCAQMD is currently recommending the use of the ITE Trip Generation manual in conjunction with their truck mix by axle-type to better quantify trip rates associated with local warehouse and distribution projects, as truck emission represent more than 90 percent of air quality impacts from these projects. This recommended procedure was utilized for the purposes of the analysis in the air quality impact analysis (*Technical Appendix B1*) (Urban Crossroads, Inc., 2016a, pp. 31-32)



A limitation inherent in calculating the projected vehicle emissions associated with any project is related to the estimation of trip length and vehicle miles traveled (VMT). VMT for a given project is calculated by the total number of vehicle trips to/from the Project multiplied by average trip length. This method of estimating VMT for use in calculating vehicle emissions likely results in the over-estimation and double-counting of emissions because, for warehouse buildings such as the Project, the land use is likely to attract (divert) existing vehicle trips that are already on the circulation system as opposed to generating new trips. In this regard, the Project would, to a large extent, redistribute existing mobile-source emissions rather than generate additional emissions within the Basin. As such, the estimation of the Project's vehicular-source emissions is likely overstated in that no credit for, or reduction in, emissions is assumed based on diversion of existing trips. (Urban Crossroads, Inc., 2016c, p. 32)

In the last five years, the SCAQMD has provided numerous comments on the trip length for warehouse/distribution and industrial land use projects. The SCAQMD asserts that the model-default trip length in CalEEMod and the URBan EMISsions (URBEMIS) 2007 model (version 9.2.4) would underestimate emissions. The SCAQMD asserts that for warehouse, distribution center, and industrial land use projects, most of the heavy-duty trucks would be hauling consumer goods, often from the Ports of Long Beach and Los Angeles (POLA and POLB) and/or to destinations outside of California. The SCAQMD states that for this reason, the CalEEMod and the URBan EMISsions model default trip length (approximately 12.6 miles) would not be representative of activities at like facilities. The SCAQMD generally recommends the use of a 40-mile one-way trip length. SCAG maintains a regional transportation model. In its most recent (2008) transportation validation for the 2003 Regional Model, SCAG indicates the average internal truck trip length for the SCAG region is 5.92 miles for Light Duty Trucks, 13.06 miles for Medium Duty Trucks, and 24.11 miles for Heavy Duty Trucks. (Urban Crossroads, Inc., 2016c, pp. 32-33)

Trip lengths and VMT estimates employed in the air quality impact analysis (*Technical Appendix B1*) generate vehicular-source emissions that would represent a maximum impact scenario. To maintain analytic consistency and establish the maximum impact scenario noted above, the following approach was utilized by Urban Crossroads, Inc. in calculating emissions associated with vehicles accessing the Project:

For passenger car trips, the CalEEMod default for a one-way trip length of 16.6 miles was assumed. For heavy duty trucks, an average trip length was derived from distances from the Project site to the far edges of the SCAB as follows. It is appropriate to stop the VMT calculation at the boundary of the SCAB because any activity beyond that boundary would be speculative. This approach is also consistent with professional industry practice. (Urban Crossroads, Inc., 2016c, p. 33)

- Project site to the Port of Los Angeles/Long Beach: 80 miles;
- Project site to East on State Route 60: 30 miles;
- Project site to San Diego County line: 60 miles;
- Project site to Inland Empire: 50 miles;



- Project site to Perris destinations: 10 miles;
- Project site to Moreno Valley destinations: 10 miles;

Assuming that 50% of all delivery trips will travel to and from the Project and the Port of Los Angeles/Long Beach, 10% go east on the State Route 60 (SR-60), 20% go to San Diego, 10% go to the Inland Empire, 5% go to Perris destinations, and the remainder as Moreno Valley destinations, the average truck trip length is calculated as 61 miles. (Urban Crossroads, Inc., 2016c, p. 33)

Urban Crossroads, Inc. utilized two separate model runs in order to more accurately model emissions resulting from vehicle operations. The first model run analyzed passenger car emissions, which incorporated a default trip length of 16.6 miles for passenger cars and a fleet mix of 100% Light-Duty-Auto vehicles (LDA). The second model run analyzed truck emissions, which incorporated an average truck trip length of 61 miles and a fleet mix of 22.03% Light-Heavy-Duty Trucks, 17.66% Medium-Heavy-Duty Trucks, and 60.31% Heavy-Duty Trucks. Detailed emission calculations are provided in Appendix 3.2 of *Technical Appendix B1*. (Urban Crossroads, Inc., 2016c, p. 33)

4.7.3 BASIS FOR DETERMINING SIGNIFICANCE

In order to assess the significance of a proposed Project's environmental impacts it is necessary to identify quantitative or qualitative thresholds which, if exceeded, would constitute a finding of significance. As discussed above in Subsection 4.7.1, while Project-related GHG emissions can be estimated, the direct impacts of such emissions on GCC and global warming cannot be determined on the basis of available science. There is no evidence at this time that would indicate that the emissions from a project the size of the proposed Project would directly or indirectly affect the global climate.

AB 32 states, in part, that “[g]lobal warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California.” Because global warming is the result of GHG emissions, and GHGs are emitted by innumerable sources worldwide, the proposed Project would have no potential to result in a direct impact to global warming; rather, Project-related contributions to GCC, if any, only have potential significance on a cumulative basis. Therefore, the analysis below focuses on the Project's potential to contribute to GCC in a cumulatively considerable way.

The CEQA Guidelines indicate that a project would result in a significant impact on climate change if a project were to:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or*
- b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.*



Under CEQA Guidelines §15064.4 CEQA lead agencies are directed to exercise their judgment when determining the methodologies and significance threshold(s) to apply when analyzing GHG impacts in the context of a particular project. Lead agencies are afforded broad discretion in making these determinations. Because the County’s CAP addresses GHG emissions reduction, is in concert with international efforts to address global climate change, and includes specific local requirements that will substantially lessen cumulative effects, the County has determined that if the proposed Project complies with the County’s CAP, it would fulfill the description of mitigation found in CEQA Guidelines §15130(a)(3) and §15183.5 and result in a less than significant GHG impact. (Urban Crossroads, Inc., 2016c, p. n.p.) Further, on November 30, 2015, the California Supreme Court in *Center for Biological Diversity v. California Department of Fish and Wildlife* (“Newhall Ranch”) confirmed that a CEQA lead agency may utilize “geographically specific GHG emission reduction plans” such as climate action plans or greenhouse gas emission reduction plans to provide a basis for the tiering or streamlining of project-level CEQA analysis. The Riverside County CAP is a geographically specific plan that was adopted by the County of Riverside for the purpose of reducing GHG emissions under the control or influence of the County consistent with AB 32 and subsequent state legislation and state agency action to address climate change. This threshold is also consistent with the SCAQMD’s draft interim threshold Tier 2, which consists of determining whether a project is consistent with a qualified greenhouse gas reduction plan. If a project is consistent with the CAP, it is considered to not directly or indirectly generate GHGs in quantities that would have a significant impact on the environment. Thus, projects that comply with the Riverside County CAP would comply with the County’s applicable plan for the purpose of reducing the emissions of GHGs, and would not generate GHG emissions that would have a significant effect on the environment. If the Project does not comply with the County’s CAP, a significant GHG impact would result, requiring mitigation.

The County also considered the following when making its determination to rely upon the above as the GHG significance thresholds for the proposed Project.

CARB’s Preliminary Draft Staff Proposal for Interim Significance Thresholds

Separate from its Scoping Plan (approved in December of 2008), CARB issued a Staff Proposal in October 2008, as its first step toward developing recommended statewide interim thresholds of significance for GHGs that may be adopted by local agencies for their own use. CARB staff’s objective in this proposal is to develop a threshold of significance that will result in the vast majority (approximately 90 percent statewide) of GHG emissions from new industrial projects being subject to CEQA’s requirement to impose feasible mitigation. The proposal does not attempt to address every type of project that may be subject to CEQA, but instead focuses on common project types that, collectively, are responsible for substantial GHG emissions – specifically, industrial, residential, and commercial projects. CARB is developing these thresholds in these sectors to advance climate objectives, streamline project review, and encourage consistency and uniformity in the CEQA analysis of GHG emissions throughout the state. These draft thresholds are under revision in response to public comments. There is no timetable for finalized thresholds at this time.



As currently proposed by CARB staff, the threshold consists of a quantitative threshold of 7,000 metric tons (MT) of CO_{2e} per year for operational emissions (excluding transportation), and performance standards for construction and transportation emissions (which have not yet been developed). CARB's proposal was not final at the time that the NOP for this EIR was released for public review (August 31, 2015). Further, CARB's proposal sets forth draft thresholds for industrial projects that have high operational stationary GHG emissions, such as manufacturing plants, or uses that utilize combustion engines. Mobile source emissions are not addressed. The GHG emissions that would be emitted by the Project evaluated in this EIR would be mostly from mobile sources, and as such, the CARB proposal would not be applicable to the proposed Project because it excludes transportation (mobile) sources.

CARB's Draft Sustainable Freight Strategy

Specific to the warehouse, logistics, and goods movement industries, CARB released a concepts list in 2014 regarding their efforts to develop a Sustainable Freight Strategy (SFS). In 2015, CARB released a draft report named "Sustainable Freight: Pathways to Zero and Near-Zero Emissions" that focuses on ways for California to move toward a zero emissions transportation system (CARB, 2015). The report describes possible ways for this transition to occur, but does not impose any requirements or restrictions. A final SFS was published by CARB in 2016.

South Coast Air Quality Management District Recommendations for Significance Thresholds

In April 2008, the South Coast Air Quality Management District (SCAQMD) convened a "GHG CEQA Significance Threshold Working Group," in order to provide guidance to local lead agencies on determining the significance of GHG emissions identified in CEQA documents. The goal of the working group is to develop and reach consensus on an acceptable CEQA significance threshold for GHG emissions that would be utilized on an interim basis until CARB (or some other state agency) develops statewide guidance on assessing the significance of GHG emissions under CEQA. (Urban Crossroads, Inc., 2016c, p. 25)

Initially, SCAQMD staff presented the working group with a significance threshold that could be applied to various types of projects (residential, non-residential, industrial, etc.). However, final thresholds were never discussed or adopted for land development projects. Notwithstanding, in December 2008, SCAQMD staff presented the SCAQMD Governing Board with a significance threshold for development projects that are stationary sources of air pollutants where the SCAQMD is the lead agency. This threshold utilizes a tiered approach to determine a project's significance, with 10,000 MTCO_{2e} as a numerical screening threshold for "industrial project" stationary sources of air pollution. More importantly it should be noted that when setting the 10,000 MTCO_{2e} threshold, the SCAQMD did not consider mobile sources (vehicular travel), rather the threshold is based mainly on stationary source generators such as boilers, refineries, power plants, etc. Therefore, it would be misleading to apply a threshold that was developed without consideration for mobile sources to a



Project where the majority of emissions are related to mobile sources. Thus, there is no SCAQMD threshold that can be applied to this Project. (Urban Crossroads, Inc., 2016c, p. 25)

In 2010, the SCAQMD Working Group authored an alternative, tiered approach for evaluating the significance of GHG emissions from development projects. Under the Working Group's alternative approach, development projects that are not exempt from CEQA and that would exceed a numerical screening threshold (10,000 MTCO_{2e} for industrial development) would result in a cumulatively considerable impact associated with GHG emissions, unless the project can demonstrate that it meets a project-level efficiency target or reduces emissions by an undefined percentage. The Working Group set the project-level efficiency target for the Year 2020 at 4.8 MTCO_{2e} per service population. The Working Group made no formal recommendations to the SCAQMD regarding significance thresholds for GHG emissions, and the SCAQMD did not take action on the Working Group's alternative approach. The Working Group last convened in 2010 and it is unclear if the SCAQMD will re-initiate the working group or if the process has been abandoned altogether. (Urban Crossroads, Inc., 2016c, pp. 25-26)

Mobile source emissions are not addressed in the SCAQMD's Recommendations for Significance Thresholds. The GHG emissions that would be emitted by the Project evaluated in this EIR would be mostly from mobile sources, and as such, the SCAQMD's Recommendations for Significance Threshold would not be applicable to the proposed Project because it excludes transportation (mobile) sources.

County of Riverside Climate Action Plan

In conjunction with GPA No. 960, the County of Riverside certified Final EIR No. 521 and approved a Climate Action Plan (CAP). The County of Riverside released a draft CAP in February 2015. Changes made to GPA No. 960's CAP after the close of the February 2015 public review period are noted in the County of Riverside's CAP Errata. The CAP was formally adopted by the County of Riverside on December 8, 2015, which includes an Errata contained in Section 5 of the CAP document. The intent of the adopted CAP is help ensure that the impact of development on air quality is minimized, energy is conserved, and land use decisions made by Riverside County and all internal operations within Riverside County are consistent with adopted state legislation.

The CAP includes GHG inventories of community-wide and municipal sources based on the most recent data available for the year 2008. Sources of emissions include transportation, electricity and natural gas, landscaping, water and wastewater pumping and treatment and decomposition of solid waste. Riverside County's 2008 inventory amounted to 7,012,983 MTCO_{2e} community-wide and 226,753 MTCO_{2e} from municipal operations. Following the state's adopted AB 32 GHG reduction target, Riverside County set a goal to reduce emissions back to 1990 levels by the year 2020. (County of Riverside, 2015, pp. ES-1) The County of Riverside CAP includes reducing 4,288,863 MTCO_{2e} per year from new development by year 2020 as compared to the 2020 unmitigated conditions. (County of Riverside, 2015, p. 3)



The development of the CAP coincides with Riverside County's General Plan Update. A community-wide emissions inventory is also calculated for the horizon year 2035. Various state policies, such as those mentioned above, have enacted programs that also will contribute to reduced GHG emissions in Riverside County by the year 2020. In order to reach the reduction target, the County of Riverside would also need to implement the additional reduction measures described in the CAP. The measures encourage energy efficiency and renewable energy in buildings, transit-oriented planning, water conservation, and increase waste diversion. (County of Riverside, 2015, pp. ES-1 through ES-2)

As stated in the CAP Chapter 7, Section 7.5, "Implementation; Project Review":

" The CEQA guidelines support projects that lower the carbon footprint of new development, and encourage programmatic mitigation strategies that may include reliance on adopted regional blueprint plans, CAPs and general plans that meet regional and local GHG emissions targets and that have also undergone CEQA review. The County of Riverside will implement the reduction measures for new development during the CEQA review, through the use of a Riverside County GHG Screening Table document based upon the CAP. The screening table will provide a menu of reduction options. If a project can obtain 100 points from the screening table, the mitigated project will implement pertinent reduction measures such that it meets the reduction goals of the CAP and a less than significant finding can be made for the project."

In order to evaluate consistency with the CAP, the County of Riverside provides Screening Tables to aid in measuring the reduction of GHG emissions attributable to certain design and construction measures incorporated into development projects. The CAP contains a menu of 47 overall measures potentially applicable to discretionary development that include energy conservation, water use reduction, increased residential density or mixed uses, transportation management and solid waste recycling. Individual sub-measures are assigned a point value within the overall screening table of GHG implementation measures. The point values are adjusted according to the intensity of action items with modest adoption/installation (those that reduce GHG emissions by modest amounts) worth the least number of points and greatly enhanced adoption/installation worth the most. Projects that garner at least 100 points (equivalent to an approximate 15% reduction in GHG emissions) are determined to be consistent with the reduction quantities anticipated in the County's GHG Technical Report, and consequently would be consistent with the CAP. As such, projects that achieve a total of 100 points or more do not require quantification of project specific GHG emissions after the incorporation of all of the measures required to meet the 100-point score within the CAP and, consistent with CEQA Guidelines, such projects are considered to have a less than significant individual and cumulative impact on GHG emissions. (Urban Crossroads, Inc., 2016c, p. 26)



4.7.4 IMPACT ANALYSIS

Threshold a) Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

The Project proposes the construction and operation of two high cube warehouse buildings. Although the future building users are not yet known, high cube warehouse buildings typically accommodate users that are part of the Southern California supply chain (goods movement network), which facilitates the efficient movement of goods from arrival points in the U.S. (such as the ports of LA/Long Beach) to end consumers. Without the efficient movement of goods from ports of entry, to warehouses (such as the proposed Project) where sorting and packing occur, and then to stores and end consumers, increased levels of GHG emissions have the potential to occur from inefficiencies in the movement system (longer vehicular trips and more frequent trips to move goods from their port of entry to end-consumers). Nonetheless, assuming that every vehicle trip generated by the Project would be a “new” trip (meaning that the vehicle trip is not already on the road moving goods between other facilities in the supply chain (and which may be occurring less efficiently that would occur under the proposed Project)), the Project would add GHG emissions to the Earth’s atmosphere.

The Riverside County CAP specifies a two-step approach in quantifying GHG emissions. First, a screening threshold of 3,000 MTCO_{2e} per year is used to determine if additional analysis is required. Projects that would produce GHG emissions the exceed 3,000 MTCO_{2e} per year are required to either achieve a minimum 100 points per the Screening Tables set forth in the CAP, or achieve a minimum 25 percent reduction of GHG emissions from a 2011-year level of efficiency compared to the mitigated Project buildout year. For projects that cannot attain 100 points, the CAP indicates that additional analysis would be required.

Based on the construction and operational details of the Project described in EIR Section 3.0, *Project Description*, the Project would emit approximately 2,030.09 MTCO_{2e} per year from construction, area, energy, waste, and water usage. In addition, the Project has the potential to result in an additional 19,814.65 MTCO_{2e} per year from mobile sources if the assumption is made that all of the vehicle trips to and from the Project are “new” trips resulting from the development of the Project. As such, as shown on Table 4.7-5, *Project Greenhouse Gas Emissions*, the Project has the potential to generate a total of approximately 24,617.57 MTCO_{2e} per year. Although the emission of 24,617.57 MTCO_{2e} per year from a single development project would not change the global climate, the Project’s emissions would participate in the potential for climate change by their incremental contribution combined with the cumulative increase of all other sources of GHGs worldwide, which when taken together may have an effect on global climate change. (Urban Crossroads, Inc., 2016c, p. 35) Because 24,617.57 MTCO_{2e} per year would exceed the CAP’s initial screening threshold of 3,000 MTCO_{2e}, the Project’s level of GHG emissions represent a cumulatively-considerable impact requiring mitigation.



Table 4.7-5 Project Greenhouse Gas Emissions

| Emission Source | Emissions (metric tons per year) | | | |
|---|----------------------------------|-----------------|------------------|-------------------------|
| | CO ₂ | CH ₄ | N ₂ O | Total CO ₂ E |
| Annual construction-related emissions amortized over 30 years | 99.19 | 0.01 | -- | 99.50 |
| Area | 0.07 | 1.90E-04 | 0 | 0.07 |
| Energy | 996.87 | 0.05 | 0.01 | 1001.78 |
| Mobile Sources (Trucks) | 18,127.30 | 0.12 | 0 | 18129.84 |
| Mobile Sources (Passenger Cars) | 1683.5 | 0.06 | 0 | 1684.81 |
| Offroad Equipment | 333.07 | 0.1 | 0 | 335.21 |
| Waste | 240.24 | 14.2 | 0 | 538.40 |
| Water Usage | 43.12 | 0.42 | 0.01 | 55.13 |
| Total CO₂E (Revised Project) | 21,844.74 | | | |
| Total CO₂E (From GHG Study) | 24,617.57 | | | |
| Variance | -2,772.83 | | | |

Source: CalEEMod model output. See Appendix G of *Technical Appendix F* for detailed model outputs.

Note: Totals obtained from CalEEMod and may not total 100% due to rounding.

Source: (Urban Crossroads, Inc. , 2017a)

Threshold b) Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The County of Riverside’s CAP was designed reduce GHG emissions at the local level. Because the Project would emit 24,617.57 MTCO₂e per year, which would exceed the CAP’s initial screening threshold of 3,000 MTCO₂e, the Project’s level of GHG emissions represent a cumulatively-considerable impact requiring mitigation.

The Project would comply with a number of regulations that would further reduce GHG emissions, including the following regulations that are particularly applicable to the Project and that would assist in the reduction of GHG emissions.

- Title 24 California Code of Regulations (California Building Standards Code) and Title 20 California Code of Regulations (Appliance Energy Efficiency Standards). Establishes energy efficiency requirements for new (and altered) buildings and appliances. Construction of the Project is required to comply with these regulations.
- California Water Conservation in Landscaping Act of 2006 (AB1881). Requires local agencies to adopt the Department of Water Resources updated Water Efficient Landscape Ordinance or equivalent to ensure efficient landscapes in new development and reduced water waste in existing landscapes by January 1, 2010. The Project is required to comply with the County of Riverside’s adopted water efficient landscape requirements and would therefore be consistent with the requirements of AB1881.



- Renewable Portfolio Standards (SB 1078). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to 20 percent by 2010 and 33 percent by 2020. Energy directly or indirectly supplied to the Project by electric corporations would thus comply with SB 1078.

There are no other plans, policies, or regulations that have been adopted for the purpose of reducing the emissions of GHGs that are applicable to the proposed Project.

4.7.5 CUMULATIVE IMPACT ANALYSIS

GCC occurs as the result of global emissions of GHGs. An individual project such as the proposed Project does not have the potential to result in direct and significant GCC-related effects in the absence of cumulative sources of GHGs. The CEQA Guidelines also emphasize that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impacts analysis (See CEQA Guidelines §15130[f]).

Accordingly, the Project-specific impact analysis provided in Subsection 4.7.4 reflects a cumulative impact analysis of the Project's GHG emissions, and concludes that the proposed would emit 24,617.57 MTCO_{2e} per year, which would exceed the CAP's initial screening threshold of 3,000 MTCO_{2e}. Thus, the Project's level of GHG emissions represent a cumulatively-considerable impact requiring mitigation.

4.7.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold (a): Cumulatively Considerable Significant Impact. At Project buildout, the Project's total annual GHG emissions are calculated to be approximately 24,617.57 MTCO_{2e} per year, which exceeds the Riverside County CAP's annual GHG emissions threshold of 3,000 MTCO_{2e}. Thus, Project would result in cumulatively considerable impacts.

Threshold (b): Cumulatively Considerable Significant Impact. At Project buildout, the Project's total annual GHG emissions are calculated to be approximately 24,617.57 MTCO_{2e} per year, which exceeds the Riverside County CAP's annual GHG emissions threshold of 3,000 MTCO_{2e}. Thus, Project would result in cumulatively considerable impacts.

4.7.7 MITIGATION

Applicable County Regulations and Design Requirements

The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- The Project's construction activities are required to comply with Title 24 California Code of Regulations (California Building Standards Code) and Title 20 California Code of Regulations



(Appliance Energy Efficiency Standards). These regulations establish energy efficiency requirements for new (and altered) buildings and appliances.

- The Project is required to comply with Riverside County Ordinance No. 859, which is known as the Water Efficient Landscape Requirements Ordinance. Ordinance No. 859 mandates requirements for ensuring efficient landscapes in new development and reduced water waste in existing landscapes.

Mitigation

MM 4.7-1 Prior to issuance of a building permit, the Project Applicant shall provide documentation to the County of Riverside Building Department demonstrating that the improvements and/or buildings subject to each building permit application include the following measures from the County of Riverside Climate Action Plan (CAP) (December 2015) Greenhouse Gas Emissions Screening Tables (Appendix F to the Climate Action Plan), as needed to achieve a minimum of 100 points:

- a. E5. A.1: Enhanced Insulation (rigid wall insulation R-13, roof/attic R-38) – 18 points
- b. E5. A.2: Enhanced Window Insulation (15% > Title 24) – 8 points
- c. E5. B.1: Enhanced Duct Insulation (R-8) – 10 points
- d. E5. B.2: Improved Efficiency HVAC (EER 14/65% AFUE or 8 HSPF) – 7 points
- e. E5. B.4: High Efficiency Water Heater (0.72 Energy Factor) – 16 points
- f. E5. B.5: All peripheral rooms having at least one window or skylight – 1 point
- g. E5. B.6: Very High Efficiency Lights (100% of in-unit fixtures are high efficacy) – 14 points
- h. E5. B.7: Star Commercial Refrigerator (new) – 4 points
- i. E5. C.1: North/south alignment of building such that the orientation optimizes conditions for natural heating, cooling, and lighting – 6 points
- j. W1. C.1: Eliminate turf and only drought tolerant plants – 4 points
- k. W1. D.2: Water efficient toilets/urinals (1.5 gpm) – 3 points
- l. W1. D.3: Water efficient faucets (1.28 gpm) – 3 points
- m. T1. A.2: Car/vanpool program with preferred parking – 2 points
- n. T4. A.1: Larger parking spaces to accommodate ride-sharing vans – 1 point
- o. SW2. B.1: Recycle 20% of debris during construction – 6 points

Alternatively, the Project Applicant may demonstrate that other Implementation Measures from Appendix F of the County’s CAP have been incorporated into the building permit application and/or plans to achieve the required minimum of 100 points.

4.7.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Thresholds (a) and (b): Less-than-Significant with Mitigation Incorporated. The specific CAP measures specified by Mitigation Measure MM 4.7-1 would achieve the required 100 points, and all



measures listed are feasible. In any case, compliance with the CAP requirements to achieve 100 points would be required prior to issuance of any building permits. Because the Project would be fully compliant with the County's CAP with implementation of the required mitigation, cumulatively-considerable impacts due to GHG emissions would be reduced to below a level of significance.



4.8 HAZARDS AND HAZARDOUS MATERIALS

As discussed in Section 3.0, *Project Description*, the proposed Project involves the development of two properties located south of Oleander Avenue and both east and west of Ellsworth Street totaling approximately 58.6 acres. The Building D Site is located on approximately 37.1 acres east of Ellsworth Street, and the Building E Site is located on approximately 21.5 acres west of Ellsworth Street. Both properties are collectively referred to as the “Project site.” For purposes of evaluation herein, the two properties are referred to individually as the “Building D Site” and the “Building E Site.”

The analysis in this Subsection is based in part on two site-specific environmental site assessments. The environmental site assessment prepared for the Building D Site is titled, “Decker Assemblage Phase I Environmental Site Assessment Unincorporated Riverside County, California” prepared by Kennedy/Jenks Consultants (hereafter Kennedy/Jenks), dated August 18, 2014 and appended to this EIR as *Technical Appendix G1* (Kennedy/Jenks, 2014). The environmental site assessment prepared for the Building E Site is titled, “Decker II Assemblage Phase I Environmental Site Assessment Unincorporated Riverside County, California” prepared by Kennedy/Jenks, dated January 29, 2015 and appended to this EIR as *Technical Appendix G2* (Kennedy/Jenks, 2015). Please note that *Appendix G2* was prepared prior to the Project Applicant’s decision to reduce the size of the Building E Site to its current configuration; therefore, the report covers additional acreage (west of the Building E Site) that is no longer in the Project site boundary and is not applicable to the discussion herein of potential on-site impacts. These and all other reference sources used in this Subsection are listed in EIR Section 7.0, *References*.

4.8.1 EXISTING CONDITIONS

A. Definition of Toxic Substances and Hazardous Waste

For the purposes of this EIR, the term “toxic substance” is defined as a substance which, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may present an unreasonable risk of injury to human health or the environment. Toxic substances include chemical, biological, flammable, explosive, and radioactive substances.

“Hazardous material” is defined as a substance which, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may: 1) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, disposed of, or otherwise mismanaged; or 2) cause or contribute to an increase in mortality or an increase in irreversible or incapacitating illness. Hazardous waste is defined in the California Code of Regulations, Title 22, § 66261.3. The defining characteristics of hazardous waste are: Ignitability (oxidizers, compressed gases, and extremely flammable liquids and solids), Corrosivity (strong acids and bases), Reactivity (explosives or generates toxic fumes when exposed to air or water), and Toxicity (materials listed by the United States Environmental Protection Agency (USEPA) as capable of inducing systemic damage to humans or animals). Certain wastes are called “Listed Wastes” and are found in the California Code of Regulations, Title 22, §§ 66261.30 through 66261.35. Wastes appear on the lists because of their



known hazardous nature or because the processes that generate them are known to produce hazardous wastes (which are often complex mixtures).

B. Historical Use of the Project Site

Kennedy/Jenks conducted a review of various sources of information to determine the historical use of the Building D Site and the Building E Site, including review of historical aerial photography, Sanborn Fire Insurance Maps, City Directories, Environmental Data Resources, Inc. (EDR) Property Tax Reports, EDR Environmental Liens Search Reports, and EDR Building Permit Reports.

Building D Site

Through review of the various sources of information to determine the historical use of the Building D Site, Kennedy/Jenks determined that the Building D Site was undeveloped land from the 1930s into the late 1960s. By the late 1970s, grading activities are evident in the southwest portion of the Building D Site and the remainder of the property remained undeveloped. By the late 1980s, little change is evident in the photographs, with the exception of structures in the southwest corner of the Building D Site. By the early 1990s, the existing off-site water tank located to the west of the Building D Site is visible in the aerial photographs. Historical aerial photography between 2005 and 2009 indicate that the southwest portion of the Building D Site was used for vehicle and equipment storage. (Kennedy/Jenks, 2014, pp. 4-1 through 4-2) Under existing conditions, the Building D Site contains a mobile home connected to an on-site septic system. Additionally, a concrete pad that is used for the storage of construction equipment is present on the Building D Site. Historical aerial photographs are provided in Appendix D of *Technical Appendix G1*.

Building E Site

Through review of the various sources of information to determine the historical use of the Building E Site, Kennedy/Jenks determined that the Building E Site was undeveloped land from the 1930s and into the late 1960s. Dirt access roads in and around the Building E Site first appear in aerial photographs in the early 1950s and are more developed in the late 1980s. Between the 1990s and 2012 the Building E Site is visible in the aerial photographs in its current configuration as vacant and undeveloped land. As with the Building D Site, the existing off-site water tank is visible in the early 1990s aerial photographs. Between 2006 and 2009, light grading activities are evident in the northern portion of the Building E Site. (Kennedy/Jenks, 2015, pp. 4-1 through 4-2)

C. Agency Records Review and Government Database Review

Kennedy/Jenks reviewed available environmental reports, state and local agency records, and appropriate permits in an effort to identify reported potential environmental issues that could be associated with the Building D Site and the Building E Site. In addition, a review of federal, state, and tribunal databases was conducted to identify potential Recognized Environmental Conditions (RECs), Historical Recognized Environmental Conditions (HRECs), Controlled Recognized Environmental Conditions (CRECs), or Notable Findings (NFs). The review included an environmental database



search for the surrounding area (1.0-mile radius). Information from these various databases is included in the EDR Radius Map Report with GeoCheck EDR Report included as Appendix C of *Technical Appendix G1* and Appendix B of *Technical Appendix G2*.

1. Building D Site

The agency records review and government database review determined that the Building D Site was not listed on any of the searched governmental databases included in the EDR report and no RECs, HRECs or CRECs are associated with the Building D Site. (Kennedy/Jenks, 2014, pp. 3-1 through 3-3 and p. 6-1)

Building E Site

The agency records review and government database review determined that the Building E Site was not listed on any of the searched governmental databases included in the EDR report and no RECs, HRECs or CRECs are associated with the Building E Site. (Kennedy/Jenks, 2015, pp. 3-1 through 3-3 and p. 6-1)

Properties within a One-Mile Radius of the Project Site

Properties within a one-mile radius of the Building D Site that were listed in the EDR Report include Bell Grain and Milling located at 17971 Highway 215 which is listed in the California Leaking Underground Storage Tank (LUST) and Cortese databases. According to the LUST database, Bell Grain and Milling received case closure in 1990 for reported gasoline impacts to soil only. Properties within a one-mile radius of both the Building D Site and the Building E Site include Temtex Products, Inc. located at 23560 Old Oleander Avenue, listed in the Hist UST database for operating a 2,000 fuel underground storage tank (UST). March Air Reserve Base (MARB) is listed in five environmental databases (National Priorities List (NPL), California EnviroStor Database (EnviroStor), Department of Defense (DoD), Record of Decision (ROD), and Formerly Used Defense Sites (FUDS)). According to online environmental records reviewed by Kennedy/Jenks for MARB, the Project site is located upgradient to MARB and is located approximately 0.50-mile south of the MARB. To date, no chemical impacts originating from MARB have been identified at the Project site. In summary, none of the hazardous materials listings for properties within one-mile of the Building D Site and the Building E Site are substances that have resulted in a substantial hazard at the Project site. Based on Kennedy/Jenks review of the information in the EDR Database Report for all of the surrounding sites having listings, no RECs, CRECs, HRECs, or NFs were noted. (Kennedy/Jenks, 2014, p. 3-3) (Kennedy/Jenks, 2015, p. 3-3) Refer to the EDR Radius Map Report with GeoCheck EDR Report included as Appendix C of *Technical Appendix G1* and Appendix B of *Technical Appendix G2* for a detailed summary of the EDR Database Report.



D. Interviews and Property Reconnaissance

1. Building D Site

Kennedy/Jenks conducted phone interviews in August 2014 with owners of the subject parcels on the Building D Site and on August 10, 2014, Kennedy/Jenks performed subject property reconnaissance on the Building D Site. Visual observations noted by Kennedy/Jenks during the reconnaissance are included in the site-specific Phase I Environmental Site Assessment (ESA). (*Technical Appendix G1*). Based on interviews and property reconnaissance, Kennedy/Jenks determined that the existing residential mobile home located in the southwest portion of the Building D Site is connected to an on-site septic system. A concrete pad is located east of the mobile home and is used for vehicle equipment and storage. Kennedy/Jenks also observed discarded debris along the western perimeter of the property, along Ellsworth Street. Types of debris included empty 5-gallon buckets with oily residue, small stockpiles of dirt, small mounds of asphalt, piles of concrete, household trash, and tires. Minor trash and debris are present on the remainder of the Building D Site. (Kennedy/Jenks, 2014 pp. 7-1 through 7-4)

Kennedy/Jenks determined that because the mobile home was placed on the property in the late 1980s, asbestos-containing materials (ACMs) and lead based paint (LBP) are not likely present in the building materials of the structure because those materials were not used in the 1980s. Also, no electrical transformers or other polychlorinated biphenyls (PCBs) were observed by Kennedy/Jenks on the Building D Site. Based on the location of the Building D Site, radon levels reported by the State of California in the zip code in which the Building D Site is located are reported to be below the USEPA action level. In summary, Kennedy/Jenks determined that no historical materials of concern occur on the Building D Site. (Kennedy/Jenks, 2014, p. 8-1)

2. Building E Site

Kennedy/Jenks conducted phone interviews in January 2015 with owners and property managers of the Building E Site. On December 30, 2014, Kennedy/Jenks performed property reconnaissance on the Building E Site. Visual observations noted by Kennedy/Jenks during the reconnaissance are included in the site-specific Phase I ESA (*Technical Appendix G2*). Based on the interviews and reconnaissance, Kennedy/Jenks determined that the Building E Site is comprised of undeveloped land. Kennedy/Jenks observed a parked recreational vehicle on the northeast portion of the Building E Site, and one pole-mounted transformer isolated at or just outside the southern perimeter of the Building E Site. (Kennedy/Jenks, 2015, pp. 7-1 through 7-4)

No permanent structures are located on the Building E Site; therefore, no ACM or LDP are present on the Building E Site. No obvious visual evidence of leaking associated with the one pole mounted transformer was observed by Kennedy/Jenks during their reconnaissance conducted on December 30, 2014 and there are no documented or observed releases of PCBs on the Building E Site. Similar to the Building D Site, based on the location of the Building E Site, radon levels reported by the State of California in the zip code in which the Building E Site is located are reported to be below the USEPA



action level. In summary, Kennedy/Jenks determined that no historical materials of concern occur on the Building E Site. (Kennedy/Jenks, 2015, p. 8-1)

E. Airport Hazards

The Project site is located approximately 1.1 mile west of the nearest runway at the MARB. Because the Project site is located within the influence area and Compatibility Zone C2 of MARB, development on the property is subject to the MARB Airport Land Use Compatibility Plan (ALUCP). According to the MARB ALUCP Table MA-2, *Base Compatibility Criteria*, within Compatibility Zone C2, highly noise-sensitive outdoor residential uses and hazards to flight are prohibited. Also, airspace review is required for objects greater than 70 feet tall, and MARB must be notified of any land use having an electromagnetic radiation component to assess whether a potential conflict with Air Base radio communications could result. Also, Compatibility Zone C2 is identified as a flight zone corridor (meaning a designated path in the region where planes fly overhead). Within this compatibility zone, the ALUCP indicates that the maximum number of persons per acre should not exceed an average of 200, or a maximum of 500 persons on any given acre. The ALUCP also specifies certain review, notification, and disclosure requirements for new land uses within Compatibility Zone C2. (RCALUC, 2014) Based on the Project site's location within the MARB ALUCP, ALUC review of the Project as proposed on the Building D Site and the Building E Site is required.

F. Hazardous Fire Area

According to the Moreno Valley Area Plan (MVAP) and Riverside County GIS, the Building D Site and Building E Site are not located in an area that is susceptible to wildfire hazards (RCIT, 2015) (Riverside County, 2003b, Figure 11). The Building D Site and the Building E Site and surrounding areas contain flat and gently sloping topographic relief and a paucity of flammable vegetation, due largely to the presence of development and/or routine weed abatement to preclude fire hazards. (Google Earth Pro, 2015) Furthermore, the nearest wildland region where land is substantially undeveloped and contains flammable vegetation is located approximately 4.2 miles to the southwest and is separated by intervening development.

G. Applicable Environmental Regulations

1. Federal Regulations – CERCLA and SARA

The USEPA is responsible for enforcing federal regulations that affect public health or the environment. The primary federal laws and regulations related to hazardous materials include: the Resource Conservation and Recovery Act (RCRA); the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA); and the Superfund Act and Reauthorization Act (SARA). Federal regulations pertaining to hazardous materials and wastes are contained in the Code of Federal Regulations (40 CFR).

RCRA, which was enacted in 1976, is the principal federal law that regulates the generation, management, and transportation of hazardous materials and hazardous wastes. Other specific areas



covered by the amendment include regulation of carcinogens; listing of hazardous wastes; permitting for hazardous waste facilities; and leaking underground storage tanks. The USEPA maintains lists of the facilities that generate or transport large quantities of hazardous materials.

CERCLA, enacted in 1980, is a federal law enacted to address abandoned hazardous substance facilities. This act is also referred to as the Superfund Act, and the sites listed under it are referred to as Superfund sites.

In 1986, Congress passed the SARA. The SARA required Superfund actions to consider the standards and requirements found in other State and federal environmental laws and regulations; provided new enforcement authorities and settlement tools; increased State involvement in every phase of the Superfund program; and increased the focus on human health problems posed by hazardous waste sites. SARA also required EPA to revise the Hazard Ranking System (HRS) to ensure that it accurately assessed the relative degree of risk to human health and the environment posed by uncontrolled hazardous waste sites that may be placed on the NPL.

2. *Federal Regulations - OSHA*

Enacted in 1970, this federal law, like its namesake enforcement agency, OSHA (the Occupational Safety and Health Administration), governs the occupational health and safety of the private sector and the federal government. Codified under United States Code (USC) Title 29, Chapter 15, the OSH Act ensures that employers provide employees with an environment free from “recognized hazards,” such as exposure to toxic chemicals, excessive noise, mechanical dangers, heat or cold stress, and unsanitary conditions. Section 5 of the OSH Act contains a “general duty clause” that requires employers to: maintain conditions or adopt practices reasonably necessary and appropriate to protect workers on the job; be familiar with and comply with standards applicable to their establishments; and, ensure that employees have and use personal protective equipment when required for safety and health. OSHA may act under the general duty clause when four criteria are met: First, there must be a hazard. Second, the hazard must be a recognized hazard (e.g., the employer knew or should have known about the hazard, the hazard is obvious, or the hazard is a recognized one within the industry). Third, the hazard must be sufficient to cause, or be likely to cause, serious harm or death. And, lastly, the hazard must be correctable (OSHA recognizes not all hazards are correctable). (Riverside County, 2015c, pp. 4.13-55)

3. *Federal Regulations – 49 CFR Chapter 1, Subchapter C – Hazardous Materials Regulations, Part 171-177*

Under Federal Regulation (49 CFR Chapter I, Subchapter C – Hazardous Materials Regulations, Part 171-177) Ammonium Nitrate Fuel Oil (ANFO) is classified as a Hazard Class 1 Explosive with a hazard class of 1.5D. 49 CFR 172.101. These Federal Hazardous Material Regulations (HMR) have been adopted for the safe and secure transportation of hazardous materials, and apply to persons who offer hazardous materials for transport, cause hazardous materials to be transported, and transport hazardous materials, including ANFO. The HMR includes requirements for packaging, marking,



labelling, loading, blocking, and bracing, segregating materials, registration, recordkeeping, and emergency response. 49 CFR 171.1, 171.2. The transportation of ANFO to the site is required to comply with these and other regulations to ensure safe transport. 49 CFR 172.101. (CFR, 2018, 49 CFR Ch.1, Subchapter C-Hazardous Materials Regulations, Part 171-177)

4. *State Regulations - Cal/OSHA and the California State Plan*

Under an agreement with OSHA, since 1973 California has operated an occupational safety and health program in accordance with Section 18 of the federal OSH Act of 1970. The State of California's Department of Industrial Relations administers the California Occupational Safety and Health Program, commonly referred to as Cal/OSHA. The State of California's Division of Occupational Safety and Health (DOSH) is the principal agency that oversees plan enforcement and consultation. In addition, the California State program has an independent Standards Board responsible for promulgating State safety and health standards, and reviewing variances. It also has an Appeals Board to adjudicate contested citations, and the Division of Labor Standards Enforcement to investigate complaints of discriminatory retaliation in the workplace. (Riverside County, 2015c, pp. 4.13-55) The Cal/OSHA enforcement unit conducts inspections of California workplaces in response to a report of an industrial accident, a complaint about an occupational safety and health hazard, or as part of an inspection program targeting industries with high rates of occupational hazards, fatalities, injuries, or illnesses. (Riverside County, 2015c, pp. 4.13-55)

The Hazardous Materials Business Plan (HMBP) program was established in 1986. A HMBEP is a written set of procedures and information created to help minimize the effect and extent of a release or threatened release of a hazardous material. The purpose of the HMBP program is to prevent or minimize the damage to public health and safety and the environment, from a release or threatened release of hazardous materials. It also satisfies community right-to-know laws. This is accomplished by requiring businesses that handle hazardous materials in quantities equal to or greater than greater than 55 gallons of a liquid, 500 pounds of a solid, or 200 cubic feet of compressed gas, or extremely hazardous substances above the threshold planning quantity to prepare a hazardous materials plan (40 CFR, Part 355, Appendix A). (Cal OES, 2015)

5. *State Regulations - California Code of Regulations (CCR), Titles 22 and 26*

The California Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Boards (RWQCBs) are the primary state agencies charged with regulating hazardous materials in California. The RWQCBs are authorized by the State Water Resources Control Board (SWRCB) to enforce the provisions of the Porter-Cologne Water Quality Control Act of 1969. The Porter-Cologne Water Quality Control Act gives the RWQCBs authority to require water quality investigations and remediation, if necessary, if groundwater or surface water of the State is threatened. The DTSC is authorized by the USEPA to regulate the management of hazardous waste.

California's hazardous materials laws incorporate federal standards but are often more stringent than comparable federal laws. The primary laws regulating hazardous materials in California include the



California Hazardous Waste Control Law (HWCL), the state equivalent of RCRA, and the Carpenter-Presley-Tanner Hazardous Substance Account Act (HSAA), the state equivalent of CERCLA. State hazardous materials and waste laws are contained in the California Health and Safety Code and the California Water Code, and these regulations are contained in the California Code of Regulations, Titles 22 and 26.

6. *Local Regulations – Hazardous Materials*

Federal and state hazardous materials regulations require all businesses that handle more than a specified amount of hazardous materials or extremely hazardous materials to obtain a hazardous materials permit and submit a business plan to its local Certified Unified Program Agency (CUPA). The CUPA also ensures local compliance with all applicable hazardous materials regulations. The California Environmental Protection Agency (CAL EPA) designated the County of Riverside Department of Environmental Health (DEH) as the CUPA for Riverside County. The Riverside County DEH Hazardous Materials Branch is responsible for overseeing the six hazardous materials programs in the County. Riverside County Ordinance No. 615 “Hazardous Waste Generation, Storage, Handling and Disposal” was promulgated for the purpose of monitoring establishments where hazardous waste is generated, stored, handled, disposed, treated or recycled and to regulate the issuance of permits and the activities of establishments where hazardous waste is generated. The County DEH Branch is responsible for inspecting facilities that handle hazardous materials, generate hazardous waste, treat hazardous waste, own/operate underground storage tanks, own/operate aboveground petroleum storage tanks, or handle other materials subject to the California Accidental Release Program. In addition, the Branch maintains an emergency response team that responds to hazardous materials and other environmental health emergencies 24 hours a day, 7 days a week. (County of Riverside DEH, 2015)

7. *Local Regulations – Abatement of Hazardous Vegetation*

Requirements for fire hazard reduction around improved parcels (i.e., those with structures) are set forth in Riverside County Ordinance No. 787. A minimum 30-foot clearance is required around all structures; it may be extended up to 100 feet in areas with severe fire hazards. Under Riverside County Ordinance No. 695, the Riverside County Fire Department (RCFD) distributes hazard abatement notices that require property owners to reduce fire fuels (e.g., flammable grass, brush, etc.) around their property. On unimproved parcels, the property owner is required to disc or mow 100 feet around the property perimeter. This ordinance, among other things, also allows the Fire Chief or designee entry onto any real property to inspect when there is reasonable cause that hazardous vegetation exists. (Riverside County, 2015c, pp. 4.13-65 and -66)

4.8.2 BASIS FOR DETERMINING SIGNIFICANCE

The proposed Project would result in a significant impact to hazards and hazardous materials if the Project or any Project-related component would:

Hazards and Hazardous Materials



- a) *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;*
- b) *Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;*
- c) *Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan;*
- d) *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;*
- e) *Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.*

Airports

- a) *Result in an inconsistency with an Airport Master Plan;*
- b) *Require review by the Airport Land Use Commission;*
- c) *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area;*
- d) *For a project within the vicinity of a private airstrip, or heliport, would the project result in a safety hazard for people residing or working in the project area.*

Hazardous Fire Area

- a) *Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.*



4.8.3 IMPACT ANALYSIS

Hazards and Hazardous Materials

Threshold a) Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Threshold b) Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

A. Impact Analysis for Existing Site Conditions

1. Building D Site

As discussed in Subsection 4.8.1, a residential mobile home located in the southwest portion of the Building E Site is connected to an onsite septic system and a concrete pad used for vehicle equipment and storage is located east of the residential mobile home. As discussed in Subsection 4.8.1, given the mobile home appears to have been set on the Building D Site in the late 1980s, ACM and LDP are not likely to be present within the structure. The existing mobile home, cement pad, and onsite existing septic system would be required to be removed, handled, and disposed in accordance with all applicable local and State regulations. In addition, if present at the time of construction activities, the discarded debris along the western perimeter of the property, along Ellsworth Street, would be removed, handled, and disposed of in accordance with local and State regulations. There is no evidence that the Building D Site was ever used for any purpose that would have resulted in soil contamination and no contaminated soils are present on the property. With mandatory compliance with applicable hazardous materials regulations, implementation of the Project as proposed on the Building D Site would not expose the public or environment to significant hazardous materials associated with the removal and disposal of onsite structures and discarded debris.

2. Building E Site

As discussed in Subsection 4.8.1, under existing conditions, the Building E Site is vacant and undeveloped and contains no structures. Types of debris present on the Building E Site during the site-specific Phase I ESA included small quantities of empty plastic containers with oily residue, small stockpiles of asphalt, piles of concrete, household trash, wood, and tires. If present at the time of construction activities, the debris would be removed, handled, and disposed of in accordance with local and State regulations. There is no evidence that the Building E Site was ever used for any purpose that would have resulted in soil contamination and no contaminated soils are present on the property. With mandatory compliance with applicable hazardous materials regulations, implementation of the Project as proposed on the Building E Site would not expose the public or environment to significant hazardous materials associated with the debris present on the Building E Site under existing conditions.

B. Impact Analysis for Temporary Construction-Related Activities

Heavy equipment (e.g., dozers, excavators, tractors) would be operated during construction of the Project as proposed on the Building D Site and the Building E Site. This heavy equipment would



likely be fueled by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the proposed Project than would occur on any other similar construction site. As part of standard construction practices, the construction contractor(s) will have a spill prevention kit at the site.

During construction of the Project, rock blasting would occur on portions of the Project site. The rock blasting would utilize small, highly controlled explosive charges to fragment hard rocks into smaller, crushable pieces. The charges will be made up of ammonium nitrate/fuel oil (ANFO) which consists of 94 percent ammonium nitrate and 6 percent diesel fuel. Construction contractors would be required to comply with all applicable federal, state, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to the requirements imposed by the USEPA, DTSC, and the Santa Ana RWQCB. With mandatory compliance with applicable hazardous materials regulations, the construction activities associated with the Project as proposed on the Building D Site and the Building E Site would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during the construction phase. Thus, impacts would be less than significant.

C. Impact Analysis for Long-Term Operation of the Project

The future building occupants that would occupy the Building D Site and the Building E Site are not known at this time. Future uses on the Project site are assumed to be high-cube dry goods warehousing as permitted by the County of Riverside's "Industrial Park (I-P)" zoning designation.

Based on the list of permitted activities that would be allowed in the County of Riverside's I-P zone, it is possible that hazardous materials could be used during the course of a future building occupant's daily operations. Federal and State Community-Right-to-Know laws allow the public access to information about the amounts and types of chemicals that may be used by businesses on the Building D Site and the Building E Site. Laws also are in place that require businesses to plan and prepare for possible chemical emergencies. Any business that occupies a building on the Building D Site or the Building E Site and that handles and/or stores substantial quantities of hazardous materials (as defined by Riverside County Ordinance or § 25500 of California Health and Safety Code, Division 20, Chapter 6.95) would be required to prepare and submit a HMBEP to the Riverside County Department of Environmental Health in order to register the business as a hazardous materials handler. Such businesses also are required to comply with California's Hazardous Materials Release Response Plans and Inventory Law, which require immediate reporting to Riverside County Fire Department and State Office of Emergency Services regarding any release or threatened release of a hazardous material, regardless of the amount handled by the business.



If businesses that use or store hazardous materials occupy the Building D Site or the Building E Site, the business owners and operators would be required to comply with all applicable federal, State, and local regulations to ensure the proper transport, use, or disposal of hazardous substances (as described above). With mandatory regulatory compliance, potential hazardous materials impacts associated with long-term operation of the Project as proposed on the Building D Site and the Building E Site is not expected to pose a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials, nor would the Project as proposed on the Building D Site and the Building E Site increase the potential for accident operations which could result in the release of hazardous materials into the environment.

With mandatory regulatory compliance to federal, State, and local laws, potential hazardous materials impacts associated with long-term operation of the Project as proposed on the Building D Site and the Building E Site are regarded as less than significant and mitigation is not required.

Hazards and Hazardous Materials

Threshold c) Would the Project impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?

The Building D Site and the Building E Site do not contain any emergency facilities nor do they serve as an emergency evacuation route. During construction and long-term operation, the proposed Project would be required to maintain adequate access for emergency vehicles. As part of the County's discretionary review process, the County reviewed the Project as proposed on the Building D Site and the Building E Site to ensure appropriate emergency ingress and egress would be available to the Building D Site and the Building E Site and the proposed buildings, and determined that the Project as proposed on the Building D Site and the Building E Site would not substantially impede emergency response routes in the local area during either construction or operations. Accordingly, the Project as proposed on the Building D Site and the Building E Site would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan. Thus, no impact would occur and mitigation is not required.

Hazards and Hazardous Materials

Threshold d) Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The nearest existing school to the Project site is the Tomas Rivera Middle School, located approximately 1.2 miles southwest of the Project site (Google Earth Pro, 2015). Additionally, there are no schools planned within 0.25-mile of the Project site (RCIT, 2015). Accordingly, the Project has no potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Thus, no impact would occur and mitigation is not required.



Hazards and Hazardous Materials

Threshold e) Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The Building D Site and the Building E Site are not listed on any hazardous materials sites lists compiled pursuant to Government Code Section 65962.5 (CalEPA, n.d.) (CalEPA, 2012) (DTSC, 2007) (SWRCB, n.d.) (SWRCB, 2015). Thus, no impact would occur.

Airports

Threshold a) Would the Project result in an inconsistency with an Airport Master Plan?

Threshold b) Would the Project require review by the Airport Land Use Commission?

Threshold c) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the project area?

As discussed in Subsection 4.8.1, the Building D Site and the Building E Site are located within the influence area of the MARB and are subject to the March Air Reserve Base/Inland Port Land Use Compatibility Plan. The Project site is located within Compatibility Zone C2 of the ALUCP. According to March Air Reserve Base/Inland Port Land Use Compatibility Plan, Table MA-2, *Base Compatibility Criteria*, within Compatibility Zone C2, highly noise-sensitive outdoor residential uses and hazards to flight are prohibited. Also, children's schools are discouraged, airspace review is required for objects greater than 70 feet tall, and the MARB must be notified of any land use having an electromagnetic radiation component to assess whether a potential conflict with Air Base radio communications could result. Also, Compatibility Zone C2 is identified as a flight zone corridor (meaning a designated path in the region where planes fly overhead). Within this compatibility zone, the ALUCP indicates that the maximum number of persons per acre should not exceed an average of 200, or a maximum of 500 persons on any given acre. The ALUCP also specifies certain review, notification, and disclosure requirements for new land uses within Compatibility Zone C2

The Project as proposed on the Building D Site and Building E Site was subject to review by the Riverside County Airport Land Use Commission (ALUC) on May 11, 2017, which concluded that the Project is conditionally consistent with the March Air Reserve Base/Inland Port Land Use Compatibility Plan. A copy of the ALUC staff report that contains the conditions of approval imposed on the Project is included in the Project's Administrative Record for this EIR on file with the County of Riverside. The ALUC's conditions are listed as regulatory requirements applicable to the Project in EIR Subsection 4.8.6. With compliance to the ALUC conditions of approval, the Project is consistent with the ALUCP and would not create a hazard.



Airports

Threshold d) For a project within the vicinity of a private airstrip, or heliport, would the Project result in a safety hazard for people residing or working in the project area?

There are no known private airstrips located within the vicinity of the Building D Site or the Building E Site (Google Earth Pro, 2015). The Riverside County Regional Medical Center (RCRMC) located in Moreno Valley at 26520 Cactus Avenue has a helipad for emergency medical purposes. The proposed Project has no potential to interfere with operation of the helipad. As such, implementation of the Project as proposed on the Building D Site and the Building E Site would not expose people residing or working in the Project area to safety hazards associated with a private airstrip or heliport. Thus, no impact would occur.

Hazardous Fire Area

Threshold a) Would the Project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

According to the MVAP and Riverside County GIS, the Building D Site and Building E Site are not located in an area that is susceptible to wildfire hazards (RCIT, 2015) (Riverside County, 2003b, Figure 11). The Building D Site and the Building E Site and surrounding areas contain relatively little topographic relief and a paucity of flammable vegetation, due largely to the presence of development and/or routine weed abatement to preclude fire hazards. (Google Earth Pro, 2015) Furthermore, the nearest wildland region where land is substantially undeveloped with flammable vegetation is located approximately 4.2 miles to the southwest and is separated by intervening development. The Project would not introduce hazards such as non-irrigated landscaping etc. Accordingly, the Project as proposed on the Building D Site and the Building E Site would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. No impact would occur.

4.8.4 CUMULATIVE IMPACT ANALYSIS

Hazards and Hazardous Materials

As discussed above under Hazards and Hazardous Materials Thresholds (a) and (b), implementation of the Project as proposed on the Building D Site and the Building E Site would involve high cube dry goods warehousing in conformance with the County's "Industrial Park (I-P)" zoning designation. Although the end users are not presently known, if businesses that use or store hazardous materials occupy the Building D Site and/or the Building E Site, the business owners and operators would be required to comply with all applicable federal, state, and local regulations to ensure the proper use, storage, and disposal of hazardous materials. Such uses also would be subject to additional review and permitting requirements by the County of Riverside DEH. Mandatory compliance with applicable hazardous materials regulations would preclude potential adverse impacts related to the routine transport and handling of hazardous materials and accident conditions involving hazardous materials.



Similarly, any other developments in the area proposing the construction of uses for the potential for use, storage, or transport of hazardous materials also would be required to comply with the same federal, state, and local regulations as the Project, which would preclude potential adverse impacts related to hazardous materials. Because the Project and nearby cumulative development would not result in adverse impacts related to handling, transport, storage, and treatment of hazardous materials due to mandatory compliance with federal, state, and local regulations that require that minimum, adequate safety standards are met, there is no potential for a cumulative impact to occur related to hazardous materials, including under routine and accident conditions.

As discussed above under Hazards and Hazardous Materials Threshold (c), the Building D Site and the Building E Site do not contain any emergency facilities nor do they serve as an emergency evacuation route. Also, during construction and long-term operation, the proposed Project would be required to maintain adequate access for emergency vehicles. Thus, the Project would have no effect on emergency access and there is no potential for the Project as proposed on the Building D Site or the Building E Site to contribute to any cumulative impacts associated with emergency facilities or emergency evacuation routes.

As discussed above under Hazards and Hazardous Materials Threshold (d), the Building D Site and the Building E Site are not located within 0.25-mile of any existing or planned school; therefore, the Project has no potential to combine with other development projects to result in substantial hazardous materials-related impacts within 0.25-mile of the Project site.

As discussed above under Hazards and Hazardous Materials Threshold (e), the Building D Site and the Building E Site are not listed on any hazardous materials sites lists compiled pursuant to Government Code Section 65962.5. Because the Project site is not classified as a hazardous materials site, there is no potential for the Project to contribute to, or exacerbate, adverse environmental effects resulting from other hazardous materials sites in the Project vicinity.

Airports

As discussed above under Airports Threshold (a), (b), and (c), the Project is conditionally consistent with the March Air Reserve Base/Inland Port Land Use Compatibility Plan and implementation of the Project on the Building D Site and the Building E Site would not result in an airport-related safety hazard for people residing or working in the Project area. All development within the MARB airport influence area is required to be consistent with the March Air Reserve Base/Inland Port Land Use Compatibility Plan to avoid potential land use conflicts with the MARB and minimize potential safety hazards. All projects proposed in the MARB airport influence area are required to undergo a review by the ALUC and, the ALUC issues conditions on these projects to ensure that adverse impacts to the MARB's aircraft operations do not occur. The ALUC conducted a review of the ~~Building D Project and the Building E~~ proposed Project and issued conditions of approval that are listed as regulatory requirements applicable to the Project in Subsection 4.8.6. Mandatory compliance with the ALUC's conditions will ensure that the Project and other development in proximity to MARB do not result in substantial, cumulative impacts related to air travel safety hazards or aircraft operations at MARB.



As discussed under Airports Threshold (d), there are no known private airstrips or heliports located within the vicinity of the Building D Site or the Building E Site. Thus, the Project has no potential to contribute to a cumulative impact to nearby private airstrips or heliports.

Hazardous Fire Area

The Building D Site and Building E Site are not located in an area that is susceptible to wildfire hazards and surrounding areas contain relatively little topographic relief and a paucity of flammable vegetation, due largely to the presence of development and/or routine weed abatement to preclude fire hazards. As such, The Project would not contribute to any cumulative impact.

4.8.5 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Hazards and Hazardous Materials

Thresholds (a) and (b) for the Building D Site and the Building E Site: Less-than-Significant Impact. During Project construction and operation, mandatory compliance to federal, state, and local regulations would ensure that the Project as proposed on the Building D Site and the Building E Site would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Threshold (c) for the Building D Site and the Building E Site: No Impact. The Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan. No emergency facilities exist on the Project site, nor does the Project site serve as an emergency evacuation route.

Threshold (d) for the Building D Site and the Building E Site: No Impact. The Building D Site and the Building E Site are not located within one-quarter mile of any existing or planned school. Accordingly, the Project as proposed on the Building D Site and the Building E Site would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Threshold (e) for the Building D Site and the Building E Site: No Impact. The Building D Site and the Building E site are not located on any list of hazardous materials compiled pursuant to Government Code Section 65962.5.

Airports

Threshold (a), (b), and (c) for the Building D Site and the Building E Site: Less-than-Significant Impact. Pursuant to mandatory compliance with Riverside County ALUC conditions of approval, the Project is consistent with the restrictions and requirements of the March Air Reserve Base/Inland Port Land Use Compatibility Plan. As such, the Project would not result in an airport safety hazard for people residing or working in the Project area.



Threshold (d) for the Building D Site and the Building E Site: No Impact. The Project would have no impact on private aviation facilities. There are no known private airstrips located within the vicinity of the Project site. The Project would have no potential to impact the helipad at the Riverside County Regional Medical Center.

Hazardous Fire Area

Threshold (a) for the Building D Site and the Building E Site: No Impact. The Project site is not located in a wildland fire hazard area. The Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

4.8.6 MITIGATION

Applicable County Regulations and Design Requirements

The following are applicable regulations and design requirements imposed by the Riverside County ALUC on the proposed Project. Although these requirements technically do not meet CEQA's definition for mitigation, they are listed below to ensure Project compliance with the ALUC regulations and design requirements.

- Any outdoor lighting installed shall be hooded or shielded to prevent either the spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing.
- The following uses/activities are not included in the proposed Project and shall be prohibited at the site, in accordance with Note 1 on Table 4 of the Mead Valley Area Plan as noted below.
 - Any use which would direct a steady light or flashing light or red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator.
 - Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport.
 - Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area.
 - Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.
- The “Notice of Airport in Vicinity,” included in the May 11, 2017 County of Riverside ALUC Staff Report, shall be given to all prospective purchasers of the property and tenants of the buildings, and shall be recorded as a deed notice.



- The proposed detention basins on the site (including water quality management basins) shall be designed so as to provide for a maximum 48-hour detention period following the conclusion of a storm event for the design storm (may be less, but not more), and to remain totally dry between rainfalls. Vegetation in and around the detention basins that would provide food or cover for bird species that would be incompatible with airport operations shall not be utilized in project landscaping. Trees shall be spaced so as to prevent large expanses of contiguous canopy, when mature.
- The following uses/activities are specifically prohibited: wastewater management facilities; trash transfer stations that are open on one or more sides; recycling centers containing putrescible wastes; and incinerators.
- March Air Reserve Base must be notified of any land use having an electromagnetic radiation component to assess whether a potential conflict with Air Base radio communications could result. Sources of electromagnetic radiation include radio wave transmission in conjunction with remote equipment inclusive of irrigation controllers, access gates, etc.
- The Federal Aviation Administration has conducted aeronautical study of each proposed building (Aeronautical Study Nos. 2017-AWP-2411-OE and 2017-AWP-2412-OE) and has determined that neither marking nor lighting of the proposed structures is necessary for aviation safety. However, if marking and/or lighting for aviation safety are accomplished on a voluntary basis, such marking and/or lighting (if any) shall be installed in accordance with FAA Advisory Circular 70/7460-1 L Change 1 and shall be maintained in accordance therewith for the life of the Project.
- The maximum height of the structure proposed through Plot Plan No. 25838 (Building D) shall not exceed a height of 55 feet above ground level and shall not exceed a maximum elevation at top point (including all roof-mounted appurtenances, if any) of 1,640 feet above mean sea level.
- The maximum height of the structure proposed through Plot Plan No. 25837 (Building E) shall not exceed a height of 55 feet above ground level and shall not exceed a maximum elevation at top point (including all roof-mounted appurtenances, if any) of 1,673 feet above mean sea level.
- The maximum height and top point elevations specified in the above bullet points shall not be amended without further review by the Airport Land Use Commission and the Federal Aviation Administration; provided, however, that reduction in structure height or elevation shall not require further review by the Airport Land Use Commission.
- Temporary construction equipment such as cranes used during actual construction of Building D shall not exceed a height of 55 feet and a maximum elevation of 1,640 feet above mean sea



level, unless separate notice is provided to the Federal Aviation Administration through the Form 7460-1 process.

- Temporary construction equipment such as cranes used during actual construction of Building E shall not exceed a height of 55 feet and a maximum elevation of 1,673 feet above mean sea level, unless separate notice is provided to the Federal Aviation Administration through the Form 7460-1 process.
- Within five (5) days after construction of each building reaches its greatest height, Federal Aviation Administration (FAA) Form 7460-2 (Part II), Notice of Actual Construction or Alteration, shall be completed by the Project proponent or his/her designee and e-filed with the Federal Aviation Administration. This requirement is also applicable in the event the Project is abandoned or a decision is made not to construct the applicable structure.
- The Federal Aviation Administration (FAA) has conducted a aeronautical studies under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, Part 77 concerning Building D and Building E. The aeronautical studies revealed that the structures do not exceed obstruction standards and would not be met with a hazard to air navigation provided the following condition is met. Within five (5) days after the construction of each building reaches its greatest height, FAA Form 7460 (Part II) -2, Notice of Actual Construction or Alteration shall be completed by the Project Proponent or his/her designee and e-filed with the FAA. ~~any time the Project is abandoned or within 5 days after the construction reaches its greatest height (7460-2, Part 2).~~

Mitigation Measures

Impacts would be less than significant. Mitigation is not required.



4.9 HYDROLOGY AND WATER QUALITY

As discussed in Section 3.0, *Project Description*, the proposed Project involves the development of two properties located south of Oleander Avenue and both east and west of Ellsworth Street (also referred to herein as “Decker Road”) totaling approximately 58.6 acres. The Building D Site is located on approximately 37.1 gross acres east of Ellsworth Street, and the Building E Site is located on approximately 21.5 gross acres west of Ellsworth Street. Both properties are collectively referred to as the “Project site.” For purposes of evaluation herein, the two properties are referred to individually as the “Building D Site” and the “Building E Site.”

The analysis in this subsection primarily relies on a memorandum prepared by David Evans and Associates, Inc., (hereafter DEA) titled “Knox Business Park, Buildings D & E, Hydrology & Water Quality Narrative,” dated April 28, 2017 (DEA, 2017a). This memorandum with accompanying exhibits is provided as *Technical Appendix H* to this EIR.

The Riverside County Flood Control and Water Conservation District (RCFCWCD) is the agency responsible for the regional flood control system in the Project area. The RCFCWCD’s Master Drainage Plans (MDPs) address the current and future drainage needs of a given community and the boundaries of the plans usually follows watershed limits. Area Drainage Plans (ADPs) are financing mechanisms used to offset taxpayer costs for proposed regional drainage facilities. According to the RCFCWCD, an Area Drainage Plan is essentially a Master Drainage Plan with additional language supporting costs and distribution of the fee within the Plan area. (RCFCWCD, 2015) The Project site is located within the Perris Valley MDP and the Perris Valley ADP (RCFCWCD, 2015, RCFCWCD MDP Index Map). Accordingly, flood control information for this subsection was obtained from the Perris Valley MDP and the Perris Valley ADP.

The Project site is located within the jurisdiction of the Santa Ana Regional Water Quality Control Board (RWQCB). Accordingly, water quality information for this subsection was obtained from the *Santa Ana RWQCB Water Quality Control Plan (Basin Plan)* for the Santa Ana River Basin (updated June 2011).

A bibliography of above-listed documents and all other references used in the subsection is provided in EIR Section 7.0, *References*.

4.9.1 EXISTING CONDITIONS

A. Regional Hydrology

The Project site is located in the San Jacinto and the San Jacinto Sub-Watershed of the greater Santa Ana River Watershed. The Santa Ana River Watershed drains a 2,650 square-mile area. The Santa Ana River drains the largest coastal system in Southern California and flows over 100 miles to a discharge point into the Pacific Ocean at the location of the City of Huntington Beach. The total length of the Santa Ana River and its tributaries is approximately 700 miles. (SAWPA, 2014b, Section 3.0)



The location of the Project site within the San Jacinto Watershed is depicted in Figure 4.9-1, *San Jacinto Watershed Map*.

B. Project Site Hydrology

1. Building D Site

Figure 4.9-2, *Existing Condition Hydrology Map – Plot Plans 25838/25837* illustrates the existing drainage pattern of the Building D Site under existing conditions. Under existing conditions, storm water from two off-site tributary areas traverse the Building D Site in a west-to-east direction as surface sheet flow. Surface runoff flows leave the Building D Site at its northeast corner (near Old Oleander Avenue) and its southeastern boundary, respectively.

A third off-site tributary is located southwest of the Building D Site; runoff from this off-site tributary area flows in a northeasterly direction and spills into Ellsworth Street and travels east – and south – of the Building D Site.

2. Building E Site

As shown on Figure 4.9-2, *Existing Condition Hydrology Map – Plot Plans 25838/25837*, the Building E Site receives storm water from two off-site tributary areas under existing conditions. Runoff from the largest off-site tributary area enters the Building E Site at the northwest corner of the site and the approximate mid-point of the site's western boundary, respectively, and travels across the site as surface sheet flow before spilling into Ellsworth Street at the site's northeast boundary. The second, smaller, off-site tributary that contributes storm water runoff to the Building E Site is located near the site's southwest boundary. Runoff flows from this off-site tributary travel across the site in a northeasterly direction as surface sheet flow before spilling into Ellsworth Street at the site's eastern boundary.

A third off-site tributary is located southwest of the Building E Site; runoff from this off-site tributary area travels north and east, along the Building E Site's southern boundary, before spilling into Ellsworth Street and continuing farther east.

C. Water Quality

The California Porter-Cologne Water Quality Control Act (Section 13000 (“Water Quality”) *et seq.*, of the California Water Code), and the Federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act (CWA)) require that comprehensive water quality control plans be developed for all waters in the State of California. In order to accomplish this, the California State Water Resources Control Board divided the state into planning regions and the present system of nine Regional Water Quality Control Boards (RWQCBs). The Project site and vicinity is within the purview of the Santa Ana RWQCB. Therefore, the Santa Ana RWQCB's Santa Ana River Basin Water Quality Control Plan is the governing water quality plan for the region,

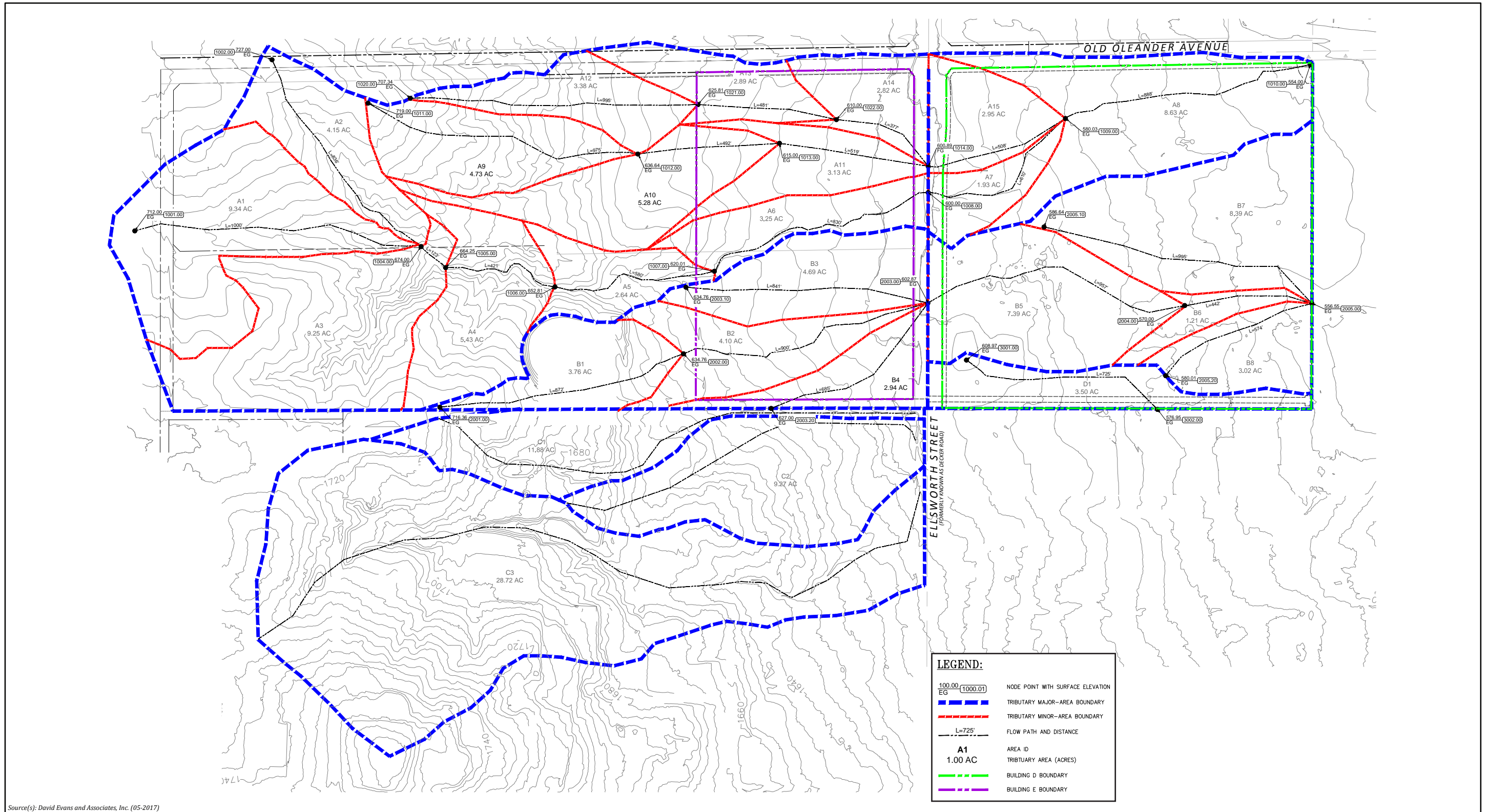
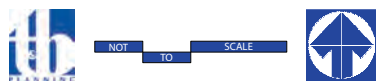


Figure 4.9-2



EXISTING CONDITION HYDROLOGY MAP - PLOT PLANS 25838/25837



which sets forth goals and objectives for protecting water quality within the region (SARWQCB, 2011). One Water One Watershed (OWOW) is an Integrated Regional Water Management Plan (IRWMP) planning process being developed within the Santa Ana River Watershed. The OWOW 2.0 Plan, adopted by the Santa Ana Watershed Project Authority (SAWPA) Commission on February 4, 2014, reflects a collaborative planning process that addresses all aspects of water resources in the Watershed over a 20-year time period. (SAWPA, 2014)

The CWA Section 303(d) requires that States assess the quality of their water every two years and publish a list of those waters not meeting the water quality standards established for them. Water quality standards including beneficial uses, water quality objectives necessary to protect these uses and the antidegradation policy, are found in the Santa River Basin-Regional 8 (Basin Plan). For water bodies on the 303(d) List of Water Quality Segments, States are required to develop Total Maximum Daily Loads (TMDLs) for the pollutant(s) that are causing standards impairment. (CalEPA, 2015). As discussed above, the Project site is located in the San Jacinto and the San Jacinto Sub-Watershed of the greater Santa Ana River Watershed. The 2010 Santa Ana Region 303(d) List of Water Quality Limited Segments for the receiving waters for the property's drainage are San Jacinto Reaches 1 through 3; Lake Elsinore; Temescal Creek Reaches 1a through 6; Santa Ana Reaches 1 through 3; the Prado Basin Management Zone; Tidal Prism of Santa Ana River and Newport Slough; Pacific Ocean Nearshore Zone; and Pacific Ocean Offshore Zone. The EPA-approved 303(d) List Impairments for the Project site's receiving waters are: indicator bacteria (Temescal Creek, Reach 6 and Santa Ana River, Reach 2); pH (Temescal Creek, Reach 1); copper, lead, and pathogens (Santa Ana River, Reach 3); and enterococcus, fecal coliform, and total coliform (Newport Slough). (RWQCB, 2011)

The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a National Pollutant Discharge Elimination System (NPDES) permit program to control discharges is obtained. The NPDES permit program also requires operators of construction sites one acre or larger to prepare a Stormwater Pollution Prevention Plan (SWPPP) and obtain authorization to discharge stormwater under a NPDES construction stormwater permit.

D. Groundwater

The West San Jacinto Groundwater Management Area is located in western Riverside County, within the San Jacinto River Watershed portion of the greater Santa Ana River Watershed. The Management Area covers more than 164,200 acres and includes the cities of Moreno Valley, Menifee, and Perris, as well as unincorporated areas of Lakeview, Nuevo, and Winchester, including the area of the Project site. The Management Areas is divided into six groundwater management zones as well as essentially non-water bearing areas. Eastern Municipal Water District (EMWD) oversees the Groundwater Monitoring Programs within the Management Area, including groundwater quality, groundwater level, groundwater extraction, recycled water use, precipitation, and additional activities affecting the entire Management Area and/or specific groundwater management zones. Groundwater quality samples are taken annually, groundwater levels are measured semi-annually, and groundwater extraction is read monthly. EMWD's Groundwater Level Monitoring Program characterizes basin hydrology and



evaluates groundwater flow conditions. Measurements are taken twice annually, in the spring and fall. (EMWD, 2014, pp. 1, 5, and 16)

The Project site is located within the Perris North Groundwater Basin (EMWD, 2011 Figure 3-6). Within the Perris North Groundwater Basin, the minimum depth to water was measured at 3.3 feet and the maximum depth to water was measured at 212.7 feet in 2013 (EMWD, 2014, Table 4-3).

E. Flood Zones

According to Riverside County GIS and General Plan Amendment No. 960 (which reflect the most recent flood mapping information from the Federal Emergency Management Agency FEMA), the Project site is not located within an area subject to 100-year flood hazards. The nearest 100-year flood hazard area is located approximately 0.25-mile northwest of the Project Site. (RCIT, 2015; Riverside County, 2015c, Mead Valley Area Plan, Figure 11)

F. Applicable Policies and Regulations

1. Federal Policies and Regulations

Clean Water Act

The basis of the Clean Water Act (CWA) was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. CWA became the Act's common name with amendments in 1972 when the Act became the "Clean Water Act" with amendments. The CWA establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. Under the CWA, the Environmental Protection Agency (EPA) has implemented pollution control programs such as setting wastewater standards for industry and water quality standards for all contaminants in surface water. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a NPDES permit program to control discharges is obtained. The EPA defines point sources as discrete conveyances such as pipes or man-made ditches. Industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. (USEPA)

The CWA requires all states to conduct water quality assessments of their water resources and identify water bodies that do not meet water quality standards. The Environmental Protection Agency (EPA) publishes recommended water quality criteria. States are not required to adopt the exact criteria, but state standards must be approved by the EPA and provide the same level of protection as EPA's standards. In California, water quality standards are established by the nine RWQCBs. The Project site is located in the Santa Ana region, and the *Santa Ana RWQCB's Santa Ana River Basin Water Quality Control Plan* is applicable to the Project site and vicinity.

The provisions of the CWA applicable to the proposed Project are as follows, which also apply to all construction sites of over one acre in size:



- CWA Section 401 requires federal agencies to obtain a Water Quality Certification from states, territories, and Indian tribes before issuing permits that would result in increased pollutant loads to a water body. A Section 401 certification can be issued only if increased pollutant loads would not cause or contribute to exceedances of water quality standards; and
- CWA Section 402 authorizes the National Pollutant Discharge Elimination System (NPDES) permit program that covers point sources of pollution discharging to a water body. The NPDES program also requires operators of construction sites one acre or larger to prepare a Stormwater Pollution Prevention Plan (SWPPP) for construction activities and obtain authorization to discharge stormwater under an NPDES construction stormwater permit. The NPDES program also requires certain land uses (e.g., industrial uses) to prepare a SWPPP for operational activities and to implement a long-term water quality sampling and monitoring program, unless an exemption has been granted. On April 1, 2014, the California State Water Resources Control Board adopted an updated NPDES permit for storm water discharge associated with industrial activities (referred to as the “Industrial General Permit”). The new Industrial General Permit, which is more stringent than the previous Industrial General Permit, became effective on July 1, 2015.

2. State Policies and Regulations

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act is the principal state law regulating water quality in California. The Porter-Cologne Water Quality Control Act establishes a comprehensive program to protect water quality and the beneficial uses of water, and applies to both surface and groundwater. As mentioned above, the State Water Resources Control Board adopts statewide water quality control plans and its nine RWQCBs are required to develop and adopt regional water quality control plans (“basin plans”) that conform to state water quality policy. As mentioned above, the Project site is located in the Santa Ana region. As such, the Santa Ana RWQCB’s Santa Ana River Basin Water Quality Control Plan is applicable to the Project site; it designates beneficial uses of water bodies to be protected and establishes water quality objectives.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act of 2014 (SGMA) consists of three legislative bills, Senate Bill 1168 (Pavley), Assembly Bill 1739 (Dickinson), and Senate Bill 1319 (Pavley). The legislation provides a framework for long-term sustainable groundwater management across California, allowing local and regional authorities in medium- and high-priority groundwater basins to form Groundwater Sustainability Agencies (GSAs) that will oversee the preparation and implementation of a local Groundwater Sustainability Plan (GSP). Local stakeholders have until 2017 to organize themselves in GSAs and GSPs will have to be in place and implementation begun between 2020 and 2022. GSAs will have until 2040 to achieve groundwater sustainability.



3. *Local Policies and Regulations*

Riverside County Ordinance No. 754 (as amended through 754.4)

Riverside County Ordinance No. 754 (codified as Chapter 13.12 in the Riverside County Code of Ordinances) requires new development or redevelopment projects to control stormwater runoff so as to prevent any deterioration of water quality that would impair subsequent or competing uses of water. The purpose and intent of the Riverside County Stormwater/Urban Runoff Management and Discharge Controls Ordinance is to ensure the future, health, safety, and general welfare of the County residents by:

- A. Reducing pollutants in stormwater discharges to the maximum extent practicable;
- B. Regulating illicit connections and discharges to the storm drain system; and
- C. Regulating non-stormwater discharges to the storm drain system. The intent of this ordinance is to protect and enhance the water quality of County watercourses, water bodies, groundwater, and wetlands in a manner pursuant to and consistent with applicable requirements contained in the Federal Clean Water Act, Title 33 U.S.C. §§ 1521 et seq.), Porter-Cologne Water Quality Control Act (California Water Code §§ 1300 et seq.), any applicable state or federal regulations promulgated thereto, and any related administrative orders or permits issued in connection therewith. (County of Riverside, 2006)

4.9.2 BASIS FOR DETERMINING SIGNIFICANCE

The proposed Project would result in a significant impact to hydrology and water quality if the Project or any Project-related component would:

Water Quality Impacts

- a) *Substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site;*
- b) *Violate any water quality standards or waste discharge requirements;*
- c) *Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted);*
- d) *Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;*
- e) *Place housing within a 100-year flood hazard area, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;*



- f) *Place within a 100-year flood hazard area structures which would impede or redirect flood flows;*
- g) *Otherwise substantially degrade water quality; or*
- h) *Include new or retrofitted stormwater Treatment Control Best Management Practices (BMPs) (e.g. water quality treatment basins, constructed treatment wetlands), the operation of which could result in significant environmental effects (e.g. increased vectors or odors).*

Floodplains

- a) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site;*
- b) *Result in changes in absorption rates or the rate and amount of surface runoff;*
- c) *Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam (Dam Inundation Area); or*
- d) *Result in changes in the amount of surface water in any water body.*

4.9.3 IMPACT ANALYSIS

Water Quality

Threshold a) Would the Project substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?

Threshold b) Would the Project violate any water quality standards or waste discharge requirements?

As described in detail later in this subsection, under Floodplain Threshold a), the Project would not result in substantial adverse effects to the drainage pattern of the Project site or local area. The analysis on the following pages evaluates the Project's potential to generate substantial waterborne pollution, including erosion and siltation.

1. Construction-Related Water Quality Impacts

Construction of the Project would involve grading, paving, utility installation, building construction, and landscaping installation; all of these activities would have the potential to generate water-borne pollutants such as silt, debris, chemicals, paints, and other solvents with the potential to affect water quality. As such, short-term water quality impacts have the potential to occur during the Project's construction in the absence of any protective or avoidance measures.

Pursuant to the requirements of the Santa Ana RWQCB and Riverside County (as required by Ordinance No. 754), prior to the commencement of construction activities, the Project would be required to obtain coverage under the State of California NPDES Construction General Permit. The



NPDES permit is required for all projects that include construction activities, such as clearing, soil stockpiling, grading, and/or excavation that disturb at least one (1) acre of total land area. In addition, the Project would be required to comply with the *Santa Ana RWQCB's Santa Ana River Basin Water Quality Control Program*. Compliance with the NPDES permit and the *Santa Ana River Basin Water Quality Control Program* involves the preparation and implementation of a SWPPP for construction-related activities, including grading. The SWPPP will specify the BMPs that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern – including silt/sediment – are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Examples of BMPs that could be used during Project construction include, but are not restricted to, sandbag barriers, geotextiles, storm drain inlet protection, sediment traps, rip-rap, and soil stabilizers/hydroseeding.

Mandatory compliance with the SWPPP will ensure that the Project does not violate any water quality standards or waste discharge requirements during short-term construction activities. Thus, water quality impacts associated with short-term construction activities would be less than significant and no mitigation would be required.

2. *Post-Development Water Quality Impacts*

Storm water pollutants commonly associated with industrial development projects include bacterial indicators, metals, nutrients, pesticides, toxic organic compounds, sediments, trash and debris, and oil and grease.

The Project would construct bioretention/detention basins on the Building D and Building E Sites to treat stormwater runoff that originates within the Project site (e.g. runoff from on-site parking lots, building roofs). The bioretention/detention basins would be sized to accommodate “first flush” stormwater flows; the “first flush” is the initial surface runoff of a rainstorm and contains the highest concentrations of pollution (the initial surface runoff absorbs pollution – atmospheric fallout, accidental spills, leakages – that has collected on impervious surfaces since the last rain storm). The bioretention/detention basins would be designed to control the release of stormwater runoff from the Project site, allowing time for pollutants to be removed from stormwater via settlement. The bioretention/detention basins also would be planted with plant materials that filter pollutants from stormwater and would contain a sand bed that would filter pollutants from stormwater as it percolates into the ground. Bioretention/detention basins are very effective at removing urban pollutants from stormwater runoff and would minimize the amount of waterborne pollution leaving the Project site via stormwater runoff.

In addition, to meet the requirements of the County’s NPDES permit and in accordance with the Riverside County Code of Ordinances Section 13.12.060.C, the Project would be required to prepare and implement Water Quality Management Plans (WQMPs). The WQMP is a site-specific, post-construction water quality management program designed to minimize the release of potential waterborne pollutants, including pollutants of concern for downstream receiving waters, under long-term conditions via BMPs. Implementation of the WQMP ensures on-going, long-term protection of the watershed basin. Prior to issuance of grading permits and/or building permits for the Project site,



the County of Riverside would require that a site-specific WQMP be prepared for the Building D and Building E Sites. Compliance with the applicable WQMP would be required as a condition of approval for all development proposals on the Project site and long-term maintenance of on-site water quality features would be required to ensure their long-term effectiveness. Therefore, water quality impacts associated with post-development at the Project site and long-term operation of the Project would be less than significant. Therefore, long-term use of the Project site with industrial land uses would not violate any water quality standards or waste discharge requirements and impacts would be less than significant.

The Project also would be required to demonstrate compliance with the NPDES program, which requires certain land uses (e.g., industrial uses) to prepare a SWPPP for operational activities and to implement a long-term water quality sampling and monitoring program, unless an exemption has been granted. On April 1, 2014, the California State Water Resources Control Board adopted an updated new NPDES permit for storm water discharge associated with industrial activities (referred to as the “Industrial General Permit”). The new Industrial General Permit, which is more stringent than the prior Industrial General Permit, became effective on July 1, 2015. The new NPDES Industrial General Permit requires the preparation of a SWPPP for operational activities and the implementation of a long-term water quality sampling and monitoring program unless an exemption is granted. Mandatory compliance with the NPDES Industrial General Permit would further reduce water quality impacts during long-term operation of the Project to below significant levels.

Water Quality

Threshold c) Would the Project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

The Project would not install any water wells; therefore, the Project would not directly extract groundwater the Perris North Groundwater Basin. Notwithstanding, the Project would install impervious surfaces on the Building D and Building E Sites and the increase in impervious surface cover could reduce the amount of water percolating down into the groundwater basin that underlies the Project area. However, water captured by the Project’s bioretention/detention basins and landscaped areas would have the opportunity to percolate into the ground and would minimize potential adverse effects related to groundwater recharge. Thus, with buildout of the Project, the local groundwater levels would not be adversely affected and impacts to groundwater supplies and recharge would be less than significant.



Water Quality

Threshold d) Would the Project create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

As discussed under Floodplain Threshold a), the Project would be consistent with the Perris Valley MDP and existing/planned storm drain improvements have sufficient capacity to convey stormwater runoff generated by the Project. Accordingly, the Project would not create or contribute runoff that would exceed the capacity of any existing or planned stormwater drainage system, and impacts would be less than significant.

As discussed under Water Quality Thresholds a) and b), the Project would be required to comply with future SWPPPs and WQMPs, which will identify the BMPs to be incorporated into the Project to ensure that construction and operational activities on the Project site would not result in substantial amounts of polluted runoff. Therefore, with mandatory compliance with the Project's SWPPPs and WQMPs, the Project would not create or contribute additional sources of substantial, polluted runoff. Impacts would be less than significant.

Water Quality

Threshold e) Would the Project place housing within a 100-year flood hazard area, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

The Project does not include housing and the Project site is not located within a 100-year flood hazard area (RCIT, 2015; Riverside County, 2015c, Mead Valley Area Plan, Figure 11). Accordingly, no impact would occur.

Water Quality

Threshold f) Would the Project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

The Project site is not located within a 100-year flood hazard area (RCIT, 2015; Riverside County, 2015c, Mead Valley Area Plan, Figure 11). Therefore, the Project would not place structures within a 100-year flood hazard area that would impede or redirect flood flows. No impact would occur.

Water Quality

Threshold g) Would the Project otherwise substantially degrade water quality?

There are no components of the Project that would result in the substantial degradation of water quality beyond what is described above under Water Quality Thresholds a), b), and d). No impact would occur.



Water Quality

Threshold h) Would the Project include new or retrofitted stormwater Treatment Control Best Management Practices (BMPs) (e.g. water quality treatment basins, constructed treatment wetlands), the operation of which could result in significant environmental effects (e.g. increased vectors or odors)?

Bioretention/detention basins would be constructed on the Building D and Building E Sites. The Riverside County Airport Land Use Commission (ALUC) imposed a condition that requires bioretention/detention basins on the Project site to completely drain within 48 hours following the conclusion of a rain storm event for the design storm (may be less, but not more), and to remain totally dry between rainfalls. Vegetation in and around the detention basins that would provide food or cover for bird species that would be incompatible with airport operations would not be utilized in Project landscaping and trees would be spaced so as to prevent large expanses of contiguous canopy, when mature. The Project would be required to comply with ALUC conditions of approval (included as mitigation measures in EIR Section 4.8, *Hazards and Hazardous Materials*). Compliance with the ALUC's conditions of approval would preclude vector breeding on the Project site, as vectors, such as mosquitoes, require standing water for a minimum of 72 hours in order to breed. Normal maintenance activities for bioretention/detention basins, including landscape maintenance, debris and trash removal, would further minimize potential effects related to vectors and odors. Based on the foregoing information, the Project would not result in less-than-significant environmental effects related to the long-term operation of BMPs on the Building D and Building E Sites.

Floodplains

Threshold a) Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?

Threshold b) Would the Project result in changes in absorption rates or the rate and amount of surface runoff?

Development of the Project site would alter the site's existing drainage patterns; however, the Perris Valley MDP establishes the long-term drainage plan for the Project site and surrounding area. The Perris Valley MDP identifies the drainage system plan for the Perris Valley area that will safely convey stormwater runoff to major, regional drainage facilities (i.e., Perris Valley Storm Drain) in consideration of physical barriers, topography, and ultimate land uses. The Project site is tributary to Line F of the Perris Valley MDP via Laterals F-3, F-3.1, and Lateral F-4.

Lateral F-3 is a planned storm drain line with a west-to-east alignment that would run beneath the future alignment of Redwood Drive, starting at Ellsworth Street and continuing to Harvill Avenue where it ties into Line F.



Lateral F-3.1 is a planned storm drain line with a (mostly) west-to-east alignment that would traverse the southern portion of the Building D Site. Lateral F-3.1 is planned to tie into Lateral F-3 to the south of the Building D Site.

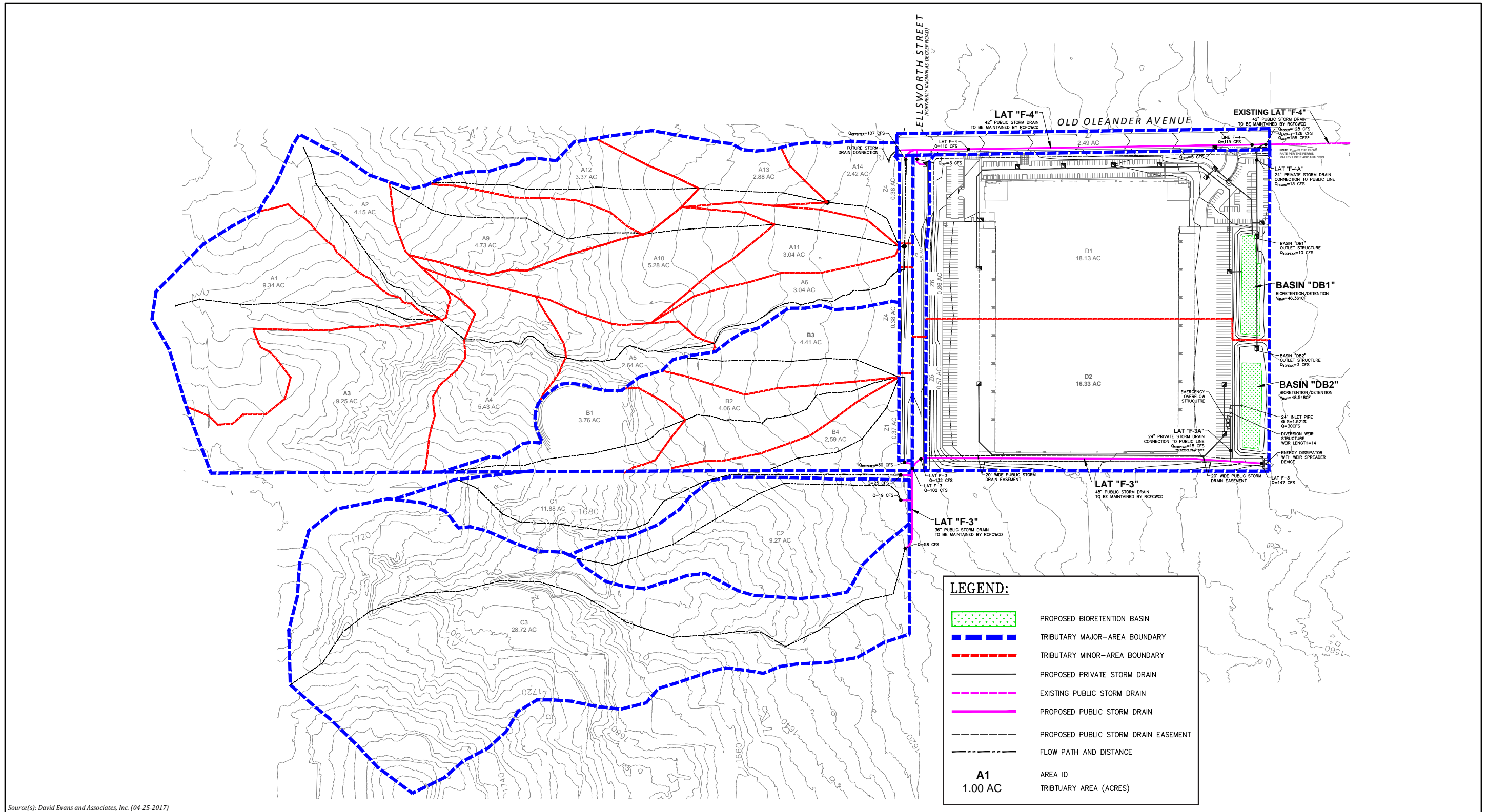
Lateral F-4 is a planned storm drain line with a west-to-east alignment that would run beneath Old Oleander Avenue, between the northeast corner of the Building E Site and Harvill Avenue. At Harvill Avenue, Lateral F would continue south beneath Harvill Avenue for approximately 1,200 feet before connecting with Line F. Under existing conditions, Lateral F is constructed up to the northeast corner of the Building D Site.

1. Building D Site

Figure 4.9-3, *Developed Condition Hydrology Map – Building D Site (Plot Plan 25838)*, illustrates the post-development drainage conditions for the Building D Site.

In conjunction with development of the Building D Site, the Project would extend Lateral F-4 from its existing terminus near the northeast corner of the Building D Site to Ellsworth Street. Lateral F-4 would capture runoff flows from an off-site tributary located west of the Building D Site via storm drain inlets at the Old Oleander Avenue / Ellsworth Street intersection and, also, would receive runoff from the Building D Site via a bioretention/detention basin in the northern portion of the site and an outlet structure in the southern portion of the site. During peak storm events, the Building D Site would discharge approximately 13 cubic feet per second (cfs) into Lateral F-4; Lateral F-4 also would capture approximately 115 cfs from the off-site tributary located west of the Building D Site. The available capacity of Lateral F-4 is approximately 138 cfs; therefore, sufficient capacity is available to accommodate flows from the Building D Site and off-site tributary areas (i.e., 128 cfs). (DEA, 2017a, n.p.)

Due to the magnitude and direction of runoff flows from off-site tributary areas located west and southwest of the Building D Site, Laterals F-3 and F-3.1 need to be combined as a single storm drain line (Lateral F-3). As shown in Figure 4.9-3, Lateral F-3 would be constructed primarily along the southern boundary of the Building D Site, with an approximately 300-foot segment located beneath Ellsworth Street (extending approximately 150 feet south of the Building D Site). Lateral F-3 would outlet at an energy dissipator located at the southeast corner of the Building D Site. Lateral F-3 would capture runoff flows from off-site tributaries located west and southwest of the Building D Site via storm drain inlets within Ellsworth Street. Lateral F-3 also would receive runoff from the



Source(s): David Evans and Associates, Inc. (04-25-2017)

Figure 4.9-3

DEVELOPED CONDITION HYDROLOGY MAP - BUILDING D SITE (PLOT PLAN 25838)



Building D Site via a bioretention/detention basin in the southern portion of the site. During peak storm events, Building D would discharge 15 cfs to Lateral F-3; Lateral F-3 also would capture approximately 132 cfs from the off-site tributaries located west and southwest of the Building D Site.

The available capacity of Lateral F-3 is approximately 206 cfs; therefore, sufficient capacity is available to accommodate flows from the Building D Site and off-site tributary areas (i.e., 147 cfs). (DEA, 2017a, n.p.)

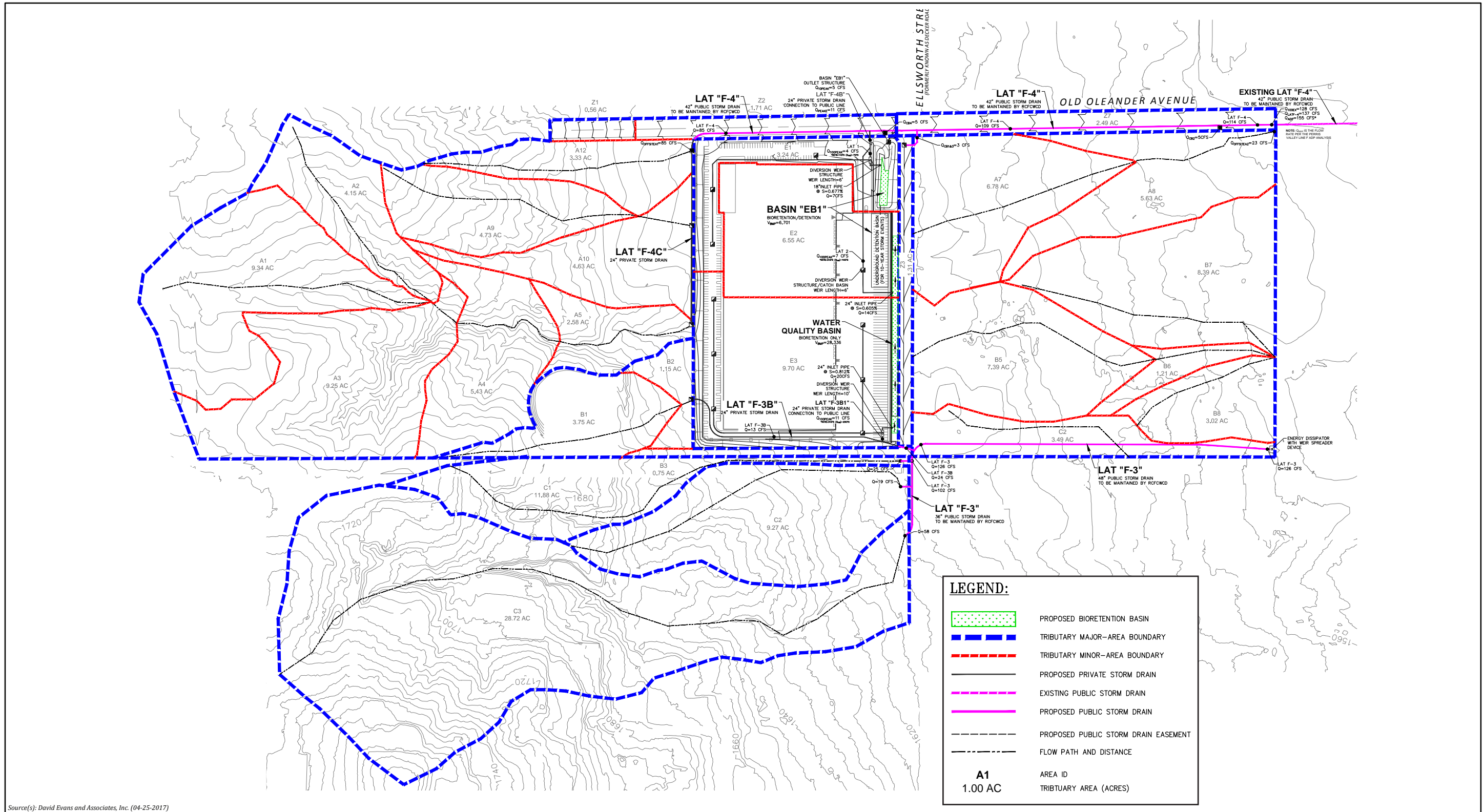
Based on the foregoing information, Building D would be consistent with the Perris Valley MDP and would not result in flooding on- or off-site due to the introduction of substantial, unanticipated storm water runoff. A less-than-significant impact would occur.

2. Building E Site

Figure 4.9-4, *Developed Condition Hydrology Map – Building E Site (Plot Plan 25837)* illustrates the post-development drainage conditions for the Building E Site.

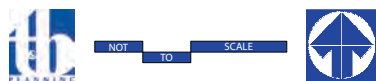
In conjunction with development of the Building E Site, the Project would extend Lateral F-4 from its existing terminus near the northeast corner of the Building D Site to the northwest corner of the Building E Site. Lateral F-4 would capture runoff flows from an off-site tributary located west of the Building E Site via a storm drain inlet at the northwest corner of the Building E Site. Lateral F-4 also would receive runoff from the Building E Site via the on-site system of bioretention/detention basins, underground detention basins, and diversion weir structures. During peak storm events, the Building E Site would discharge approximately 16 cfs into Lateral F-4; Lateral F-4 also would capture approximately 120 cfs from the off-site tributary located west of the Building D Site. The available capacity of Lateral F-4 is approximately 138 cfs; therefore, sufficient capacity is available to accommodate flows from the Building D Site and off-site tributary areas (i.e., 137 cfs). (DEA, 2017a, n.p.)

Due to the magnitude and direction of runoff flows from off-site tributary areas located west and east of the Building E Site, Laterals F-3 and F-3.1 need to be combined as a single storm drain line (Lateral F-3). As shown in Figure 4.9-4, Lateral F-3 would be constructed along the southern boundary of the Building D Site. Lateral F-3 would outlet at an energy dissipator with weir device located at the southeast corner of the Building D Site. (It is important to note that Lateral F-3 is ultimately expected to be extended, by others, to Harvill Avenue as planned by the Perris Valley MDP.) Lateral F-3 would capture runoff flows from off-site tributaries located west and southwest of the Building E Site via storm drain inlets near the site's southwest corner and, also, would receive runoff from the Building E Site via a weir diversion structure in the southeastern portion of the site. During peak storm events, Building E would discharge 11 cfs to Lateral F-3; Lateral F-3 also would capture approximately 115 cfs from the off-site tributaries located west and southwest of the Building E Site. The available capacity of Lateral F-3 is approximately 206 cfs; therefore, sufficient capacity is available to accommodate flows from the Building E Site and off-site tributary areas (i.e., 126 cfs). (DEA, 2017a, n.p.)



Source(s): David Evans and Associates, Inc. (04-25-2017)

Figure 4.9-4



DEVELOPED CONDITION HYDROLOGY MAP - BUILDING E SITE (PLOT PLAN 25837)



Based on the foregoing information, Building E would be consistent with the Perris Valley MDP and would not result in flooding on- or off-site due to the introduction of substantial, unanticipated storm water runoff. A less-than-significant impact would occur.

3. Project Buildout (Building D + Building E)

Figure 4.9-5, *Developed Condition Hydrology Map – Ultimate Condition (Plot Plans 25838/25837)* illustrates drainage conditions upon full buildout of the Project. At full buildout, the Project would include the same storm drain facilities and improvements described above under the individual analyses for the Building D and Building E Sites. During peak storm events, the Project would discharge approximately 29 cfs of stormwater runoff to Lateral F-4 and approximately 26 cfs of stormwater runoff to Lateral F-3. When peak storm runoff flows from off-site tributary areas are added to the Project’s flows, Lateral F-4 would have a total flow of 130 cfs and Lateral F-3 would have a total flow of 141, both of which are below their available capacities of 138 cfs and 206 cfs, respectively. (DEA, 2017a, n.p.)

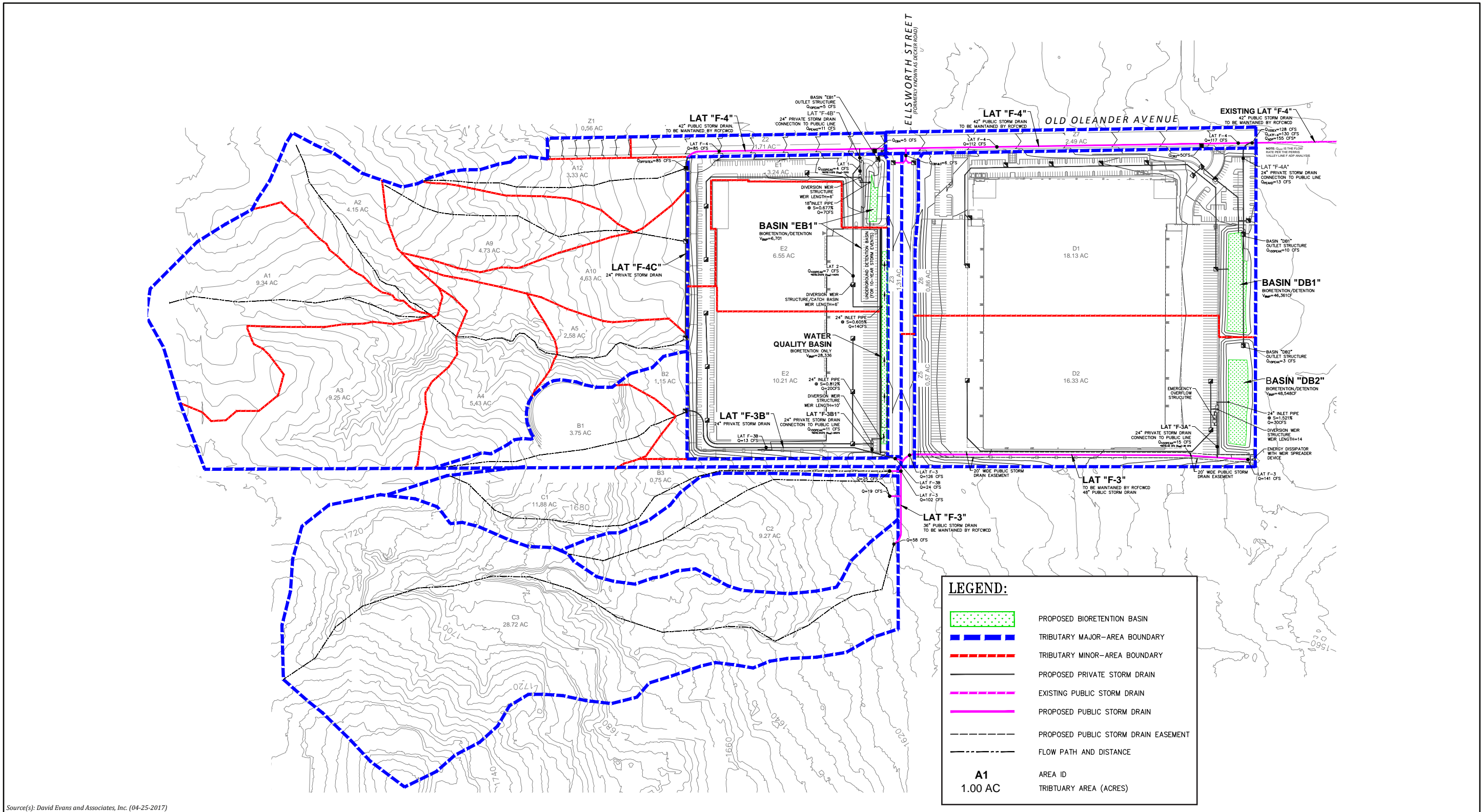
Based on the foregoing information, the Project would be consistent with the Perris Valley MDP and would not result in flooding on- or off-site due to the introduction of substantial, unanticipated storm water runoff. The Project’s impact would be less than significant.

***Floodplains
Threshold c) Would the Project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam (Dam Inundation Area)?***

The Project site is not located within a flood hazard area (RCIT, 2015; Riverside County, 2015c, Mead Valley Area Plan, Figure 11). In addition, according to the Mead Valley Area Plan (MVAP) Figure 10, *Flood Hazards*, the Project site and surrounding area are not subject to dam inundation hazards (Riverside County, 2003b, Figure 10). Because the Project would not expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam, no impact would occur.

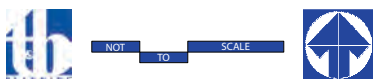
***Floodplains
Threshold d) Would the Project result in changes in the amount of surface water in any water body?***

Runoff from the Project site would be conveyed in a general south/southwest direction toward Lake Elsinore, which is located approximately 12.5 miles southwest of the Project site. As discussed above under Floodplain Threshold a), the stormwater drainage infrastructure proposed by the Project, including the bioretention/detention basins on the Building D and Building E Sites, would be designed to ensure that the historical drainage characteristics of the Project site and surrounding areas



Source(s): David Evans and Associates, Inc. (04-25-2017)

Figure 4.9-5



DEVELOPED CONDITION HYDROLOGY MAP - ULTIMATE CONDITION (PLOT PLANS 25838/25837)



would not be substantially altered. Accordingly, the Project is not expected to result in substantial changes in the amount of surface water in any water body. Impacts would be less than significant.

4.9.4 CUMULATIVE IMPACT ANALYSIS

The cumulative impact analysis considers construction and operation of the proposed Project in conjunction with other development projects in the vicinity of the Project site and resulting from full General Plan buildout in the County of Riverside and surrounding areas. The analysis of potential cumulative impacts to hydrology and water quality is divided into two general topics (water quality and floodplains) as defined by the Thresholds of Significance.

Water Quality

During Project construction, the proposed Project and other development projects within the Santa Ana River watershed would have the potential to result in a cumulative water quality impact, including erosion and sedimentation. Pursuant to the requirements of the State Water Resources Control Board and the Santa Ana RWQCB, all construction projects that disturb one or more acres of land area are required to obtain a NPDES permit and obtain coverage for construction activities. In order to obtain coverage, an effective site-specific SWPPP is required to be developed and implemented for all development projects. The SWPPP must identify potential on-site pollutants and identify and implement an effective combination of erosion control and sediment control measures to reduce or eliminate discharge of pollutants to surface water from stormwater and non-stormwater discharges. In addition, the Project and all cumulative developments would be required to comply with the Santa Ana RWQCB's *Santa Ana River Basin Water Quality Control Program*. With compliance to these mandatory regulatory requirements, the Project's contribution to water quality impairments during Project construction would not be cumulatively considerable and mitigation is not required.

WQMPs would be required for all development on the Project site. Compliance with the applicable WQMP would be required as a condition of approval for future development activities pursuant to Riverside County Code of Ordinances Section 13.12.060.C. Other developments within the watershed would similarly be required to prepare site-specific WQMPs and to incorporate BMPs into site design as necessary to ensure that runoff does not substantially contribute to existing water quality violations, pursuant to the requirements of RWQCB Order No. R8-2010-0033. Accordingly, under long-term conditions, the Project site would not contribute to cumulatively considerable water quality effects and no mitigation would be required.

The Project would not directly extract groundwater; however, with addition of the proposed Project and surrounding cumulative developments, an increase in impervious surface cover would occur, which could reduce the amount of water percolating into the groundwater supply in the Project's area. Based on population growth and development projections, EMWD calculated that its groundwater supply under normal, single, and multi-dry year conditions is projected to remain unchanged as compared to existing conditions (13,200 AFY) through at least the year 2035 (EMWD, 2011, p. 30). EMWD noted that groundwater extraction in the Project's area in the West San Jacinto Groundwater



Basin is anticipated to remain static by recharging the groundwater basin with imported water (EMWD, 2011, p. 52). Thus, development of the Project in addition to other local cumulative development projects would not result in cumulatively considerable adverse effects to local groundwater resources. Furthermore, pursuant to the SGMA, EMWD will be required to prepare and implement a GSP to ensure that groundwater resources in the Project area remain at a sustainable level.

Floodplains

As with the proposed Project, all development activities within the Perris Valley MDP would be required to be consistent with the MDP, thereby ensuring that cumulative development activities can accommodate projected stormwater runoff flows and preclude the potential for flooding. Accordingly, the Project would not result in adverse, cumulatively considerable effects related to flooding.

The Project site is not located within a 100-year flood hazard area. Accordingly, development on the Project site would have no potential to place housing, or other structures, within a 100-year floodplain or impede or redirect flood flows within a 100-year floodplain and no cumulatively considerable impact would occur.

The Project site is not subject to flood hazards associated with failure of a levee or dam. As such, the Project has no potential to contribute to cumulative impacts associated with such failures.

The Project would not result in changes in the amount of surface water in any water body. As such, the Project has no potential to contribute to cumulative impacts to a change in the amount of surface water in any water body.

4.9.5 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Water Quality

Threshold (a) for the Building D Site and the Building E Site: Less-than-Significant Impact. Development on the Building D Site and Building E Site would not result in substantial erosion or siltation on- or off-site.

Threshold (b) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would not violate any water quality standards or waste discharge requirements on a direct or cumulatively considerable basis. The Project is required to prepare and comply with a Storm Water Pollution Prevention Program (SWPPP) to address short-term construction-related water quality issues, and is required to comply with the site-specific Water Quality Management Plans (WQMPs) and their associated Best Management Practices (BMPs).

Threshold (c) for the Building D and the Building E Site: Less-than-Significant Impact. Groundwater wells would not be installed on either the Building D Site or Building E site; therefore, the Project would not directly extract groundwater. Also, the Project would not interfere substantially with



groundwater recharge such that there would be a net deficit in aquifer volume or lowering of the local groundwater table.

Threshold (d) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would not create or contribute runoff which would exceed the capacity of existing or planned stormwater drainage systems, nor would the Project provide substantial additional sources of runoff.

Threshold (e) for the Building D Site and the Building E Site: No Impact. The Project does not involve the construction of housing and neither the Building D Site nor the Building E Site are located within a flood hazards zone. Therefore, the Project would not place housing in a 100-year flood zone.

Threshold (f) for the Building D Site and the Building E Site: No Impact. Neither the Building D Site nor the Building E Site are located within a flood hazard zone; therefore, there is no potential for the Project to construct structures within a flood hazard zone that could redirect flood flows.

Threshold (g) for the Building D Site and the Building E Site: No Impact. There are no Project components that would otherwise result in the substantial degradation of water quality.

Threshold (h) for the Building D Site and the Building E Site: Less-than-Significant Impact. The proposed Project would not result in significant environmental effects associated with storm water features such as increased vectors or odors.

Floodplains

Threshold (a) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project is consistent with the Perris Valley MDP and would not result in flooding on- or off-site.

Threshold (b) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project is consistent with the Perris Valley MDP and would not result in on- or off-site flooding due to changes in absorption rates and/or the amount of surface runoff.

Threshold (c) for the Building D Site and the Building E Site: No Impact. The Project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

Threshold (d) for the Building D Site and the Building E Site: No Impact. The Project would not result in changes in the amount of surface water in any water body.

4.9.6 MITIGATION

Applicable County Regulations and Design Requirements



The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- Prior to issuance of a grading permit, the Project Applicant shall obtain coverage under a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Evidence that a NPDES permit has been issued shall be provided to the County of Riverside prior to issuance of a grading permit.
- Prior to issuance of a grading permit, the Project Applicant shall prepare a Stormwater Pollution Prevention Plan (SWPPP). Project contractors shall be required to ensure compliance with the SWPPP and shall permit periodic inspection of the construction site by the County of Riverside staff or its designee to confirm compliance.
- Prior to issuance of a grading permit, the Project Applicant shall prepare and the County of Riverside shall approve a Final Water Quality Management Plan (WQMP). The Project Applicant or its property manager shall be required to ensure compliance with the Final WQMP and shall permit periodic inspection of the Project site by County of Riverside staff or its designee to confirm compliance.
- Prior to issuance of a grading permit, the Project Applicant shall obtain a National Pollutant Discharge Elimination System (NPDES) permit – or qualify for an exemption thereto – for operational activities.

Mitigation

Impacts would be less than significant. No mitigation is required.



4.10 LAND USE AND PLANNING

This subsection discusses the Project's consistency with applicable land use and planning policies adopted by the County of Riverside and other governing agencies for the purpose of reducing adverse effects on the physical environment.

Information used to support the analysis in this Subsection was obtained from the 2003 Riverside County General Plan (last updated in 2014) and the General Plan Update (approved in December 2015). At the time the Notice of Preparation for this EIR was issued (August 2015), the 2003 General Plan was in effect and the County of Riverside was in the process of updating its General Plan. The County approved the General Plan Update in December 2015. The analysis in this Subsection addresses the 2003 General Plan, which was the approved version of the General Plan at the time this EIR's NOP was released, and the General Plan Update that was approved in December 2015. The NOP issuance date establishes the environmental setting for the EIR, pursuant to CEQA Guidelines § 15215(a). Regardless, the analysis in this Subsection uses information from the General Plan Update when the updated information is relevant and applicable to the discussion. *Technical Appendix M* to this EIR contains a consistency analysis that discusses the proposed Project's consistency with applicable policies of the County's General Plan (2003) and General Plan Update (2015). Both the 2003 General Plan and the General Plan Update are herein incorporated by reference pursuant to CEQA Guidelines § 15150, and are available for review at County of Riverside Transportation and Land Management Agency Planning Department, 4080 Lemon Street, 12th Floor, Riverside, California 92502, as well as on the County of Riverside's website noted in Section 7.0, *References*.

4.10.1 EXISTING CONDITIONS

A. Existing Land Use and Development

The Project site consists of vacant, undeveloped land, with exception of the southwestern portion of the Building D Site which contains a mobile home and a concrete pad that is used for the storage of construction equipment. The undeveloped portions of the Project site are regularly maintained for weed abatement and wildfire suppression purposes.

The Project site is located within the I-215 corridor, which is an area of Riverside County that is developing as an employment center, containing business park, distribution warehousing, e-commerce, and light industrial land uses. Lands north of the Project site are largely undeveloped, with exception of a recently-constructed industrial warehouse building located north of Oleander Road and east of Harvill Avenue. To the south of the Project site are scattered, rural residences, business enterprises, and undeveloped land. To the southwest of the Project site is a water tank owned by the Eastern Municipal Water District (EMWD). To the west of the Project site are undeveloped lands, beyond which are single family homes. To the east of the Project site are undeveloped lands, several scattered single-family homes, and an industrial warehouse building located along the eastern edge of Harvill Avenue. Approximately 0.4 miles to the east of the Project site is I-215, beyond which is the March Air Reserve Base (MARB) and industrial land within the City of Moreno Valley's *Moreno Valley*



Industrial Area Plan, which is developing as a regional hub for light industrial and distribution warehouse development.

B. Sphere of Influence

The Project site is located within the Sphere of Influence (SOI) of the City of Perris. A SOI is a geographic area that could eventually be incorporated into a city by annexation, subject to approval of the Riverside County Local Agency Formation Commission (LAFCO).

C. Applicable Land Use and Planning Policies

1. County of Riverside General Plan and Mead Valley Area Plan

The County of Riverside General Plan is a policy document that reflects the County’s vision for the future. At the time the Notice of Preparation for this EIR was issued (August 2015), the County of Riverside was in the process of updating its General Plan; however, the General Plan Update was in draft form at that time and subsequently approved in December 2015. The analysis in this Subsection primarily relies on information contained in the 2003 General Plan, which was the approved version of the General Plan at the time this EIR’s NOP was released, and the General Plan Update that was approved in December 2015. The General Plan is organized into nine elements, including Land Use, Circulation, Multipurpose Open Space, Safety, Noise, Housing, Air Quality, Healthy Communities, and Administration, which establish County-wide policies to guide the County’s vision for future development. The General Plan also includes a series of Area Plans that establish community-specific policies to guide future growth, preclude land use inconsistencies, protect residents’ quality of life, and maximize public safety. The Project site is located within the General Plan’s Mead Valley Area Plan (MVAP).

□ Land Use Element

The Land Use Element designates the general distribution, general location, and extent of land uses, such as housing, business, industry, open space, agriculture, natural resources, recreation, and public-quasi-public uses. The Land Use Element also discusses the standards of residential and non-residential density intensity for the various land use designations. The Land Use Element also provides development standards related to each land use category, and general plan policy level direction for an array of land-use related issues such as hillside development and community design. (Riverside County, 2003a) (Riverside County, 2015)

The Riverside County General Plan’s Land Use Element and the MVAP Land Use Plan designate approximately 8.6 acres on the Building D Site and 19.0 acres on the Building E Site (27.6 acres total) for “Community Development-Business Park (CD-BP)” land uses and approximately 25.9 acres on the Building D Site for “Community Development –Light Industrial (CD-LI)” land uses. The CD-BP land use designation allows for employee-intensive uses, including research & development, technology centers, corporate offices, clean industry, and supporting retail uses at a maximum building intensity of 0.60 floor area ratio (FAR). The CD-LI land use designation allows for industrial and related uses including warehousing/distribution, assembly and light manufacturing, repair facilities,



and supporting retail uses at a maximum building intensity of 0.60 FAR. (Riverside County, 2003a, Table LU-4) The General Plan land uses for the Project site and surrounding areas were previously illustrated on EIR Figure 2-2, *Existing General Plan Land Use Designations*.

Circulation Element

The Circulation Element identifies the general location and extent of existing and proposed major transportation facilities, including major roadways, rail, transit systems, and airports. The Circulation Element also identifies and provides policy direction for implementation of the Community Environmental Transportation Acceptability Process (CETAP) Corridors. (Riverside County, 2003a, p. I-13) (Riverside County, 2015) A detailed description of the Project's relationship to the Circulation Element and an analysis of the Project's consistency with the Circulation Element is provided in EIR Subsection 4.15, *Transportation*.

Multipurpose Open Space Element

The Multipurpose Open Space Element addresses the conservation, development, and use of natural resources, including water, soils, rivers, and mineral deposits. The Multipurpose Open Space Element details plans and measures for preserving open space for protection of natural resources such as wildlife habitat; the managed availability of space for parks, trails, and scenic vistas; and protection of public health and safety through protection of areas subject to geologic hazards, flooding and fires. (Riverside County, 2003a, p. I-13) (Riverside County, 2015)

Safety Element

The Safety Element establishes policies and programs to protect the community from risks associated with seismic, geologic, flood, and wildfire hazards. The Safety Element serves the following functions: develops a framework by which safety considerations are introduced into the land use planning process; facilitates identification and mitigation of hazards for new development and thus strengthens existing codes; project review, and permitting processes; presents policies directed at identifying and reducing hazards in existing development; and strengthens earthquake, flood, inundation, and wildland fire preparedness planning and post-related reconstruction policies. (Riverside County, 2003a, pp. I-13 and S-1) (Riverside County, 2015)

Noise Element

The Noise Element identifies and appraises noise problems and includes policies to protect the County from excessive noise (Riverside County, 2003a, p. I-13). (Riverside County, 2015)

Housing Element

The Housing Element assesses current and protected housing needs, and sets out policies and proposals for the improvement of housing and the provision of adequate sites for housing to meet the needs of all economic segments of the County (Riverside County, 2003a, p. I-13) (Riverside County, 2015).



Air Quality Element

The Air Quality Element identifies and appraises air quality problems and includes policies to improve air quality (Riverside County, 2003a, p. I-13) (Riverside County, 2015).

Healthy Communities Element

The Healthy Communities Element establishes policies to address primary health issues that may address County residents, such as high rates of obesity, chronic illness, air pollution, lack of access to healthy foods, unsafe environments, and lack of access to health care and mental health services (Riverside County, 2003a, p. I-13) (Riverside County, 2015).

Administration Element

The Administration Element establishes policies and procedures for the County to administer and implement the General Plan (Riverside County, 2003a, p. I-13) (Riverside County, 2015).

Mead Valley Area Plan

The MVAP guides the physical development in the unincorporated portions of the Perris Valley, north and west of the City of Perris, west of the City of Moreno Valley, and south of the City of Riverside. The MVAP is not a stand-alone document, but rather an extension of the County of Riverside General Plan. The County of Riverside General Plan establishes standards and policies for development within the entire unincorporated County territory. The MVAP, on the other hand, provides customized direction specifically for the Mead Valley area by establishing local Policy Areas. The Project site is not located within any MVAP Policy Area. (Riverside County, 2003a, Mead Valley Area Plan, p. 1 & Figure 4)

2. County of Riverside Zoning Designations

Development of the Project site is regulated by development regulations and design standards contained within the County of Riverside's Zoning Ordinance (Ordinance No. 348). Under existing conditions, the County of Riverside has applied different zoning designations to the Project site. The Building D Site is zoned for "Manufacturing – Medium (M-M)," "Rural Residential (R-R)," and "Industrial Park (I-P)." The Building E Site is zoned for "Rural Residential 1/2-Acre Lot Sizes (R-R-1/2) and "Industrial Park (I-P)." The M-M zoning designation allows for limited agricultural uses, medium-intensity manufacturing and commercial uses. The "R-R" land uses allow for large-lot, single family residential development with small-scale agricultural and animal keeping uses. The "I-P" zoning designation allows for industrial and manufacturing uses with approval of a plot plan. The zoning designations for the Project site and surrounding areas were previously illustrated on EIR Figure 2-3, *Existing Zoning Designations*.



4.10.2 BASIS FOR DETERMINING SIGNIFICANCE

The proposed Project would result in a significant impact to land use and planning if the Project or any Project-related component would:

Land Use

- a) *Result in a substantial alteration of the present or planned land use of an area;*
- b) *Affect land use within a city sphere of influence and/or within adjacent city or county boundaries.*

Planning

- a) *Be consistent with the site’s existing or proposed zoning;*
- b) *Be compatible with existing surrounding zoning;*
- c) *Be compatible with existing and planned surrounding land uses;*
- d) *Be consistent with the land use designations and policies of the Comprehensive General Plan (including those of any applicable Specific Plan);*
- e) *Disrupt or divide the physical arrangement of an established community (including a low-income or minority community).*

4.10.3 IMPACT ANALYSIS

Land Use
Threshold a) *Would the Project result in a substantial alteration of the present or planned land use of an area?*

Under existing conditions, the Project site consists mostly of vacant, undeveloped land, with the exception of a mobile home, outbuildings, and equipment storage area in the southwestern portion of the Building D Site. The Project would develop the subject property with two business park warehouse buildings and associated site improvements, including, but not limited to, surface parking areas, vehicle drive aisles, truck courts, utility infrastructure, landscaping, exterior lighting, signage, walls and fencing, and water quality/detention basins. The changes to the Project site proposed by the Project represent a substantial alteration to the site’s present land use. The land use change proposed by the Project is not inherently significant; but, would be considered significant if the change were to result in significant, adverse physical effects to the environment that would not otherwise occur under the site’s current use. As disclosed in this EIR, the proposed Project would result in adverse effects to the environment. This EIR provides mitigation to reduce the Project’s effect on the environment to less-than-significant levels when feasible; however, mitigation is not available to reduce all of the Project’s impacts to less than significant. Accordingly, the Project’s alteration of the present land use on the Project site is considered a significant land use impact.



Pursuant to the Project site’s existing General Plan and MVAP land use designations, the subject property can be developed with up to 721,353 s.f. of business park (CD-BP) building space and 676,000 s.f. of light industrial (CD-LI) building space (for a total of up to 1,397,353 s.f. of building space). The Project would amend the General Plan and MVAP to designate the entire Project site for CD-LI land uses, which would accommodate the proposed development of two warehouse buildings having a collective total of 1,113,627 s.f. of building space on the Project site. The land uses proposed by the Project (i.e., light industrial, containing two warehouse buildings) would not differ substantially from the range of CD-BP and CD-LI land uses that are permitted on the subject property under existing conditions. CD-LI allows for high cube warehouse buildings, whereas CD-BP allows for similar and compatible uses, such as research & development, technology centers, corporate offices, clean industry, and supporting retail uses (although not high cube warehouse as proposed by the Project). Accordingly, the Project’s conversion of areas planned for CD-BP to CD-LI is not regarded as a substantial alteration of the planned land uses for the Project site.

Land Use

Threshold b) Would the Project affect land use within a city sphere of influence and/or within adjacent city or county boundaries?

The Project site is located in the Sphere of Influence (SOI) of the City of Perris. Neither the City’s General Plan Land Use Map nor its Zoning Map identify land use designations for properties within its SOI (City of Perris, 2013; City of Perris, 2014). Because the City of Perris does not assign land use or pre-zoning designations to the Project site, implementation of the Project as proposed would have no potential to adversely impact Perris’ planned use of the land. No impact would occur.

Planning

Threshold a) Would the Project be consistent with the site’s existing or proposed zoning?

The Building D Site is zoned “Manufacturing – Medium (M-M),” “Industrial Park (I-P),” and “Rural Residential One-Half Acre Lot Size (R-R)” under existing conditions. A Change of Zone application (CZ 7872) is proposed to change the zoning designations of the portions of the property zoned “M-M” and “R-R” to “I-P”, so that the entire Building D Site is zoned “I-P”.

The Building E Site is zoned “Rural Residential 1/2-Acre Lot Sizes (R-R-1/2) and “Industrial Park (I-P)” under existing conditions. A Change of Zone application (CZ 7873) is proposed to change the zoning designations of the portion of the property zoned “R-R-1/2” to “I-P”.

Development proposed on the Building D Site and the Building E Site would be consistent with the land use regulations and development standards for the I-P zone, as established by the County’s Zoning Ordinance (Ordinance No. 348). The environmental effects associated with developing the Project site in accordance with the I-P zone designation is analyzed throughout this EIR. There would not be any significant, physical environmental effects on the Project site associated with the proposed Change of



Zone applications that are not otherwise evaluated throughout this EIR. The Project would be consistent with the proposed I-P zone designation. As such, impacts would be less than significant.

Planning

Threshold b) Would the Project be compatible with existing surrounding zoning?

Zoning designations surrounding the Project site include the following: “Industrial Park (I-P)” and “Manufacturing-Medium (M-M)” to the north; “I-P” and “Manufacturing-Service Commercial (M-SC)” to the east; “Rural-Residential (R-R)” and “I-P” to the south; and “Light Agriculture (A-1)” and “Rural Residential 1/2-Acre Lot Sizes (R-R-1/2)” to the west. The Project’s proposed industrial land use and zoning designation would be compatible with the industrial zoning designations (i.e., I-P, M-M, and M-SC) located to the north, east, and south of the Project site. The Project incorporates design features such as landscaped manufactured slopes, screen walls/noise barriers and landscaping buffers to provide physical separation and buffers between the Project and the rural residential zoning designation to the south of the Project site and rural residential and light agriculture zoning designations to the west. Furthermore, the Project would not result in any substantial adverse effects to the rural residential areas and light agriculture zoned areas to the south and west of the Project site after the application of mandatory regulatory requirements and the inclusion of the mitigation measures required by this EIR. Because the Project would not expose the adjacent rural residential and light agriculture zoned areas located south and west of the Project site to substantial adverse environmental effects during construction or long-term operation, the Project would be compatible with the abutting rural residential and light agriculture zones. Accordingly, the Project’s impacts related to compatibility with existing surrounding zoning would be less than significant.

Planning

Threshold c) Would the Project be compatible with existing and planned surrounding land uses?

Areas to the north and east of the Project site are largely undeveloped under existing conditions, with the exception of a large industrial warehouse building located at the northwest corner of the Harvill Avenue / Oleander Road intersection. These areas are planned by the General Plan and MVAP for “CD-BP” and “CD-LI” land uses. The Project’s two proposed business park warehouse buildings and associated on-site improvements would be compatible with the existing and planned business park and industrial land uses (i.e., CD-BP and CD-LI) north and west of the Project site.

Areas to the west of the Project site are comprised of undeveloped land and rural density residential homes. These areas are planned by the General Plan and MVAP for rural residential land uses (RC-VLDR). The Building E Site is adjacent to this area and its proposed development is designed to include a landscaped manufactured slope, oriented toward the Building E Site, and fencing to provide physical separation and buffering from off-site properties to the west. In addition, a retaining wall is proposed to wrap around the southwest corner of the Building E Site development pad. Furthermore, the Project would not result in any substantial adverse effects to the rural residential areas to the west



of the Project site after the application of mandatory regulatory requirements and the inclusion of the mitigation measures recommended by this EIR. Areas to the south of the Project site are scattered rural residences, business enterprises, and undeveloped land. The Project incorporates design features such as screen walls/noise barriers, landscaped slopes, and landscape screening to provide a physical buffer between the Project and the existing and planned rural residential land uses to the south of the Project site. The Project site is already planned by the General Plan and MVAP for business park “CD-BP” and light industrial “CD-LI” land uses, and the Project’s proposed redesignation of the entire site to the CD-LI land use category and the development of two warehouse buildings would result in a similar edge condition at the southern boundary than would occur under the existing MVAP designations. Furthermore, the Project would not result in any substantial adverse effects to the rural residential areas to the south of the Project site after the application of mandatory regulatory requirements and the inclusion of the mitigation measures required by this EIR. Because the Project would not expose the rural residential land uses located south of the Project site to substantial adverse environmental effects during construction or long-term operation, the Project would not be incompatible with the abutting rural residential uses.

Based on the foregoing, the Project would be compatible with existing and planned surrounding land uses. Impacts would be less than significant.

Planning

Threshold d) Would the Project be consistent with the land use designations and policies of the Comprehensive General Plan (including those of any applicable Specific Plan)?

The Project would not conflict with any policies of the Riverside County General Plan or the MVAP and the Project site is not located within the boundaries of any Specific Plan. The Project would amend the General Plan and MVAP to change the land use designation of the Building E Site and a portion of the Building D Site from “Community Development-Business Park (CD-BP)” to “Community Development-Light Industrial (CD-LI),” so that the entirety of both Sites is designated for CD-LI land uses. Refer to the more detailed discussion provided in the impact analysis under Land Use Threshold (a). With Riverside County’s approval of the proposed General Plan Amendments proposed for the Building D Site and the Building E Site, the Project would be consistent with the land use designations of the General Plan and MVAP, and as such, impacts would be less than significant.

Planning

Threshold e) Would the Project disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?

The Project site consists of mostly vacant land and is located within a developing area of the County of Riverside that is designated for employment generating land uses. The area immediately to the west of the Project site contains rural-density residences and vacant land. The area to the north of the Project site includes a large industrial warehouse building and undeveloped land, and is physically separated



from the Project site by Oleander Avenue. The area to the east of the Project site includes vacant, undeveloped land. The area south of the Project site includes scattered rural residential homes, business enterprises, and vacant undeveloped land. The proposed Project would effectively serve as an extension of existing and planned development patterns to the north and west. Further, the Project does not provide through-access to any surrounding land use; therefore, the Project would not divide or isolate any adjacent land use from surrounding areas/communities. The Project proposes to improve Ellsworth Street between the Building D Site and the Building E Site, which would improve transportation access between the rural uses located south of the Project site, and Oleander Avenue to the north. Based on the foregoing, the Project would not physically divide an established community. The Project's proposed improvements to a segment of Ellsworth Street would help to improve transportation access connections in the community. No impact would occur.

4.10.4 CUMULATIVE IMPACT ANALYSIS

The Project would result in a substantial alteration to the Project site's existing land use, from primarily vacant land to two business park warehouse buildings. Other development projects in the vicinity of the Project site are resulting in similar, substantial alterations to the existing land use environment, for example, converting vacant or under-developed agricultural, residential, and commercial properties into industrial business parks, warehouse distribution centers, shopping centers, and residential communities. The Project's contribution to the transformation of the existing land use environment is considered to be cumulatively considerable.

The Project site is located in the SOI of the City of Perris. The City of Perris has not assigned land use or pre-zoning designations to any property in their SOI. Therefore, it is not possible for the Project or other development projects located within the SOI to adversely impact Perris' planned use of land within their SOI and a substantial adverse cumulative impact would not occur.

The Project would not result in conflicts with surrounding land uses and zoning and there are no other development projects proposed in the immediate vicinity of the Project site that would contribute to land use and zoning conflicts with parcels that surround the Project site. Furthermore, the Project would be consistent with applicable land use policies and regulations of the County General Plan (refer to *Technical Appendix M*). Therefore, there is no potential for the Project to contribute to cumulative effects related to land use/zoning incompatibilities on nearby properties.

The Project site does not provide access to established communities. Therefore, development of the Project site in conjunction with other development in the cumulative study area would not contribute to the isolation of any established communities or residences from neighboring communities. As such, the Project has no potential to result in cumulatively considerable impacts associated with the physical arrangement of an established community.



4.10.5 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Land Use

Threshold (a) for the Building D Site and the Building E Site: Significant Direct and Cumulatively Considerable Impact. Although the Industrial Park land use designation proposed by the Project would not substantially differ from the Industrial Park and Business Park land use designations that are applied to the property by the Riverside County General Plan and Mead Valley Area Plan, the Project site is mostly vacant and undeveloped under existing conditions. Therefore, the proposed development of two warehouse buildings on the site would result in a substantial change to the site's existing land use.

Threshold (b) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project proposes the development of land within the City of Perris' Sphere of Influence, but because the City of Perris has not applied any land use or pre-zone designations to the Project site, the Project would not affect the City's planned use of the land.

Planning

Threshold (a) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project proposes to change the zoning designations on portions of the Building D Site and Building E Site from R-R-1/2, R-R, M-M, to I-P. The change in zoning designation would result in less-than-significant impacts as analyzed throughout the EIR. Development on the property would be consistent with the proposed I-P zoning designation.

Threshold (b) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would not result in conflicts with the existing, surrounding zoning designations, which are A-1-1, RR-1/2, I-P, M-M, and M-SC zoning designations located north, east, and south of the Project site. The Project includes design features (e.g., an open space buffers, screen walls, and landscaping) to ensure compatibility with the existing residentially zoned areas to the west and south of the Project site.

Threshold (c) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would be compatible with the existing and planned Business Park and Light Industrial land uses located north and east of the Project site. The Project includes design features (e.g., landscaped manufactured slopes, walls and fencing, and landscaping screening) to ensure compatibility with the existing and planned rural residential land uses to the west and south of the Project site.

Threshold (d) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would be consistent with the land use designations and applicable policies of the Riverside County General Plan and the Mead Valley Area Plan.



Threshold (e) for the Building D Site and the Building E Site: No Impact. The Project would not physically divide an established community. The Project's improvements to a segment of Ellsworth Street would improve roadway connections in the local area.

4.10.6 MITIGATION

Refer to all mitigation measures presented in this EIR, which address the Project's significant impacts associated with a change in the site's existing land use (primarily vacant) to a developed property containing two warehouse buildings. In instances where significant impacts are identified in this EIR for the Project's construction and/or operational phases, mitigation measures are recommended in each applicable subsection of this EIR, where mitigation is feasible.

4.10.7 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Land Use

Threshold (a): Significant and Unavoidable Direct and Cumulatively Considerable Impact. Mitigation is not available to reduce all of the Project's significant environmental effects to less-than-significant levels, which would be caused by the proposed change in the site's existing land use (primarily vacant land) to two warehouse buildings and associated site improvements. Specifically, the Project would result in significant unavoidable impacts under the subject areas of air quality, noise, and traffic, even with adherence to mandatory regulatory requirements and the application of feasible mitigation measures identified in this EIR. Thus, the proposed alteration of the site from a primarily vacant, undeveloped property to a developed property containing two warehouse buildings is considered a substantial, adverse change; the Project's land use impact is significant and unavoidable.



4.11 NOISE

This subsection addresses the environmental issue of noise. The information contained herein is based in part on information contained in the technical report prepared by Urban Crossroads, Inc. titled, “Knox Business Park Noise Impact Analysis,” dated January 31, 2017, and appended to this EIR as *Technical Appendix I* (Urban Crossroads, Inc., 2017b). Please note that the segment of Ellsworth Street that passes through the Project site is called “Decker Avenue” in this EIR Subsection and in *Technical Appendix I*. All references used in this Subsection are listed in EIR Section 7.0, *References*.

4.11.1 NOISE FUNDAMENTALS

A. Noise Definitions

Noise is simply defined as "unwanted sound." Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm or when it has adverse effects on health. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). A-weighted decibels (dBA) approximate the subjective response of the human ear to broad frequency noise sources by discriminating against very low and very high frequencies of the audible spectrum; dBA are adjusted to reflect only those frequencies which are audible to the human ear. The most common sounds vary between 40 dBA (very quiet) to 100 dBA (very loud). Normal human voice conversation at three feet is roughly at 60 dBA, while loud jet engine noises equate to 110 dBA at approximately 100 feet. (Urban Crossroads, Inc., 2017b, pp. 11-12)

B. Noise Descriptors

Environmental noise descriptors are generally based on averages, rather than instantaneous, noise levels. The most commonly used figure is the equivalent level (Leq). Equivalent sound levels are not measured directly but are calculated from sound pressure levels typically measured in A-weighted decibels (dBA). The Leq represents a steady state sound level containing the same total energy as a time varying signal over a given sample period and is commonly used to describe the “average” noise levels within the environment. (Urban Crossroads, Inc., 2017b, p. 12)

Peak hour or average noise levels, while useful, do not completely describe a given noise environment. Noise levels lower than peak hour may be disturbing if they occur during times when quiet is most desirable, namely evening and nighttime (sleeping) hours. To account for this, the Community Noise Equivalent Level (CNEL), representing a composite 24-hour noise level, is utilized. The CNEL is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. The time of day corrections require the addition of 5 decibels to dBA Leq sound levels in the evening from 7:00 p.m. to 10:00 p.m., and the addition of 10 decibels to dBA Leq sound levels at night between 10:00 p.m. and 7:00 a.m. These additions are made to account for the noise sensitive time periods during the evening and night hours when sound is perceived to be louder. CNEL does not represent the actual sound level heard at any particular time, but rather represents the total sound exposure. The County of Riverside relies on the 24-hour CNEL level to assess land use compatibility with transportation related noise sources. (Urban Crossroads, Inc., 2017b, p. 12)



C. Sound Propagation

When sound propagates over a distance, it changes in level and frequency content. The way noise reduces with distance depends on the following factors.

1. Geometric Spreading

Sound from a localized source (i.e., a stationary point source) propagates uniformly outward in a spherical pattern. The sound level attenuates (or decreases) at a rate of 6 dB for each doubling of distance from a point source. Highways consist of several localized noise sources on a defined path and hence can be treated as a “line source,” which approximates the effect of several point sources. Noise from a line source propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of 3 dB for each doubling of distance from a line source. (Urban Crossroads, Inc., 2017b, p. 12)

2. Ground Absorption of Noise

To account for the ground-effect attenuation (absorption) of noise, two types of site conditions are commonly used in traffic noise models: soft site and hard site conditions. For acoustically hard sites (i.e., sites with a reflective surface between the source and the receptor, such as a parking lot or body of water), no excess ground attenuation is assumed. For acoustically absorptive or soft sites (i.e., those sites with an absorptive ground surface between the source and the receptor such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dB per doubling of distance is normally assumed. When added to the cylindrical spreading, the excess ground attenuation results in an overall drop-off rate of 4.5 dB per doubling of distance from a line source. (Urban Crossroads, Inc., 2017b, pp. 12-13)

3. Atmospheric Effects

Receptors located downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Sound levels can be increased at large distances (e.g., more than 500 ft.) due to atmospheric temperature inversion (i.e., increasing temperature with elevation). Other factors that may affect noise levels include air temperature, humidity, and turbulence. (Urban Crossroads, Inc., 2017b, p. 13)

4. Shielding

A large object or barrier in the path between a noise source and a receptor can substantially attenuate noise levels at the receptor. The amount of attenuation provided by shielding depends on the size of the barrier and the frequency content of the noise source. Shielding by trees and other such vegetation typically only has an “out of sight, out of mind” effect. That is, the perception of noise level tends to decrease when vegetation blocks the line-of-sight to nearby residents. However, for vegetation to provide a substantial, or even noticeable, noise reduction, the vegetation area must be at least 15 feet in height, 100 feet wide and dense enough to completely obstruct the line-of sight between the source



and the receiver. This size of vegetation may provide up to 5 dBA of noise reduction. (Urban Crossroads, Inc., 2017b, p. 13)

D. Traffic Noise Prediction

Vehicle noise is a combination of the noise produced by the engine, exhaust, and tires on the roadway. Per the Federal Highway Administration's (FHWA) *Highway Traffic Noise Analysis and Abatement Policy and Guidance*, the level of traffic noise depends on three primary factors: 1) the volume of the traffic, 2) the speed of the traffic, and 3) the vehicle mix within the flow of traffic. Generally, the loudness of traffic noise is increased by heavier traffic volumes, higher speeds, and a greater number of trucks. A doubling of the traffic volume, if the speed and vehicle mix do not change, results in a noise level increase of 3 dBA. The vehicle mix on a given roadway may also influence community noise levels. As the number of medium and heavy trucks increases and becomes a larger percentage of the vehicle mix, adjacent noise level impacts will increase. (Urban Crossroads, Inc., 2017b, p. 13)

E. Community Response to Noise

A variety of reactions can be expected from people exposed to any given noise environment. Surveys have shown that about ten percent of the people exposed to traffic noise of 60 dBA will report being highly annoyed with the noise, and each increase of one dBA is associated with approximately two percent more people being highly annoyed. When traffic noise exceeds 60 dBA or aircraft noise exceeds 55 dBA, people may begin to complain. Despite this variability in behavior on an individual level, the population can be expected to exhibit the following responses to changes in noise levels: a) an increase or decrease of 1 dBA cannot be perceived except in carefully controlled laboratory experiments, b) a change of 3 dBA is considered barely perceptible, and c) changes of 5 dBA or more are considered readily perceptible. (Urban Crossroads, Inc., 2017b, pp. 14-15)

F. Vibration

Vibration is the periodic oscillation of a medium or object. The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. (Urban Crossroads, Inc., 2017b, p. 15)

Ground-borne vibrations may be described by amplitude and frequency. Vibration is usually expressed in peak particle velocity (PPV) in inches per second (in/sec) and discussed in decibel (dB) units to compress the range of numbers required to describe vibration. Vibration impacts are generally associated with activities such as train operations, construction, and heavy truck movements. Although PPV is appropriate for evaluating the potential for building damage, it is not always suitable for evaluating human response (annoyance). It takes some time for the human body to respond to vibration signals. In a sense, the human body responds to average vibration amplitude often described as the root-mean-square (RMS). The RMS of a signal is the average of the squared amplitude of the



signal, typically calculated over a 1-second period. The RMS velocity is often expressed in decibel notation as vibration decibels (VdB), which serves to reduce the range of numbers used to describe human response to vibration. (Urban Crossroads, Inc., 2017b, p. 15)

The background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings. (Urban Crossroads, Inc., 2017b, pp. 15-16)

4.11.2 EXISTING NOISE CONDITIONS

To assess existing noise levels, 24-hour noise level measurements were taken at seven (7) noise sensitive receiver locations in the Project study area. The receiver locations were selected by Urban Crossroads, Inc. to describe and document the existing noise environment within the Project study area. To fully describe the existing noise conditions, noise level measurements were collected by Urban Crossroads, Inc. from Tuesday, March 31 to Wednesday, April 1, 2015. (Urban Crossroads, Inc., 2017b, p. 27) The noise measurement locations and boundary of the study area are identified in Figure 4.11-1, *Noise Measurement Locations*.

The hourly noise levels were measured during typical weekday conditions over a 24-hour period. By collecting individual hourly noise level measurements, it is possible to describe the daytime and nighttime hourly noise levels and calculate the 24-hour CNEL. To describe the existing noise environment, it is not necessary to collect measurements at each individual building or residence in the Project vicinity, because each receiver measurement represents a group of buildings that share acoustical equivalence. In other words, an individual receiver shares similar shielding, terrain, and geometric relationship to the reference noise source as abutting receivers. (Urban Crossroads, Inc., 2015a, p. 27) The seven sensitive receiver locations shown on Figure 4.11-1 are representative of all locations that have the potential to be most affected by the proposed Project's construction and operational noise.

A. Existing Ambient Noise Environment

Table 4.11-1, *24-Hour Ambient Noise Level Measurements*, identifies the hourly daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise levels at each noise level measurement location. To describe the existing ambient noise environment, the noise measurements presented below focus on the average or equivalent sound levels (Leq). The Leq represents a steady state sound level containing the same total energy as a time varying signal over a given sample period. (Urban Crossroads, Inc., 2017b, p. 29) Refer to Appendix 5.2 of *Technical Appendix I* for the noise measurement worksheets used by Urban Crossroads, Inc. to calculate the noise levels reported in Table 4.11-1:



- Location L1: Location L1 represents the noise levels at the northwest corner of Corson Avenue and Day Street near existing residential homes, northwest of the Project site. Homes in this area have a General Plan Land Use Designation of “Rural Community-Very Low Density Residential (RC-VLDR)” and a zoning designation of “Light Agriculture (A-1-1).” The noise level measurements collected show an overall 24-hour exterior noise level of 58.4 dBA CNEL. The hourly noise levels measured at location L1 ranged from 44.5 to 63.6 dBA Leq during the daytime hours and from 41.8 to 47.5 dBA Leq during the nighttime hours. The energy (logarithmic) average daytime noise level was calculated at 56.4 dBA Leq with an average nighttime noise level of 45.2 dBA Leq. (Urban Crossroads, Inc., 2017b, p. 29)
- Location L2: Location L2 represents the noise levels along Day Street south of Burch Street at existing residential homes located west of the Project site. Homes in this area have a General Plan Land Use Designation of “Rural Community-Low Density Residential (RC-LDR)” and a zoning designation of “Rural Residential, ½-acre Minimum (R-R-½).” The noise level measurements collected show an overall 24-hour exterior noise level of 61.2 dBA CNEL. The hourly noise levels measured at location L2 ranged from 51.6 to 63.7 dBA Leq during the daytime hours and from 45.3 to 54.3 dBA Leq during the nighttime hours. The energy (logarithmic) average daytime noise level was calculated at 58.2 dBA Leq with an average nighttime noise level of 51.7 dBA Leq. (Urban Crossroads, Inc., 2017b, p. 29)
- Location L3: Location L3 represents the noise levels southwest of the Project site along Nance Street adjacent to existing residential homes. Homes in this area have a General Plan Land Use Designation of “RC-VLDR” and a zoning designation of “A-1-1.” The 24-hour CNEL indicates that the overall exterior noise level is 57.6 dBA CNEL. At location L3 the background ambient noise levels ranged from 39.6 to 63.3 dBA Leq during the daytime hours to levels of 39.7 to 46.3 dBA Leq during the nighttime hours. The energy (logarithmic) average daytime noise level was calculated at 56.1 dBA Leq with an average nighttime noise level of 57.6 dBA Leq. (Urban Crossroads, Inc., 2017b, p. 29)
- Location L4: Located at the future southwest property line of the Building D Site, location L4 represents the existing noise levels adjacent to existing residential homes along Redwood Drive. The area of Location L4 has a General Plan Land Use Designation of “RC-VLDR” and a zoning designation of “Rural Residential (R-R).” The noise level measurements collected show an overall 24-hour exterior noise level of 56.8 dBA CNEL. The hourly noise levels measured at location L4 ranged from 40.8 to 61.8 dBA Leq during the daytime hours and from 42.6 to 47.2 dBA Leq during the nighttime hours. The energy (logarithmic) average daytime noise level was calculated at 55.9 dBA Leq with an average nighttime noise level of 44.6 dBA Leq. (Urban Crossroads, Inc., 2017b, p. 29)



- Location L5: Location L5 represents the noise levels on Old Oleander Avenue, northeast of the Project site near an existing cell tower with electrical generators and a residential home. The area of location L5 has a General Plan Land Use Designation of “Community Development-Light Industrial (CD-LI)” and a zoning designation of “Manufacturing-Service Commercial (M-SC).” The noise level measurements collected show an overall 24-hour exterior noise level of 66.5 dBA CNEL. The hourly noise levels measured at location L5 ranged from 57.3 to 67.3 dBA Leq during the daytime hours and from 51.4 to 62.6 dBA Leq during the nighttime hours. The energy (logarithmic) average daytime noise level was calculated at 63.0 dBA Leq with an average nighttime noise level of 58.2 dBA Leq. (Urban Crossroads, Inc., 2017b, p. 29)
- Location L6: Location L6 represents the noise levels at the northwest corner of Markham Street and Decker Road near existing residential homes. The homes in this area have a General Plan Land Use Designation of “RC-VLDR” and a zoning designation of “R-R.” The noise level measurements collected show an overall 24-hour exterior noise level of 68.2 dBA CNEL. The hourly noise levels measured at location L6 ranged from 60.8 to 65.9 dBA Leq during the daytime hours and from 53.2 to 64.2 dBA Leq during the nighttime hours. The energy (logarithmic) average daytime noise level was calculated at 63.7 dBA Leq with an average nighttime noise level of 60.6 dBA Leq. (Urban Crossroads, Inc., 2017b, pp. 29-30)
- Location L7: Location L7 represents the noise levels along Markham Street near existing residential homes, south of the Project site. The homes in this area have a General Plan Land Use Designation of “RC-VLDR” and a zoning designation of “Industrial Park (I-P).” The 24-hour CNEL indicates that the overall exterior noise level is 73.9 dBA CNEL. At location L7 the background ambient noise levels ranged from 66.0 to 72.1 dBA Leq during the daytime hours to levels of 59.7 to 69.5 dBA Leq during the nighttime hours. The energy (logarithmic) average daytime noise level was calculated at 69.5 dBA Leq with an average nighttime noise level of 66.3 dBA Leq. (Urban Crossroads, Inc., 2017b, p. 30)

Table 4.11-1 provides the (energy average) noise levels used to describe the daytime and nighttime ambient conditions. These daytime and nighttime energy average noise levels represent the average of all hourly noise levels observed during these time periods expressed as a single number. Appendix 5.2 of *Technical Appendix I* provides a summary of the hourly noise levels for each hour as well as the minimum and maximum noise level observed during the daytime and nighttime period. The background ambient noise levels in the Project study area are dominated by the transportation related noise associated with the arterial roadway network and March Air Reserve Base. This includes auto, heavy truck, and aircraft activities near the noise level measurement locations. Secondary background ambient noise is also included in the noise level measurements from existing stationary noise sources in the Project study area, such as the existing high-cube warehouse/distribution center use located northeast of the Project site along Oleander Avenue. (Urban Crossroads, Inc., 2017b, p. 30)



B. Existing Ground-borne Vibration

The Project site is located approximately 0.4-mile west of I-215, 5.8 miles southwest of SR-60, and approximately 1.1 miles west of the nearest runway at the March Air Reserve Base (MARB). Vehicular and airport activities are not considered sources of substantial ground-borne vibration. Due to the rapid drop-off rate of ground-borne vibration and the short duration of the associated events, vehicular/air traffic-induced ground-borne vibration is rarely perceptible beyond the roadway/runway right-of-way. Given the distances between the Project site and potential vibration sources, the Project site does not experience substantial ground-borne vibration under existing conditions.

C. Airport Noise

The Project site is located within the March Air Reserve Base Airport Influence Area boundary. As depicted on Exhibit MA-4 of the *March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan*, the Project site is located outside of the 60 CNEL range from aircraft noise and is not subject to substantial noise from operations at the March Air Reserve Base. (RCALUC, 2015)

D. Existing Noise Study Standards, Policies, and Regulations

Federal, state, and local agencies regulate different aspects of environmental noise. Federal and State agencies generally set noise standards for mobile sources such as aircraft and motor vehicles, while regulation of stationary sources is left to local agencies. Local noise standards and guidelines are often based on the broader guidelines established by State and Federal agencies. A description of the regulatory setting for the Project study area's existing noise setting is provided below.

1. State of California Green Building Standards Code

The 2014 State of California Green Building Standards Code contains mandatory measures for non-residential building construction in Section 5.506 on Environmental Comfort. These noise standards are applied to new construction in California for the purpose of controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when non-residential structures are developed in areas where the exterior noise levels exceed 65 dBA CNEL, such as within a noise contour of an airport, freeway, railroad, and other areas where noise contours are not readily available. If the development falls within an airport or freeway 65 dBA CNEL noise contour, the combined sound transmission class (STC) rating of the wall and roof-ceiling assemblies must be at least 50. For those developments in areas where noise contours are not readily available and the noise level exceeds 65 dBA Leq for any hour of operation, a wall and roof-ceiling combined STC rating of 45, and exterior windows with a minimum STC rating of 40 are required according to Section 5.507.4.1. (Urban Crossroads, Inc., 2015a, p. 17)

2. State of California Noise Requirements

The State of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards, and provides guidance for local land use compatibility. State law requires that each county and city adopt a General Plan that includes a



Noise Element which is to be prepared per guidelines adopted by the Governor's Office of Planning and Research. The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. (Urban Crossroads, Inc., 2017b, p. 17)

3. County of Riverside Noise Element

The County of Riverside has adopted a Noise Element of the General Plan to control and abate environmental noise, and to protect the citizens of the County from excessive exposure to noise. The Noise Element identifies two separate types of noise sources: 1) transportation and 2) stationary, and establishes guidelines for acceptable transportation and stationary community noise levels (Urban Crossroads, Inc., 2017b, p. 18).

Transportation Noise Standards

The Noise Element specifies the maximum noise levels allowable for new developments in unincorporated Riverside County impacted by transportation noise sources such as arterial roads, freeways, airports, and railroads. The Noise Element includes standards for land use compatibility for community noise exposure. For single family residential areas, the Noise Element states that the exterior noise levels should remain below 65 dBA CNEL, and the interior noise levels should remain below 45 dBA CNEL. For industrial uses, the Noise Element's *Land Use Compatibility for Community Noise Exposure* matrix sets guidelines per the predicted noise exposure level (see Table 4.11-2, *Land Use Compatibility for Community Noise Exposure*). According to the noise compatibility matrix, an ambient noise level of up to 75 dBA CNEL is considered *normally acceptable* for industrial uses. (Urban Crossroads, Inc., 2017b, p. 18)

Stationary Noise Standards

The County of Riverside has set exterior noise limits to control idling trucks, delivery truck activities, parking, backup alarms, as well as loading and unloading of dry goods associated with projects like the proposed Project. The County considers noise generated by the use of motor vehicles to be a stationary noise source when operated on private property such as at a truck terminal or warehousing facility. These facility-related noises, as projected to any portion of any surrounding property containing a habitable dwelling, hospital, school, library or nursing home, must not exceed the following worst-case noise levels. (Urban Crossroads, Inc., 2017b, p. 20)

Policy N 4.1 of the Noise Element sets an exterior noise limit not to be exceeded for a cumulative period of more than ten minutes in any hour of 65 dBA Leq for daytime hours of 7:00 a.m. to 10:00 p.m., and 45 dBA Leq during the noise-sensitive nighttime hours of 10:00 p.m. to 7:00 a.m. These stationary-source noise level standards are consistent with the County of Riverside Office of Industrial Hygiene guidelines for noise studies within the County. Policy N 4.8 of the Noise Element requires that loading docks of industrial land uses minimize the potential noise impacts of vehicles on the site, as well on the adjacent land uses. (Urban Crossroads, Inc., 2017b, p. 20) The County of Riverside operational noise standards used in the noise impact analysis presented in Table 4.11-3, *Operational Noise Standards, and Technical Appendix I*. (Urban Crossroads, Inc., 2017b, p. 20)



Construction Noise Standards

To control noise impacts associated with construction activities, Riverside County has established limits to permitted construction hours. Section 9.52.020 of the County's Noise Regulation ordinance, (see Appendix 3.1 of *Technical Appendix I*), indicates that noise associated with any private construction activity located within one-quarter of a mile from an inhabited dwelling is considered exempt between the hours of 6:00 a.m. and 6:00 p.m., during the months of June through September, and 7:00 a.m. and 6:00 p.m., during the months of October through May. Neither the County's General Plan nor Municipal Code establish numeric maximum acceptable construction source noise levels at potentially affected receivers, which would allow for a quantified determination of what CEQA constitutes as a substantial temporary or periodic noise increase. To allow for a quantified determination of what the Noise Control Ordinance constitutes as noise that may jeopardize the health, safety, or general welfare of Riverside County residents and degrade their quality of life due to Project construction activity, relevant quantified stationary source noise standards established in the General Plan Policy N 4.1, were used in the noise impact analysis (*Technical Appendix I*) to assess the Project construction noise levels at nearby sensitive receivers. Therefore, the daytime noise level standard of 65 dBA Leq is used to evaluate the potential Project-related construction noise impacts. (Urban Crossroads, Inc., 2017b, pp. 20-21)

Construction Vibration Standards

Typically, the human response at the perception threshold for vibration includes annoyance in residential areas when vibration levels expressed in VdB approach 75 VdB. The County of Riverside identifies a vibration perception threshold of 0.01 in/sec. The County of Riverside does not have vibration standards for temporary construction, but the County's General Plan Noise Element does describe the human reaction to typical vibration levels. Vibration levels with peak particle velocity of 0.787 inches per second are considered readily perceptible and above 0.1968 in/sec are considered annoying to people in buildings. Further, County of Riverside General Plan Policy 15.3 identifies a motion velocity perception threshold for vibration due to passing trains of 0.01 in/sec over the range of one to 100 hertz (Hz). For the purposes of the vibration analysis presented below and in *Technical Appendix I*, the perception threshold of 0.01 in/sec was used to assess the potential impacts due to Project construction at nearby sensitive receiver locations. (Urban Crossroads, Inc., 2017b, p. 21)

Blasting Regulations

The construction of the proposed Project would include blasting of hard rock areas. Because the County of Riverside General Plan and Municipal Code do not identify specific construction noise level limits for blasting activities, the Office of Surface Mining Reclamation and Enforcement (OSMRE) and the Code of Federal Regulations (CFR), *Airblast Limits* (30 CFR 816.67(b)) was used by Urban Crossroads in the noise impact analysis (*Technical Appendix I*). Section 816.2 of Title 30 of the CFR indicates that the blasting regulations are "*intended to insure that all surface mining activities are conducted in a manner which preserves and enhances environmental and other values in accordance with the Act.*" While the OSMRE regulates mining activities, the blasting activities at the Project site are representative of surface mining activities which, to satisfy CEQA guidelines, must demonstrate that they do not adversely affect the existing environment. Therefore, Urban Crossroads,



Inc. applied OSMRE blasting regulations to the blasting activities anticipated at the Project site. For mining operations, which require larger blasts than that of the proposed Project, the lowest noise level threshold identified in the CFR is a maximum noise level of 129 dBA L_{max} for blasting activity measured “at the location of any dwelling, public building, school, church, or community or institutional building outside of the permit area...” Urban Crossroads, Inc. determined that the L_{max} threshold used in the noise impact analysis (*Technical Appendix I*) is suitable for single-event noise levels, such as blasting activities, since other noise regulations in Leq (energy average), for example, average out a reference noise level over a given time period which reduces the single-event noise level over a longer period of time. The L_{max}; therefore, allows for the shorter-duration single-event noise levels to be evaluated against an appropriate threshold. (Urban Crossroads, Inc., 2017b, pp. 21-22)

The *Caltrans Transportation and Construction Vibration Guidance Manual* vibration velocity levels for various building materials’ susceptibility to damage were used by Urban Crossroads, Inc. to evaluate the potential vibration impacts due to blasting at the Project site. For residential structures, the threshold of damage for vibration is approximately 3.0 in/sec (PPV) for cosmetic cracking and damage. (Urban Crossroads, Inc., 2017b, p. 22)

4.11.3 METHODOLOGY FOR CALCULATING PROJECT-RELATED NOISE IMPACTS

A. Construction Noise

The types and numbers of heavy equipment that the Project Applicant expects to use during construction activities are listed in Table 3-1, *Construction Equipment Assumptions*. In order to assess the expected noise levels that would be generated by the Project’s construction activities, Urban Crossroads, Inc. collected reference noise level measurements at construction sites at which the same types of construction were operating. Table 4.11-6, *Construction Reference Noise Levels*, provides a summary of the 16 construction reference noise level measurements collected by Urban Crossroads, Inc. All construction noise level measurements presented in Table 4.11-6 were adjusted by Urban Crossroads, Inc. to describe a common reference distance of 50 feet. Refer to Appendix 10.1 of *Technical Appendix I* for a more detailed discussion of construction reference noise levels. (Urban Crossroads, Inc., 2017b, pp. 71-72)

Noise levels diminish with distance from the noise source at a rate of 6 dBA per doubling of distance. For example, a noise level of 80 dBA measured at 50 feet from the noise source to the receiver would be reduced to 74 dBA at 100 feet from the source to the receiver, and would further be reduced to 68 dBA at 200 feet from the source to the receiver. (Urban Crossroads, Inc., 2017b, p. 72) However, 6 dBA is based typically over a hard surface or water. The doubling distance of 7.5 dBA is more typical over softer surfaces (e.g. dirt, grass, bushes, etc.).

Blasting Noise and Blasting Vibration

Construction of the proposed Project would include blasting of hard rock areas. The intensity of the noise and vibration impacts associated with rock blasting depends on location, size, material, and shape of the rock, and the methods used to crack the rock. While a blasting contractor can design the



blasts to stay below a given vibration level that could cause damage to nearby structures, it is difficult to design blasts that produce noise levels which are not perceptible to receivers in the vicinity of the blast site. The noise produced by blasting activities is referred to as an airblast, or a pressure wave that is generated when explosive energy in the form of gases escape from the detonating blast holes. Much like a point source, airblasts radiate outward in a spherical pattern and attenuate with each doubling of distance from the blast location. (Urban Crossroads, Inc., 2017b, p. 86)

Blasting activities generally include: the pre-drilling of holes in the hard rock area; preparation and placement of the charges in the drilled holes; a pre-blast horn signal; additional pre-blast horn signals immediately prior to the blast; and the blast itself. An additional horn signal is sounded to indicate the “all clear” after the blast and the blasting contractor has inspected the blasting area. During the blast, which occurs over a few seconds, the noise from the blast itself starts with a cracking sound from the detonator, located at a distance from the charges, and ends with the low crackling sound from each charge as they are subsequently set off. It is important to note that no other construction equipment would be operating during the blast in the immediate area, and would commence once the blasting contractor indicates it is safe to do so. (Urban Crossroads, Inc., 2017b, p. 86)

As part of the noise impact analysis, Urban Crossroads, Inc. analyzed a worst-case scenario which would include fifteen (15) sections of hard rock area of approximately 400 drill holes per blast over a two-month period. This amounts to approximately fifteen separate blasting events. Using conventional blasting methods, there would be one blast near the edge of the southern property line using holes as deep as 15 to 20 feet. The explosive charges would be placed in each hole to fragment the rocks into smaller, crushable pieces. The charges would be made up of ammonium nitrate/fuel oil (ANFO) which consists of 94 percent ammonium nitrate and 6 percent diesel fuel. Further, the blasts would be single-event noise sources which would occur over a few seconds, with multiple small blasts in each hole occurring milliseconds apart from each other. Once the blast is completed, normal construction grading activities would resume. An electric rock crusher, powered by a 300 horsepower generator, would later break down the fragmented rocks at the location of the Project site. (Urban Crossroads, Inc., 2017b, pp. 86-87)

To evaluate the potential noise levels from blasting activities during Project construction, Urban Crossroads, Inc. collected a reference noise level measurement of a single blast performed by the same contractor that the Project Applicant intends to use for blasting at the Project site, California Blasting and Drilling. The reference noise level measurement was collected on March 15, 2016, at a residential construction site in Chatsworth, CA. At a reference distance of 370 feet, the blasting noise levels reached 81.5 dBA L_{max} for one (1) second over a total duration of seven (7) seconds for all blasts included in the event (Refer to Table 4.11-7, *Blasting Reference Noise Levels*). The reference blast measurement represents a larger blasting area and greater amount of ANFO explosive material than what is planned at the Project site. In addition, due to the distance of roughly 400 feet to nearby residential homes of the reference blast site, some debris was allowed to be cast into the air and the additional noise associated with this debris is included in the reference noise level. Debris due to blasting at the Project site is not anticipated to be cast into the air per conversations with the blasting



contractor, and therefore, the reference noise level measurement may conservatively overstate the noise levels of the Project site blasting activities. (Urban Crossroads, Inc., 2017b, p. 87)

B. Transportation-Related Noise

1. Federal Highway Administration Traffic Noise Prediction Model

The estimated roadway noise impacts from vehicular traffic were calculated using a computer program that replicates the FHWA Traffic Noise Prediction Model- FHWA-RD-77-108. The FHWA Model arrives at a predicted noise level through a series of adjustments to the Reference Energy Mean Emission Level (REMEL). In California, the national REMELs are substituted with the California Vehicle Noise (Calveno) Emission Levels. Adjustments are then made to the REMEL to account for: 1) the roadway classification (e.g., collector, secondary, major or arterial), 2) the roadway active width (i.e., the distance between the center of the outermost travel lanes on each side of the roadway), 3) the total average daily traffic (ADT), 4) the travel speed, 5) the percentages of automobiles, medium trucks, and heavy trucks in the traffic volume, 6) the roadway grade, 7) the angle of view (e.g., whether the roadway view is blocked), 8) the site conditions ("hard" or "soft" relates to the absorption of the ground, pavement, or landscaping), and 9) the percentage of total ADT which flows each hour throughout a 24-hour period. (Urban Crossroads, Inc., 2017b, p. 33)

2. Off-Site Traffic Noise Prediction Model Inputs

Table 4.11-8, *Off-Site Roadway Parameters*, presents the roadway parameters used to assess the Project's off-site transportation noise impacts. Table 4.11-8 identifies the 12 study area roadway segments, the distance from the centerline to adjacent land use based on the functional roadway classifications according to the County of Riverside General Plan Circulation Element, and the posted vehicle speeds. For the purpose of the site-specific noise impact analysis (*Technical Appendix I*), soft site conditions were used to analyze the traffic noise impacts within the Project study area. Soft site conditions account for the sound propagation loss over natural surfaces such as normal earth and ground vegetation. (Urban Crossroads, Inc., 2017b, p. 33)

To quantify off-site traffic noise levels, the Project's vehicular trips were assigned to the 12 study area roadway segments, based on the Project trip distribution and vehicle mix information contained in the site-specific traffic impact analysis (*see Technical Appendix J*). Refer to *Technical Appendix J* for information on existing and future traffic volumes, Project-related traffic volumes, and time of day vehicle splits for cars, medium-sized trucks, and heavy trucks. While the traffic volumes presented in *Technical Appendix J* are expressed as Passenger Car Equivalent (PCE) trips, the site-specific noise impact analysis (*Technical Appendix I*) relies on the net Project trips to accurately account for the effect of individual truck trips on the study area roadway network. (Urban Crossroads, Inc., 2017b, pp. 33, 35) Please note that calculations of the Project's traffic-related noise presented in *Technical Appendix I* and herein were prepared prior to the Project Applicant's decision to reduce the size of Building E Site to its current configuration (which reduced Project-generated traffic volumes by approximately 12%); therefore, the Project's contributions to traffic noise are overstated herein by up to 12%.



To quantify the off-site noise levels, the Project related truck trips were added to the heavy truck category in the FHWA noise prediction model. The addition of the Project related truck trips increases the percentage of heavy trucks in the vehicle mix. This approach recognizes that the FHWA noise prediction model is influenced by the number of heavy trucks in the vehicle mix. The Project's truck trip-ends were assigned to the 12 off-site study area roadway segments based on the estimated Project truck trip distribution percentages. Using the Project truck trips in combination with the Project trip distribution, it is possible to calculate the number of additional Project truck trips and vehicle mix percentages for each of the study area roadway segments. (Urban Crossroads, Inc., 2017b, p. 35)

C. Operational Noise

The future building occupants of the proposed Project are unknown at the present time. The site-specific noise impact analysis (*Technical Appendix I*) assumes the Project would be operational 24 hours per day, seven days per week. Business operations would primarily be conducted within the enclosed buildings, with the exception of traffic movement, parking, and the loading and unloading of trucks at designated loading bays. The on-site Project related noise sources are expected to include: idling trucks, delivery truck activities, parking, backup alarms, as well as loading and unloading of dry goods. The site-specific noise impact analysis (*Technical Appendix I*) does not account for any special noise generators that may be needed to accommodate the needs of specific building users. Special noise generators may consist of outdoor compressors, air scrubbers, heavy materials handlings, HVAC units, emergency generators, etc. The site-specific noise impact analysis (*Technical Appendix I*) is intended to describe noise level impacts associated with the expected typical operational activities for high cube warehouse buildings at the Project site. (Urban Crossroads, Inc., 2017b, p. 55)

1. Reference Operational Noise Levels

Because the future building occupants of the proposed Project are unknown, the Project's operational noise levels were estimated based on reference noise level measurements of similar business park warehouse buildings. The reference noise levels are intended to describe the expected operational noise sources that may include idling trucks, delivery truck activities, parking, backup alarms, as well as loading and unloading of dry goods. To estimate off-site operational noise impacts, the following reference noise level measurements were collected at an existing building containing similar operational noise sources as the proposed Project. (Urban Crossroads, Inc., 2017b, p. 56)

Short-term reference noise level measurements were collected on Wednesday, January 7th, 2015, by Urban Crossroads, Inc. at the Motivational Fulfillment & Logistics Services distribution facility located at 6810 Bickmore Avenue in the City of Chino. The noise level measurements represent the typical weekday dry goods operation at a business park warehouse building with a loading dock area. Two reference noise level measurements were taken at this location, including entry gate activity and unloading/docking activity noise sources. Up to ten trucks were observed in the loading dock area including a combination of truck trailer semi-trucks, two-axle delivery trucks, and background forklift operations. (Urban Crossroads, Inc., 2017b, p. 56)



The entry gate activity noise level measurement was taken over a 15- minute period and represents multiple noise sources producing a reference noise level of 64.0 dBA Leq. The noise sources included at this measurement location account for the rattling and squeaking during normal opening and closing operations, the gate closure equipment, truck engines idling outside the entry gate, and background forklift backup alarm noise. The unloading/docking activity noise level measurement was taken over a 15- minute period and represents multiple noise sources taken from the center of loading dock activities generating a reference noise level of 67.2 dBA Leq. At this measurement location, the noise sources associated with employees unloading a docked truck container included the squeaking of the truck's shocks when weight was removed from the truck, employees playing music over a radio, as well as a forklift horn and backup alarm. In addition, during the noise level measurement, a truck entered the loading dock area and proceeded to reverse and dock in a nearby loading bay, adding truck engine and air brakes noise. (Urban Crossroads, Inc., 2017b, p. 56)

While the specific noise levels at the Project site will depend on the actual building users, the intensity, and the daytime/nighttime hours of operation, a reference noise level of 67.2 dBA Leq is used to describe the peak Project operational noise activity because it represents similar operational characteristics. The reference noise levels are intended to describe noise level impacts associated with the expected operations at the Project site and do not account for any special noise generators. (Urban Crossroads, Inc., 2017b, p. 57)

D. Ground-borne Vibration

Ground-borne vibration levels from automobile traffic are generally overshadowed by vibration generated by heavy trucks that roll over the same uneven roadway surfaces. However, due to the rapid drop-off rate of ground-borne vibration and the short duration of the associated events, vehicular traffic-induced ground-borne vibration is rarely perceptible beyond the roadway right-of-way, and rarely results in vibration levels that cause damage to buildings in the vicinity. However, while vehicular traffic is rarely perceptible, construction activities have the potential to result in varying degrees of temporary ground vibration, depending on the specific construction activities and equipment used. Ground vibration levels associated with various types of construction equipment are summarized in Table 4.11-9, *Vibration Source Levels for Construction Equipment*. Based on the representative vibration levels presented for various construction equipment types, it is possible to estimate the human response (annoyance) using the following vibration assessment methods defined by the FTA. (Urban Crossroads, Inc., 2017b, p. 39)

Based on the California Department of Transportation's *Transportation and Construction Vibration Guidance Manual*, it is unusual for damage to be caused to residential structures from the vibrations due to blasting activities as other agencies' (U.S. Bureau of Mines and the Office of Surface Mining and Reclamation Enforcement) maximum vibration level limits have been shown to not cause any damage to existing homes. The *Transportation and Construction Vibration Guidance Manual* provides the human perception thresholds for vibration from continuous events at a PPV level of 0.02 in/sec, and provides vibration velocity levels for various building materials susceptibility to damage.



For residential structures, the threshold of damage for vibration is approximately 3.0 in/sec (PPV) for cosmetic cracking and damage. (Urban Crossroads, Inc., 2017b, p. 88)

4.11.4 BASIS FOR DETERMINING SIGNIFICANCE

The proposed Project would result in a significant noise impact if the Project or any Project-related component would:

Airport Noise

- a) *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels;*
- b) *For a project within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels.*

Railroad Noise

- a) *Result in railroad noise.*

Highway Noise

- a) *Result in highway noise.*

Other Noise

- a) *Result in other noise.*

Noise Effects on or by the Project

- a) *Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;*
- b) *Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;*
- c) *Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;*
- d) *Result in exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels.*

While the CEQA Guidelines and the County of Riverside General Plan Guidelines provide direction on noise compatibility and establish noise standards by land use type that are sufficient to assess the significance of noise impacts under *Noise Effects on or by the Project* Threshold (a), they do not define the levels at which increases are considered substantial for use under *Noise Effects on or by the Project* Threshold (b), (c) and (d) (Urban Crossroads, Inc., 2017b, p. 23). The standards used to evaluate significance in this EIR are explained below.



A. Noise-Sensitive Receivers

Noise level increases resulting from the Project are evaluated based on the guidance given in CEQA Guidelines Appendix G at the closest sensitive receiver locations. Under CEQA, consideration must be given to the magnitude of the increase, the existing ambient noise levels, and the location of noise-sensitive receivers, in order to determine if a noise increase represents a significant adverse environmental impact. This approach recognizes that there is no single noise increase that renders the noise impact significant. (Urban Crossroads, Inc., 2017b, p. 23) Therefore, the lead agency must determine when an increase is substantial, based on substantive evidence.

Because of the wide variation in individual thresholds of annoyance and differing individual experiences with noise, there is no completely satisfactory way to measure the subjective effects of noise or of the corresponding human reactions of annoyance and dissatisfaction. Thus, an important way of determining a person's subjective reaction to a new noise is the comparison of the noise to the existing environment to which one has adapted-the so-called ambient environment. In general, the more a new noise exceeds the previously existing ambient noise level, the less acceptable the new noise will typically be judged. The Federal Interagency Committee on Noise (FICON) developed guidance to be used for the assessment of project-generated increases in noise levels that take into account the ambient noise level. The FICON recommendations are based on studies that relate aircraft noise levels to the percentage of persons highly annoyed by aircraft noise. Although the FICON recommendations were specifically developed to assess aircraft noise impacts, these recommendations are often used in environmental noise impact assessments involving the use of cumulative noise exposure metrics, such as the average-daily noise level (i.e., CNEL). For example, if the ambient noise environment is quiet (<60 dBA) and the new noise source greatly increases the noise levels, an impact may occur. Therefore, for the analysis herein, FICON is used. FICON identifies a readily perceptible 5 dBA or greater project-related noise level increase as a significant impact when the noise criteria for a given land use is exceeded. Per the FICON, in areas where the without project noise levels range from 60 to 65 dBA, a 3 dBA barely perceptible noise level increase appears to be appropriate for most people. When the without project noise levels already exceed 65 dBA, any increase in community noise louder than 1.5 dBA or greater is considered a significant impact if the noise criteria given in the Noise Element's Table N-1, *Land Use Compatibility for Community Noise Exposure* matrix for a given land use is exceeded, since the noise increase likely contributes to an existing noise exposure exceedance. Table 4.11-4, *Significance of Noise Impacts at Noise Sensitive Receivers*, provides a summary of the potential noise impact significance criteria, based on guidance from FICON. (Urban Crossroads, Inc., 2017b, pp. 23-24)

B. Non-Noise Sensitive Receivers

The County of Riverside General Plan Noise Element, Table N-1, *Land Use Compatibility for Community Noise Exposure* (Table 4.11-2) was used to establish the levels of significance for non-noise-sensitive land uses in the Project study area, such as Business Park and Industrial land uses. As shown on Table 4.11-2, the "normally acceptable" exterior noise levels for non-noise sensitive land uses is 70 dBA CNEL. Noise levels greater than 70 dBA CNEL are considered "conditionally



acceptable” according to the *Land Use Compatibility for Community Noise Exposure*. (Urban Crossroads, Inc., 2017b, p. 24)

To determine if Project-related traffic noise level increases are significant at off-site non-noise sensitive land uses, a readily perceptible 5 dBA and barely perceptible 3 dBA criteria are used herein. When the without Project noise levels at the non-noise-sensitive land uses are below the normally acceptable 70 dBA CNEL compatibility criteria, a readily perceptible 5 dBA or greater noise level increase is considered a significant impact. When the without Project noise levels are greater than the normally acceptable 70 dBA CNEL land use compatibility criteria, a barely perceptible 3 dBA or greater noise level increase is considered a significant impact since the noise level criteria is already exceeded. The noise level increases used to determine significant impacts for non-noise-sensitive land uses is generally consistent with the FICON noise level increase thresholds for noise-sensitive land uses but instead rely on the County of Riverside General Plan Noise Element, *Land Use Compatibility for Community Noise Exposure* normally acceptable 70 dBA CNEL exterior noise level criteria. Table 4.11-5, *Significance Criteria Summary*, provides a summary of the noise impact significance criteria. (Urban Crossroads, Inc., 2017b, p. 24)

Noise impacts shall be considered significant if any of the following occur as a direct result of the proposed Project.

1. Off-Site Traffic Noise

When the noise levels at existing and future noise-sensitive land uses (e.g. residential, etc.):

- Are less than 60 dBA and the Project creates a readily perceptible 5 dBA or greater Project related noise level increase; or
- Range from 60 to 65 dBA and the Project creates a barely perceptible 3 dBA or greater Project noise level increase; or
- Already exceed 65 dBA, and the Project creates a community noise level impact of greater than 1.5 dBA.

When the noise levels at existing and future non-noise-sensitive land uses (e.g. business park, industrial, etc.):

- Are less than the County of Riverside General Plan Noise Element, Table N-1, normally acceptable 70 dBA and the Project creates a readily perceptible 5 dBA or greater Project related noise level increase; or
- Are greater than the County of Riverside General Plan Noise Element, Table N-1, normally acceptable 70 dBA and the Project creates a barely perceptible 3 dBA or greater Project noise level increase.



2. Operational Noise

If Project-related operational (stationary source) noise levels exceed the exterior 65 dBA Leq daytime or 45 dBA Leq nighttime noise level standards at nearby sensitive residential land uses (County of Riverside General Plan, Policy N 4.1) (direct impact).

If the operational (stationary source) noise levels at nearby noise-sensitive receivers near the Project site:

- Are less than 60 dBA and the Project creates a readily perceptible 5 dBA or greater noise level increase (cumulatively considerable impact); or
- Range from 60 to 65 dBA and the Project creates a barely perceptible 3 dBA or greater noise level increase (cumulatively considerable impact); or
- Already exceed 65 dBA, and the Project creates a community noise level impact of greater than 1.5 dBA (cumulatively considerable impact).

3. Construction Noise and Vibration

If Project-related construction activities:

- Occur at any time other than the permitted hours of 6:00 a.m. and 6:00 p.m., during the months of June through September, and 7:00 a.m. and 6:00 p.m., during the months of October through May (County of Riverside Municipal Code, Section 9.52.020) and would create noise levels of greater than 45 dBA Leq at sensitive receivers;
- Create noise levels which exceed the County of Riverside 65 dBA Leq acceptable noise level threshold at the nearby sensitive receiver locations (based on the County of Riverside General Plan, Policy N 4.1).
- If short-term Project generated construction vibration levels exceed the County of Riverside acceptable vibration standard of 0.01 in/sec (RMS) at sensitive receiver locations (County of Riverside General Plan, Policy N 15.3).
- If noise due to blasting exceeds the Office of Surface Mining Reclamation and Enforcement and Code of Federal Regulations, Section 30 CFR 816.67(b), *Use of Explosives: Control of Adverse Effects* lowest maximum noise level standard of 129 dBA Lmax at nearby sensitive receiver locations (Urban Crossroads, Inc., 2017b, p. 26).
- If vibration due to blasting exceeds 3.0 in/sec. (PPV) at nearby sensitive receiver locations (*Caltrans Transportation and Construction Vibration Guidance Manual*) (Urban Crossroads, Inc., 2017b, p. 26).



4.11.5 IMPACT ANALYSIS

Airport Noise

Threshold a) *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?*

The Project site is located approximately 1.1 miles west of the nearest runway at the March Air Reserve Base (MARB). According to Exhibit MA-4, the Project site is exposed to less than 60 dBA CNEL from operations at the MARB, which is not considered excessive. (RCALUC, 2015, Exhibit MA-4) Furthermore, the Project proposes to develop the site with business park uses, which are not considered noise-sensitive receptors. According to the Riverside County General Plan, industrial and manufacturing uses are considered “normally acceptable” at noise levels up to 75 dBA CNEL (Riverside County, 2003a, Table N-1). Accordingly, the Project would not expose workers or visitors to the Project site to excessive airport-related noise. Impacts would be less than significant.

Airport Noise

Threshold b) *For a project within the vicinity of a private airstrip, would the Project expose people residing or working in the project area to excessive noise levels?*

The Project site is not located near any private airstrips (RCIT, 2015). The Riverside County Regional Medical Center (RCRMC) located in Moreno Valley at 26520 Cactus Avenue has a helipad for emergency medical purposes. However, a helipad is not an airstrip and helicopter noise would be intermittent and has no potential to expose potential future workers at the Project site to substantial noise. Therefore, the Project has no potential to expose people residing or working in the Project area to excessive noise levels. No impact would occur.

Railroad Noise

Threshold a) *Would the Project result in railroad noise?*

The Project does not include a rail component and would not utilize rail service. Accordingly, there is no potential for the Project to result in railroad noise. No impact would occur.

Highway Noise

Threshold a) *Would the Project result in highway noise?*

The Project site is located 0.4 mile west of I-215, which is the only major highway corridor in the Project vicinity (Google Earth Pro, 2015). The Project’s contribution of traffic to I-215 would not reach the level that a measurable highway noise impacts would occur (Urban Crossroads, Inc., 2017b). Thus, a less than significant impact would occur.



Other Noise

Threshold a) Would the Project result in other noise?

The Project site does not contain any other aspects that would qualify as “other noise” that is not addressed by other thresholds. Accordingly, no impact would occur.

Noise Effects on or by the Project

Threshold a) Would the Project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Threshold b) Would the Project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Threshold c) Would the Project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

A. Short-Term Construction Noise

Construction activity associated with the proposed Project, especially activities involving heavy equipment, would create intermittent periods of noise when construction equipment is in operation and would cause a short-term increase in ambient noise levels. During Project construction, noise would be generated by a combination of trucks, power tools, concrete mixers, and portable generators during: 1) demolition; 2) grading; 3) underground utilities installation; 4) building construction; 5) landscaping; 6) paving and application of site finishes; and 7) application of architectural finishes. (Urban Crossroads, Inc., 2017b, p. 71)

Analysis of the Project’s potential construction noise level impacts were completed for eight noise receiver locations (R1 through R8) that represent the nearest noise sensitive receivers (single-family dwellings) to the Project site. Representative sensitive receivers in the vicinity of the Project site include the single-family homes at locations R1 through R8 as shown in Figure 4.11-2, *Noise Receiver Locations*. The closest noise-sensitive receiver is represented by R6 where an existing residential home is located approximately 191 feet from the Project site boundary. (Urban Crossroads, Inc., 2017b, p. 53)

The noise impacts associated with the proposed Project are expected to create temporary high-level noise impacts at the nearby receiver locations when all equipment is operating adjacent to the Project site boundaries. To assess the worst-case construction noise levels at each receiver location, the site-specific noise impact analysis (*Technical Appendix I*) shows the noise impacts by phase when heavy equipment is operating simultaneously along the Project site boundary. In reality, noise levels would vary day-to-day and would vary throughout the workday and it is highly unlikely that all pieces of construction equipment would operate simultaneously at the same time and location adjacent to the Project site boundaries. Refer to Tables 10-2 through 10-8 of *Technical Appendix I* for expected noise levels during individual phases of construction. The Project’s peak construction noise levels at the



eight modeled noise sensitive receiver locations are summarized in Table 4.11-10, *Unmitigated Construction Equipment Noise Levels*. Based on the construction noise standard described in Subsection 4.11.4, and as shown on Table 4.11-10, the Project's unmitigated construction noise level impacts are expected to reach a maximum of 67.9 dBA Leq and exceed the construction noise significance threshold of 65 dBA Leq at sensitive receiver location R6. Location R6 is located approximately 191 feet south of the Project site (Urban Crossroads, Inc., 2017b, p. 81) Accordingly, the Project's short-term construction activities would result in a significant short-term impact to noise sensitive receivers by exceeding the significance threshold by 2.9 dBA Leq. Mitigation would thus be required. Refer to Subsection 4.11.8 for applicable mitigation measures.

□ Rock Blasting Noise Levels

Table 4.11-11, *Blasting Noise Levels*, shows the blasting noise level at the closest receiver location, R6, using the reference noise level taken by Urban Crossroads, Inc. at a construction site in Chatsworth, CA. Based on the reference blasting noise level, the closest residential receiver would experience noise levels approaching 80.5 dBA Lmax over the course of the blast, which would likely occur for only a few seconds. While some blasting noise may be noticeable by nearby residents, the single-event, temporary noise levels generated by the blast would not exceed the OSMRE and the CFR standards for airblasts. Therefore, short-term construction noise impacts associated with rock blasting would be less than significant. (Urban Crossroads, Inc., 2017b, pp. 87-88)

B. Stationary Operational Noise

The proposed Project includes the operation of two business park warehouse buildings. Sources of stationary noise associated with Project operation are expected to include idling trucks, delivery truck activities, parking, backup alarms, as well as loading and unloading of dry goods. Business operations would primarily be conducted within the enclosed buildings, except for traffic movement, parking, and the loading and unloading of trucks at designated loading bays. (Urban Crossroads, Inc., 2017b, p. 55)

Table 4.11-12, *Operational Noise Level Projections (dBA Leq)*, presents the exterior stationary operational noise levels from Project operation at nearby sensitive noise receivers, based on the reference noise levels described in Subsection 4.11.3. The operational noise levels summarized in Table 4.11-12 account for the distance attenuation provided due to geometric spreading, when sound from a localized stationary source (i.e., a point source) propagates uniformly outward in a spherical pattern, and the additional noise attenuation associated with the topographic relationship between the noise source, barrier, and receiver locations. In addition, Table 4.11-12 accounts for the noise attenuation provided by the 8-foot high noise barrier walls proposed along the southern boundaries of the Building D Site and the Building E Site (refer to Figure 4.11-3, *Operational Noise Source Locations*, for the locations of the noise barriers). As shown in Table 4.11-12, the hourly noise levels associated with Project operation are expected to range from 28.4 to 37.8 dBA Leq at the sensitive receiver locations. (Urban Crossroads, Inc., 2017b, p. 59) The operational noise level calculations are included in Appendix 9.2 of *Technical Appendix I*.



Project-only noise levels shown on Table 4.11-13, *Operational Noise Level Compliance (dBA Leq)*, include the attenuation provided by the 8-foot high noise barriers proposed along the portions of the southern boundary of the Building D Site where truck courts and loading docks would be positioned nearest the southern boundary. Without the 8-foot high noise barriers, the Project-only operational noise levels at the Building D Site would not satisfy the County of Riverside General Plan Noise Element standards at Receiver R6 and a significant impact would occur. (Urban Crossroads, Inc., 2017b, p. 59) As such, the Project also would not comply with General Plan Policy N 6.3 without installation of the 8-foot high wall, which is a policy that truck delivery hours be limited when adjacent to noise-sensitive land uses.

With the construction of the 8-foot high noise barriers at the southern property line of the Building D Site in the truck court areas, the Project's operational noise levels would not exceed the County of Riverside General Plan Noise Element's daytime (7:00 a.m. to 10:00 p.m.) noise level standard of 65 dBA Leq or nighttime (10:00 p.m. to 7:00 a.m.) noise level standard of 45 dBA Leq at any sensitive residential receiver locations. (Urban Crossroads, Inc., 2017b, p. 59) As indicated in Table 4.11-12, *Operational Noise Level Projections (dBA Leq)*, without installation of the 8-foot wall, Project-related noise at the Project site's southern property boundary is calculated to be 67.2 dBA Leq. The 8-foot high wall would provide for 11 dBA Leq of sound attention, and when accounting to distance to Receiver R6, the Project-related noise level at Receiver R6 would be 36.9 dBA Leq. Because noise levels at sensitive receivers would be less than significant with installation of the 8-foot high wall, the Project would not require delivery hour modifications pursuant to General Plan Policy N 6.3.

C. Transportation-Related Noise

To evaluate off-site noise increases that could result from Project-related traffic, noise levels were modeled for the following traffic scenarios:

- Existing: This traffic scenario refers to the existing present-day noise conditions without and with the proposed Project (Urban Crossroads, Inc., 2017b, p. 41).
- Year 2017: This traffic scenario refers to the background noise conditions at future Year 2017 without and with the proposed Project (Urban Crossroads, Inc., 2017b, p. 41).
- Year 2035: This traffic scenario refers to the background noise conditions at future Year 2035 without and with the proposed Project. This scenario corresponds to 2035 conditions, and includes all cumulative projects identified in the site-specific traffic impacts analysis (*Technical Appendix J*) (Urban Crossroads, Inc., 2017b, p. 41).

To quantify the Project's traffic noise impacts on the surrounding areas, the changes in traffic noise levels on 12 roadway segments surrounding the Project site were calculated by Urban Crossroads, Inc. based on the changes in the average daily traffic volumes. As previously noted, calculations of the Project's traffic-related noise presented in *Technical Appendix I* and herein were prepared prior to the Project Applicant's decision to reduce the size of Building E Site to its current configuration (which reduced Project-generated traffic volumes by approximately 12%); therefore, the Project's



contributions to traffic noise for the 2017 and 2035 scenarios are overstated herein by up to 12%. Because the land uses adjacent to the study area roadways conveying Project traffic consist of business park/industrial uses, which are considered non-noise sensitive, the methodology for assessing impacts to non-noise sensitive uses as described in Subsection 4.11.4, shall apply.

Urban Crossroads, Inc. used noise contours to assess the Project's incremental traffic-related noise impacts at land uses adjacent to roadways conveying Project traffic. The noise contours represent the distance to noise levels of a constant value and are measured from the center of the roadway for the 70, 65, and 60 dBA noise levels. The noise contours do not consider the effect of any existing noise barriers or topography that may affect ambient noise levels. In addition, because the noise contours reflect modeling of vehicular noise along area roadways, they appropriately do not reflect noise contributions from the surrounding stationary noise sources within the Project study area. A summary of the traffic noise level contours for each of the traffic scenarios is included in Appendix 7.1 of *Technical Appendix I*. (Urban Crossroads, Inc., 2017b, pp. 41-42) The study area includes intersections where the Project is calculated to contribute 50 or more peak hour trips per the County of Riverside's traffic study guidelines (Urban Crossroads, Inc., 2015a, p. 5). Other roadways would, thus, experience less Project-related traffic noise than reported herein.

1. Existing + Project Conditions

Table 4.11-14, *Existing Condition Off-Site Project-Related Traffic Noise Impacts*, presents a comparison of existing noise levels to noise levels that would result with implementation of the proposed Project in the absence of cumulative development and ambient growth. As shown on Table 4.11-14, the Project would generate potentially significant noise level increases of 13.0 to 19.7 dBA CNEL on two study area roadway segments: Oleander Avenue east of Driveway 6, and Oleander Avenue west of Harvill Avenue. It is important to note that under existing conditions Oleander Avenue is not fully constructed west of the future location of Driveway 6, which depresses existing noise levels along these Oleander Avenue segments by preventing through traffic. Further, the Project-generated traffic represents a larger share of projected noise along these roadway segments because the roadway will be fully constructed under Existing with Project conditions. Moreover, the Project-related traffic noise level increases would not cause noise levels to exceed the County of Riverside General Plan Noise Element's "normally acceptable" standard at the land uses adjacent to the affected segment of Oleander Avenue (70 dBA CNEL for Business Park and Industrial land uses). Regardless, based on the previously stated significance criteria, the *readily perceptible* Project-related increases of greater than 5 dBA at non-noise sensitive land uses that are below 60 dBA represent a significant direct impact under Existing + Project Conditions. (Urban Crossroads, Inc., 2017b, p. 47)

2. Year 2017+ Project Conditions

Table 4.11-15, *Year 2017 Off-Site Project-Related Noise Impacts*, presents a comparison of calculated 2017 noise levels to noise levels that would result with implementation of the proposed Project in the absence of cumulative development and ambient growth. As shown on Table 4.11-15, the Project would generate significant noise level increases of 13.0 to 19.7 dBA CNEL on two study area roadway segments: Oleander Avenue east of Driveway 6, and Oleander Avenue west of Harvill Avenue.



However, the Project-related traffic noise level increases would not cause noise levels to exceed the County of Riverside General Plan Noise Element's "*normally acceptable*" standard at the land uses adjacent to the affected segment of Oleander Avenue (70 dBA CNEL for Business Park and Industrial land uses). Regardless, based on the previously stated significance criteria, the readily perceptible Project-related increases of greater than 5 dBA at non-noise sensitive land uses that are below 60 dBA represent a significant direct impact under Year 2017 + Project Conditions. (Urban Crossroads, Inc., 2017b, pp. 48-49)

3. Year 2035 + Project Conditions

Table 4.11-16, *Year 2035 Off-Site Project-Related Traffic Noise Impacts*, presents calculated 2035 noise levels that would result with implementation of the proposed Project in the absence of cumulative development and ambient growth. Table 4.11-16 shows that the exterior noise levels without accounting for any noise attenuation features, are expected to range from 62.3 to 76.9 dBA CNEL without the Project. When Project-related traffic is added to 2035 conditions, noise level contours that are expected to range from 66.1 to 77.2 dBA CNEL. As shown on Table 4.11-16, the Project would generate less-than-significant noise level increases on the study area roadway segments based on the significance criteria, under Year 2035 + Project Conditions. (Urban Crossroads, Inc., 2017b, p. 49)

Noise Effects on or by the Project

Threshold d) Would the Project result in exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?

A. Short-Term Construction Ground-borne Vibration Levels

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used and the distance to the affected structures and soil type. It is expected that ground-borne vibration from Project construction activities would cause intermittent, localized intrusion. The proposed Project's construction activities most likely to cause vibration impacts are heavy mobile construction equipment used on-site and trucks hauling building materials to the site. (Urban Crossroads, Inc., 2017b, pp. 84-85)

Ground-borne vibration levels resulting from construction activities occurring within the Project site were estimated by Urban Crossroads using data published by the Federal Transit Administration (FTA). Construction activities that would have the potential to generate low levels of ground-borne vibration within the Project site include grading and paving. Using the vibration source level of construction equipment provided in Table 4.11-9 and the construction vibration assessment methodology published by the FTA, the Project vibration impacts were estimated. Table 4.11-17, *Construction Equipment Vibration Levels*, presents the expected Project related vibration levels at the eight receiver locations. (Urban Crossroads, Inc., 2017b, p. 85)



Based on the reference vibration levels provided by the FTA, a large bulldozer represents the peak source of vibration with a reference velocity of 0.089 in/sec (PPV) at 25 feet. At distances ranging from 191 to 1,485 feet from the Project site, construction vibration velocity levels are expected to approach 0.004 in/sec PPV, as shown on Table 4.11-17. To assess the human perception of vibration levels in PPV, as previously discussed in Subsection 4.11.2, the velocities are converted to RMS vibration levels based on the *Caltrans Transportation and Construction Vibration Guidance Manual* conversion factor of 0.71. As shown in Table 4.11-17, the construction vibration levels in RMS are expected to approach 0.003 in/sec (RMS) at the eight receiver locations. Based on the County of Riverside vibration standards of 0.01 in/sec, the proposed Project's construction activities would not include or require equipment, facilities, or activities that would result in a barely perceptible human response (annoyance), and therefore, the construction-related vibration impacts are considered less-than-significant. (Urban Crossroads, Inc., 2017b, pp. 85-86)

Further, vibration levels at the site of the closest sensitive receiver are unlikely to be sustained during the entire construction period, but will occur rather only during the times that heavy construction equipment is operating along the Project site perimeter. Moreover, heavy construction at the Project site will be restricted to daytime hours consistent with the County of Riverside Noise Ordinance thereby eliminating potential vibration impacts during the sensitive nighttime hours. (Urban Crossroads, Inc., 2017b, p. 86)

B. Short-Term Construction Ground-borne Vibration Levels-Blasting Activities

Urban Crossroads, Inc. calculates that the major source of vibration due to rock blasting is expected to be from the charges placed in each drill hole within the Project site. The blasting contractor would design the blasts when located within 200 feet of existing residential structures to reduce vibration velocity levels from each blast below the Caltrans-identified damage threshold of 3.0 in/sec. Due to the ability of the blasting contractor to limit the ground-borne vibration levels, the vibration velocity levels at 191 feet to the nearest sensitive receiver would be less than significant. (Urban Crossroads, Inc., 2017b, p. 89)

C. Long-Term Operational Vibration

Although the human threshold of perception for vibration is around 65 VdB, human response to vibration is not usually significant unless the vibration exceeds 70 VdB. Truck vibration levels are dependent on vehicle characteristics, load, speed, and pavement condition. Typical vibration levels for heavy trucks at normal traffic speeds do not exceed 65 VdB. During long-term operation of the Project, trucks would travel to and from the Project site on surrounding roadways; however, vibration levels for heavy trucks operating at the posted speed limits on smooth, paved surfaces as is expected on the Project site and surrounding roadways, are typically below the human threshold of perception (65 VdB). Accordingly, long-term operation of the proposed Project would not result in the exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels. (Urban Crossroads, Inc., 2017b, p. 69) Thus, a less-than-significant impact would occur as a result of Project operations.



4.11.6 CUMULATIVE IMPACT ANALYSIS

The cumulative impact analyses considers construction and operation of the proposed Project in conjunction with other development projects in the immediate vicinity of the Project site that would be under simultaneous construction or operation, and which would have the potential for combined noise levels to audible at the same noise receiver locations. For the purposes of this analysis, the list of projects approach was used for all properties with a direct line of sight within 300 meters of the Project site and west of I-215. Refer to Table 4.0-1, Cumulative Development Land Use Summary and Figure 4.0-1, *Cumulative Development Location Map*. In regards to transportation noise, the cumulative study area relies upon the study area determined for the Project's traffic report, and considers the summary of projections approach combined with the list of projects provided in Table 4.0-1.

A. Airport Noise, Railroad Noise, and Other Noise

The proposed Project does not directly involve the construction, operation, or use of any public airports, public use airports, private airstrips, or railroads. Indirect and occasional use of airports and railroads by employees of the Project (including use of MetroLink) would be de minimus and immeasurably small. Occasional use by Project-related employees and employees and residents of cumulative development projects in the study area would not feasibly result in more flights or more railroad trips or increase noise levels associated with these forms of transportation. There are no conditions associated with the proposed Project that would contribute airport noise or railroad noise or exposure of people to unacceptable levels of airport noise or railroad noise. Accordingly, the Project would have no potential to cumulatively contribute to impacts associated with noise from a public airport, public use airport, private airstrip, or railroad. Additionally, the Project is not a noise sensitive land use and operation of the Project would not contribute towards the exposure of people to excessive airport- or railroad-related noise. As such, the Project would not contribute cumulatively considerable noise associated with airports, railroads. In addition, the Project would not result in any other noise source increases beyond those discussed in the topics discussed below.

B. Short-Term Construction-Related Cumulative Noise Impacts

Construction activities associated with the Project, especially activities involving heavy construction equipment and blasting, would create intermittent periods of noise when construction equipment is in operation and when blasting occurs. As previously shown in Table 4.11-10, *Unmitigated Construction Equipment Noise Levels*, the Project's construction activities would expose noise sensitive receiver R6 to noise levels in excess of 65 dBA Leq. In addition, blasting activities would expose nearby noise receivers to noise levels approaching 80.5 dBA Lmax over the course of the blast, which would likely occur for only a few seconds.

Project construction noise levels combined with ambient noise and vehicular noise from potential cumulative development projects would have a cumulative noise effect on these receivers. In the event that construction activities occur on any properties within 300 meters of the Project site occur simultaneously with Project-related construction activities and that also contribute construction noise



to receivers R2 through R7, a cumulative impact may occur and the Project's construction-related noise contribution to the overall noise level in the Project study area would be cumulatively considerable. None of the projects listed in Table 4.0-1 and located within 300 meters of the Project site are expected to be under construction at the same time as the proposed Project, but because construction schedules can fluctuate, there is still a possibility that simultaneous construction activities could occur and the combined noise levels could be cumulatively significant. The Project's contribution to cumulative construction activity noise levels would represent a cumulatively considerable substantial temporary or periodic increase in ambient noise levels in the Project study area above levels existing without the Project. Accordingly, the Project's short-term construction-related noise impacts are regarded as a cumulatively considerable short-term impact. Because construction noise would be temporary in nature, Project construction activities would result in a less than cumulatively considerable substantial permanent (long-term) increase in ambient noise levels in the Project study area above levels existing without the Project.

C. Long-Term Stationary Operational Cumulative Noise Impacts

To assess the potential impacts from cumulative development activities at each receiver location, the expected noise levels from adjacent cumulative development projects were combined with Existing + Project noise levels. Table 4.11-18, *Cumulative Daytime Noise Level Contributions (dBA Leq)*, shows the cumulative daytime noise level increase in the Project vicinity would range between 0.0 and 3.2 dBA Leq at nearby receiver locations. Based on the previously stated significance criteria and the expected ambient noise conditions at nearby receiver locations, the cumulative development impacts during daytime hours represent a less-than-significant impact on the existing ambient noise environment. Table 4.11-19, *Cumulative Nighttime Noise Level Contributions (dBA Leq)*, shows the cumulative development nighttime noise level increases would range from 0.6 to 13.8 dBA Leq. Based on the significance criteria and ambient noise conditions are nearby receiver locations, the total cumulative noise level increases at receiver locations R1 and R3 through R5 during nighttime hours represent a significant cumulative noise level impact. (Urban Crossroads, Inc., 2017b, pp. 64-65) However, the Project's noise contribution at these receiver locations would range between 0.0 and 0.6 dBA Leq and would neither be *readily perceptible* nor exceed the significance thresholds based on ambient noise conditions at the receiver locations. Accordingly, the Project's contribution to cumulative noise effects at receiver locations R1 and R3 through R5 would not be cumulatively considerable. (Urban Crossroads, Inc., 2017b, p. 65)

D. Long-Term Cumulative Transportation-Related Noise Impacts

Table 4.11-20, *Year 2035 Off-Site Cumulative Traffic Noise Impacts (dBA Leq)*, shows that the cumulative increase from Existing conditions to Year 2035 conditions would range from 2.5 to 18.2 dBA CNEL. Based on the significance criteria, the cumulative noise increase would represent a significant cumulative impact along the following roadway segments: 1) Harvill Avenue, south of Oleander Avenue; 2) I-215 NB Freeway, north of Harley Knox Boulevard; 3) Harley Knox Boulevard, east of Harvill Avenue; 4) Oleander Avenue, east of Driveway 6; and 5) Oleander Avenue, west of Harvill Avenue. At each of these roadway segments, the Project's transportation-related noise contribution would be less than 1.9 dBA CNEL. Accordingly, the Project's noise contribution would



neither be *readily perceptible* nor exceed the significance thresholds based on ambient noise conditions at the receiver locations. Therefore, since the Project-related off-site traffic noise level increases represent a less than significant contribution to the cumulative noise impacts, the Project-related traffic noise level increases are less than cumulatively considerable. (Urban Crossroads, Inc., 2017b, pp. 50-51)

E. Ground-borne Noise and Ground-borne Vibration

Based on the County of Riverside vibration standards, Project-related construction activities would not include or require equipment, facilities, or activities that would produce substantial ground-borne noise or ground-borne vibration. Vibration levels at the location of the closest receiver are unlikely to be sustained during the entire construction period, but would occur rather only during the times that heavy construction equipment is operating along the Project site perimeter. Additionally, the Project would employ blasting techniques during construction that would produce ground-borne noise and ground-borne vibration. Because vibration generated during Project construction and blasting would be minimal and would be limited to the Project site and the immediate environs adjacent to the Project site boundaries, and because there are no other sources of substantial vibration in the immediate Project site vicinity, the potential for the Project to result in cumulatively considerable ground-borne vibration during construction would be less-than-significant.

Under long-term conditions, operational activities of the proposed Project would not include or require equipment, facilities, or activities that would result in perceptible groundborne vibration. Trucks would travel to and from the Project site during long-term operation; however, vibration levels for heavy trucks operating at legal speeds operating at the posted speed limits on smooth, paved surfaces as is expected on the Project site and surrounding roadways are typically below the human threshold of perception (65 VdB). Accordingly, long-term operation of the Project would not expose people to or generate excessive groundborne vibration or groundborne noise levels. For this reason, impacts would be less than cumulatively considerable.

4.11.7 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Airport Noise

Airport Noise: Threshold (a) and (b) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would not expose people to excessive noise levels associated with a public airport or public use airport. No private airstrips are located in the vicinity of the Project site. The MARB is located approximately 1.1 miles east of the Project site, but the Project site would not be exposed to aircraft noise greater than the 60 dBA CNEL, which is acceptable for business park uses according to the Riverside County General Plan.

Railroad Noise

Railroad Noise: Threshold (a) for the Building D Site and the Building E Site: No Impact. The Project does not involve the construction, operation, or use of any railroads. Thus, the Project would not expose people to excessive railroad noise.



Highway Noise

Highway Noise: Threshold (a) for the Building D Site and the Building E Site: Less-than-Significant Impact. I-215 is located approximately 2,112 feet from the Project site. According to the Riverside County General Plan, land uses that are greater than 1,228 feet and less than 2,645 from a freeway corridor would be subject to noise levels ranging from 55 dBA to 60 dBA. Industrial uses like those proposed on the Project site are considered *normally acceptable* at noise levels of 75 dBA CNEL according to the Riverside County General Plan. Thus, the Project would not expose people to excessive highway noise.

Other Noise

Other Noise: Threshold (a) for the Building D Site and the Building E Site: No Impact. The Project site does not contain any other aspects that would qualify as “other noise” that has not been addressed by other thresholds. Thus, the Project would not result in other noise.

Noise Effects on or by the Project

Noise Effects on or by the Project: Threshold (a), (b), and (c) for the Building D Site and the Building E Site: Significant Direct Impact (Short-Term) and Cumulatively Considerable Impact (Short-Term). Project-related construction activities, including blasting, would result in a direct short-term significant impact to noise-sensitive receivers. Also, in the event that construction activities occur on any properties surrounding the Project site simultaneously with Project-related construction activities, and that also would contribute construction noise to significantly impacted noise-sensitive receivers, a cumulative impact may occur and the Project’s construction-related noise contribution to the overall noise level in the Project study area would be cumulatively considerable. The Project’s contribution to off-site, transportation-related noise levels along several Oleander Avenue road-segments adjacent to and west of the Project site would result in a significant direct impact under Existing + Project and Year 2017 traffic conditions.

Noise Effects on or by the Project: Threshold (a), (b) and (c) for the Building D Site and the Building E Site: Less-than-Significant Impact (Long-Term). Project-related operational impacts would result in a less-than-significant impact to noise-sensitive receivers in the long term associated with on-site operational activities and off-site traffic-related noise. The Project’s contribution to roadway noise levels at adjacent land uses would result in a less-than-significant direct and cumulatively considerable impact under Year 2035 traffic conditions.

Threshold (d) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would not generate substantial noise or ground-borne vibration during short-term construction and blasting activities or long-term operational activities.



4.11.8 MITIGATION MEASURES

Applicable County Regulations and Design Requirements

The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- All construction activities shall comply with the County of Riverside Noise Ordinance (Chapter 9.52 of the County of Riverside Code of Ordinances). This requirement shall be noted on all grading and building plans and in bid documents issued to construction contractors.
- As a Riverside County condition of approval for blasting activities at the Project site, and prior to the issuance of grading permits, a blasting noise and vibration monitoring and abatement plan shall be submitted to and approved by the County of Riverside. The contractor shall be required to comply with the approved plan.
 - a) Pre-blasting inspections shall be offered to property owners within 200 feet of the blast site.
 - b) Existing damage of each structure shall be documented.
 - c) Post-blasting inspections shall be offered to assess any new or additional damage to each structure once blasting activities have ceased for those property owners who accepted pre-blast inspections.
 - d) Property owners within at least 200 feet of the blast site shall be notified via postings on the construction site at least 24 hours before the occurrence of major construction-related noise and vibration impacts (such as grading and rock blasting) which may affect them.
 - e) The County may impose conditions and procedures on the blasting operations as necessary. The construction contractor shall comply with these measures for the duration of the blasting permit. The County may inspect the blast site and materials at any reasonable time.

Mitigation Measures

The following mitigation measures would reduce noise levels produced by the Project's construction-related activities:

- MM 4.11-1 Prior to the issuance of grading permits and building permits that would authorize grading and construction activities on the Building D Site, the construction contractor



shall install a minimum 6-foot high temporary noise barrier along the southern boundary of the Building D Site. The temporary noise control barrier must present a solid face from top to bottom and must be a minimum of 6 feet high. The temporary noise control barrier shall comply with the following:

- a) The noise barrier may be constructed using an acoustical blanket (i.e., vinyl acoustic curtains or quilted blankets) attached to the construction site perimeter fence or equivalent temporary fence posts.
- b) The noise barriers must be maintained and any damage promptly repaired. Gaps, holes, or weaknesses in the barrier or openings between the barrier and the ground shall be promptly repaired.
- c) The noise control barriers and associated elements shall be completely removed and the site appropriately restored upon the conclusion of the construction activity.

MM 4.11-2 Prior to any issuance of grading and building permits, the County of Riverside shall review grading and building plans to ensure the following notes are included on the plans. Project contractors shall be required to comply with these notes and maintain written records of such compliance that can be inspected by the County of Riverside upon request.

- a) The construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards.
- b) The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the Project site.
- c) The construction contractor shall locate equipment staging in the north-central portions of the Project site (in the vicinity of the future Ellsworth Street / Oleander ~~Avenue Road~~ intersection) to maximize the distance between construction-related noise sources and noise-sensitive receivers nearest the Project site.
- d) The construction contractor shall limit haul truck deliveries to the same hours specified by the Riverside County Noise Ordinance for the operation of construction equipment (between the hours of 6:00 a.m. and 6:00 p.m., during the months of June through September, and 7:00 a.m. and 6:00 p.m., during the months of October through May).



- e) The contractor shall prepare a haul route exhibit and shall design delivery routes to minimize the exposure of sensitive land uses or residential dwellings to delivery truck-related noise.
- f) The contractor shall post a durable, legible, weather-proof sign that lists a phone number to report legitimate construction-related noise complaints to Riverside County or its enforcement designee. The contractor shall require that the sign be posted on the construction site visible from an adjacent public right-of-way during the duration of construction activities.

Although noise-generating construction activities are not anticipated to occur at night, Mitigation Measure MM 4.11-2(A) is recommended as a best practice measure to ensure that nighttime activities such as concrete pouring do not exceed 45 dBA Leq at the nearest noise-sensitive residential homes located south of the Project site (Wolfe, 2017).

MM 4.11-2(A) No construction activities and no construction-related night lighting shall occur within 600 feet of occupied sensitive receivers after 6:00 p.m. and before 6:00 a.m. during the months of June through September or before 7:00 a.m. during the months of October through May.

The following mitigation measures would reduce the Project's operational noise impacts to noise-sensitive receivers:

MM 4.11-3 Prior to building permit final inspection, the County of Riverside shall verify that a minimum 8-foot high solid noise barrier is constructed along the southwestern and southeastern corners of the Building D Site, adjacent to the truck yard/truck parking area.

MM 4.11-4 Prior to building permit final inspection, the County of Riverside shall review building plans to ensure that the following notes are included. Contractors shall be required to comply with these notes and maintain written records of such compliance that can be inspected by the County of Riverside upon request. Additionally, prior to building permit final inspection, the Project's property owner(s) shall provide documentation to the County of Riverside verifying that provisions are made in the builder's lease agreement that inform tenants of the following:

- a) All on-site operating equipment under the control of the building user that is used in outdoor areas (including but not limited to trucks, tractors, forklifts, and hostlers), shall be operated with properly functioning and well-maintained mufflers.



- b) Speed bumps are not allowed. Quality pavement conditions shall be maintained on the property that is free of vertical deflection (i.e. speed bumps) to minimize truck noise.

MM 4.11-5 Should any of the buildings accommodate a user that requires special noise generators, including but not limited to outdoor compressors, air scrubbers, emergency generators, large HVAC units, or outdoor amplification (speakers), prior to the issuance of a building permit or occupancy permit that would allow installation of the noise generator, an acoustical study shall be prepared to show that noise levels at noise sensitive receivers would not exceed the Riverside County Noise Ordinance operational noise standards for noise-sensitive receivers of 65 dBA nighttime and 45 dBA nighttime.

4.11.9 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Noise Effects on or by the Project

Threshold (a), (b), and (c): Less-than-Significant Short-Term Impact (Construction-Related Noise) and Significant and Unavoidable Short-Term Impact (Off-Site Traffic Noise). Mitigation Measures MM 4.11-1 and MM 4.11-2 will ensure that the Project would construct a temporary noise barrier adjacent to maximally exposed, nearby noise sensitive receptors and also employ noise-reducing construction techniques. As summarized in Table 4.11-21, *Mitigated Construction Equipment Noise Summary*, these mitigation measures would reduce the Project's construction-related noise to less-than-significant levels at nearby sensitive receivers by remaining below the 65 dBA Leq threshold

No feasible mitigation measures are available to reduce the Project's transportation-related noise impacts along the Oleander Avenue road segments west of Harvill Avenue and east of the Project's Driveway #6 under Existing + Project and Year 2017 conditions. The only way to reduce the impact would be to surround the front yards of the parcels adjacent to the affected Oleander Avenue road segments with a solid wall, which is not feasible because it would restrict access to these parcels. Furthermore, the noise levels along the affected segments of Oleander Avenue ~~Road~~ would not exceed 65 dBA CNEL during either the Existing + Project or the Year 2017 noise scenarios. The parcels adjacent to the affected Oleander Avenue road segments are designated by the Riverside County General Plan for "Business Park" land uses. Business Park land uses are not considered to be noise sensitive uses, and Riverside County considers noise levels 65 dBA or less to be acceptable for such uses. By the Year 2035, the Project's contribution of transportation-related noise along the above-listed segments of Oleander Avenue ~~Road~~ would be reduced to less-than-significant levels, as ambient traffic volumes increase along the roadway and the Project's overall percentage of the noise levels would diminish. Regardless, because the Project's greater than 5 dBA contribution of transportation-related noise along the Oleander Avenue road segments west of Harvill Avenue and east of the Project's Driveway #6 would exceed the significance thresholds under Existing + Project and Year 2017 conditions and no feasible mitigation is available to avoid the impact, the Project's short-term impact would be significant and unavoidable.



Table 4.11-1 24-Hour Ambient Noise Level Measurements

| Location ¹ | Distance To Project Site Boundary | Description | Hourly Noise Level (dBA Leq) ² | | CNEL |
|-----------------------|-----------------------------------|--|---|-----------|------|
| | | | Daytime | Nighttime | |
| L1 | 1,920' | Located at the northwest corner of Corson Avenue and Day Street near existing residential homes. | 56.4 | 45.2 | 58.4 |
| L2 | 1,770' | Located along Day Street south of Burch Street near existing residential homes. | 58.2 | 51.7 | 61.2 |
| L3 | 225' | Located southwest of the Project site along Nance Street adjacent to existing residential homes. | 56.1 | 42.9 | 57.6 |
| L4 | 0' | Located at the future southwest property line of Building D, adjacent to existing residential homes on Redwood Drive. | 55.9 | 44.6 | 56.8 |
| L5 | 1,074' | Located on Old Oleander Avenue, northeast of the Project site near an existing cell tower with electrical generators and residential home. | 63.0 | 58.2 | 66.5 |
| L6 | 1,285' | Located at the northwest corner of Markham Street and Decker Road near existing residential homes. | 63.7 | 60.6 | 68.2 |
| L7 | 1,282' | Located along Markham Street near existing residential homes, south of the Project site. | 69.5 | 66.3 | 73.9 |

¹ See Figure 4.11-1 for the noise measurement locations.

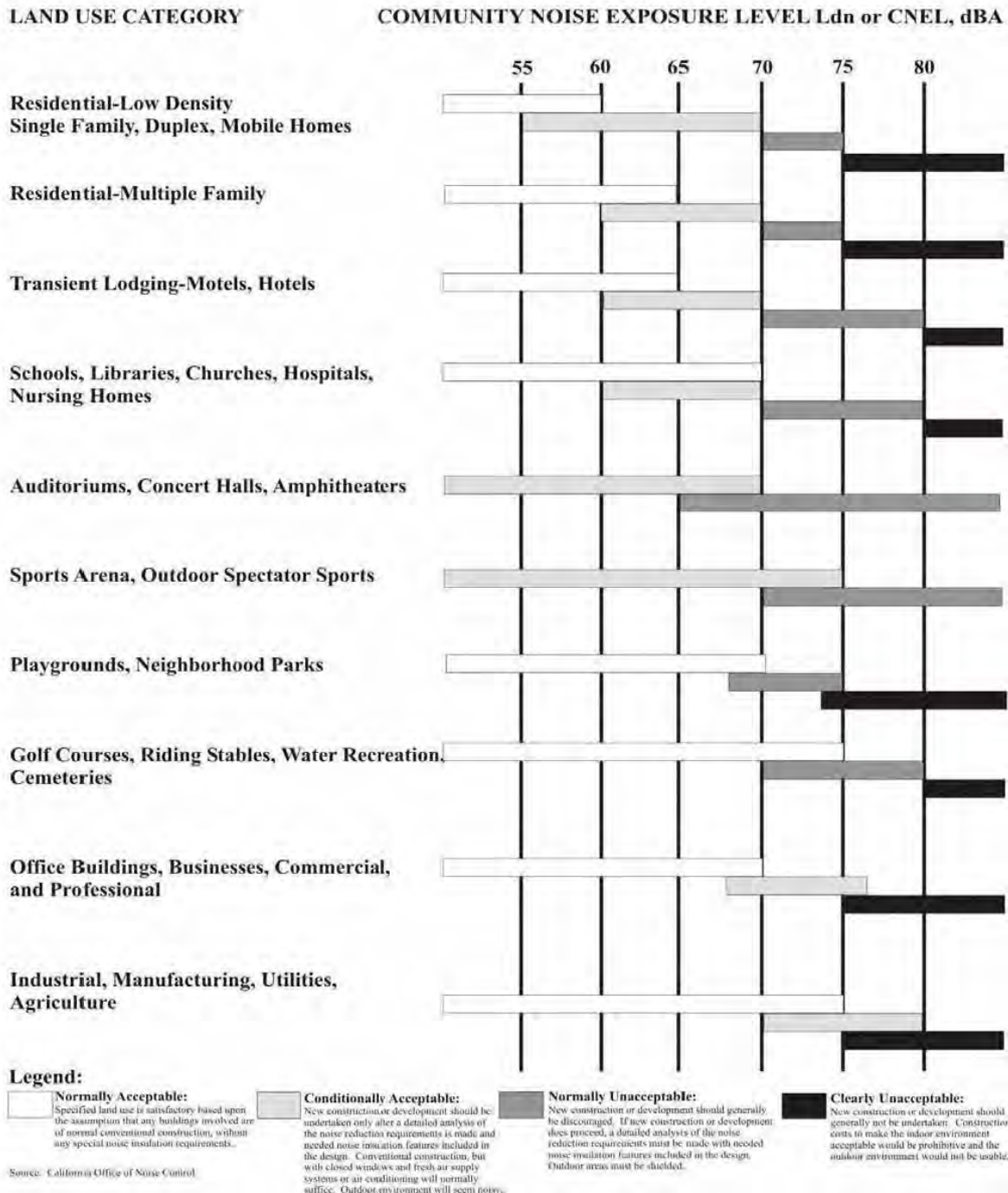
² Energy (logarithmic) average hourly levels. The long-term 24-hour measurements are included in Appendix 5.2 of *Technical Appendix I*.

“Daytime” = 7:00 a.m. to 10:00 p.m.; “Nighttime” = 10:00 p.m. to 7:00 a.m.

Source: (Urban Crossroads, Inc., 2017b, Table 5-1)



Table 4.11-2 Land Use Compatibility for Community Noise Exposure



Source: County of Riverside General Plan Element, Table N-1.
Source: (Urban Crossroads, Inc., 2015a, Exhibit 3-A)



Table 4.11-3 Operational Noise Standards

| Jurisdiction | Land Use | Time Period | Exterior Noise Level Standards (dBA Leq) ² |
|----------------------------------|-------------|------------------------------------|---|
| County of Riverside ¹ | Residential | Daytime (7:00 a.m. - 10:00 p.m.) | 65 |
| | | Nighttime (10:00 p.m. - 7:00 a.m.) | 45 |

¹Leq represents a steady state sound level containing the same total energy as a time varying signal over a given sample period.

Source: County of Riverside General Plan Noise Element, Table N-2.

Source: (Urban Crossroads, Inc., 2015a, Table 3-1)

Table 4.11-4 Significance of Noise Impacts at Noise Sensitive Receivers

| Without Project Noise Level | Potential Significant Impact |
|-----------------------------|------------------------------|
| < 60 dBA | 5 dBA or more |
| 60 - 65 dBA | 3 dBA or more |
| > 65 dBA | 1.5 dBA or more |

Source: Federal Interagency Committee on Noise (FICON), 1992

Source: (Urban Crossroads, Inc., 2017b, Table 4-1)



Table 4.11-5 Significance Criteria Summary

| Noise Analysis | Land Use | Condition(s) | Significance Criteria | |
|----------------|---------------------|--|---------------------------------|------------|
| | | | Daytime | Nighttime |
| Off-Site | Noise-Sensitive | if ambient is < 60 dBA CNEL | ≥ 5 dBA CNEL Project increase | |
| | | if ambient is 60 - 65 dBA CNEL | ≥ 3 dBA CNEL Project increase | |
| | | if ambient is > 65 dBA CNEL | ≥ 1.5 dBA CNEL Project increase | |
| | Non-Noise-Sensitive | if ambient is < 70 dBA CNEL | ≥ 5 dBA CNEL Project increase | |
| | | if ambient is > 70 dBA CNEL | ≥ 3 dBA CNEL Project increase | |
| Operational | Noise-Sensitive | Exterior residential land use | 65 dBA Leq | 45 dBA Leq |
| | | if ambient is < 60 dBA Leq | ≥ 5 dBA Leq Project increase | |
| | | if ambient is 60 - 65 dBA Leq | ≥ 3 dBA Leq Project increase | |
| | | if ambient is > 65 dBA Leq | ≥ 1.5 dBA Leq Project increase | |
| Construction | Noise-Sensitive | Permitted hours of 6:00 a.m. and 6:00 p.m., during the months of June through September, and 7:00 a.m. and 6:00 p.m., during the months of October through May | | |
| | | Noise level threshold | 65 dBA Leq | 45 dBA Leq |
| | | Vibration level threshold | 0.01 in/sec (RMS) | n/a |
| | | Blasting Noise Threshold | 129 dBA Lmax | n/a |
| | | Blasting Vibration Threshold | 3.0 in/sec (PPV) | n/a |

“Daytime: = 7:00 a.m. to 10:00 p.m.; “Nighttime” = 10:00 p.m. to 7:00 a.m.; “n/a” = No nighttime construction activity is permitted and therefore, no nighttime construction noise level is identified.

Source: (Urban Crossroads, Inc., 2017b, Table 4-2)



Table 4.11-6 Construction Reference Noise Levels

| ID | Noise Source | Reference Distance From Source (Feet) | Reference Noise Levels @ Reference Distance | | Reference Noise Levels @ 50 Feet ⁶ | |
|----|--|---------------------------------------|---|----------|---|----------|
| | | | dBA Leq | dBA Lmax | dBA Leq | dBA Lmax |
| 1 | Truck Pass-Bys & Dozer Activity ¹ | 30' | 63.6 | 68.1 | 59.2 | 63.7 |
| 2 | Dozer Activity ¹ | 30' | 68.6 | 76.4 | 64.2 | 72.0 |
| 3 | Construction Vehicle Maintenance Activities ² | 30' | 71.9 | 74.8 | 67.5 | 70.4 |
| 4 | Foundation Trenching ² | 30' | 72.6 | 74.9 | 68.2 | 70.5 |
| 5 | Rough Grading Activities ² | 30' | 77.9 | 84.8 | 73.5 | 80.4 |
| 6 | Residential Framing ³ | 30' | 66.7 | 76.7 | 62.3 | 72.3 |
| 7 | Water Truck Pass-By & Backup Alarm ⁴ | 30' | 76.3 | 82.3 | 71.9 | 77.9 |
| 8 | Dozer Pass-By ⁴ | 30' | 84.0 | 89.9 | 79.6 | 85.5 |
| 9 | Two Scrapers & Water Truck Pass-By ⁴ | 30' | 83.4 | 89.0 | 79.0 | 84.6 |
| 10 | Two Scrapers Pass-By ⁴ | 30' | 83.7 | 86.9 | 79.3 | 82.5 |
| 11 | Scraper, Water Truck, & Dozer Activity ⁴ | 30' | 79.7 | 87.7 | 75.3 | 83.3 |
| 12 | Concrete Mixer Truck Movements ⁵ | 50' | 71.2 | 73.1 | 71.2 | 73.1 |
| 13 | Concrete Paver Activities ⁵ | 30' | 70.0 | 75.7 | 65.6 | 71.3 |
| 14 | Concrete Mixer Pour & Paving Activities ⁵ | 30' | 70.3 | 76.3 | 65.9 | 71.9 |
| 15 | Concrete Mixer Backup Alarms & Air Brakes ⁵ | 50' | 71.6 | 78.8 | 71.6 | 78.8 |
| 16 | Concrete Mixer Pour Activities ⁵ | 50' | 67.7 | 79.2 | 67.7 | 79.2 |

¹ As measured by Urban Crossroads, Inc. on 10/14/15 at a business park construction site located at the northwest corner of Barranca Parkway and Alton Parkway in the City of Irvine.

² As measured by Urban Crossroads, Inc. on 10/20/15 at a construction site located in Rancho Mission Viejo.

³ As measured by Urban Crossroads, Inc. on 10/30/15 during grading operations within an industrial construction site located in the City of Ontario.

⁴ Reference noise level measurements were collected from a nighttime concrete pour at an industrial construction site, located at 27334 San Bernardino Avenue in the City of Redlands, between 1:00 a.m. and 2:00 a.m. on 7/1/15.

⁵ Reference noise levels are calculated at 50 feet using a drop off rate of 6 dBA per doubling of distance (point source).

(Urban Crossroads, Inc., 2017b, Table 10-1)

Table 4.11-7 Blasting Reference Noise Levels

| Reference Construction Activity ¹ | Reference Noise Level @ 370 Feet (dBA Lmax) |
|--|---|
| Blasting | 81.5 |
| Peak Reference Noise Level at 370 Feet: | 81.5 |

¹ As measured by Urban Crossroads, Inc. on March 15, 2016 at a construction site in Chatsworth, CA. (Urban Crossroads, Inc., 2017b, Table 10-12)



Table 4.11-8 Off-Site Roadway Parameters

| ID | Roadway | Segment | Adjacent Planned Land Use ¹ | Distance from Centerline to Nearest Adjacent Land Use (Feet) ² | Posted Vehicle Speed (MPH) |
|----|-----------------|------------------------|--|---|----------------------------|
| 1 | Harvill Av. | s/o Harley Knox Bl. | Business Park | 59' | 50 |
| 2 | Harvill Av. | n/o Oleander Av. | Business Park | 59' | 50 |
| 3 | Harvill Av. | s/o Oleander Av. | Business Park | 59' | 50 |
| 4 | I-215 SB Fwy | n/o Harley Knox Bl. | Light Industrial | 85' | 65 |
| 5 | I-215 SB Fwy | s/o Harley Knox Bl. | Light Industrial | 85' | 65 |
| 6 | I-215 NB Fwy | n/o Harley Knox Bl. | Light Industrial | 85' | 65 |
| 7 | I-215 NB Fwy | s/o Harley Knox Bl. | Light Industrial | 85' | 65 |
| 8 | Harley Knox Bl. | e/o Harvill Av. | Business Park | 76' | 45 |
| 9 | Harley Knox Bl. | e/o I-215 SB Fwy Ramps | Light Industrial | 76' | 45 |
| 10 | Harley Knox Bl. | e/o I-215 NB Fwy Ramps | Light Industrial | 76' | 45 |
| 11 | Oleander Av. | e/o Driveway 6 | Business Park | 50' | 40 |
| 12 | Oleander Av. | w/o Harvill Av. | Business Park | 50' | 40 |

¹ Source: County of Riverside General Plan, Mead Valley Area Plan Land Use Plan, Figure 3.

² Distance to adjacent land use is based upon the right-of-way distances for each functional roadway classification provided in the General Plan Circulation Elements.

Source: (Urban Crossroads, Inc., 2017b, Table 6-1)

Table 4.11-9 Vibration Source Levels for Construction Equipment

| Equipment | PPV (in/sec) at 25 feet |
|-----------------|-------------------------|
| Small bulldozer | 0.003 |
| Jackhammer | 0.035 |
| Loaded Trucks | 0.076 |
| Large bulldozer | 0.089 |

Source: FTA, Transit Noise and Vibration Impact Assessment, May 2006.

Source: (Urban Crossroads, Inc., 2017b, Table 6-7)



Table 4.11-10 Unmitigated Construction Equipment Noise Levels

| Noise Receiver ¹ | Distance to Const. Activity (Feet) | Construction Phase Hourly Noise Level (dBA Leq) | | | | | | | |
|-----------------------------|------------------------------------|---|---------|-----------|-----------------|-----------|--------|-------|-------------------|
| | | Demo. | Grading | Utilities | Building Const. | Landscape | Paving | Arch. | Peak ² |
| R1 | 1,992' | 47.6 | 47.6 | 47.6 | 47.6 | 47.6 | 39.6 | 36.2 | 47.6 |
| R2 | 1,141' | 52.4 | 52.4 | 52.4 | 52.4 | 52.4 | 44.4 | 41.0 | 52.4 |
| R3 | 1,044' | 53.2 | 53.2 | 53.2 | 53.2 | 53.2 | 45.2 | 41.8 | 53.2 |
| R4 | 631' | 57.5 | 57.5 | 57.5 | 57.5 | 57.5 | 49.6 | 46.1 | 57.5 |
| R5 | 780' | 55.7 | 55.7 | 55.7 | 55.7 | 55.7 | 47.7 | 44.3 | 55.7 |
| R6 | 191' | 67.9 | 67.9 | 67.9 | 67.9 | 67.9 | 60.0 | 56.5 | 67.9 |
| R7 | 814' | 55.3 | 55.3 | 55.3 | 55.3 | 55.3 | 47.4 | 43.9 | 55.3 |
| R8 | 1,163' | 52.2 | 52.2 | 52.2 | 52.2 | 52.2 | 44.3 | 40.8 | 52.2 |

¹ Noise receiver locations are shown on Figure 4.11-2.

² Estimated construction noise levels during peak operating conditions.

Source: (Urban Crossroads, Inc., 2017b, Table 10-9)



Table 4.11-11 Blasting Noise Levels

| Reference Construction Activity ¹ | Reference Noise Level @ 370 Feet (dBA Lmax) |
|--|---|
| Blasting | 81.5 |
| Peak Reference Noise Level at 370 Feet: | |
| | 81.5 |

| Receiver Location | Distance To Property Line Activity (Feet) ² | Distance Attenuation (dBA) ³ | Calculated Noise Barrier Attenuation (dBA) ⁴ | Blasting Noise Level (dBA Lmax) |
|-------------------|--|---|---|---------------------------------|
| R6 | 191' | 5.7 | -6.7 | 80.5 |

¹ As measured by Urban Crossroads, Inc. on March 15, 2016 at a construction site in Chatsworth, CA.

² Distance from the nearest point of construction activity to the nearest receiver.

³ Point (stationary) source drop off rate of 6.0 dBA per doubling of distance.

⁴ Calculated barrier attenuation from existing barriers in the Project study area (refer to Appendix 10.2 of *Technical Appendix I*).

Source: (Urban Crossroads, Inc., 2017b, Table 10-12)

Table 4.11-12 Operational Noise Level Projections (dBA Leq)

| Receiver Location ¹ | Project Noise (dBA Leq) ² | Distance From Source To Receiver (Feet) ³ | Attenuation (dBA Leq) | | Noise Level At Receiver Locations (dBA Leq) ⁶ |
|--------------------------------|--------------------------------------|--|-----------------------|---|--|
| | | | Distance ⁴ | Recommended Noise Barriers ⁵ | |
| R1 | 67.2 | 2,598' | -38.8 | 0.0 | 28.4 |
| R2 | 67.2 | 1,685' | -35.0 | 0.0 | 32.2 |
| R3 | 67.2 | 1,577' | -34.4 | 0.0 | 32.8 |
| R4 | 67.2 | 1,164' | -31.8 | 0.0 | 35.4 |
| R5 | 67.2 | 881' | -29.4 | 0.0 | 37.8 |
| R6 | 67.2 | 276' | -19.3 | -11.0 | 36.9 |
| R7 | 67.2 | 998' | -30.4 | 0.0 | 36.8 |
| R8 | 67.2 | 1,310' | -32.8 | 0.0 | 34.4 |

¹ Refer to Figure 4.11-2 for the noise receiver and noise source locations.

² Worst-case Project-only reference noise level.

³ Estimated distances to nearest loading dock activities.

⁴ Noise levels diminish at a rate of 6 dBA per doubling of distance and a reference distance of 30 feet.

⁵ Calculated noise attenuation provided by the recommended barriers.

⁶ Estimated Project stationary source noise levels.

Source: (Urban Crossroads, Inc., 2017b, Table 9-2)



Table 4.11-13 Operational Noise Level Compliance (dBA Leq)

| Receiver Location ¹ | Noise Level At Receiver Locations (dBA Leq) ² | Noise Level Standard (dBA Leq) ³ | | Compliance ⁴ | |
|--------------------------------|--|---|-----------|-------------------------|-----------|
| | | Daytime | Nighttime | Daytime | Nighttime |
| R1 | 28.4 | 65 | 45 | Yes | Yes |
| R2 | 32.2 | 65 | 45 | Yes | Yes |
| R3 | 32.8 | 65 | 45 | Yes | Yes |
| R4 | 35.4 | 65 | 45 | Yes | Yes |
| R5 | 37.8 | 65 | 45 | Yes | Yes |
| R6 | 36.9 | 65 | 45 | Yes | Yes |
| R7 | 36.8 | 65 | 45 | Yes | Yes |
| R8 | 34.4 | 65 | 45 | Yes | Yes |

¹ Refer to Figure 4.11-2 for the noise receiver and noise source locations.

² Estimated Project stationary source noise levels as shown on Table 4.11-12.

³ Noise standards as shown on Table 4.11-3.

⁴ Do the estimated Project stationary source noise levels meet the noise standards on the affected land uses?

“Daytime” = 7:00 a.m. to 10:00 p.m.; “Nighttime” = 10:00 p.m. to 7:00 a.m.

Source: (Urban Crossroads, Inc., 2017b, Table 9-3)



Table 4.11-14 Existing Condition Off-Site Project-Related Traffic Noise Impacts

| ID | Road | Segment | Adjacent Planned Land Use ¹ | CNEL at Adjacent Land Use (dBA) ² | | | Potential Significant Impact at Receivers ³ | |
|----|-----------------|------------------------|--|--|--------------|------------------|--|---------------------|
| | | | | No Project | With Project | Project Addition | Noise-Sensitive | Non Noise-Sensitive |
| 1 | Harvill Av. | s/o Harley Knox Bl. | Business Park | 65.9 | 68.5 | 2.6 | No | No |
| 2 | Harvill Av. | n/o Oleander Av. | Business Park | 65.6 | 68.4 | 2.8 | No | No |
| 3 | Harvill Av. | s/o Oleander Av. | Business Park | 65.5 | 65.7 | 0.2 | No | No |
| 4 | I-215 SB Fwy | n/o Harley Knox Bl. | Light Industrial | 74.3 | 74.3 | 0.0 | No | No |
| 5 | I-215 SB Fwy | s/o Harley Knox Bl. | Light Industrial | 73.8 | 74.0 | 0.2 | No | No |
| 6 | I-215 NB Fwy | n/o Harley Knox Bl. | Light Industrial | 73.6 | 74.2 | 0.6 | No | No |
| 7 | I-215 NB Fwy | s/o Harley Knox Bl. | Light Industrial | 72.9 | 72.9 | 0.0 | No | No |
| 8 | Harley Knox Bl. | e/o Harvill Av. | Business Park | 65.1 | 67.8 | 2.7 | No | No |
| 9 | Harley Knox Bl. | e/o I-215 SB Fwy Ramps | Light Industrial | 66.0 | 67.9 | 1.9 | No | No |
| 10 | Harley Knox Bl. | e/o I-215 NB Fwy Ramps | Light Industrial | 67.1 | 67.2 | 0.1 | No | No |
| 11 | Oleander Av. | e/o Driveway 6 | Business Park | 44.1 | 63.8 | 19.7 | No | Yes |
| 12 | Oleander Av. | w/o Harvill Av. | Business Park | 51.0 | 64.0 | 13.0 | No | Yes |

¹ Sources: County of Riverside General Plan, Mead Valley Area Plan Land Use Plan, Figure 3.

² The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the nearest adjacent land use.

³ Based on Significance Criteria.

Source: (Urban Crossroads, Inc., 2017b, Table 7-7)



Table 4.11-15 Year 2017 Off-Site Project-Related Noise Impacts

| ID | Road | Segment | Adjacent Planned Land Use ¹ | CNEL at Adjacent Land Use (dBA) ² | | | Potential Significant Impact at Receivers ³ | |
|----|-----------------|------------------------|--|--|--------------|------------------|--|---------------------|
| | | | | No Project | With Project | Project Addition | Noise-Sensitive | Non Noise-Sensitive |
| 1 | Harvill Av. | s/o Harley Knox Bl. | Business Park | 66.8 | 69.0 | 2.2 | No | No |
| 2 | Harvill Av. | n/o Oleander Av. | Business Park | 66.7 | 69.0 | 2.3 | No | No |
| 3 | Harvill Av. | s/o Oleander Av. | Business Park | 66.4 | 66.6 | 0.2 | No | No |
| 4 | I-215 SB Fwy | n/o Harley Knox Bl. | Light Industrial | 75.5 | 75.5 | 0.0 | No | No |
| 5 | I-215 SB Fwy | s/o Harley Knox Bl. | Light Industrial | 75.2 | 75.4 | 0.2 | No | No |
| 6 | I-215 NB Fwy | n/o Harley Knox Bl. | Light Industrial | 75.0 | 75.4 | 0.4 | No | No |
| 7 | I-215 NB Fwy | s/o Harley Knox Bl. | Light Industrial | 73.9 | 73.9 | 0.0 | No | No |
| 8 | Harley Knox Bl. | e/o Harvill Av. | Business Park | 66.1 | 68.4 | 2.3 | No | No |
| 9 | Harley Knox Bl. | e/o I-215 SB Fwy Ramps | Light Industrial | 68.6 | 69.7 | 1.1 | No | No |
| 10 | Harley Knox Bl. | e/o I-215 NB Fwy Ramps | Light Industrial | 70.1 | 70.2 | 0.1 | No | No |
| 11 | Oleander Av. | e/o Driveway 6 | Business Park | 44.1 | 63.8 | 19.7 | No | Yes |
| 12 | Oleander Av. | w/o Harvill Av. | Business Park | 51.0 | 64.0 | 13.0 | No | Yes |

¹ Sources: County of Riverside General Plan, Mead Valley Area Plan Land Use Plan, Figure 3.

² The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the nearest adjacent land use.

³ Based on Significance Criteria.

Source: (Urban Crossroads, Inc., 2017b, Table 7-8)



Table 4.11-16 Year 2035 Off-Site Project-Related Traffic Noise Impacts

| ID | Road | Segment | Adjacent Planned Land Use ¹ | CNEL at Adjacent Land Use (dBA) ² | | | Potential Significant Impact at Receivers ³ | |
|----|-----------------|------------------------|--|--|--------------|------------------|--|---------------------|
| | | | | No Project | With Project | Project Addition | Noise-Sensitive | Non Noise-Sensitive |
| 1 | Harvill Av. | s/o Harley Knox Bl. | Business Park | 69.7 | 71.0 | 1.3 | No | No |
| 2 | Harvill Av. | n/o Oleander Av. | Business Park | 69.7 | 71.0 | 1.3 | No | No |
| 3 | Harvill Av. | s/o Oleander Av. | Business Park | 70.6 | 70.7 | 0.1 | No | No |
| 4 | I-215 SB Fwy | n/o Harley Knox Bl. | Light Industrial | 76.8 | 76.8 | 0.0 | No | No |
| 5 | I-215 SB Fwy | s/o Harley Knox Bl. | Light Industrial | 76.4 | 76.5 | 0.1 | No | No |
| 6 | I-215 NB Fwy | n/o Harley Knox Bl. | Light Industrial | 76.9 | 77.2 | 0.3 | No | No |
| 7 | I-215 NB Fwy | s/o Harley Knox Bl. | Light Industrial | 75.7 | 75.7 | 0.0 | No | No |
| 8 | Harley Knox Bl. | e/o Harvill Av. | Business Park | 70.5 | 71.5 | 1.0 | No | No |
| 9 | Harley Knox Bl. | e/o I-215 SB Fwy Ramps | Light Industrial | 69.6 | 70.6 | 1.0 | No | No |
| 10 | Harley Knox Bl. | e/o I-215 NB Fwy Ramps | Light Industrial | 70.8 | 70.8 | 0.0 | No | No |
| 11 | Oleander Av. | e/o Driveway 6 | Business Park | 62.3 | 66.1 | 3.8 | No | No |
| 12 | Oleander Av. | w/o Harvill Av. | Business Park | 62.3 | 66.1 | 3.8 | No | No |

¹ Sources: County of Riverside General Plan, Mead Valley Area Plan Land Use Plan, Figure 3.

² The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the nearest adjacent land use.

³ Based on Significance Criteria

Source: (Urban Crossroads, Inc., 2017b, Table 7-9)



Table 4.11-17 Construction Equipment Vibration Levels

| Noise Receiver ¹ | Distance to Construction (Feet) | Receiver PPV Levels (in/sec) ² | | | | | RMS Velocity Levels (in/sec) ³ | Potential Significant Impact? ⁴ |
|-----------------------------|---------------------------------|---|-------------|---------------|-----------------|----------------|---|--|
| | | Small Bulldozer | Jack-hammer | Loaded Trucks | Large Bulldozer | Peak Vibration | | |
| R1 | 1,485' | 0.0000 | 0.0001 | 0.0002 | 0.0002 | 0.000 | 0.000 | No |
| R2 | 537' | 0.0000 | 0.0004 | 0.0008 | 0.0009 | 0.001 | 0.001 | No |
| R3 | 612' | 0.0000 | 0.0003 | 0.0006 | 0.0007 | 0.001 | 0.001 | No |
| R4 | 418' | 0.0000 | 0.0005 | 0.0011 | 0.0013 | 0.001 | 0.001 | No |
| R5 | 780' | 0.0000 | 0.0002 | 0.0004 | 0.0005 | 0.001 | 0.000 | No |
| R6 | 191' | 0.0001 | 0.0017 | 0.0036 | 0.0042 | 0.004 | 0.003 | No |
| R7 | 814' | 0.0000 | 0.0002 | 0.0004 | 0.0005 | 0.000 | 0.000 | No |
| R8 | 1,163' | 0.0000 | 0.0001 | 0.0002 | 0.0003 | 0.000 | 0.000 | No |

¹ Receiver locations are shown on Figure 4.11-2.

² Based on the vibration source levels of construction equipment included in Table 4.11-9.

³ Vibration levels in PPV are converted to RMS velocity using a 0.71 conversion factor identified in the *Caltrans Transportation and Vibration Guidance Manual*, September 2013.

⁴ Does the peak vibration exceed the County of Riverside maximum acceptable vibration standard of 0.01 in/sec.? *Source:* (Urban Crossroads, Inc., 2017b, Table 10-11)



Table 4.11-18 Cumulative Daytime Noise Level Contributions (dBA Leq)

| Receiver Location ¹ | Existing Ambient Measurements (dBA Leq) ² | | Cumulative Dev. Only Noise Level ³ | Cumulative Plus Existing Noise Levels (dBA Leq) ⁴ | | Potentially Significant Impact? ⁵ | Project Only Operational Noise Level ⁶ | Combined Existing Plus Project Noise Levels (dBA Leq) ⁷ | | Potentially Significant Impact? ⁵ | Cumulative Plus Project Plus Existing Noise Levels (dBA Leq) ⁸ | | | Potentially Significant Impact? ⁵ |
|--------------------------------|--|-------------|---|--|------------------------|--|---|--|------------------------|--|---|------------------------|----------------------|--|
| | Meas. Location | Noise Level | | Logarithmic Sum | Increase Over Existing | | | Logarithmic Sum | Increase Over Existing | | Logarithmic Sum | Increase Over Existing | Project Contribution | |
| R1 | L1 | 56.4 | 52.3 | 57.8 | 1.4 | No | 28.4 | 56.4 | 0.0 | No | 57.8 | 1.4 | 0.0 | No |
| R2 | L2 | 58.2 | 35.0 | 58.2 | 0.0 | No | 32.2 | 58.2 | 0.0 | No | 58.2 | 0.0 | 0.0 | No |
| R3 | L3 | 56.1 | 54.3 | 58.3 | 2.2 | No | 32.8 | 56.1 | 0.0 | No | 58.3 | 2.2 | 0.0 | No |
| R4 | L3 | 56.1 | 56.5 | 59.3 | 3.2 | No | 35.4 | 56.1 | 0.0 | No | 59.3 | 3.2 | 0.0 | No |
| R5 | L4 | 55.9 | 49.9 | 56.9 | 1.0 | No | 37.8 | 56.0 | 0.1 | No | 56.9 | 1.0 | 0.1 | No |
| R6 | L4 | 55.9 | 36.2 | 55.9 | 0.0 | No | 36.9 | 56.0 | 0.1 | No | 56.0 | 0.1 | 0.1 | No |
| R7 | L7 | 69.5 | 60.2 | 70.0 | 0.5 | No | 36.8 | 69.5 | 0.0 | No | 70.0 | 0.5 | 0.0 | No |
| R8 | L5 | 63.0 | 50.1 | 63.2 | 0.2 | No | 34.4 | 63.0 | 0.0 | No | 63.2 | 0.2 | 0.0 | No |

¹ Refer to Figure 4.11-2 for the noise receiver locations.

² Existing noise level measurement locations are shown on Figure 4.11-1 and the noise levels are shown on Table 4.11-1.

³ Cumulative development operational noise levels at each receiver location.

⁴ Represents the combined existing ambient conditions plus the cumulative development activities.

⁵ Does the noise level increase exceed the significance criteria?

⁶ Total Project operational noise levels as shown on Table 4.11-12.

⁷ Represents the combined existing ambient conditions plus the Project activities, and the noise level increase expected with the addition of the proposed Project activities.

⁸ Represents the combined ambient conditions plus the Project activities plus the cumulative development activities.

Source: (Urban Crossroads, Inc., 2017b, Table 9-6)



Table 4.11-19 Cumulative Nighttime Noise Level Contributions (dBA Leq)

| Receiver Location ¹ | Existing Ambient Measurements (dBA Leq) ² | | Cumulative Dev. Only Noise Level ³ | Cumulative Plus Existing Noise Levels (dBA Leq) ⁴ | | Potentially Significant Impact? ⁵ | Project Only Operational Noise Level ⁶ | Combined Existing Plus Project Noise Levels (dBA Leq) ⁷ | | Potentially Significant Impact? ⁵ | Cumulative Plus Project Plus Existing Noise Levels (dBA Leq) ⁸ | | | Potentially Significant Impact? ⁵ |
|--------------------------------|--|-------------|---|--|------------------------|--|---|--|------------------------|--|---|------------------------|----------------------|--|
| | Meas. Location | Noise Level | | Logarithmic Sum | Increase Over Existing | | | Logarithmic Sum | Increase Over Existing | | Logarithmic Sum | Increase Over Existing | Project Contribution | |
| R1 | L1 | 45.2 | 52.3 | 53.0 | 7.8 | Yes | 28.4 | 45.3 | 0.1 | No | 53.1 | 7.9 | 0.0 | No |
| R2 | L2 | 51.7 | 35.0 | 51.8 | 0.1 | No | 32.2 | 51.7 | 0.0 | No | 51.8 | 0.1 | 0.0 | No |
| R3 | L3 | 42.9 | 54.3 | 54.6 | 11.7 | Yes | 32.8 | 43.3 | 0.4 | No | 54.7 | 11.8 | 0.0 | No |
| R4 | L3 | 42.9 | 56.5 | 56.7 | 13.8 | Yes | 35.4 | 43.6 | 0.7 | No | 56.7 | 13.8 | 0.0 | No |
| R5 | L4 | 44.6 | 49.9 | 51.0 | 6.4 | Yes | 37.8 | 45.4 | 0.8 | No | 51.2 | 6.6 | 0.2 | No |
| R6 | L4 | 44.6 | 36.2 | 45.2 | 0.6 | No | 36.9 | 45.3 | 0.7 | No | 45.8 | 1.2 | 0.6 | No |
| R7 | L7 | 66.3 | 60.2 | 67.3 | 1.0 | No | 36.8 | 66.3 | 0.0 | No | 67.3 | 1.0 | 0.0 | No |
| R8 | L5 | 58.2 | 50.1 | 58.8 | 0.6 | No | 34.4 | 58.2 | 0.0 | No | 58.8 | 0.6 | 0.0 | No |

¹ Refer to Figure 4.11-2 for the noise receiver locations.

² Existing noise level measurement locations are shown on Figure 4.11-1 and the noise levels are shown on Table 4.11-1.

³ Cumulative development operational noise levels at each receiver location.

⁴ Represents the combined existing ambient conditions plus the cumulative development activities.

⁵ Does the noise level increase exceed the significance criteria?

⁶ Total Project operational noise levels as shown on Table 4.11-12.

⁷ Represents the combined existing ambient conditions plus the Project activities, and the noise level increase expected with the addition of the proposed Project activities.

⁸ Represents the combined ambient conditions plus the Project activities plus the cumulative development activities.

Source: (Urban Crossroads, Inc., 2017b, Table 9-7)



Table 4.11-20 Year 2035 Off-Site Cumulative Traffic Noise Impacts (dBA Leq)

| ID | Road | Segment | Adjacent Planned Land Use ¹ | CNEL at Adjacent Land Use ² | | Cumulative | | Noise Level Increases | | Project-Related | |
|----|-----------------|------------------------|--|--|---------------------------------------|-------------------------------------|--------------------------------|---------------------------------------|--------------------------------------|--------------------------------------|--|
| | | | | Existing Without Project (Table 7-1) | Year 2035 Without Project (Table 7-5) | Increase From Existing ³ | Potential Impact? ⁴ | Year 2035 Project-Related (Table 7-9) | Project Plus Cumulative ⁵ | Cumulative Contribution ⁶ | Cumulatively Considerable Impact? ⁷ |
| 1 | Harvill Av. | s/o Harley Knox Bl. | Business Park | 65.9 | 69.7 | 3.8 | No | 1.3 | 5.7 | 1.9 | No |
| 2 | Harvill Av. | n/o Oleander Av. | Business Park | 65.6 | 69.7 | 4.1 | No | 1.3 | 5.9 | 1.8 | No |
| 3 | Harvill Av. | s/o Oleander Av. | Business Park | 65.5 | 70.6 | 5.1 | Yes | 0.1 | 6.3 | 1.2 | No |
| 4 | I-215 SB Fwy | n/o Harley Knox Bl. | Light Industrial | 74.3 | 76.8 | 2.5 | No | 0.0 | 4.4 | 1.9 | No |
| 5 | I-215 SB Fwy | s/o Harley Knox Bl. | Light Industrial | 73.8 | 76.4 | 2.6 | No | 0.1 | 4.5 | 1.9 | No |
| 6 | I-215 NB Fwy | n/o Harley Knox Bl. | Light Industrial | 73.6 | 76.9 | 3.3 | Yes | 0.3 | 5.1 | 1.8 | No |
| 7 | I-215 NB Fwy | s/o Harley Knox Bl. | Light Industrial | 72.9 | 75.7 | 2.8 | No | 0.0 | 4.6 | 1.8 | No |
| 8 | Harley Knox Bl. | e/o Harvill Av. | Business Park | 65.1 | 70.5 | 5.4 | Yes | 1.0 | 6.7 | 1.3 | No |
| 9 | Harley Knox Bl. | e/o I-215 SB Fwy Ramps | Light Industrial | 66.0 | 69.6 | 3.6 | No | 1.0 | 5.5 | 1.9 | No |
| 10 | Harley Knox Bl. | e/o I-215 NB Fwy Ramps | Light Industrial | 67.1 | 70.8 | 3.7 | No | 0.0 | 5.2 | 1.5 | No |
| 11 | Oleander Av. | e/o Driveway 6 | Business Park | 44.1 | 62.3 | 18.2 | Yes | 3.8 | 18.4 | 0.2 | No |
| 12 | Oleander Av. | w/o Harvill Av. | Business Park | 51.0 | 62.3 | 11.3 | Yes | 3.8 | 12.0 | 0.7 | No |

¹ Sources: County of Riverside General Plan, Mead Valley Area Plan Land Use Plan, Figure 3.

² The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the nearest adjacent land use.

³ Increase from Existing without Project to Year 2035 without Project conditions.

⁴ Does the cumulative increase without the Project exceed the 3 dBA significance criteria for non-noise-sensitive land uses?

⁵ Combined cumulative and Project Year 2035 noise level increases.

⁶ Total Project contribution to the cumulative noise level increase.

⁷ Does the Project-related contribution to the cumulative noise level increase exceed the 3 dBA significance criteria for non-noise-sensitive land uses?

Source: (Urban Crossroads, Inc., 2017b, Table 7-10)



Table 4.11-21 Mitigated Construction Equipment Noise Summary

| Receiver Location ¹ | Const. Noise Levels (dBA Leq) | | | With Temporary Noise Barriers | | |
|--------------------------------|--------------------------------------|----------------------------------|----------------------------------|-------------------------------|--|----------------------------------|
| | Peak Activity (dBA Leq) ² | Threshold (dBA Leq) ³ | Threshold Exceeded? ⁴ | Attenuation (dBA Leq) | Construction Noise Levels (dBA Leq) ⁵ | Threshold Exceeded? ⁴ |
| R1 | 47.6 | 65 | No | 0 | 47.6 | No |
| R2 | 52.4 | 65 | No | 0 | 52.4 | No |
| R3 | 53.2 | 65 | No | 0 | 53.2 | No |
| R4 | 57.5 | 65 | No | 0 | 57.5 | No |
| R5 | 55.7 | 65 | No | 0 | 55.7 | No |
| R6 | 67.9 | 65 | Yes | -6.7 | 61.2 | No |
| R7 | 55.3 | 65 | No | 0 | 55.3 | No |
| R8 | 52.2 | 65 | No | 0 | 52.2 | No |

¹ Refer to Figure 4.11-2 for noise receiver locations.

² Estimated construction noise levels during peak operating conditions, as shown on Table 4.11-10.

³ Source: County of Riverside General Plan Noise Element, Table N-2.

⁴ Do the estimated Project construction noise levels meet the County of Riverside noise standards at the sensitive receiver locations?

⁵ Peak construction noise levels with the minimum 6-foot high temporary construction noise barrier.

Temporary barrier attenuation calculations are provided in Appendix 10.2 of *Technical Appendix I*.

Source: (Urban Crossroads, Inc., 2017b, Table 10-10)



Figure 4.11-1



NOT TO SCALE



NOISE MEASUREMENT LOCATIONS



Figure 4.11-2



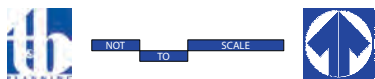
NOT TO SCALE



NOISE RECEIVER LOCATIONS



Figure 4.11-3



OPERATIONAL NOISE SOURCE LOCATIONS



4.12 POPULATION AND HOUSING

This subsection discloses existing population and housing data for western Riverside County and assesses the potential for impacts on population and housing associated with implementation of the Project. At the time the Notice of Preparation (NOP) for this EIR was issued (August 2015), the County of Riverside 2003 General Plan was in effect and the County was in the process of updating its General Plan. The County approved the General Plan Update in December 2015. Because the information pertaining to population and housing was more up-to-date in the General Plan Update, as well as the *County of Riverside General Plan Housing Element 2013-2021*, as compared to the 2003 General Plan, the information in those more recent documents is cited herein. (Riverside County, 2015c) Population projections in this Subsection are based on forecasts from the Southern California Association of Governments (SCAG), Western Riverside Council of Governments (WRCOG), and the County of Riverside General Plan Housing Element 2013-2021.

4.12.1 EXISTING CONDITIONS

The Project site consists mostly of vacant, undeveloped land, with exception of the southwestern portion of the Building D Site which contains a mobile home, outbuildings, and a concrete pad that is used for the storage of construction equipment. As depicted previously on Figure 2-1, *Surrounding Land Uses and Development*, lands north of the Project site are largely undeveloped, with exception of a recently-constructed industrial warehouse building located north of Oleander Road and east of Harvill Avenue. To the south of the Project site are scattered, rural residences and business ventures, and undeveloped land. Near the southwest corner of the Project site is a water tank owned by the Eastern Municipal Water District (EMWD). To the west of the Project site are undeveloped lands, beyond which are single family homes. To the east of the Project site are undeveloped lands, several scattered single family residences and an industrial warehouse building located along the eastern edge of Harvill Avenue. Approximately 0.4 miles to the east is I-215, beyond which are the March Air Reserve Base (MARB) and an area of the City of Moreno Valley mostly developed with industrial warehouse buildings.

A. Regional Growth

Between April 1, 2000, and January 1, 2012, Riverside County's population grew by over 699,000 people or by approximately 45 percent. The western portion of the County (including unincorporated areas and member jurisdictions of the WRCOG) grew at a faster pace (76%) than the eastern portion (including unincorporated areas and member jurisdictions of the Coachella Valley Association of Governments (CVAG)) (36%). Riverside County grew four and a half times as fast as the region covered by SCAG, which includes the counties of Los Angeles, Orange, Riverside, San Bernardino, Ventura, and Imperial Counties. As shown on Table 4.12-1, *Regional Population Growth Trends 2000-2012*, the SCAG region grew 10 percent during this same time period. Because the draft *Housing Element* addresses the unincorporated portions of the County, it is important to note that the population in the unincorporated areas in the western portion of the County declined by 23 percent between 2000 and 2012 due to the incorporation of the cities of Eastvale, Jurupa Valley, Menifee, and Wildomar,



while the eastern portion of the unincorporated County’s population grew by approximately 19 percent. (Riverside County, 2016, pp. H-73 and H-74)

Table 4.12-1 Regional Population Growth Trends 2000-2012

| Area | 4/1/2000 ¹ | 4/1/2010 ¹ | 1/1/2012 ² | Change 2000-2012 (%) |
|------------------|-----------------------|-----------------------|-----------------------|----------------------|
| Riverside County | 1,545,387 | 2,189,641 | 2,244,399 | 45% |
| Cities | 1,124,666 | 1,685,249 | 1,887,766 | 68% |
| Unincorporated | 420,721 | 504,392 | 356,633 | -15% |
| WRCOG Area | | | | |
| Cities | 848,413 | 1,467,188 | 1,495,621 | 76% |
| Unincorporated | 351,652 | 423,231 | 271,173 | -23% |
| CVAG Area | | | | |
| Cities | 276,253 | 367,335 | 375,323 | 36% |
| Unincorporated | 69,069 | 82,444 | 82,444 | 19% |
| SCAG Region | 16,516,703 | 18,421,491 | 18,249,494 | 10% |
| California | 33,873,086 | 37,559,440 | 37,668,804 | 11% |

Sources:

1. US Census Bureau, 2010.
2. California Department of Finance, 2012.

(Riverside County, 2016, Table H-2)

B. Riverside County Housing Element

The County of Riverside General Plan Housing Element 2013-2021 (in draft form at the time this EIR was prepared) identifies and establishes the County’s policies with respect to meeting the housing needs of existing and future residents in Riverside County and closely follows the County’s General Plan Update approved in December 2015. (Riverside County, 2016, pp. H-1 and H-11)

State law requires that jurisdictions evaluate their Housing Elements every eight years to determine their effectiveness in achieving county and state housing goals and objectives, and to adopt an update Housing Element that reflects the results of this evaluation. The current statutory update in the SCAG region covers the planning period October 15, 2013 through October 15, 2021. The County’s Housing Element represents a comprehensive update of its former General Plan Housing Element to bring it into compliance with state housing law and to meet the statutory update requirement. (Riverside County, 2016, p. H-1)

C. Housing Inventory

The vacancy rate is an indicator of the general availability of housing. It also reflects how well available units meet the current housing market demand. A low vacancy rate suggests that households may have difficulty finding housing within their price range whereas a high vacancy rate may indicate



either an imbalance between household characteristics and the type of available units, or an oversupply of housing units. The draft *2013-2021 Housing Element* indicates a 26 percent vacancy rate in the eastern County area and a 12 percent vacancy rate in the western portion of Riverside County, for a combined 16 percent vacancy rate for the unincorporated areas of Riverside County in 2010. (Riverside County, 2016, p. H-92)

D. Jobs/Housing Balance

Riverside County serves as a bedroom community that supplies a substantial portion of the labor pool for the Los-Angeles-Orange County metropolitan area and San Diego County. As shown in Table 4.12-2, *Jobs-Household Ratios, Unincorporated Riverside County 2000-2010*, between 2000 and 2010, Riverside County’s jobs-to-housing ratio slightly increased from 1.02 to 1.07. The unincorporated area of Riverside County experienced a severe shortage of jobs with only 0.57 jobs per household in the western portion of the County and 0.777 jobs per household in the eastern portion of the County in 2010.

Table 4.12-2 Jobs-Household Ratios, Unincorporated Riverside County 2000-2010

| | Total County | | Western | Eastern | Total |
|-----------------------|--------------|---------|---------|---------|---------|
| | 2000 | 2010 | 2010 | 2010 | 2010 |
| Employment | 517,000 | 700,266 | 47,339 | 20,116 | 67,455 |
| Households | 506,218 | 653,977 | 83,746 | 26,120 | 109,866 |
| Jobs-Household Ratios | 1.02 | 1.07 | 0.57 | 0.77 | 0.61 |

Source: Riverside County Center for Demographic Research, 2012.

Total employment includes wage and salary employment from Employment Development Department plus self-employment.

Total households from the Department of Finance.

Note: Data not seasonally adjusted.

(Riverside County, 2016, Table H-9)

4.12.2 BASIS FOR DETERMINING SIGNIFICANCE

The proposed Project would result in a significant impact to population and housing if the Project or any Project-related component would:

- a) *Displace substantial numbers of existing housing, necessitating the construction of replacement housing else-where;*
- b) *Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County’s median income;*
- c) *Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere;*
- d) *Affect a County Redevelopment Project Area;*
- e) *Cumulatively exceed official regional or local population projections; or*



- f) *Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).*

4.12.3 IMPACT ANALYSIS

Threshold a) *Would the Project displace substantial numbers of existing housing, necessitating the construction of replacement housing else-where?*

Threshold c) *Would the Project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?*

Under existing conditions, the southwestern portion of the Building D Site contains one mobile home. The Project would remove this mobile home from the Building D Site but removal of one structure would not displace substantial numbers of people or substantial numbers of existing housing. The removal of one mobile home is not substantial, considering that there are over 83,000 households in western Riverside County. The removal of one mobile home from the Building D Site would not necessitate the construction of replacement housing elsewhere. Accordingly, impacts would be less than significant.

Threshold b) *Would the Project create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?*

The Project proposes to develop the Project site with two business park buildings. For purposes of analysis, employment estimates were calculated using data and average employment density factors utilized in the County of Riverside General Plan. The General Plan estimated that light industrial (LI) business would employ one (1) worker for every 1,030 s.f. of building area ($1,113,627 \text{ s.f.} \div 1,030 \text{ s.f.} = 1,030$). Based on this employment generation rate, the Project is expected to create approximately 1,030 new, recurring jobs. (Riverside County, 2016, Appendix E-1, Table E-5)

As discussed in Subsection 4.12.1, unincorporated Riverside County had a 16 percent vacancy rate in 2010. It is expected that the job opportunities created by the Project would be filled by the existing residents in Riverside County. However, if residents are drawn from the surrounding region, it is anticipated that the vacancy rate of unincorporated Riverside County would fill those housing needs. Accordingly, the proposed Project would not create a demand for additional housing and a less than significant impact would occur.

Threshold d) *Would the Project affect a County Redevelopment Project Area?*

The Riverside County Redevelopment Agency was dissolved as of February 1, 2012. Due to the dissolution of the Riverside County Redevelopment Agency, the Project has no potential to adversely impact a County Redevelopment Area. No impact would occur.



Threshold e) Would the Project cumulatively exceed official regional or local population projections?

The Project site is a proposed business park that would not generate a residential population. It is anticipated that the employment base for both the construction and operational phases of the proposed Project would come from the existing population in Riverside County. According to the Bureau of Labor Statistics, in August 2015 the Riverside-San Bernardino-Ontario region's civilian labor force unemployment rate is 6.8%, or approximately 131,300 persons. (BLS, 2015) Furthermore, the anticipated jobs generated as part of the Project are not the types of position necessitating specialized skills and it is anticipated those positions could be filled from the local area. Accordingly, the surrounding area contains an ample supply of potential employees. Therefore, it is not anticipated that the labor demand caused by the proposed Project would result in the addition of residents within Riverside County or surrounding jurisdictions. Therefore, the Project is not expected to be a catalyst for any population increase and no impact associated with population projections would occur.

Threshold f) Would the Project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The Project proposes to develop the site with two business park buildings. For purposes of analysis, employment estimates were calculated using data and average employment density factors utilized in the County of Riverside General Plan. The General Plan estimated that light industrial business would employ one (1) worker for every 1,030 s.f. of building area ($1,113,627 \text{ s.f.} \div 1,030 \text{ s.f.} = 1,030$). Based on this employment generation rate, the Project is expected to create approximately 1,030 new, recurring jobs. (Riverside County, 2016, Appendix E-1, Table E-5) Additionally, the Project would install infrastructure improvements such as paved roads and access to improved and expanded water and sewer lines that could indirectly induce growth in the local area.

As discussed in the impact analysis for Threshold (e), the on-site employment generation would not induce substantial growth in the area because it is anticipated that the Project's future employees would already be living in the Riverside County area. The Project does not propose the construction of any new homes or dwelling units that would directly result in the introduction of new residents to the area. Indirect population growth has the potential to occur when infrastructure improvements are proposed. Increased road access and availability of utility connections are a byproduct of the proposed Project. However, the proposed improvements are specific to the Project and access would not extend beyond the Project sites' frontage with roadways, with the exception of a proposed connection to a proposed storm drain line beneath Oleander Avenue. The Project would not construct any roadways beyond what was already planned by the County of Riverside. Surrounding properties that would have access to or benefit from such improvements are designated by the County of Riverside General Plan for "Business Park," "Light Industrial," and "Very Low Density Residential" land uses. The "Business Park" and "Light Industrial" land uses are not considered to be population increasing land uses, as they would have similar characteristics to the proposed Project (the employees for such developments



would most likely come from within the County for the same reasons as those discussed for this Project). The “Very Low Density Residential” land uses are anticipated to be built out with low density housing, as planned by the County General Plan. Project-related utility improvement would service the Building D Site and the Building E Site and would not induce growth on other parcels. Accordingly, the proposed Project would have a less-than-significant impact related to directly or indirectly inducing substantial population growth in the area.

4.12.4 CUMULATIVE IMPACT ANALYSIS

For purposes of a cumulative effects analysis, the geographic area studied is Riverside County and its incorporated cities, based on buildout of governing General Plans. The proposed Project would not displace substantial numbers of either people or existing housing, and therefore would not necessitate the construction of replacement housing elsewhere. As such, the Project has no potential to contribute to a cumulatively significant impact associated with housing displacement in Riverside County. The Project would supply employment opportunities to people already residing in the area, and, although population growth resulting from the employment opportunities offered at the Project site is not expected, the surrounding area has ample supply of vacant housing and approved housing projects that are not yet constructed to accommodate any population growth in the area that could indirectly occur due to employment-demand generation from the Project and other developments in the area that will offer new employment opportunities. The creation of employment opportunities would benefit Riverside County by helping to achieve a better jobs-to-housing balance, and the County and its incorporated cities have ample housing to support any potential additional residents. As such, a less-than-significant cumulative impact would occur.

The Project is an employment use and is not a population-generating project and thus would not cause direct population growth that would exceed official regional or local population projections. Because no residential housing units are proposed as part of the Project and jobs generated by the Project are expected to be filled by persons that occupy existing homes in the surrounding area and new homes that are approved but not yet built, the Project would have a less than significant and less than cumulatively considerable impact upon population projections.

The on-site employment generation would not induce substantial growth in the area because it is reasonably foreseeable that the Project’s future employees are already living in the Riverside County area or would reside in homes that are already approved to be constructed. The Project does not propose the construction of any new homes or dwelling units that would directly result in the introduction of new residents to the area. Surrounding properties that would have access to or benefit from the Project’s infrastructure improvements are designated by the County of Riverside General Plan for “Business Park,” “Light Industrial,” and “Very Low Density Residential” land uses. The “Business Park” and “Light Industrial” land uses are not population increasing land uses because, like the proposed Project, it is reasonably foreseeable based on existing residential vacancy rates, unemployment rates, and the number of homes approved for construction in the surrounding area that have not yet been built, that employees for such developments would most likely come from within the County for the same reasons as those discussed for this Project. Cumulative population and housing



impacts are thus considered to be less than significant. The properties designated for “Very Low Density Residential” land uses near the Project site are anticipated to be built out with low density housing, as planned by the County General Plan. Project-related utility improvement would service the Building D Site and the Building E Site and would not induce growth on other surrounding parcels. Accordingly, the proposed Project would have a less-than-significant and less than cumulatively considerable impact related to directly or indirectly inducing substantial population growth in the area.

4.12.5 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Thresholds (a) and (c) for the Building D Site and the Building E Site: Less-than-Significant Impact.

The Project site contains one mobile home under existing conditions which would be removed as part of the proposed Project. The removal of one mobile home structure would not result in the displacement of substantial numbers of people or existing housing. A less-than-significant impact would occur.

Threshold (b) for the Building D Site and the Building E Site: Less-than-Significant Impact.

The Project site is expected to employ approximately 1,030 workers. It is expected that the job opportunities created by the Project would be filled by existing residents in Riverside County and residents of homes that are already approved for construction but not yet built. Therefore, the Project would not create a demand for additional housing, and impacts would be less than significant.

Threshold (d) for the Building D Site and the Building E Site: No Impact.

The Riverside County Redevelopment Agency was dissolved in 2012; therefore, the Project would have no potential to impact a County Redevelopment Project Area. No impact would occur.

Threshold (e) for the Building D Site and the Building E Site: No Impact.

The Project is an employment-generating use that would not directly cause population growth. Therefore the Project has no potential to exceed regional or local population projections. No impact would occur.

Threshold (f) for the Building D Site and the Building E Site: Less-than-Significant Impact.

The Project would introduce new businesses and infrastructure improvements to the area. The jobs generated by the Project are expected to be filled by existing residents of Riverside County and residents of homes that are already approved for construction but not yet built. In addition, Project-related utility improvements would service the Building D Site and the Building E Site and would not be sized to accommodate unplanned growth on other surrounding parcels. Accordingly, the Project would not induce substantial population growth and impacts would be less than significant.

4.12.6 MITIGATION

Impacts would be less than significant. Mitigation is not required.



4.13 PUBLIC SERVICES

The analysis in this subsection assesses the Project's potential to cause physical impacts to the environment resulting from Project-related service demands placed on the following public services: fire protection, police (sheriff) protection, schools, libraries, and public health services. There are no other public services for which Project-related service demands would have the potential to physically impact the environment. The analysis in this subsection is based in part on the Riverside County EIR No. 521, Section 4-17, *Public Facilities* (Riverside County, 2015d), as well as written communication from the Riverside County Sheriff's Department (RCSD, 2015) and the Cal-Fire – Riverside Unit of the Riverside County Fire Department (RCFD, 2015), which are included in *Technical Appendix N*. A complete list of references utilized in this subsection is contained in EIR Section 7.0, *References*.

4.13.1 EXISTING CONDITIONS

A. Fire Protection

Fire protection services to the Project site and surrounding area are provided by the Riverside County Fire Department (RCFD). The RCFD is a full-service fire department that provides fire suppression, emergency medical, rescue, and fire prevention services and is equipped to fight both urban and wildland emergency conditions. The State (CalFire) also has primary responsibility for managing fires on lands designated "State Responsibility Areas" (SRAs). A variety of local fire agencies, for example city fire departments, have jurisdiction over "Local Responsibility Areas" (LRAs). According to the CalFire Riverside Unit 2012 Strategic Fire Plan (page 9), State resources include 14 type 3 engines, one type 2 helicopter, two type 3 air tankers and three bulldozers. County resources include 81 type 1 engines, five type 2 engines, one bulldozer, water tenders, eight medic ambulances, and two breathing supports. Other equipment in the RCFD inventory includes: structural engines, rural engines, brush engines, telesquirts, trucks, paramedic units, a helicopter, hazardous materials unit, incident command units, water tenders, fire crew vehicles, mobile communications centers, breathing support units, lighting units, power supply units, fire dozers, mobile training vans and emergency feeding units (Riverside County, 2015d, pp. 4.17-3 and 4.17-4).

The RCFD calls for service are dispatched from one of 94 fire stations throughout the County, which are separated into 17 battalions with approximately 230 pieces of equipment (Riverside County, 2015d, p. 4.17-3). Within the Project area, the RCFD would serve the Project site from one of two locations:

- **RCFD Station No. 59:** Station 59 is located at 21510 Pinewood Street, Perris, CA 92570 (approximately 1.8 miles southwest of the Project site). This station would be the first engine company to arrive at emergencies at the Project site. Station 59 is staffed 24 hours per day, seven days a week, with a minimum three-person crew, including a paramedic operating "Type-1" structural firefighting apparatus (RCFD, 2015).
- **RCFD Station No. 90:** Station 90 is located at 333 Placentia Avenue Perris, CA 92571 (approximately 3.75 miles southeast of the Project site). This station would be the second engine company to respond to emergencies at the Project site. This Station is staffed 24 hours



per day, seven days a week, with a minimum four-person crew, including a paramedic operating on a 75-foot Quint Aerial truck (RCFD, 2015).

As noted, Station No. 59 is the nearest RCFD fire station to the Project site, with an estimated total response time (TRT) of 7:00 minutes. Station No. 90 is estimated to have a TRT of 9:48 minutes. Other fire stations within the Project vicinity that could respond include Station No. 101 (11:00 minute response time), Station 06 (11:53 minute response time), Station 91 (12:15 minute response time), and Station 04 (12:41 minute response time). Additionally, the RCFD has a mutual aid agreement with the City of Riverside Fire Department and the Federal Fire Department located at March Air Reserve Base (RCFD, 2015).

The County of Riverside also provides fire protection planning and engineering services, in which County fire protection specialists review plans for all new residential developments and commercial and industrial buildings proposed within unincorporated Riverside County. Requirements are established to provide a high degree of life safety and property protection. Common requirements include installation of fire hydrants, sprinkler systems, early warning fire detection systems, and fire safety zones in remote areas. In addition, as disaster and recovery planning are key elements for emergency services, the Riverside County Emergency Services Division maintains two underground Emergency Operation Centers with communications for government use during major events (Riverside County, 2015d, p. 4.17-9).

The Riverside County Fire Department has set a response time goal of first due unit on-scene within 4:00 minutes 90% of the time, and a first alarm assignment operating on the fire ground within 15:00 minutes. According to the RCFD, there are no plans currently to construct any new fire stations in the area of the proposed Project site (RCFD, 2015).

B. Police Protection Services

Police protection services in the Project site's vicinity are provided by the Riverside County Sheriff's Department (RCSD). The RCSD has 4,500 established positions, including roughly 2,300 sworn personnel, to provide community policing services. The Sheriff's Department is a "demand response" agency that maintains limited patrol services. Nine Sheriff Department stations are located throughout Riverside County to provide area-level community service. Police protection services in the Project site's vicinity are provided from the Perris Station, which is located at 137 North Perris Boulevard, Suite A, Perris, CA 92570 (approximately 5.3 miles southeast of the Project site). The Sheriff's Department also operates five adult correction or detention centers located throughout Riverside County. The Riverside County Probation Department operates the juvenile detention facilities (RCSD, 2015; Google Earth, 2015; Riverside County, 2015d, p. 4.17-25).

RCSD calls for service are prioritized as Priority 1 through 4. Priority 1 calls are emergency calls and Priority 2-4 calls are non-emergency calls. Table 4.13-1, *RCSD Perris Station 2014 Average Response Times*, summarizes the average response time data for Calendar Year 2014 in the northern portion of the Perris Station's service area, which encompasses lands to the west of I-215, north of Cajalco Road,



east of Wood Road, and south of Oleander Avenue. The Perris Station encourages “quality of service” over “quantity of service.” To this end, response times are second to the quality of service that the RCSD officers are encouraged to provide to the communities they serve (RCSD, 2015).

Table 4.13-1 RCSD Perris Station 2014 Average Response Times

| Priority | Total Calls | Average Response Time (Minutes) |
|-----------------|--------------------|--|
| 1 | 60 | 8.15 |
| 2 | 918 | 25.95 |
| 3 | 843 | 48.95 |
| 4 | 610 | 80.36 |

(RCSD, 2015)

The RCSD maintains a goal of providing 1.0 officer per 1,000 residents, with a longer term goal of increasing the staffing level to 1.2 officers per 1,000 residents by the end of Fiscal Year 2017/2018. As of December 2015, the Project area meets or exceeds the standard of 1.0 officer per 1,000 residents. The RCSD expects that the increased standard will be met through additional funds that have been allocated to the Sheriff’s budget for hiring and training additional officers (RCSD, 2015).

C. School Services

The Project site lies within the Val Verde Unified School District (VVUSD) (RCIT, 2015). The nearest schools to the Project site are the Tomas Rivera Middle School, located approximately 0.98 mile southwest of the Project site at 21675 Martin Street, and the Mead Valley Elementary School, located approximately 1.2 mile west of the Project site at 21-100 Oleander Ave (Google Earth, 2015). Under existing conditions, the Project site places no demand on the public school system because the Project site is undeveloped with no residents on site except for one mobile home that is not occupied by any school children.

D. Library Facilities

The Riverside County Library System owns and operates 35 library branches throughout the County, in addition to mobile “Bookmobiles” within western Riverside County and the Coachella Valley. In addition, the Riverside County Library System operates an automated network that currently deploys over 350 computer/terminal workstations in the library branches of the Riverside County Library System, Riverside Public Library, Moreno Valley Library, Murrieta Public Library, Murrieta Valley High School, and College of the Desert. The network can also be accessed by Riverside County residents via the Internet. The library system manages the library catalog of the 1.3 million items in the library system and the annual checkout of over 3.5 million books, audios, and videos. For 2010, the Riverside County Library System reported a total of 681,117 ‘registered borrowers’ utilizing County library services (Riverside County, 2015d, pp. 4.17-65 through 4.17-66).



The Riverside County Library System does not maintain a specific numerical factor to analyze the needs for physical library space created by new development. However, the American Library Association suggests that appropriate service criteria would be availability of convenient library facilities and book reserves at a rate of 0.5 square foot of library space and 2.5 volumes per capita. Based on 2010, reported registered borrowers (681,117) and current square footage of library facilities available as of 2014 (333,884), at present facilities provide approximately 0.49 square feet of space per registered borrower (not the Riverside County population as a whole) (Riverside County, 2015d, p. 4.17-66). Under existing conditions, the Project site places no demand on the public library system because the Project site is undeveloped and vacant.

E. Public Health Services

The closest public health service facility to the Project site is the Riverside County Regional Medical Center (RCRMC) located in Moreno Valley at 26520 Cactus Avenue. The RCRMC also operates a number of adjunct clinics. In addition, the Riverside County Department of Public Health operates ten separate clinics located throughout Riverside County. Additional medical facilities and services, such as private/for profit and municipal facilities, also exist within Riverside County (Riverside County, 2015d, p. 4.17-73).

The RCRMC is a 520,000-square foot state-of-the-art tertiary care and level II adult and pediatric facility, licensed for a total of 439 beds. This includes 362 licensed beds in the main acute-care hospital and 77 licensed beds in a separate psychiatric facility (in the Arlington area of Riverside). The RCRMC can provide 200,000 annual patient visits in its specialty outpatient clinics and upwards of 100,000 annual patient visits to its emergency room/trauma unit. The community-based clinics operated by the Riverside County Department of Public Health throughout Riverside County provide a wide array of family care services. Each FCC has at least one family medicine physician on staff and is open from 8:00 a.m. to 5:00 p.m., Monday through Friday (Riverside County, 2015d, pp. 4.17-73 and 4.17-74).

According to the 2008 Regional Medical Facility Profile report, in 2005, there were 80,932 licensed hospital beds in California, a rate of 2.2 beds per 1,000 residents. Riverside County had 2,880 licensed beds, a rate of 1.47 beds per 1,000 residents, which is 33% lower than the California average. No specific adopted criteria are maintained for determining future needs for public hospital or medical clinics. The Riverside County Department of Public Health reports that Riverside County only has 50% of the needed hospital beds necessary to meet current needs. According to the Department and as stated in the Riverside County General Plan Update EIR, while the Family Care Centers are sized to meet current needs, approximately one additional clinic of 15,000 to 20,000 square feet (or corresponding increase in size of an existing clinic) would be needed for every 250,000 person increase in population (Riverside County, 2015d, p. 4.13-3). Under existing conditions, the Project site is vacant and undeveloped and places little to no demand on County health facilities.



F. Regulatory Setting

Riverside County Ordinance No. 659

Ordinance No. 659 is known as the County Development Impact Fee (DIF) which requires a fee payment by developers for the funding of public facilities, including fire protection facilities, sheriff facilities, library books, and public health facilities.

Riverside County Fire Department Fire Protection and Emergency Medical Services Strategic Master Plan

The County of Riverside developed this plan to proactively plan facility, service, and equipment needs for fire protection. It also incorporates the CDF Management Plan for several sub-zones within Riverside County. Implementation of this plan helps reduce potential risks of fire for residents in areas of moderate to high fire danger. (Riverside County, 2015c, p. 4.13-95)

Assembly Bill (AB) 16

In 2002, AB 16 created the Critically Overcrowded School Facilities program, which supplements the new construction provisions within the School Facilities Program (SFP). The SFP provides State of California funding assistance for new facility construction projects and modernization projects. The Critically Overcrowded School Facilities program allows school districts with critically overcrowded school facilities, as determined by the California Department of Education (CDE), to apply for new construction projects in advance of meeting all SFP new construction program requirements. Districts with SFP new construction eligibility and school sites included on a CDE list of source schools may apply. (Riverside County, 2015c, p. 4.17-56)

Leroy F. Greene School Facilities Act of 1998 (Senate Bill [SB] 50)

Senate Bill 50 (SB 50) was enacted by the State Legislature in 1998, which amended existing state law governing school fees. In particular, SB 50 amended prior California Government Code (CGC) Section 65995(a) to prohibit state or local agencies from imposing school impact mitigation fees, dedications or other requirements in excess of those provided in the statute in connection with “any legislative or adjudicative act...by any state or local agency involving...the planning, use, or development of real property....” (Riverside County, 2015c, p. 4.17-56)

The legislation also amended CGC Section 65996(b) to prohibit local agencies from using the inadequacy of school facilities as a basis for denying or conditioning approvals of any “legislative or adjudicative act [involving] the planning, use or development of real property.” Further, SB 50 established the base amount of allowable developer fees: \$1.93 per square foot for residential construction and \$0.31 per square foot for commercial. These base amounts are commonly called “Level 1 fees” and are the same caps that were in place at the time SB 50 was enacted. Level 1 fees are subject to inflation adjustment every two years. (Riverside County, 2015c, p. 4.17-59)



4.13.2 BASIS FOR DETERMINING SIGNIFICANCE

The Project would result in a significant impact to public services if the Project or any Project-related component would result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:

- a. *Fire Services;*
- b. *Sheriff Services;*
- c. *Schools;*
- d. *Libraries; and/or*
- e. *Health Services.*

Based on the above and in accordance with CEQA and Section XIV of CEQA Guidelines Appendix G (OPR, 2009), the analysis below focuses on whether or not the proposed Project would cause a physical environmental change to public service facilities, either from the demand it would place on service facilities or due to a direct physical impact caused by the Project's construction or operation. Services demand in and of itself is not an environmental impact under CEQA unless such demand causes an adverse physical change to the environment.

Public Services

Threshold a) Would the proposed Project or any Project-related component result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for Fire Protection Services?

The Project site receives fire protection services from the RCFD. Development of the Project site with two business park warehouse buildings has the potential to increase the frequency of fire protection calls to the site.

Proposed Building D and Building E are required by law to include fire sprinklers. Further, given the building sizes and occupant types that would be permitted by the proposed Project, the Project Applicant is proposing to install an Early Suppression, Fast Response (ESFR) fire sprinkler system in each building. ESFR systems incorporate high volume, high-pressure sprinkler heads to provide the necessary fire protection, without the need for in-rack sprinklers, for warehouse buildings that may contain high piled storage. While most other sprinkler systems are intended to control the growth of a fire, an ESFR sprinkler system is designed to suppress a fire. To suppress a fire does not necessarily mean that the system will extinguish the fire but rather it is meant to "knock" the fire back down to its



original point of origin. ESFR systems provide warehouse buildings with a high margin of fire safety and also allow more time for emergency responders to reach a fire incident before a fire spreads from its point of origin.

A number of California regulations, including Public Resources Code (PRC) §§ 4290-4299 and California Government Code (CGC) § 51178, also would apply to the proposed Project and would address fire safety. In particular, these sections require minimum state-wide fire safety standards pertaining to: roads for fire equipment access; signage for identifying streets, roads, and buildings; minimum private water supply reserves for emergency fire use; and, fire fuel breaks. In addition, they set fire safety standards for all buildings and structures in, or adjoining, mountainous areas, or forest-, brush- or grass-covered lands or any land covered with flammable material to protect property from wildland fires. Mandatory compliance with California regulations related to fire hazards would reduce the Project's potential to expose people or structures to wildland fire hazard risks (Riverside County, 2015d, p. 4.17-23).

In addition, to ensure adequate fire protection for all residents of Riverside County, the Riverside County Department of Building and Safety and the RCFD enforce fire standards as they review building plans and conduct building inspections. This includes a review for compliance with Riverside County Ordinance No. 787 (Riverside County, 2014), which requires, among other measures, the County to review all future building plans to ensure that every building is positioned in a way that allows adequate access for emergency vehicles and has adequate fire hydrant placement and fire flows (Riverside County, 2015d, p. 4.17-23).

As indicated above, RCFD Station No. 59 is the first responder to the Project site for emergency fire protection services and RCFD Station No. 90 is the second responder. The estimated total response time (TRT) from RCFD Station No. 59 is approximately 7:00 minutes, while the TRT from RCFD Station No. 90 is approximately 9:48 minutes. TRT is broken down by dispatch time (1:30 minutes), turnout time (1:00 minute), and drive time. The RCFD has established a response time goal of first unit due on-scene within 4:00 minutes 90% of the time, and a first alarm assignment operating on the fire ground within 15:00 minutes (RCFD, 2015).

Based on information provided by the RCFD, buildout of the proposed Project would not directly result in or require the physical construction of any new or expanded fire stations or fire protection facilities in the Project area. However, the Project site cannot be reached by the nearest fire stations (RCFD Station Nos. 59 and 90) within the RCFD's response time goal of 4:00 minutes under existing conditions. As such, the RCFD has indicated that the Project would contribute to the RCFD's continued inability to meet its response time goal of 4:00 minutes because the Project and other development projects in the area would result in increased service calls due to the introduction of structures, traffic, and workers to the area. Nonetheless, the RCFD does not have plans to construct a new fire station in the vicinity of the Project site or to physically alter or expand any of its existing facilities in response to increased demand. Although the Project's increased demand on fire services would be impactful to the RCFD's response times, the impact under CEQA is determined to be less than significant because the Project would be served from existing RCFD fire stations and would not



cause the construction of a new fire station or physical alteration of an existing fire station. Because the RCFD does not have any plans to build a new fire station in the area, the construction of a new fire station is highly speculative. For these reasons, the Project would not cause or contribute to any reasonably foreseeable environmental impacts associated with the provision of fire protection services. The RCFD has not identified the location for a new fire station and has not allocated funding for the construction of a new fire station (RCFD, 2015). The Project would be primarily serviced from existing Fire Stations No. 59 and 90. For these reasons, physical impacts to fire protection facilities would be less than significant. The Project Applicant would be required to comply with Riverside County Ordinance No. 659 (the County Development Impact Fee (DIF)), which requires a fee payment by developers for the funding of public facilities, including fire protection facilities.

Public Services

Threshold b) Would the proposed Project or any Project-related component result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for Sheriff Services?

The Project site receives police protection services from the RCSD. Development of the Project Site with two business park warehouse buildings has the potential to increase the frequency of sheriff calls to the site due to the addition of structures, traffic, and workers.

The proposed Project's design includes security features. Retaining walls, concrete tilt-up screen walls, and/or landscape screening is proposed on the west, south, and east sides of the Building E Site, facing off-site property to the south and west and facing Ellsworth Street to the east. Trucks accessing the Building E Site from Oleander Avenue would pass through a gatehouse and then into a truck court that would be fully secured around its perimeter. The north and west sides of the Building D Site, facing Oleander Avenue and Ellsworth Street are designed to include a concrete screen wall and landscaping and the truck courts would be fully secured. Both buildings also would include exterior security lighting and a check-in gate for trucks and service vehicles. In addition, given the value of goods typical at such sites, the Project Applicant anticipates that individual building occupants would likely elect to install security cameras and/or employ private security to patrol the property.

The RCSD has indicated that current staffing and facilities at the Perris Station, located at 137 North Perris Boulevard, Suite A, Perris, CA 92570, would provide adequate police protection services without the need for the construction of additional facilities or the expansion of existing facilities. The RCSD has indicated that as of Fiscal Year (FY) 2013/2014, the RCSD has achieved the service goal of one sworn officer for every 1,000 residents, and plans on achieving a service ratio of 1.2 sworn officers per 1,000 residents by the end of FY 2017/2018 due to additional funding that has been allocated to the RCSD (RCSD, 2015).



The Project, which proposes the construction and operation of two business park buildings, would not directly result in a permanent increase in the County’s population because Riverside County as a whole has an abundance of housing relative to jobs. Data presented in Appendix F-1 to Riverside County General Plan Amendment No. 960 demonstrates that the jobs-housing ratio in the County reflects “net out-commuting,” which indicates that existing residents commute outside of the County for employment opportunities. Thus, it is anticipated that future employees of the Project would primarily consist of existing County residents; as such, the Project would not result in a net change to the existing or projected service ratios within the Perris Station service area. (Riverside County, 2015c, Appendix F-1, pp. 8-9). Nonetheless, the Project would result in an incremental increase in demand on the RCSD due to increased calls to the Project site, which could adversely affect service response times within the Perris Station’s service area. Although the RCSD encourages “quality of service” over “quantity of service,” indicating that response times are secondary to quality of service, the Project’s incremental increase in demands for police-protection services would need to be accommodated by the RCSD.

As noted above, based on information from the RCSD, Project implementation would not result in or require new or expanded sheriff service facilities. In addition, no sheriff stations are located on the site or are planned to be located on the site, so there is no potential for the Project to have a direct physical impact any sheriff service facility. For these reasons, physical impacts to sheriff facilities would be less than significant (RCSD, 2015). The Project Applicant would be required to comply with Riverside County Ordinance No. 659 (the County DIF), which requires a fee payment by developers for the funding of public facilities, including sheriff service facilities.

Public Services

Threshold c) Would the proposed Project or any Project-related component result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for School Services?

Development of the property with two business park warehouse buildings would not create a direct demand for public school services, as the property would contain non-residential uses that would not directly generate any school-aged children requiring public education. The proposed Project would not directly generate students and is not expected to indirectly draw a substantial number of students to the area for the reasons discussed above under Threshold (b). In summary, jobs and housing data presented in Appendix F-1 to Riverside County General Plan Amendment No. 960 demonstrates that future employees of the Project would primarily consist of existing County residents; as such, the Project would not affect the existing or projected housing supply, and thus the school-aged population, in the County. As such, the proposed Project would not directly cause or contribute to a need to construct new or physically altered public school facilities.



Although the Project would not directly create a demand for additional public school services, the Project Applicant would still be required to contribute fees to the Val Verde Unified School District (VVUSD) in compliance with California Senate Bill 50 (SB 50, Greene), California Government Code §§ 65995.5–65998, which allows school districts to collect fees from new developments to offset the costs associated with increasing school capacity needs. The payment of school mitigation impact fees authorized by SB 50 is deemed to provide “full and complete mitigation of impacts” on school facilities from the development of real property (California Government Code Section 65995).

Project implementation would not result in or require new or expanded public school facilities. In addition, no schools are located on the site or are planned to be located on the site, so there is no potential for the Project to have a direct physical impact on any school. For these reasons, impacts to school facilities would be less than significant.

Public Services

Threshold d) Would the proposed Project or any Project-related component result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for Library Services?

Development of the Project site with two business park warehouse buildings and associated site improvements would not directly create a demand for public library facilities and would not directly result in the need to modify existing or construct new library buildings. Demand placed on libraries is based on the generation of a resident population associated with a person’s place of residence, and not typically their place of employment. As discussed above under Threshold (b), based on the County-wide jobs and housing data presented in Appendix F-1 to Riverside County General Plan Amendment No. 960, the Project would not result in an increase in the County’s population and would therefore not directly result in an increased demand for library facilities. Accordingly, Project-related impacts to library facilities would be less than significant. There are no other public services for which Project-related service demands would have the potential to physically impact public facilities. The Project Applicant would be required to comply with Riverside County Ordinance No. 659 (the County DIF), which requires a fee payment by developers for the funding of public facilities, including public libraries and other public facilities.



Public Services

Threshold e) Would the proposed Project or any Project-related component result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for Health Services?

As indicated above under the discussion and analysis of Threshold (b), based on the jobs and housing data presented in Appendix F-1 to Riverside County General Plan Amendment No. 960, implementation of the proposed Project is not anticipated to result in an increase in the County’s population because Riverside County as a whole has an abundance of housing relative to jobs (Riverside County, 2015c, Appendix F-1, pp. 8-9). As such, it is not anticipated that the proposed Project would result in a substantial increase in demand for public and/or private health care facilities. Moreover, the provision of private health care, which serves a majority of County residents, is largely based on economic factors and demand and is beyond the scope of analysis required for this EIR. Nonetheless, the Project could result in an incremental increase in demand for health services associated with the Project’s addition of employees in the area. Existing public health facilities would accommodate nominal increases in demand, such as demand from the Project. Project implementation would not result in or require the physical construction, expansion, or alteration of public health facilities; therefore, impacts would be less than significant. The Project Applicant would be required to comply with Riverside County Ordinance 659 (the County DIF), which requires a fee payment by developers for the funding of public facilities, including public health facilities.

4.13.3 CUMULATIVE IMPACT ANALYSIS

For purposes of analysis herein, the Project’s cumulative study area comprises the service areas of the RCFD, RCSD, VVSD, the Riverside County Library System, and western Riverside County for the analysis of public health services.

As noted in the impact analysis for Threshold (a), buildout of the proposed Project would not result in the physical construction of any new or expanded fire stations. The RCFD has indicated that the Project would cumulatively affect the RCFD’s ability to provide an acceptable level of service because RCFD response time goals to the Project site are not currently met and will continue to not be met as more structures, traffic, and workers are introduced in the area (RCFD, 2015). However, impacts on service demands are not considered significant under CEQA unless they manifest into physical impacts to the environment. Because the RCFD does not have any plans to construct a new fire station in the vicinity of the Project site and intends to service the Project site and its surrounding area from existing fire stations, any physical impacts associated with new or modified fire protection facilities is highly speculative. As such, the Project’s direct and cumulative impacts are less than significant.

As noted in the impact analysis for Threshold (b), Project implementation would not result in or require the physical construction of new or expanded police protection facilities. Additionally, the Project is



not expected to result in a change in the County's service population, therefore the Project would not adversely affect the RCSD service goal to provide 1.2 officers per 1,000 residents by FY 2017/2018. However, the Project would result in an incremental increase in demand on the RCSD which could adversely affect service response times within the Perris Station's service area. Although the RCSD encourages "quality of service" over "quantity of service," indicating that response times are secondary to quality of service, the Project's incremental increase in demand for sheriff services would need to be accommodated by the RCSD (RCSD, 2015). Nonetheless, because the RCSD does not plan to construct or physically alter a sheriff's station as the result of cumulative growth in the vicinity of the Project site, the cumulative impact under CEQA is less than significant.

The proposed Project and all other development projects in Riverside County are required to comply with County's Development Impact Fee (DIF) Ordinance (Riverside County Ordinance No. 659), which requires payment of a development mitigation fee to assist in providing revenue that the County can use to improve public facilities and/or equipment, to offset the incremental increase in the demand for fire and police protection services, as well as other public services such as public health care.

With respect to school services, the Project would not directly increase the County's population and is not expected to result in an indirect increase in the County's population, and therefore would have no impact on school services. Regardless, the Project Applicant would be required to contribute fees to the VVSD in compliance with California Senate Bill 50 (SB 50, Greene). The payment of school mitigation impact fees authorized by SB 50 is deemed to provide "full and complete mitigation of impacts" on school facilities from the development of real property (California Government Code Section 65995). Accordingly, Project impacts to school services would be less-than-cumulatively considerable.

The Project also would have less-than-significant and less than cumulatively considerable impacts to library services because the Project would not directly create a demand for public library facilities and would not directly result in the need to modify existing or construct new libraries.

Although the proposed Project is not expected to result in an increase in the County's service population, the construction and operation of two business park warehouse buildings on the site could result in an incremental increase in demand for health services due to the addition of employees in the area. Cumulative growth is not expected to result in or require the physical construction, expansion, or alteration of public health facilities; therefore, the Project's impacts would be less than cumulatively considerable.

4.13.4 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold (a) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would introduce structures, traffic, and workers to the Project site, which would increase the demand for fire protection services provided by the Riverside County Fire Department (RCFD). The increased demand would adversely affect the RCFD's ability to meet its response time goals from Station 59 (located at 21510 Pinewood Street, Perris) and Station No. 90 (located at 333 Placentia



Avenue Perris). Although demand would be increased and the RCFD's response time goal of 4:00 minutes would not be met to the Project site, the RCFD's existing fire stations have adequate physical capacity to service the Project. Fire hydrants are proposed on the Project site and an Early Suppression, Fast Response (ESFR) fire sprinkler system is proposed to be installed in each building. The RCFD does not have plans to construct a new fire station or physically expand fire protection facilities in the Project site's vicinity; therefore, the Project would have no physical environmental effects on fire protection facilities. Increased demand, unless it results in some form of a physical environmental impact, is not an environmental effect under CEQA; thus, impacts are less than significant.

Threshold (b) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would introduce structures, traffic, and workers to the Project site, which would increase the demand for sheriff services provided by the Riverside County Sheriff's Department (RCSD). Service to the Project site is provided by the RCSD Perris Station, and the RCSD has no plans to physically construct or expand a station due to the Project or other growth in the area. As such, the Project would have no physical environmental effects on sheriff facilities. Increased demand, unless it results in some form of a physical environmental impact, is not an environmental effect under CEQA; thus, impacts are less than significant.

Threshold (c) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would not result in or require new or expanded public school facilities and would not result in any direct demand for school facilities. There is no potential for the Project to have a direct physical impact on any school. For these reasons, less-than-significant impacts to school facilities would occur.

Threshold (d) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would not result in or require new or expanded public library facilities and would not result in any direct demand for library space. There is no potential for the Project to have a direct physical impact on any library. For these reasons, less-than-significant impacts to library facilities would occur.

Threshold (e) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would result in an incremental increase in demand for public health services associated with persons that would be employed at or visit the Project site. However, because the Project would not result in or require the physical construction or alteration of public health facilities to accommodate the Project's demand, impacts to public health facilities would be less than significant.

4.13.5 MITIGATION

Applicable County Regulations and Design Requirements

The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- Prior to building permit inspection, the Project Applicant shall comply with the County's Development Impact Fee (DIF) Ordinance (Riverside County Ordinance No. 659), which



requires payment of a development mitigation fee to assist in providing revenue that the County can use to improve public facilities and/or equipment, to offset the incremental increase in the demand for fire, police protection, and health care services that would be created by the Project.

- Prior to building permit inspection, the Project Applicant shall comply with the provisions of California Government Code §§ 65995.5-65998 by payment of required school impact fees to the Val Verde Unified School District, in accordance with the District's Level 1 Fee Schedule.

Mitigation Measures

Impacts would be less than significant. No mitigation is required.



4.14 RECREATION

4.14.1 EXISTING CONDITIONS

The Riverside County Regional Park and Open Space District (Park District) acquires, manages, develops, and maintains 27 neighborhood and regional parks throughout Riverside County. The Park District maintains approximately 71,700 acres of land including 150 miles of multi-purpose recreational trails, seven archeological sites, 16 wildlife reserves, and natural areas. (Riverside County, 2015d, p. 4.16-8) The locations of existing parks and recreation areas in unincorporated Riverside County are shown in Figure 4.14-1, *Parks, Forests, and Recreation Areas in Riverside County*. The closest recreation area to the Project site is the 8,800-acre Lake Perris State Recreation Area, which is located approximately 6.0 miles east of the Project site. Recreation activities available at the Lake Perris State Recreation area include fishing, water sports, bird watching, hiking, climbing, camping, and horseback riding. The State Recreation Area is visited by nearly one million people from the surrounding communities each year. (California State Parks, 2013)

The four park and recreation districts located within Western Riverside County are: 1) Beaumont-Cherry Valley; 2) Desert; 3) Jurupa; and 4) Valley Wide. Together, these four districts provide approximately 27 neighborhood and community parks accounting for approximately 275 acres of parkland. Additionally, some County Service Areas (CSAs) also provide local park maintenance services, often for parks constructed as part of development projects. The cities within Riverside County also offer numerous park and recreational facilities resulting in approximately 215 parks over 1,500 acres. However, these city facilities are outside of the County's jurisdiction. (Riverside County, 2015d, p. 4.16-1) The Project site is not located within a park and recreation district or within a CSA that provides local park maintenance services.

The County of Riverside General Plan includes a county trail system to provide connectivity among various recreational areas and regional trails, as well as policies to ensure coordination of trails and future development. The General Plan Circulation Element contains standards for two basic types of county trails: regional trails and community trails. (Riverside County, 2015d, p. 4.16-11) As shown on Figure 4.14-2, *Mead Valley Area Plan Trails and Bikeway System*, community trails are planned along Oleander Avenue and Ellsworth Street adjacent to the Project site. As shown in Figure 4.14-2, the extensive trail system mainly follows the vehicular roadway circulation routes. Community trails are designed to connect to the regional trail system as well as provide connectivity throughout communities. Trails are designed for trail users preferring a soft trail surface and are typically maintained by a local park and recreation district or other governmental entity. (Riverside County, 2015d, p. 4.16-11)

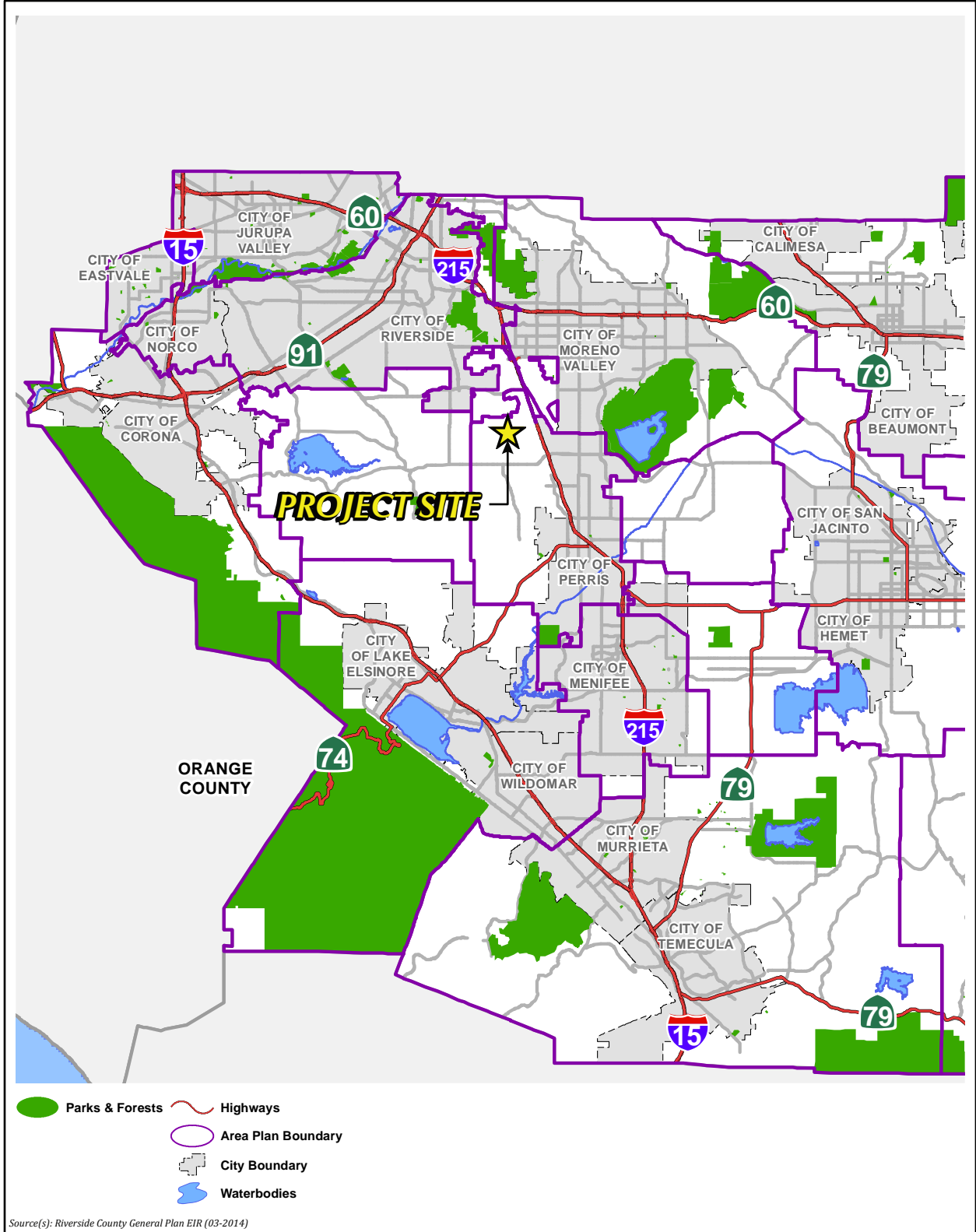


Figure 4.14-1

**PARKS, FORESTS, AND
 RECREATION AREAS IN RIVERSIDE COUNTY**



NOT TO SCALE



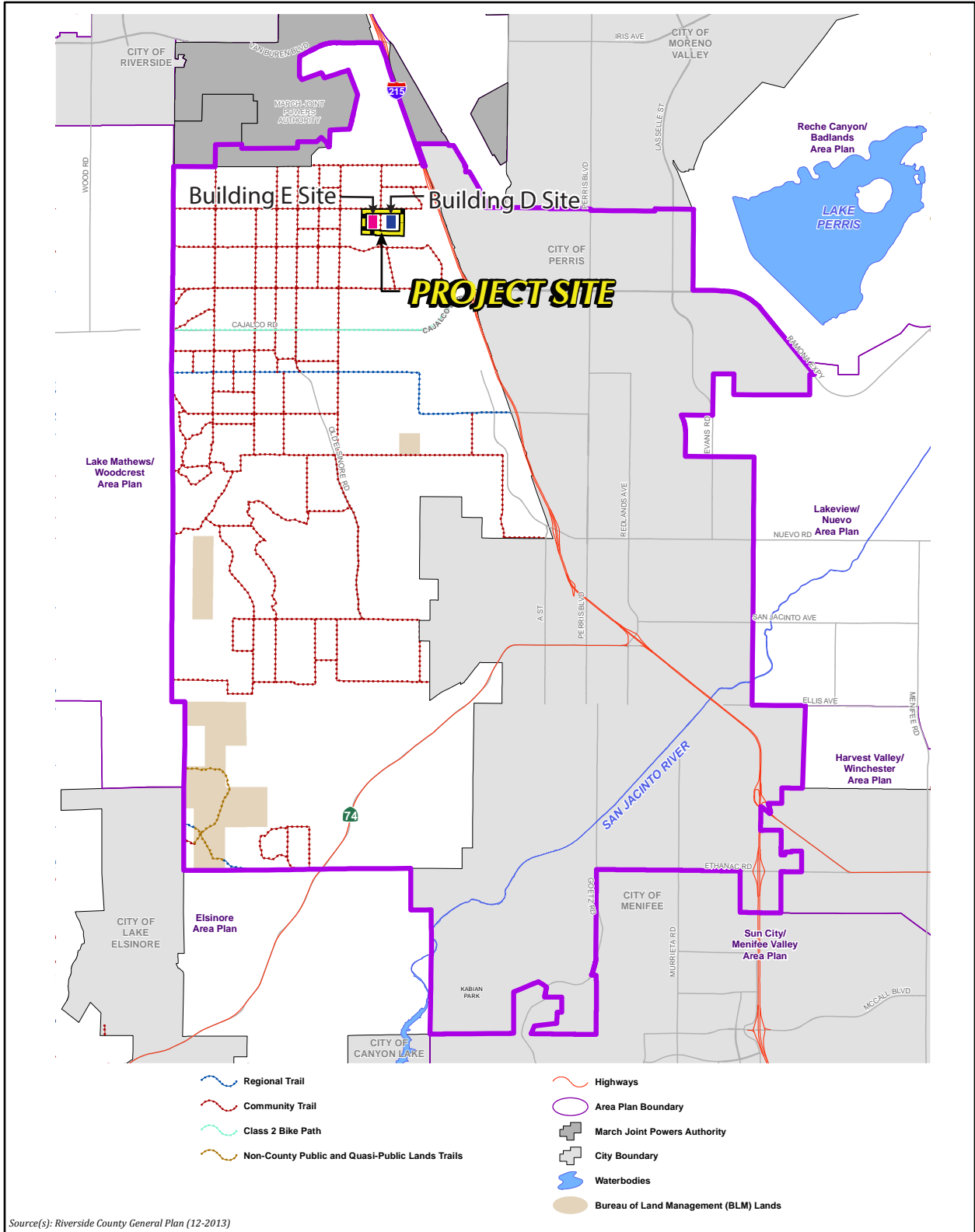


Figure 4.14-2



NOT TO SCALE



MEAD VALLEY AREA PLAN TRAILS AND BIKEWAY SYSTEM



4.14.2 BASIS FOR DETERMINING SIGNIFICANCE

The proposed Project would result in a significant impact to parks and recreation and recreational trails if it would:

Parks and Recreation

- a) *Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment;*
- b) *Include the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated;*
- c) *Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees).*

Recreational Trails

- a) *Cause an impact to recreational trails.*

4.14.3 IMPACT ANALYSIS

Parks and Recreation

Threshold a) Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Threshold b) Would the Project include the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The Project proposes to develop the Project site with two business park warehouse buildings. The Project does not propose to include any public or private recreational facilities and also does not propose any type of residential use or other land use which would generate a population that would require the construction or expansion of recreational facilities. Also, the Project does not propose any type of residential use or other land use that would generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur. Accordingly, no impact would occur.

Parks and Recreation

Threshold c) Would the Project be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?

According to Riverside County GIS, the Project site is located within CSA 117; however, CSA 117 was established for street lighting services, and does not address recreational facilities. Accordingly,



the Project site is not located within a CSA that provides local park maintenance services as discussed in Subsection 4.14.1. The Project site also is not located in any recreation and parks districts.

Quimby fees refer to an in-lieu fee program that applies to residential development if the development does not provide on-site public park space. Because the proposed Project proposes two business park warehouse buildings that proposes non-residential development, Quimby fees would not be required of the Project. Accordingly, no impact would occur.

Recreational Trails

Threshold a) Would the Project cause an impact to recreational trails?

As shown on Figure 4.14-2, *Mead Valley Area Plan Trails and Bikeway System*, the County of Riverside identifies planned trails in the immediate vicinity of the Project site, including “Community Trails” along Oleander Avenue and Ellsworth Street adjacent to the Project site. The County of Riverside General Plan defines community trails as trails that are designed to link areas of a community to the regional trail system and to link areas of a community with each other. Such trails are typically maintained and operated by local parks and recreation district or other governmental entities empowered and funded to maintain trails. Community trails are to be sited within an easement or portions of road right-of-ways of up to 14-foot wide. (Riverside County, 2015c, p. C-35) The proposed Tentative Parcel Maps for the Building D Site and the Building E Site designate a 14-foot wide trail easement paralleling Oleander Avenue along the Project site’s frontage. Similarly, the proposed Building D Site Tentative Parcel Map designates a 14-foot wide trail easement paralleling the east side of Ellsworth Street along the Building D Site’s frontage. A 5-foot sidewalk would be provided in an 18-foot wide parkway on the west side of Ellsworth Street along the Building E Site’s frontage; a trail easement is not required on the west side of Ellsworth Street. Ground disturbance in the trail easement areas are an inherent part of the proposed Project’s grading plan, the environmental effects of which are evaluated throughout this EIR. Implementation of the Project would not preclude the County’s ability to establish a planned community trail along other road segments in the community. Under existing conditions, there is no recreational trail present along Oleander Avenue or Ellsworth Street adjacent to the Project site, so the Project has no potential to physically impact an existing trail. For these reasons, the Project would not cause an impact to recreational trails and impacts would be less than significant.

4.14.4 CUMULATIVE IMPACT ANALYSIS

The Project proposes to develop the Project site with two business park warehouse buildings. Accordingly, the Project does not include recreational facilities and the Project does not propose any type of residential use or other land use which would generate a population that would require the construction or expansion of recreational facilities or existing neighborhood or regional parks. Accordingly, no cumulatively considerably impact associated with recreational facility development or use would occur as a result of development of the Project.



The Project would not impact recreational trails on a cumulatively considerable basis. The Project would provide trail easements along the Building D Site and Building E Site frontages with Oleander Avenue and along the Building D Site frontage with Ellsworth Street as called for by the Mead Valley Area Plan. Environmental effects resulting from ground disturbance in the easement areas is evaluated as an inherent part of the Project throughout this EIR. The Project has no potential to physically impact an existing trail, because no trails are located in the Project's development footprint. The Project also would not directly or cumulatively impact the County's ability to establish a planned community trail north of the Project site along Oleander Avenue.

4.14.5 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Parks and Recreation

Threshold (a) and (b) for the Building D Site and the Building E Site: No Impact. The Project does not propose any type of residential use or other land use that would generate a population that would increase the use of recreation facilities or existing neighborhood or regional parks. Parks would not be physically affected by the Project.

Threshold (c) for the Building D Site and the Building E Site: No Impact. The Project does not propose any type of residential use and is not located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees).

Recreational Trails

Threshold (a) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would not physically impact an existing recreational trail. The Project would provide easements for community trail segments along Oleander Avenue and Ellsworth Street, as called for by the Mead Valley Area Plan. Environmental effects resulting from ground disturbance in the trail easement areas is evaluated as an inherent part of the Project throughout this EIR and in no cases are significant effects identified specifically related to the trail easements.

4.14.6 MITIGATION

Impacts would be less than significant. No mitigation is required.



4.15 TRANSPORTATION

The following analysis is based on two technical studies prepared by Urban Crossroads, Inc. that evaluate the Project's potential to adversely affect local and regional circulation. These studies include: 1) "Knox Business Park Traffic Impact Analysis County of Riverside" (dated June 8, 2015), which is included as *Technical Appendix J1* to this EIR (Urban Crossroads, 2015a); and 2) "Knox Business Park Supplemental Basic Freeway Segment Analysis" (dated June 8, 2015), which is included as *Technical Appendix J2* to this EIR (Urban Crossroads, 2015b).

Please note that *Technical Appendix J1* and *Technical Appendix J2* were prepared prior to the Project Applicant's decision to reduce the size of the Building E Site and the size of its proposed building to the current configurations described in EIR Section 3.0, *Project Description*. Therefore, Urban Crossroads, Inc. prepared a supplemental analysis to address the reduction in size of the Building E Site and its proposed building. The update letter, "Knox Business Park Supplemental Analysis" is dated January 31, 2017 and is appended to the front of *Technical Appendix J1*. Based on the results of Urban Crossroads' Supplemental Analysis, all of the Project's traffic impacts would be less than disclosed in *Technical Appendix J1* and *Technical Appendix J2*.

The above-listed reports were prepared in accordance with the County of Riverside Transportation Department's *Traffic Impact Analysis Preparation Guide*. Also, where appropriate, *Technical Appendices J1* and *J2* address guidelines as identified by the *Riverside County Congestion Management Program (CMP)* and the California Department of Transportation (Caltrans) *Guide for the Preparation of Traffic Studies*. These and other reference sources are listed in Section 7.0, *References*, of this EIR. Please note that the segment of Ellsworth Street that passes through the Project site is called "Decker Avenue" in this EIR Subsection and in *Technical Appendices J1* and *J2*.

4.15.1 STUDY AREA DESCRIPTION

The geographic area that was evaluated for Project-related effects to the transportation and circulation network (hereafter referred to as the "Project study area" or "study area") was determined as described below.

A. Intersections

The study area includes all intersections at which the Project would add 50 or more peak hour trips, in conformance with the County of Riverside's *Traffic Impact Analysis Preparation Guide* and direction provided by the County of Riverside staff during the Project's traffic study scoping process. A "peak hour trip" is defined as a trip that occurs between the hours of 7:00 AM and 9:00 AM (AM peak hour) or between the hours of 4:00 PM and 6:00 PM (PM peak hour). The "50 peak hour trip" criteria utilized by the County of Riverside is consistent with the methodology used by many other jurisdictions in Southern California and transportation engineering industry best practices, and generally represents a threshold at which a development project's traffic is distinguishable from background traffic. Although each intersection may have unique operating characteristics, this traffic engineering rule of thumb is a valid and proven way to establish a study area. Accordingly, intersections that would



receive fewer than 50 peak hour trips from the Project are not required to be included in the study area, because the Project’s contribution of traffic would not be substantial and distinguishable from background traffic (i.e., fewer than 50 peak hour trips) and is considered to be a less-than-significant impact on both a direct and cumulatively considerable basis. (Urban Crossroads, 2015a, pp. 5, 37)

Eleven (11) intersections are located within the Project study area and are listed in Table 4.15-1, *Study Area Intersections*. For ease of reference throughout this EIR Subsection, identification numbers are assigned to each intersection listed in Table 4.15-1 and correspond to the intersection locations identified on Figure 4.15-1, *Study Area Intersection Locations*. In addition to the County of Riverside, the Project study area includes intersections that are wholly or partially under the jurisdictions of the City of Perris and Caltrans. (Urban Crossroads, 2015a, pp. 5-7)

Table 4.15-1 Study Area Intersections

| ID | Intersection Location | Jurisdiction | CMP? |
|----|---|-------------------------------|------|
| 1 | Driveway 1 / Oleander Avenue – Future Intersection | County of Riverside | No |
| 2 | Driveway 2 / Oleander Avenue – Future Intersection | County of Riverside | No |
| 3 | Driveway 3 / Oleander Avenue – Future Intersection | County of Riverside | No |
| 4 | Decker Road / Oleander Avenue – Future Intersection | County of Riverside | No |
| 5 | Driveway 4 / Oleander Avenue – Future Intersection | County of Riverside | No |
| 6 | Driveway 5 / Oleander Avenue – Future Intersection | County of Riverside | No |
| 7 | Driveway 6 / Oleander Avenue – Future Intersection | County of Riverside | No |
| 8 | Harvill Avenue / Harley Knox Boulevard | County of Riverside | No |
| 9 | Harvill Avenue / Oleander Avenue | County of Riverside | No |
| 10 | I-215 Southbound Ramps / Harley Knox Boulevard | Caltrans, County of Riverside | Yes |
| 11 | I-215 Northbound Ramps / Harley Knox Boulevard | Caltrans, City of Perris | Yes |

Source: (Urban Crossroads, 2015a, Table 1-1)

B. Freeway Mainline Segments

All freeway mainline segments are under the jurisdiction of Caltrans. To facilitate management of the State highway system, Caltrans is divided into individual districts with each district responsible for State highway system facilities within their geographic area. The Caltrans district with jurisdiction over the Project’s geographic area, District 8, requests that quantitative traffic impact analyses for proposed development projects within the Project’s geographic area evaluate potential impacts to freeway mainline segments when that project is anticipated to contribute 50 or more two-way peak hour trips to a freeway mainline segment. Because impacts to freeway segments dissipate with distance from the point of entry to the State highway system (i.e., at ramps receiving a project’s traffic), Caltrans District 8 has indicated that when a project’s traffic volumes dissipate to fewer than 50 peak hour trips on a freeway mainline segment, they become unrecognizable from other traffic on the State highway system. Thus, Caltrans does not require a project’s entire vehicular travel path on State highway facilities to be studied. (Caltrans, 2014)



Based on Caltrans guidance, the Project study area includes all freeway mainline segments that would receive 50 or more two-way peak hour trips from the Project. The 24 freeway mainline segments located within the Project study area are listed in Table 4.15-2, *Study Area Freeway Mainline Segments*, and include northbound and southbound segments of I-215. Because I-215 and SR-60 overlap between I-215 and SR-91, the overlapping freeway segments can be referred to as either “I-215” or “SR-60.” For purposes of analysis in this subsection and *Technical Appendix J2*, all SR-60 eastbound/westbound mainline segments located west of I-215 and east of SR-91 are referred to as northbound/southbound segments of I-215. For ease of reference throughout this EIR Subsection, identification numbers are assigned to each roadway segment listed Table 4.15-2.

Table 4.15-2 Study Area Freeway Mainline Segments

| ID | Freeway | Direction | Segment |
|----|---------|------------|--|
| 1 | I-215 | Southbound | SR-60/SR-91 Freeway to Blaine St. |
| 2 | I-215 | Southbound | Blaine St. to University Av. |
| 3 | I-215 | Southbound | University Av. to Martin Luther King Bl. |
| 4 | I-215 | Southbound | Martin Luther King Bl. to Central Av. |
| 5 | I-215 | Southbound | Central Av. to Box Springs Rd. |
| 6 | I-215 | Southbound | Box Springs Rd. to SR-60/I-215 Freeway |
| 7 | I-215 | Southbound | SR-60 Freeway to Eucalyptus Av. |
| 8 | I-215 | Southbound | Eucalyptus Av. to Alessandro Bl. |
| 9 | I-215 | Southbound | Alessandro Bl. to Cactus Av. |
| 10 | I-215 | Southbound | Cactus Av. to Van Buren Bl. |
| 11 | I-215 | Southbound | Van Buren Bl. to Harley Knox Bl. |
| 12 | I-215 | Southbound | Harley Knox Bl. to Ramona Exwy. |
| 13 | I-215 | Northbound | SR-60/SR-91 Freeway to Blaine St. |
| 14 | I-215 | Northbound | Blaine St. to University Av. |
| 15 | I-215 | Northbound | University Av. to Martin Luther King Bl. |
| 16 | I-215 | Northbound | Martin Luther King Bl. to Central Av. |
| 17 | I-215 | Northbound | Central Av. to Box Springs Rd. |
| 18 | I-215 | Northbound | Box Springs Rd. to SR-60/I-215 Freeway |
| 19 | I-215 | Northbound | SR-60 Freeway to Eucalyptus Av. |
| 20 | I-215 | Northbound | Eucalyptus Av. to Alessandro Bl. |
| 21 | I-215 | Northbound | Alessandro Bl. to Cactus Av. |
| 22 | I-215 | Northbound | Cactus Av. to Van Buren Bl. |
| 23 | I-215 | Northbound | Van Buren Bl. to Harley Knox Bl. |
| 24 | I-215 | Northbound | Harley Knox Bl. to Ramona Exwy. |

Source: (Urban Crossroads, 2015b, Table 1)



C. Freeway Ramp Merge/Diverge Junctions

The Project study area includes four freeway ramp merge/diverge junctions locations for I-215, in both northbound and southbound locations. The freeway ramp merge/diverge junctions included in the Project study area represent locations where the Project would contribute 50 or more peak hour trips that would merge and diverge across freeway lanes and potentially disrupt traffic flow. The freeway mainline merge/diverge ramp junctions in the Project study area are listed in Table 4.15-3, *Study Area Freeway Merge/Diverge Ramp Junctions*. All freeway ramp junctions are under the jurisdiction of Caltrans. (Urban Crossroads, 2015a, p. 8)

Table 4.15-3 Study Area Freeway Merge/Diverge Ramp Junctions

| ID | Freeway Merge/Diverge Ramp Junctions |
|----|---|
| 1 | I-215 Freeway – Southbound, Off-Ramp at Harley Knox Boulevard (Diverge) |
| 2 | I-215 Freeway – Southbound, On-Ramp at Harley Knox Boulevard (Merge) |
| 3 | I-215 Freeway – Northbound, On-Ramp at Harley Knox Boulevard (Merge) |
| 4 | I-215 Freeway – Northbound, Off-Ramp at Harley Knox Boulevard (Diverge) |

Source: (Urban Crossroads, 2015a, Table 1-3)

D. Freeway Off-Ramps

The Project’s traffic would access I-215 at Harley Knox Boulevard. As such, a queuing impact analysis was conducted to determine the potential for the Project to cause or contribute to excessive vehicles queues at the Harley Knox Boulevard interchange, which would cause traffic to “spill back” onto the freeway mainline and disrupt vehicle flow. Therefore, the off-ramps are included in the study area.

4.15.2 EXISTING CONDITIONS

The Project site is located within the unincorporated community of Mead Valley in the northwestern portion of Riverside County. The Project site is within the Sphere of Influence (SOI) for the City of Perris. Figure 4.15-2, *County of Riverside General Plan Circulation Element*, and Figure 4.15-3, *City of Perris General Plan Circulation Plan*, show the roadway network for the major roads located adjacent to and surrounding the Project site. The Project site is approximately 0.4-mile west of I-215, 5.8 miles south of SR-60, and approximately 9.5 miles southeast of SR-91.

A. Existing Intersection Conditions

1. Existing Intersection Traffic Counts

The intersection level of service (LOS) analysis is based on the traffic volumes observed during the peak hour conditions using traffic count data collected in April 2015. The weekday AM and weekday PM peak hour count data is representative of typical weekday peak hour traffic conditions in the study area. Urban Crossroads did not observe anything in the field that would indicate atypical traffic conditions on the count dates, such as construction activity or detour roads, and near-by schools were in session and operating on normal schedules. Existing number of through lanes and intersection controls within the Project study area are shown on Figure 4.15-4, *Existing Number of Through Lanes and Intersection Controls*. (Urban Crossroads, 2015a, p. 37)



The traffic count data includes a tabulation of passenger cars, 2-axle trucks, 3-axle trucks, and 4-or-more axle trucks, in accordance with Riverside County traffic report requirements. Larger vehicles take up more space on the roadway and take longer to accelerate and decelerate than smaller, passenger vehicles; therefore, converting larger vehicle into passenger car equivalents (PCEs) accounts for the effect trucks have on circulation and allows for traffic to be represented as a standardized unit. For purposes of the analysis, a PCE factor of 1.5 was applied to 2-axle truck trips, 2.0 was applied to 3-axle truck trips, and 3.0 was applied for 4-or-more axle truck trips. (Urban Crossroads, 2015a, p. 37). For a more detailed discussion about the methodology used for the traffic counts and the use of PCEs, please refer to EIR Subsection 4.15.3B.

Existing weekday average daily traffic (ADT) volumes on arterial roadways throughout the Project's study area are shown on Figure 4.15-5, *Existing Average Daily Traffic (ADT)*. The existing ADT is presented the PCEs in order to account for passenger cars and larger trucks. Except where specifically noted, all of the vehicle trips/volumes are presented on Figure 4.15-5 and used in the analysis presented in this EIR Subsection are shown in terms of PCEs. (Urban Crossroads, 2015a, p. 38)

2. Existing Intersection Levels of Service

Existing peak hour traffic operations were evaluated at Project study area intersections based on the analysis methodologies presented in EIR Subsection 4.15.3. The levels of service (LOS) for the Project study area intersections during peak hours are summarized in Table 4.15-4, *Existing Intersection Levels of Service*. As shown in Table 4.15-4, all intersections in the Project study area operate at acceptable LOS during peak hours under existing conditions. (Urban Crossroads, 2015a, p. 38)

Table 4.15-4 Existing Intersection Levels of Service

| # | Intersection | Traffic Control ³ | Intersection Approach Lanes ¹ | | | | | | | | | | | | Delay ² (secs.) | | Level of Service | | Acceptable LOS |
|----|----------------------------------|------------------------------|--|---|---|------------|---|---|-----------|---|---|-----------|---|---|----------------------------|------|------------------|----|----------------|
| | | | Northbound | | | Southbound | | | Eastbound | | | Westbound | | | AM | PM | AM | PM | |
| | | | L | T | R | L | T | R | L | T | R | L | T | R | | | | | |
| 1 | Dwy. 1 / Oleander Av. | | Future Intersection | | | | | | | | | | | | | | | | C |
| 2 | Dwy. 2 / Oleander Av. | | Future Intersection | | | | | | | | | | | | | | | | C |
| 3 | Dwy. 3 / Oleander Av. | | Future Intersection | | | | | | | | | | | | | | | | C |
| 4 | Decker Rd. / Oleander Av. | | Future Intersection | | | | | | | | | | | | | | | | D |
| 5 | Dwy. 4 / Oleander Av. | | Future Intersection | | | | | | | | | | | | | | | | C |
| 6 | Dwy. 5 / Oleander Av. | | Future Intersection | | | | | | | | | | | | | | | | C |
| 7 | Dwy. 6 / Oleander Av. | CSS | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 1 | 0 | 0 | 1 | 0 | 8.9 | 0.0 | A | A | C |
| 8 | Harvill Av. / Harley Knox Bl. | TS | 1 | 1 | 2 | 1 | 2 | 0 | 2 | 2 | 1 | 2 | 2 | 1 | 32.8 | 32.2 | C | C | D |
| 9 | Harvill Av. / Oleander Av. | TS | 1 | 2 | 0 | 1 | 2 | 1 | 1 | 1 | 0 | 1 | 1 | 0 | 6.5 | 4.6 | A | A | D |
| 10 | I-215 SB Ramps / Harley Knox Bl. | TS | 0 | 0 | 0 | 0 | 1 | 1 | 0 | 2 | d | 1 | 2 | 0 | 37.0 | 26.8 | D | C | D |
| 11 | I-215 NB Ramps / Harley Knox Bl. | TS | 0 | 1 | 1 | 0 | 0 | 0 | 1 | 2 | 0 | 0 | 2 | d | 13.6 | 22.2 | B | C | D |

¹ When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes.

L = Left; T = Through; R = Right; d = Defacto Right Turn Lane

² Per the 2010 Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

³ CSS = Cross-street Stop; TS = Traffic Signal

⁴ Volume-to-capacity ratio is greater than 1.00; Intersection unstable; Level of Service "F".

Source: (Urban Crossroads, 2015a, Table 3-1)



B. Existing Freeway Conditions

Freeway mainline segment and interchange traffic volume data was obtained from Caltrans' Performance System (PeMS) website. The data obtained from Caltrans was dated April 2015, and is the most recent date for which data was available at the time the NOP for this EIR was published (August 31, 2015). In an effort to conduct a conservative analysis, the maximum value observed within three-day period was utilized for the weekday morning (AM) and weekday evening (PM) peak hours. (Urban Crossroads, 2015a, p. 22)

Consistent with industry-standard methodology (i.e., Transportation Research Board's *Highway Capacity Manual*) actual vehicles, as opposed to PCE volumes, were utilized to calculate density and the associated LOS letter grade for each freeway segment. Truck traffic, expressed as a percentage of total traffic, is included as part of the data used to perform the density calculation in an effort to not overstate traffic volumes and potential impacts (Urban Crossroads, 2015a, p. 22).

1. Existing Freeway Mainline Segment Levels of Service

Existing peak hour operations along freeway mainline segments in the Project study area were evaluated using the analysis methodologies presented in EIR Subsection 4.15.3. All freeway mainline segments located in the Project study area operate at an acceptable LOS during the AM and PM peak hours under existing conditions as summarized in Table 4.15-5, *Freeway Mainline Segment Analysis for Existing and Existing plus Project (E+P) Conditions*. (Urban Crossroads, 2015a, p. 43)

2. Existing Freeway Ramp Merge/Diverge Junction Levels of Service

Existing peak hour operations at freeway ramp merge/diverge junctions within the Project study area were evaluated using the analysis methodologies presented in EIR Subsection 4.15.3. As summarized in Table 4.15-6, *Existing Freeway Merge/Diverge Conditions*, all study area freeway ramp merge/diverge junctions operate at acceptable LOS during peak hours. (Urban Crossroads, 2015a, p. 43)

3. Existing Freeway Off-Ramp Levels of Service

Existing freeway ramp queuing in the Project study area was evaluated using the methodologies presented in EIR Subsection 4.15.3. As summarized in Table 4.15-7, *Existing Freeway Off-Ramp Levels of Service*, all freeway ramps in the Project study area feature acceptable stacking lengths under existing conditions. (Urban Crossroads, 2015a, p. 38)



Table 4.15-5 Freeway Mainline Segment Analysis for Existing and Existing plus Project (E+P) Conditions

| Freeway | Direction | Mainline Segment | Lanes ¹ | Time Period | Existing (2015) | | | Existing Plus Project | | |
|----------------------------------|--|--|--------------------|-------------|-----------------|----------------------|-------|-----------------------|----------------------|-----|
| | | | | | Volume | Density ² | LOS | Volume | Density ² | LOS |
| I-215 Freeway | Southbound | SR-60/SR-91 Freeway to Blaine St. | 5 | AM | 4,287 | 13.6 | B | 4,317 | 13.7 | B |
| | | PM | | 5,907 | 18.8 | C | 5,922 | 18.9 | C | |
| | | Blaine St. to University Av. | 4 | AM | 4,344 | 17.4 | B | 4,374 | 17.5 | B |
| | | PM | | 4,209 | 16.5 | B | 4,224 | 16.6 | B | |
| | | University Av. to Martin Luther King Bl. | 4 | AM | 4,640 | 19.0 | C | 4,670 | 19.1 | C |
| | | PM | | 5,182 | 20.8 | C | 5,197 | 20.9 | C | |
| | | Martin Luther King Bl. to Central Av. | 5 | AM | 3,460 | 11.0 | A | 3,490 | 11.1 | B |
| | | PM | | 4,518 | 14.2 | B | 4,534 | 14.2 | B | |
| | | Central Av. to Box Springs Rd. | 5 | AM | 5,093 | 16.3 | B | 5,123 | 16.4 | B |
| | | PM | | 6,720 | 21.2 | C | 6,736 | 21.3 | C | |
| | Box Springs Rd. to SR-60/I-215 Freeway | 4 | AM | 4,643 | 18.2 | C | 4,673 | 18.3 | C | |
| | PM | | 5,966 | 23.9 | C | 5,982 | 23.9 | C | | |
| | SR-60 Freeway to Eucalyptus Av. | 5 | AM | 6,260 | 19.9 | C | 6,306 | 20.1 | C | |
| | PM | | 6,485 | 20.7 | C | 6,509 | 20.9 | C | | |
| | Eucalyptus Av. to Alessandro Bl. | 3 | AM | 3,456 | 18.7 | C | 3,502 | 19.0 | C | |
| | PM | | 5,159 | 30.6 | D | 5,183 | 31.0 | D | | |
| | Alessandro Bl. to Cactus Av. | 4 | AM | 4,985 | 19.9 | C | 5,504 | 20.2 | C | |
| | PM | | 5,540 | 22.5 | C | 5,565 | 22.6 | C | | |
| | Cactus Av. to Van Buren Bl. | 3 | AM | 4,693 | 26.0 | D | 4,742 | 26.4 | D | |
| | PM | | 5,354 | 31.4 | D | 5,379 | 31.7 | D | | |
| Van Buren Bl. to Harley Knox Bl. | 3 | AM | 2,544 | 13.4 | B | 2,593 | 13.8 | B | | |
| PM | | 3,855 | 20.5 | C | 3,880 | 20.8 | C | | | |
| Harley Knox Bl. to Ramona Exwy. | 3 | AM | 2,186 | 11.4 | B | 2,195 | 11.5 | B | | |
| PM | | 3,445 | 18.1 | C | 3,466 | 18.2 | C | | | |
| I-215 Freeway | Northbound | SR-60/SR-91 Freeway to Blaine St. | 5 | AM | 3,532 | 11.2 | B | 3,545 | 11.3 | B |
| | | PM | | 3,453 | 11.0 | A | 3,487 | 11.2 | B | |
| | | Blaine St. to University Av. | 5 | AM | 4,615 | 14.8 | B | 4,628 | 14.9 | B |
| | | PM | | 3,913 | 12.8 | B | 3,947 | 12.9 | B | |
| | | University Av. to Martin Luther King Bl. | 4 | AM | 6,526 | 27.7 | D | 6,539 | 27.8 | D |
| | | PM | | 5,849 | 24.3 | C | 5,883 | 24.5 | C | |
| | | Martin Luther King Bl. to Central Av. | 4 | AM | 5,255 | 21.4 | C | 5,269 | 21.5 | C |
| | | PM | | 5,332 | 21.9 | C | 5,367 | 22.0 | C | |
| | | Central Av. to Box Springs Rd. | 5 | AM | 5,098 | 16.5 | B | 5,112 | 16.6 | B |
| | | PM | | 5,614 | 18.7 | C | 5,649 | 18.8 | C | |
| | | Box Springs Rd. to SR-60/I-215 Freeway | 4 | AM | 6,028 | 24.3 | C | 6,042 | 24.4 | C |
| | | PM | | 6,305 | 25.6 | C | 6,340 | 25.9 | C | |
| | | SR-60 Freeway to Eucalyptus Av. | 3 | AM | 3,567 | 18.8 | C | 3,588 | 18.9 | C |
| | | PM | | 3,832 | 20.4 | C | 3,885 | 20.7 | C | |
| Eucalyptus Av. to Alessandro Bl. | 3 | AM | 4,693 | 26.0 | D | 4,714 | 26.2 | D | | |
| PM | | 5,354 | 31.4 | D | 5,407 | 32.2 | D | | | |
| Alessandro Bl. to Cactus Av. | 4 | AM | 2,724 | 10.9 | A | 2,746 | 11.0 | B | | |
| PM | | 2,523 | 10.0 | A | 2,579 | 10.3 | A | | | |
| Cactus Av. to Van Buren Bl. | 3 | AM | 3,679 | 19.6 | C | 3,701 | 19.7 | C | | |
| PM | | 2,478 | 14.1 | B | 2,734 | 14.5 | B | | | |
| Van Buren Bl. to Harley Knox Bl. | 3 | AM | 4,092 | 22.0 | C | 4,114 | 22.2 | C | | |
| PM | | 3,247 | 17.1 | B | 3,303 | 17.5 | B | | | |
| Harley Knox Bl. to Ramona Exwy. | 3 | AM | 3,721 | 19.6 | C | 3,740 | 19.9 | C | | |
| PM | | 2,779 | 14.6 | B | 2,788 | 14.6 | B | | | |

* **BOLD** = Unacceptable Level of Service

¹ Number of lanes are in the specified direction and is based on existing conditions.

² Density is measured by passenger cars per mile per lane (pc/mi/ln).

Source: (Urban Crossroads, 2015b, Table 3)



Table 4.15-6 Existing Freeway Merge/Diverge Conditions

| Freeway | Direction | Ramp or Segment | Lanes on Freeway ¹ | AM Peak Hour | | PM Peak Hour | |
|---------------|-----------|-----------------------------------|-------------------------------|----------------------|-----|----------------------|-----|
| | | | | Density ² | LOS | Density ² | LOS |
| I-215 Freeway | SB | Off-Ramp at Harley Knox Boulevard | 3 | 20.2 | C | 27.5 | C |
| | | On-Ramp at Harley Knox Boulevard | 3 | 15.1 | B | 21.5 | C |
| | NB | On-Ramp at Harley Knox Boulevard | 3 | 25.8 | C | 21.9 | C |
| | | Off-Ramp at Harley Knox Boulevard | 3 | 25.1 | C | 20.0 | B |

¹ Number of lanes are in the specified direction and is based on existing conditions

² Density is measured by passenger cars per mile per lane (pc/mi/ln).

Source: (Urban Crossroads, 2015a, Table 3-4)

Table 4.15-7 Existing Freeway Off-Ramp Levels of Service

| Intersection | Movement | Available Stacking Distance (Feet) | 95th Percentile Queue (Feet) ² | | Acceptable? ¹ | |
|-------------------------------------|----------|------------------------------------|---|--------------|--------------------------|-----|
| | | | AM Peak Hour | PM Peak Hour | AM | PM |
| I-215 SB Off-Ramp / Harley Knox Bl. | SBL/T | 1,330 | 383 | 339 | Yes | Yes |
| | SBR | 270 | 44 | 60 | Yes | Yes |
| I-215 NB Off-Ramp / Harley Knox Bl. | NBL/T | 1,120 | 13 | 22 | Yes | Yes |
| | NBR | 265 | 47 | 52 | Yes | Yes |

¹ Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 15 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown on this table, where applicable.

² Maximum queue length for the approach reported.

Source: (Urban Crossroads, 2015a, Table 3-2)

C. Existing Mass Transit

The Project study area is within the service area of the Riverside Transit Authority (RTA), a public transit agency serving the unincorporated Riverside County region. Under existing conditions, there are no bus routes that operate along the roadways within the study area in close proximity to the Project site. (Urban Crossroads, 2015a, p. 37)

There was no commuter rail service in close proximity to the Project site at the time the NOP for this EIR was released for public review; however, the “Perris Valley Line,” a 24-mile extension of the Metrolink commuter rail service from Downtown Riverside to Perris, became operational in June 2016. The Perris Valley Line connects to Metrolink’s 91 Line, which runs through Corona and Fullerton to Los Angeles. The Perris Valley Line runs along the west side of I-215 and the nearest station to the Project site (Moreno Valley/March Field Station, 14160 Meridian Parkway, Riverside, CA) is located approximately 3.8 miles north of the Project site. (RCTC, n.d.)

D. Existing Pedestrian and Bicycle Facilities

Field observations collected by Urban Crossroads in April 2015 indicate nominal pedestrian and bicycle activity within the study area. As shown in Figure 4.15-6, *Riverside County Trails and Bikeway*



System, the County of Riverside identifies planned trails in the immediate vicinity of the Project site, including “Community Trails” along Oleander Avenue and Ellsworth Street (“Decker Road”) along the Project site’s frontage, as well as along Harvill Avenue (north of Oleander Avenue) and Harley Knox Boulevard within the study area. There are no existing or planned bicycle facilities in the Project’s vicinity. (Urban Crossroads, 2015a, p. 31)

E. Existing Truck Routes

While the County of Riverside’s General Plan recognizes the trucking industry and the importance of the region’s role in the movement of goods, the County has not formally established any truck routes in the unincorporated area of Riverside County. The City of Perris has established local truck routes, which are shown in Figure 4.15-7, *City of Perris Truck Routes*. As shown, Harley Knox Boulevard, east of the I-215 Freeway, is designated as a City of Perris truck route. (Urban Crossroads, 2015a, p. 31)

F. Existing Airport Facilities

The Project site is located approximately 1.1 miles west of the March Air Reserve Base (MARB). Due to the proximity of the Project site to the MARB, the site is subject to the *MARB Airport Land Use Compatibility Plan* (ALUCP). The *MARB ALUCP* identifies land use standards and design criteria for new development located in the proximity of the MARB to ensure compatibility between the airport and surrounding land uses and to maximize public safety. The Project site is located within “Compatibility Zone C2.” Within Compatibility Zone C2, highly noise-sensitive outdoor residential uses and hazards to flight are prohibited. (RCALUC, 2014, Map MA-1; Table MA-2)

G. Applicable Plans, Regulations, and Policies

1. SCAG Regional Transportation Plan

The Southern California Association of Governments (SCAG) is a regional agency established pursuant to California Government Code § 6500, also referred to as the Joint Powers Authority law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project site is within SCAG’s regional authority. On April 4, 2012, SCAG adopted the *2012-2035 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS)* with goals to: 1) maximize mobility and accessibility for all people and goods in the region; 2) ensure travel safety and reliability for all people and goods in the region; 3) preserve and ensure a sustainable transportation system; 4) maximize productivity of the transportation system; 5) protect the environment, improve air quality, and promote energy efficiency; 6) encourage land use and growth patterns that complement the transportation investments and improve the cost-effectiveness of expenditures; and 7) maximize the security of the transportation system (SCAG, 2012a, p. 13).



2. Riverside County Congestion Management Program

The *Riverside County Congestion Management Program (CMP)* was prepared by the Riverside County Transportation Commission (RCTC). The intent of the *Riverside County CMP* is to more directly link land use, transportation, and air quality planning and to prompt reasonable growth management programs that would more effectively utilize new and existing transportation funds to alleviate traffic congestion and related impacts and improve air quality. The *Riverside County CMP* was first adopted in December 1992 and has been updated 11 times, with the most recent comprehensive update in December 2011. The *Riverside County CMP* states that deficiencies along the *CMP* system must be identified when they occur so that improvement measures can be identified. Understanding the reason for these deficiencies and identifying ways to reduce the impact of future growth and development along a critical *CMP* corridor is intended to conserve scarce funding resources and help target those resources appropriately.

The *Riverside County CMP* roadway network includes the following intersections in the Project study area (Urban Crossroads, 2015a, p. 7):

- I-215 southbound ramps / Harley Knox Boulevard (Intersection #10);
- I-215 northbound ramps / Harley Knox Boulevard (Intersection #11).

All State highway facilities in Riverside County are designated as *CMP* roadways, including segments of I-215 and SR-60 within the Project study area (RCTC, 2011, pp. 2-1 to 2-3).

3. County of Riverside and City of Perris General Plan Circulation Elements

The General Plans for the County of Riverside and the City of Perris each contain a Circulation Element that is intended to guide the development of the local circulation system in a manner that is compatible with the respective General Plan Land Use Element. To help meet traffic demands and achieve balanced growth, both cities have adopted specific goals and policies, which serve as the basis for their Circulation Element. Refer to *Technical Appendix J1* for a detailed summary of the General Plan Circulation Elements for the County of Riverside and City of Perris.

4. Transportation Uniform Mitigation Fee (TUMF) Program

In 2000, the Western Riverside Council of Governments (WRCOG) established the Transportation Uniform Mitigation Fee (TUMF) Program to mitigate the cumulative regional impacts of projected future growth and new development on the region's arterial highway system. The TUMF Program applies a uniform mitigation fee to new development projects that is collected by each WRCOG member agency, including the County of Riverside. The collected funds are pooled and used by WRCOG to fund transportation network improvements, including roads, bridges, interchanges, and railroad grade separations, identified by the public works departments of WRCOG member agencies and listed in the *Regional System of Highways and Arterials (RHSAs)*. (WRCOG, 2014, pp. 4-5)



5. *Development Impact Fee (DIF) Program*

The County of Riverside created its Development Impact Fee (DIF) program to impose and collect fees from new residential, commercial, and industrial development for the purpose of funding local improvements necessary to accommodate growth as identified in the County's General Plan, including improvements of transportation-related improvements such as traffic signals, roads, bridges, and other major improvements. The identification of specific roadway and intersection improvement projects and the timing to use the DIF fees is established through periodic capital improvement programs which are overseen by County's Transportation Department, as well as other County departments. Facilities eligible for funding through the County's DIF program are identified on the County's *Public Facilities Needs List*, which currently extends through the year 2020. (Urban Crossroads, 2015a, p. 12)

4.15.3 METHODOLOGY FOR ESTIMATING PROJECT-RELATED TRAFFIC IMPACTS

A. Level of Service (LOS)

Traffic operations of roadway facilities are described using the term "Level of Service" (LOS). LOS is a qualitative description of traffic flow based on several factors such as speed, travel time, delay, and freedom to maneuver. Six levels are typically defined ranging from LOS A, representing completely free-flow conditions, to LOS F, representing breakdown in flow resulting in stop-and-go conditions. LOS E represents operations at or near capacity, an unstable level where vehicles are operating with the minimum spacing for maintaining uniform flow. (Urban Crossroads, 2015a, p. 17) Table 4.15-8, *Signalized Intersections LOS Thresholds*, and Table 4.15-9, *Unsignalized Intersection LOS Thresholds*, summarize typical operational conditions at signalized and unsignalized intersections for each LOS classification, respectively. Table 4.15-10, *Freeway Mainline Segment LOS Thresholds*, summarize the typical freeway mainline operational conditions for each LOS classification.

In 2013, California Senate Bill (SB) 743 was passed, which is intended to balance the need for LOS for traffic planning with the need to build infill housing and mixed use commercial developments within walking distance of mass transit facilities, downtowns, and town centers and to provide greater flexibility to local governments to balance these sometimes competing needs. At full implementation of SB 743, the California Governor's Office of Planning and Research (OPR) is expected to replace LOS as the metric against which traffic impacts are evaluated, with a metric based on vehicle miles traveled (VMT). At the time the NOP for this EIR was released (August 2015), a VMT metric was not adopted by OPR, and the County of Riverside in its capacity as Lead Agency, as well as surrounding local agencies in which the Project's traffic would circulate, use LOS as the significance criteria for evaluating a Project's traffic impacts. For this reason, a LOS metric and not a VMT metric is appropriately used as the significance criterion in this EIR.



Table 4.15-8 Signalized Intersections LOS Thresholds

| Description | Average Control Delay (Seconds), V/C ≤ 1.0 | Level of Service, V/C ≤ 1.0 | Level of Service, V/C > 1.0 |
|---|--|-----------------------------|-----------------------------|
| Operations with very low delay occurring with favorable progression and/or short cycle length. | 0 to 10.00 | A | F |
| Operations with low delay occurring with good progression and/or short cycle lengths. | 10.01 to 20.00 | B | F |
| Operations with average delays resulting from fair progression and/or longer cycle lengths. Individual cycle failures begin to appear. | 20.01 to 35.00 | C | F |
| Operations with longer delays due to a combination of unfavorable progression, long cycle lengths, or high V/C ratios. Many vehicles stop and individual cycle failures are noticeable. | 35.01 to 55.00 | D | F |
| Operations with high delay values indicating poor progression, long cycle lengths, and high V/C ratios. Individual cycle failures are frequent occurrences. This is considered to be the limit of acceptable delay. | 55.01 to 80.00 | E | F |
| Operation with delays unacceptable to most drivers occurring due to over saturation, poor progression, or very long cycle lengths | 80.01 and up | F | F |

Source: HCM

Source: (Urban Crossroads, 2015a, Table 2-1)

Table 4.15-9 Unsignalized Intersection LOS Thresholds

| Description | Average Control Delay Per Vehicle (Seconds) | Level of Service, V/C ≤ 1.0 | Level of Service, V/C > 1.0 |
|---|---|-----------------------------|-----------------------------|
| Little or no delays. | 0 to 10.00 | A | F |
| Short traffic delays. | 10.01 to 15.00 | B | F |
| Average traffic delays. | 15.01 to 25.00 | C | F |
| Long traffic delays. | 25.01 to 35.00 | D | F |
| Very long traffic delays. | 35.01 to 50.00 | E | F |
| Extreme traffic delays with intersection capacity exceeded. | > 50.00 | F | F |

Source: (Urban Crossroads, 2015a, Table 2-2)



Table 4.15-10 Freeway Mainline Segment LOS Thresholds

| Level of Service | Description | Density Range (pc/mi/ln) ¹ |
|------------------|---|---------------------------------------|
| A | Free-flow operations in which vehicles are relatively unimpeded in their ability to maneuver within the traffic stream. Effects of incidents are easily absorbed. | 0.0 – 11.0 |
| B | Relative free-flow operations in which vehicle maneuvers within the traffic stream are slightly restricted. Effects of minor incidents are easily absorbed. | 11.1 – 18.0 |
| C | Travel is still at relative free-flow speeds, but freedom to maneuver within the traffic stream is noticeably restricted. Minor incidents may be absorbed, but local deterioration in service will be substantial. Queues begin to form behind significant blockages. | 18.1 – 26.0 |
| D | Speeds begin to decline slightly and flows and densities begin to increase more quickly. Freedom to maneuver is noticeably limited. Minor incidents can be expected to create queuing as the traffic stream has little space to absorb disruptions. | 26.1 – 35.0 |
| E | Operation at capacity. Vehicles are closely spaced with little room to maneuver. Any disruption in the traffic stream can establish a disruption wave that propagates throughout the upstream traffic flow. Any incident can be expected to produce a serious disruption in traffic flow and extensive queuing. | 35.1 – 45.0 |
| F | Breakdown in vehicle flow. | >45.0 |

¹ pc/mi/ln = passenger cars per mile per lane. Source: HCM 2010

Source: (Urban Crossroads, 2015b, Table 2)

The Riverside County General Plan designates all lands in the County as falling into one of five Foundation Components. The “Community Development” Foundation Component area is the geographic area intended by the County to accommodate the greatest amount of anticipated growth. Based on the LOS standards utilized by the County of Riverside within “Community Development” areas, intersections that operate at LOS E and F are considered deficient. The Project site and areas to the north, east, and south of the Project site are located within a “Community Development” Foundation Component area as defined by the Riverside County General Plan; therefore, all intersection operations of LOS D or better are considered acceptable in these areas. (Urban Crossroads, 2015a, p. 23) The City of Perris has adopted LOS standards stating that intersections within Perris’ jurisdiction that operate at LOS E and F are considered deficient along local roads. (City of Perris, 2008, p. 14)

The *Riverside County CMP* defines LOS F as the deficient service level for *CMP* highways and roadways (including intersections). However, as a conservative measure, the analysis presented in this Subsection and *Technical Appendices J1* and *J2* considers LOS E and LOS F to be deficient along *CMP* facilities. (Urban Crossroads, 2015a, p. 24)

Caltrans considers LOS F and LOS E to be deficient operations during the peak hour along the State highway system network under their jurisdiction (Urban Crossroads, 2015a, p. 24).

B. Traffic Trip Counts

As noted previously, to account for the effect large trucks have on circulation and allow for traffic to be represented as a standardized unit, all vehicle trips were converted to PCEs for purpose of conducting the Project’s traffic analysis. A PCE factor of 1.5 was applied to 2-axle trucks, 2.0 was applied to 3-axle trucks, and 3.0 was applied for 4+-axle trucks. These factors are consistent with the



values recommended for use in the *San Bernardino County CMP* and are more conservative than the factor recommended by County of Riverside's traffic study guidelines (which applies a factor of 2.0 to all large vehicles regardless of the number of axles). The *San Bernardino County CMP* PCE factors are utilized for the Project's analysis in an effort to conduct a more conservative analysis. (Urban Crossroads, 2015a, p. 37)

A detailed description of the methodology used to classify peak hour and daily traffic trips is provided in *Technical Appendix JI*.

C. Intersection Capacity Analysis

The intersection LOS analysis is based on the traffic volumes observed/projected during peak hour conditions. The following peak hours were selected for analysis because these hours typically experience the most traffic during a 24-hour period.

- Weekday AM Peak Hour (between 7:00 AM and 9:00 AM)
- Weekday PM Peak Hour (between 4:00PM and 6:00PM)

For signalized intersections, the County of Riverside requires operations analysis based on the methodology described in the *Highway Capacity Manual (HCM)*. Study area intersections were evaluated using the Synchro (Version 8 Build 806) analysis software package. Intersection LOS operations are based on an intersection's average control delay for each vehicle movement. Control delay includes initial deceleration delay, queue move-up time, stopped delay, and final acceleration delay. At signalized intersections LOS is directly related to the average control delay per vehicle and is correlated to a LOS designation as described in Table 4.15-8. (Urban Crossroads, 2015a, p. 17)

Per the Caltrans *Guide for the Preparation of Traffic Impact Studies*, the traffic modeling and signal timing optimization software package Synchro (Version 8 Build 806) has also been utilized to analyze signalized intersections under Caltrans' jurisdiction, which include the I-215 interchange at Harley Knox Boulevard. Signal timing for the freeway arterial-to-ramp intersections were obtained from Caltrans District 8. (Urban Crossroads, 2015a, p. 18)

For unsignalized intersections, the County of Riverside requires that operations be evaluated using the methodology described in the *HCM*. At two-way or side-street stop-controlled intersections, LOS is calculated for each controlled movement and for the left turn movement from the major street, as well as for the intersection as a whole. For approaches composed of a single lane, the delay is computed as the average of all movements in that lane. For all-way stop controlled intersections, LOS is computed for the intersection as a whole. (Urban Crossroads, 2015a, p. 19) The LOS rating is based on the weighted average control delay expressed in seconds per vehicle, as shown in Table 4.15-9.

For a more detailed discussion on intersection capacity analysis methodology, refer to Subsection 2.2 of *Technical Appendix JI*.



D. Traffic Signal Warrant Analysis

The term "signal warrants" refers to the list of established criteria used by Caltrans and other public agencies to quantitatively justify or ascertain the potential need for installation of a traffic signal at an otherwise unsignalized intersection. The signal warrant criteria presented in the latest edition of the Federal Highway Administration's (FHWA) *Manual on Uniform Traffic Control Devices (MUTCD)*, as amended by the *MUTCD 2014 California Supplement* is used for all unsignalized study area intersections. For more information on signal warrant analysis methodology, refer to Subsection 2.4 of *Technical Appendix J1*. (Urban Crossroads, 2015a, p. 20)

Traffic signal warrant analyses were performed for all unsignalized Project study area intersections (seven total intersections), as shown in Table 4.15-11, *Traffic Signal Warrant Analysis Locations*. A signal warrant defines the minimum condition under which the installation of a traffic signal might be warranted. Meeting this threshold condition does not require that a traffic control signal be installed at a particular intersection location, but rather, that other traffic factors and conditions be evaluated in order to determine whether the signal is truly justified. It should also be noted that signal warrants do not necessarily correlate with LOS. An intersection may satisfy a signal warrant condition and operate at or above acceptable LOS or operate below acceptable LOS and not meet a signal warrant. (Urban Crossroads, 2015a, p. 21)

Table 4.15-11 Traffic Signal Warrant Analysis Locations

| ID | Intersection Location | Jurisdiction | CMP? |
|----|---|---------------------|------|
| 1 | Driveway 1 / Oleander Avenue – Future Intersection | County of Riverside | No |
| 2 | Driveway 2 / Oleander Avenue – Future Intersection | County of Riverside | No |
| 3 | Driveway 3 / Oleander Avenue – Future Intersection | County of Riverside | No |
| 4 | Decker Road / Oleander Avenue – Future Intersection | County of Riverside | No |
| 5 | Driveway 4 / Oleander Avenue – Future Intersection | County of Riverside | No |
| 6 | Driveway 5 / Oleander Avenue – Future Intersection | County of Riverside | No |
| 7 | Driveway 6 / Oleander Avenue – Future Intersection | County of Riverside | No |

Source: (Urban Crossroads, 2015a, Table 2-3)

E. Freeway Mainline Segment Analysis

For purposes of analysis, the freeway system in the study area has been broken into segments defined by the freeway-to-arterial interchange locations. The freeway mainline segment analysis is based upon peak hour directional volumes, and the freeway mainline segment performance analysis utilizes the methodology described in the *HCM* and was performed using HCS2010 software. The performance measure preferred by Caltrans to calculate LOS is density. Density is expressed in terms of passenger cars per mile per lane. Table 4.15-10 summarizes the freeway segment LOS thresholds for each density range utilized for this analysis. (Urban Crossroads, 2015a, p. 21)

For a more detailed discussion of freeway mainline segment analysis methodology, refer to Subsection 2.5 of *Technical Appendix J1*.



F. Freeway Ramp Merge/Diverge Ramp Junction Analysis

The merge/diverge analysis is based on the HCM “Ramps and Ramp Junctions” analysis method and was performed using HCS+ software. Although the HCM indicates the influence area for a merge/diverge junction is 1,500 feet, the analysis presented the Project’s analysis was performed at all ramp locations with respect to the nearest on- or off-ramp at each interchange in an effort to be consistent with Caltrans guidance/comments on other projects in the region. The results (reported in passenger car per mile per lane) are calculated based on the existing number of travel lanes, number of lanes at the on- and off-ramp both at the analysis junction and at upstream and downstream locations (if applicable) and acceleration/deceleration lengths at each merge/diverge point. Table 4.15-12, *Description of Freeway Merge and Diverge LOS*, summarizes the freeway ramp merge/diverge junction LOS thresholds utilized in this analysis. (Urban Crossroads, 2015a, pp. 22-23)

Table 4.15-12 Description of Freeway Merge and Diverge LOS

| Level of Service | Density Range (pc/mi/ln) ¹ |
|------------------|---------------------------------------|
| A | ≤10.0 |
| B | 10.0 – 20.0 |
| C | 20.0 – 28.0 |
| D | 28.0 – 35.0 |
| E | >35.0 |
| F | Demand Exceeds Capacity |

¹ pc/mi/ln = passenger cars per mile per lane. Source: HCM
Source: (Urban Crossroads, 2015a, Table 2-5)

For more information on freeway ramp merge/diverge junction analysis methodology, refer to Subsection 2.6 of *Technical Appendix JI*.

G. Freeway Off-Ramp Queuing Analysis

The traffic progression analysis tool and HCM intersection analysis program, Synchro, was used to assess the potential impacts/needs of the freeway ramps with traffic added from the proposed Project. Storage (turn-pocket) length recommendations at the ramps are based upon the 95th percentile queue resulting from the Synchro progression analysis. The 95th percentile queue is the maximum back of queue with 95th percentile traffic volumes. The queue length reported is for the lane with the highest queue in the lane group. (Urban Crossroads, 2015a, pp. 19-20)

For more information on the freeway ramp queuing analysis methodology, refer to Subsection 2.3 of *Technical Appendix JI*.

H. Cumulative Impact Analysis

CEQA Guidelines § 15130 requires that an EIR disclose the impact from the Project along with the incremental impacts from closely related past, present, and reasonable foreseeable future projects (i.e., cumulative impact analysis). As previously described in EIR Subsection 4.0, *Environmental Analysis*,



the analysis of the Project's potential cumulative traffic impacts utilizes a summary of projections approach plus a list of projects approach in order to provide a conservative, worst-case analysis. Data for the summary of projections approach was obtained from the sources previously described in EIR Subsection 4.0. Data of the list of projects approach was obtained from a list of 103 cumulative projects identified in consultation with planning and engineering staff from the County of Riverside, City of Moreno Valley, March Joint Powers Authority, City of Riverside, and City of Perris. The 103 cumulative projects were identified based on their records or past, pending, and foreseeable future projects in Riverside County and surrounding jurisdictions. For purposes of analysis in *Technical Appendices J1* and *J2* and this Subsection, the cumulative Projects were grouped into 79 traffic analysis zones based on their geographic location. The list of these 103 projects is included in EIR Subsection 4.0, *Environmental Analysis*. Descriptive and locational information about each project considered in the cumulative impact analysis can be found in Subsection 4.6 of *Technical Appendix J1*. (Urban Crossroads, 2015a, pp. 56-62)

1. Future Year Background Traffic

1. Opening Year (2017) Background Traffic

Opening Year (2017) background traffic forecasts are based upon a background – or ambient – growth rate of two percent (2%) per year, compounded annually. Accordingly, the total ambient growth rate utilized for the Project's Opening Year (2017) is 4.04%. Using the ambient growth rate, two analyses known as the buildup and buildout methods were used to evaluate Opening Year (2017) traffic. The buildup method was used to approximate traffic forecasts for the Project's Opening Year (2017), and was intended to identify the significant impacts on both the existing and planned near-term circulation system. The buildup method was also utilized to approximate the Opening Year (2017) traffic forecasts with cumulative development included, to identify the cumulative impacts on both the existing and planned near-term circulation system. (Urban Crossroads, 2015a, p. 62)

For more information on the derivation of opening year background traffic forecasts, refer to Subsection 4.7 of *Technical Appendix J1*.

2. Horizon Year (2035) Background Traffic

For purposes of the analysis in *Technical Appendix J1* and this Subsection, the Horizon Year (2035) background traffic conditions were derived from the Riverside County Transportation Analysis Model (RivTAM). The RivTAM traffic forecasts reflect the area-wide growth anticipated between existing conditions and long-term conditions. To provide a more detailed Horizon Year (2035) traffic impact analysis for the Project as presented in *Technical Appendices J1* and *J2* and this EIR Subsection, Urban Crossroads supplemented and modified the RivTAM model using industry-accepted procedures for model forecast refinement and smoothing rather than rely on RivTAM model defaults. (Urban Crossroads, 2015a, pp. 63-64) This methodology would be conservative and would overstate – as opposed to understate – the Project's potential long-term impacts to traffic and circulation.



Refer to Subsection 4.8 of *Technical Appendix J1* for a detailed description of the refinements made to the RivTAM model for purposes of the Project's traffic impact analysis.

J. Future Year Roadway Conditions

1. Opening Year (2017) Roadway Conditions

The Project's traffic analyses anticipate that the traffic facilities listed below will be in place for the Project's Opening Year (2017), in addition to the lane configurations and traffic controls in place under existing conditions (Urban Crossroads, 2015a, p. 85):

- Project driveways and those facilities assumed to be constructed by the Project to provide access to the Project site; and
- Driveways and those facilities assumed to be constructed by nearby cumulative development projects to provide site access.

The traffic analysis also assumes that several freeway mainline improvements that are currently in various stages of planning, design, and construction will be completed by the Project's Opening Year (2017). The planned enhancements to the regional freeway system in the Project vicinity that are assumed to be in place by the Project's Opening Year are summarized below (Urban Crossroads, 2015b, pp. 6-7). It is reasonable to anticipate that these facilities will be in place under Opening Year conditions because these improvements are funded and were under construction at the time *Technical Appendix J2* was prepared.

- I-215: The I-215/Cactus Avenue and Van Buren Boulevard interchange will be improved to extend the northbound auxiliary lane between Alessandro Boulevard and Cactus Avenue (expected to be completed by 2018); and
- SR-91: One carpool lane in each direction between Adams Street and the SR-60/SR-91/I-215 freeway interchange (complete, but was under construction at the time *Technical Appendix J2* was prepared).

Refer to *Technical Appendix J2* for additional information on planned freeway improvements.

2. Horizon Year (2035) Roadway Conditions

The Project's traffic analyses anticipate that the traffic facilities listed below will be in place under Horizon Year (2035) conditions, in addition to the lane configurations and traffic controls in place under existing conditions and Opening Year (2017) conditions (Urban Crossroads, 2015a, p. 97). It is reasonable to anticipate that these facilities will be in place under Horizon Year (2035) conditions because these improvements are planned capital improvements that have funding programs in place for their eventual construction.

- Project driveways and those facilities assumed to be constructed by the Project to provide access to the Project site;



- Driveways and those facilities assumed to be constructed by nearby cumulative development projects to provide site access;
- The extension of Decker Road to the north of Oleander Avenue; and
- Other parallel facilities that are anticipated to be in place and would affect the travel patterns within the study area (e.g., Nandina Avenue, Markham Street, Day Street, etc.).

The traffic analysis also assumes that several freeway mainline improvements that are currently in various stages of planning, design, and construction will be completed by the Horizon Year (2035) scenario. The planned enhancements to the regional freeway system in the Project vicinity that are assumed to be in place by Year 2035 or later are summarized below (Urban Crossroads, 2015b, pp. 6-7). It is reasonable to anticipate that these facilities will be in place under Horizon Year (2035) conditions because these improvements are planned capital improvements of Caltrans.

- I-215: An approximately 10.75-mile segment of I-215, between Nuevo Road in the City of Perris and Box Springs Road in the City of Riverside, will be widened to add one carpool lane (high-occupancy vehicle lane) in each direction; however, a completion date for the I-215 expansion project has not been set due to budget constraints. Once the I-215 expansion costs and funding are determined, the planning, design and construction process is estimated to last approximately 8.5 years.

Refer to *Technical Appendix J2* for additional information on planned freeway improvements.

K. Fair-Share Calculation

In instances where the Project is projected to contribute to a cumulatively considerable impact to a roadway facility, and the recommended mitigation measure is a “fair-share” monetary contribution toward the construction of roadway improvements needed to correct the circulation deficiency, the Project’s fair-share contribution is determined by the following equation. (Urban Crossroads, 2015a, p. 25):

$$\text{Project Fair Share \%} = \text{Project Traffic} / (\text{2035 Total Traffic} - \text{Existing Traffic})$$

This calculation is reasonable mitigation under CEQA because it establishes a proportional nexus between the Project’s impact and the recommended mitigation. Refer to Subsection 2.9 of *Technical Appendix J1* for more information on the methodology used to calculate the Project’s fair share contribution toward future roadway improvements.

4.15.4 BASIS FOR DETERMINING SIGNIFICANCE

The proposed Project would result in a significant impact to the transportation/traffic system if the Project or any Project-related component that would:



- a. *Conflict with an applicable plan, ordinance or policy establishing a measure of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit;*
- b. *Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways;*
- c. *Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;*
- d. *Alter waterborne, rail or air traffic;*
- e. *Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment);*
- f. *Cause an effect upon, or a need for new or altered maintenance of roads;*
- g. *Cause an effect upon circulation during the project's construction;*
- h. *Result in inadequate emergency access or access to nearby uses; or*
- i. *Conflict with adopted policies, plans or programs regarding public transit, bikeways or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities?*

A. Determining Significance of Impacts

1. Intersections

For purposes of determining the significance of traffic impacts in this subsection, a significant direct traffic impact would occur when the addition of Project traffic under Existing plus Project (E+P) and/or Existing plus Ambient Growth plus Project (E+A+P) traffic conditions causes an intersection that operates at LOS D or better to fall to LOS E or F. (Urban Crossroads, 2015a, pp. 23-24, 38)

Cumulative traffic impacts are deficiencies that are not directly caused by the Project, but occur as a result of regional growth combined with other nearby cumulative development projects. The Project's contribution of traffic to a particular cumulative transportation deficiency is deemed cumulatively considerable if the Project adds substantial traffic to the forecasted deficiency under the Existing plus Project plus Cumulative (E+A+P+C) and/or Horizon Year (2035) traffic scenarios (Urban Crossroads, 2015a, p. 8). A Project's contribution to a cumulative impact can be reduced to less than significant if the Project is required to implement or fund its fair share of physical improvements designed to alleviate the potential cumulative impact. If full funding of future physical improvements is not reasonably assured, a short-term unmitigated cumulative impact may occur until the needed improvement is fully funded and constructed, despite the identification of the needed improvements and payment of a project's contribution to the potential deficiency.



2. Freeway Mainline Segments and Ramp Junctions

For purposes of the analysis in this EIR Subsection, if a freeway mainline segment or ramp junction is projected to operate at LOS D or better without the Project and the Project would contribute traffic that is expected to cause the facility to operate at LOS E or LOS F under E+P and/or E+A+P traffic conditions, then the Project's impact is considered direct and significant. If the facility would operate at a deficient LOS under any traffic analysis scenario without the Project and the Project would contribute traffic to the deficiency, the Project's impact would be cumulatively considerable. (Urban Crossroads, 2015a, p. 25)

3. Freeway Off-Ramp Queuing

To determine whether the addition of Project traffic at a freeway ramp results in a significant impact, the stacking distance is measured to determine if the addition of Project traffic would result in a deficiency. Stacking distance on freeway ramps is acceptable if the required 95th percentile stacking distance is less than or equal to the stacking distance provided. Therefore, a significant impact would occur if the 95th percentile stacking distance need was greater than the available stacking distance. (Urban Crossroads, 2015a, p. 19) The impact would be considered a significant direct impact of the Project if the Project's traffic causes the queue to exceed the 95th percentile under E+P and/or E+A+P traffic conditions. The impact would be considered cumulatively considerable if the Project's traffic would contribute to queues that exceed the 95th percentile under E+A+P+C and/or Horizon Year traffic conditions.

4.15.5 IMPACT ANALYSIS

The roadway improvements proposed by the Project are described in EIR Section 3.0, *Project Description*, the construction of which would be ensured as part of the Project's conditions of approval issued by the County of Riverside in association with the Project's approval process. The construction of the proposed roadway improvements, including driveway connections, is assumed throughout the analysis presented in *Technical Appendices J1* and *J2*, and summarized in this subsection.

Threshold a) Would the Project conflict with an applicable plan, ordinance or policy establishing a measure of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

The analysis of Threshold (a) focuses on potential impacts to the local circulation network (i.e., roadways and intersections). Refer to Threshold (b) for an analysis of potential impacts to the *Riverside County CMP* roadway network, including potential impacts to freeway facilities in the Project study area.



1. *Project Vehicle Trip Generation*

Vehicle trip generation represents the amount of traffic that is both attracted to and produced by a development project. Determining traffic generation for a specific project is based upon forecasting the amount of traffic that is expected to be both attracted to and produced by the specific land uses being proposed by that given project. The vehicle trip generation rates utilized to estimate the amount of traffic that would be generated by the proposed Project are based on data collected by Institute of Transportation Engineers (ITE) and presented in their most recent edition of the *Trip Generation* manual (9th Edition, 2012).

Due to the size and proposed use of Buildings D and E, both buildings are evaluated as high cube warehouses (ITE Land Use Code 152), which has a weighted average daily trip generation rate of 1.68 trips per one thousand square feet (refer to Table 4.15-13, *Project Trip Generation Rates*). The Project's vehicle mix (i.e., percentage of passenger car trips vs. truck trips) is based on values contained in the ITE's *Trip Generation* manual. For truck trips, the ITE's *Trip Generation* manual provides no guidance on truck fleet mix (i.e., percentage of 2-axle, 3-axle, and 4-axle trips); therefore, data regarding truck vehicle mix is based on recommendations provided by the South Coast Air Quality Management District (SCAQMD). The SCAQMD recommends the use of a specific truck mix by axle-type to better quantify trip rates associated with local warehouse and distribution projects. Based on the data from the ITE and the recommendations of the SCAQMD, the proposed Project as evaluated herein is calculated to generate 2,115 actual vehicle trips per day, of which 138 would occur during the AM peak hour and 151 would occur during the PM peak hour (refer to Table 4.15-14, *Project Trip Generation (Actual Vehicles)*). Of the Project's actual vehicle trips per day, passenger cars would comprise 1,309 trips and trucks would comprise 806 trips. (Urban Crossroads, 2015a, pp. 47-52)

Table 4.15-15, *Project Trip Generation (PCE)*, summarizes the number of trips and vehicle mix for the land use proposed by the Project, with PCE factors applied. After converting to PCE, the Project is estimated to generate 3,319 daily PCE trips, including 195 PCE trips during the AM peak hour and 226 PCE trips during the PM peak hour. The converted trip rates and vehicle mix presented in Table 4.15-15 are utilized throughout the analysis in *Technical Appendices J1* and *J2* and this EIR Subsection to determine the Project's effect to the transportation and circulation network. (Urban Crossroads, 2015a, pp. 47-52)

As mentioned in the introduction to this subsection, the calculations presented herein are based on a larger sized Building E than is currently proposed. A Supplemental Analysis prepared for the currently proposed smaller Building E is provided in the front of *Technical Appendix J1* and shows that the proposed Project (Building D and Building E) is calculated to generate a net total of approximately 2,936 passenger car equivalent (PCE) based trip-ends per day (instead of the 3,319 daily PCE trips evaluated herein) with 172 PCE AM peak hour trips and 200 PCE PM peak hour trips. This accounts for 382 fewer PCE trip-ends per day with 23 fewer PCE AM peak hour trips and 25 fewer PCE PM trips than analyzed herein. Because the analysis in *Technical Appendices J1* and *J2* overstate the Project's impacts, the County did not find it necessary to update the reports to show a lesser Project



Table 4.15-13 Project Trip Generation Rates

| Land Use ¹ | Units ² | ITE LU Code | AM Peak Hour | | | PM Peak Hour | | | Daily |
|---|----------------------------|-------------|--------------|-------|-------|--------------|-------|-------|-------|
| | | | In | Out | Total | In | Out | Total | |
| Actual Vehicle Trip Generation Rates | | | | | | | | | |
| High-Cube Warehouse/Distribution Center ³ | TSF | 152 | 0.076 | 0.034 | 0.110 | 0.037 | 0.083 | 0.120 | 1.680 |
| | Passenger Cars | | 0.055 | 0.025 | 0.080 | 0.025 | 0.055 | 0.080 | 1.040 |
| | 2-Axle Trucks | | 0.005 | 0.002 | 0.007 | 0.003 | 0.006 | 0.009 | 0.141 |
| | 3-Axle Trucks | | 0.004 | 0.002 | 0.005 | 0.002 | 0.005 | 0.007 | 0.113 |
| | 4-Axle+ Trucks | | 0.012 | 0.006 | 0.018 | 0.007 | 0.017 | 0.024 | 0.386 |
| Passenger Car Equivalent (PCE) Trip Generation Rates | | | | | | | | | |
| High-Cube Warehouse/Distribution Center ^{3,4} | TSF | 152 | 0.076 | 0.034 | 0.110 | 0.037 | 0.083 | 0.120 | 1.680 |
| | Passenger Cars | | 0.055 | 0.025 | 0.080 | 0.025 | 0.055 | 0.080 | 1.040 |
| | 2-Axle Trucks (PCE = 1.5) | | 0.007 | 0.003 | 0.010 | 0.004 | 0.009 | 0.013 | 0.211 |
| | 3-Axle Trucks (PCE = 2.0) | | 0.007 | 0.003 | 0.011 | 0.004 | 0.010 | 0.014 | 0.226 |
| | 4-Axle+ Trucks (PCE = 3.0) | | 0.037 | 0.017 | 0.054 | 0.022 | 0.050 | 0.072 | 1.158 |

¹ Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Ninth Edition (2012).

² TSF = thousand square feet

³ Vehicle Mix Source: Total truck percentage source from ITE Trip Generation manual. Truck mix (by axle type) source from SCAQMD.

AM peak hour = 72.7% passenger cars, 6.01% 2-Axle trucks, 4.83% 3-Axle trucks, 16.46% 4-Axle trucks

PM peak hour = 66.7% passenger cars, 7.33% 2-Axle trucks, 5.89% 3-Axle trucks, 20.08% 4-Axle trucks

ADT = 61.9% passenger cars, 8.38% 2-Axle trucks, 6.74% 3-Axle trucks, 22.98% 4-Axle trucks

⁴ PCE rates are per SANBAG.

Source: (Urban Crossroads, 2015a, Table 4-1)



Table 4.15-14 Project Trip Generation (Actual Vehicles)

| Land Use | Quantity | Units ¹ | AM Peak Hour | | | PM Peak Hour | | | Daily |
|---|----------|--------------------|--------------|-----------|------------|--------------|------------|------------|--------------|
| | | | In | Out | Total | In | Out | Total | |
| Building D | 703.040 | TSF | | | | | | | |
| Passenger Cars: | | | 39 | 17 | 56 | 17 | 39 | 56 | 731 |
| Truck Trips: | | | | | | | | | |
| 2-axle: | | | 3 | 1 | 4 | 2 | 4 | 6 | 99 |
| 3-axle: | | | 3 | 1 | 4 | 2 | 3 | 5 | 80 |
| 4+-axle: | | | 9 | 4 | 13 | 5 | 12 | 17 | 271 |
| - Net Truck Trips (Actual Trucks) ² | | | 15 | 6 | 21 | 9 | 19 | 28 | 450 |
| BUILDING D TOTAL NET TRIPS (Actual Vehicles)³ | | | 53 | 23 | 76 | 26 | 58 | 84 | 1,181 |
| Building E | 556.010 | TSF | | | | | | | |
| Passenger Cars: | | | 31 | 14 | 45 | 14 | 31 | 45 | 578 |
| Truck Trips: | | | | | | | | | |
| 2-axle: | | | 3 | 1 | 4 | 2 | 3 | 5 | 78 |
| 3-axle: | | | 2 | 1 | 3 | 1 | 3 | 4 | 63 |
| 4+-axle: | | | 7 | 3 | 10 | 4 | 9 | 13 | 215 |
| - Net Truck Trips (Actual Trucks) ² | | | 12 | 5 | 17 | 7 | 15 | 22 | 356 |
| BUILDING E TOTAL NET TRIPS (Actual Vehicles)³ | | | 43 | 19 | 62 | 21 | 46 | 67 | 934 |
| TOTAL (ACTUAL): | | | 96 | 42 | 138 | 47 | 104 | 151 | 2,115 |

¹ TSF = thousand square feet

² Vehicle Mix Source: Total truck percentage source from ITE *Trip Generation* manual. Truck mix (by axle type) source from SCAQMD.

³ TOTAL NET TRIPS (Actual Vehicles) = Passenger Cars + Net Truck Trips (Actual Trucks).

Source: (Urban Crossroads, 2015a, Table 4-3)

Note: The numerical values shown in Table 4.15-14 were calculated prior to the Project Applicant's decision to reduce the size of the Building E Site and the size of its proposed building to the current configurations described in EIR Section 3.0, *Project Description*. Therefore, Urban Crossroads, Inc. prepared a supplemental analysis to address the reduction in size of the Building E Site and its proposed building. The update letter, "Knox Business Park Supplemental Analysis," is appended to the front of *Technical Appendix JI*. (Urban Crossroads, Inc., 2017a).



Table 4.15-15 Project Trip Generation (PCE)

| Land Use | Quantity | Units ¹ | AM Peak Hour | | | PM Peak Hour | | | Daily |
|---|----------|--------------------|--------------|-----------|------------|--------------|------------|------------|--------------|
| | | | In | Out | Total | In | Out | Total | |
| Building D | 703.040 | TSF | | | | | | | |
| Passenger Cars: | | | 39 | 17 | 56 | 17 | 39 | 56 | 731 |
| Truck Trips: | | | | | | | | | |
| 2-axle: | | | 5 | 2 | 7 | 3 | 6 | 9 | 148 |
| 3-axle: | | | 5 | 2 | 7 | 3 | 7 | 10 | 159 |
| 4+-axle: | | | 26 | 12 | 38 | 16 | 35 | 51 | 814 |
| - Net Truck Trips (PCE) ² | | | 36 | 16 | 52 | 22 | 48 | 70 | 1,122 |
| BUILDING D TOTAL NET TRIPS (PCE)³ | | | 75 | 34 | 108 | 39 | 87 | 126 | 1,853 |
| Building E | 556.010 | TSF | | | | | | | |
| Passenger Cars: | | | 31 | 14 | 45 | 14 | 31 | 45 | 578 |
| Truck Trips: | | | | | | | | | |
| 2-axle: | | | 4 | 2 | 6 | 2 | 5 | 7 | 117 |
| 3-axle: | | | 4 | 2 | 6 | 2 | 5 | 7 | 126 |
| 4+-axle: | | | 21 | 9 | 30 | 12 | 28 | 40 | 644 |
| - Net Truck Trips (PCE) ² | | | 29 | 13 | 42 | 17 | 38 | 55 | 887 |
| BUILDING E TOTAL NET TRIPS (PCE)³ | | | 59 | 27 | 87 | 31 | 69 | 99 | 1,466 |
| TOTAL (PCE): | | | 135 | 60 | 195 | 70 | 156 | 225 | 3,319 |

¹ TSF = thousand square feet

² Vehicle Mix Source: Total truck percentage source from ITE *Trip Generation* manual. Truck mix (by axle type) source from SCAQMD.

³ TOTAL NET TRIPS (PCE) = Passenger Cars + Net Truck Trips (PCE).

Source: (Urban Crossroads, 2015a, Table 4-2)

Note: The numerical values shown in Table 4.15-15 were calculated prior to the Project Applicant's decision to reduce the size of the Building E Site and the size of its proposed building to the current configurations described in EIR Section 3.0, *Project Description*. Therefore, Urban Crossroads, Inc. prepared a supplemental analysis to address the reduction in size of the Building E Site and its proposed building. The update letter, "Knox Business Park Supplemental Analysis," is appended to the front of *Technical Appendix JI*. (Urban Crossroads, Inc., 2017a).



impact. Thus, all Project impacts disclosed herein overstate the actual expected impact. (Urban Crossroads, Inc., 2017c)

For more information on the trip generation methodology, refer to Subsection 4.1 of *Technical Appendix J1*.

2. Project Vehicle Trip Distribution

Trip distribution is the process of identifying the probable destinations, directions, or traffic routes that will be utilized by Project traffic. The potential interaction between the planned land uses and surrounding regional access routes are considered, to identify the route where the Project's traffic would distribute. The trip distribution pattern of passenger cars is heavily influenced by the geographical location of the Project site, the location of surrounding uses, and the proximity to the regional freeway system. The trip distribution patterns for truck traffic are strongly influenced by the location of designated local truck routes.

The near- and long-term traffic distribution pattern for Project-related passenger and truck trips is graphically depicted on Figure 4.15-8, *Project Passenger Cars Trip Distribution*, and Figure 4.15-9, *Project Trucks Trip Distribution*, respectively. Based on the identified Project traffic generation and trip distribution patterns, Project ADT along Project study area roadways and peak hour intersections turning movement volumes are shown on Figure 4.15-10, *Project Traffic Volumes*.

3. Analysis Scenarios

Potential impacts to the transportation and circulation network are assessed for each of the scenarios listed below.

- Short-Term Construction Conditions
- Existing plus Project Conditions
- Opening Year (2017) Conditions
- Opening Year (2017) plus Cumulative Conditions
- Horizon Year (2035) Conditions

The Short-Term Construction Conditions analysis determines the potential for Project construction-related traffic or construction-related activities (i.e., construction activities within the public right-of-way) to result in an adverse effect to the local roadway system, based on existing (2015) conditions. Types of traffic anticipated during construction include, but is not limited to employees traveling to/from the Project site as well as deliveries of construction materials to the Project site.

Information for existing conditions is disclosed in Subsection 4.15.2, above, and represents the baseline traffic conditions and they existed in 2015 when the NOP for the EIR was circulated for public review. The Existing plus Project (E+P) analysis determines traffic impacts that would occur of the existing roadway system with the addition of Project traffic in the theoretical scenario of the Project being



placed upon existing conditions. The E+P scenario is presented to disclose direct impacts as required by CEQA. In the case of the proposed Project, the estimated time period between the distribution of the NOP for the Project's EIR (2015) and estimated Project occupancy (2017) is two years. During this time period, traffic conditions are not static – other projects are being constructed, the transportation network is evolving, and traffic patterns are changing. Therefore, the E+P scenario is very unlikely to materialize in real world conditions and thus does not accurately describe the environment that will exist when the proposed Project is constructed and becomes operational. Regardless, the E+P scenario is evaluated to satisfy CEQA requirements to identify the Project's impacts to the existing environment.

The Opening Year (2017) analysis includes an evaluation the Existing plus Ambient Growth plus Project (E+A+P) traffic conditions. The E+A+P analysis is intended to identify the direct impacts associated solely with the development of the proposed Project based on the expected background growth within the study area. The Opening Year (2017) analysis also includes an evaluation of Existing plus Ambient Growth plus Project plus Cumulative Development (E+A+P+C) conditions to identify the Project's potential cumulative contribution to traffic impacts within the study area.

The Horizon Year (2035) conditions analysis is utilized to determine if planned local and regional transportation improvements, which are funded through local and regional transportation mitigation fee programs such as the TUMF program, County of Riverside DIF program, or other approved funding mechanism (Community Facilities District, etc.), can accommodate expected long-term growth and development at the applicable target LOS identified in the Riverside County General Plan. If the “funded” improvements can provide the target LOS, then the Project's payment into the TUMF and DIF is considered adequate cumulative mitigation as imposed through Conditions of Approval applied to the Project by the County of Riverside. If they are not, then those impacts are deemed potentially significant. Regardless, fair share fees would apply for a project's impact to those intersections.

A. Short-Term Construction Traffic Impact Analysis

During the Project's construction phase, traffic to-and-from the subject property would be generated by activities such as construction employee trips, delivery of construction materials, and use of heavy equipment. During peak construction periods, which are expected to occur during building construction, vehicular traffic associated with construction employees is estimated at approximately 500 two-way trips per day, assuming Building D and Building E are under simultaneous construction. Peak daily construction traffic volumes would be less than daily and peak hour traffic volumes generated by the Project operational activities at study area intersections. Based on the anticipated construction schedule, most construction workers would arrive to and depart from the Project site outside of the AM/PM peak hours and, therefore, would not be driving to/from the subject property during hours of peak congestion. Deliveries of construction materials to the Project site also would have a nominal effect to the local roadway network. Construction materials would be delivered to the site throughout the construction phase based on need and would not occur on an everyday basis. Heavy equipment would be utilized on the Project site during the construction phase. Because most heavy equipment is not authorized to be driven on a public roadway, most equipment would be delivered and



removed from the site via flatbed trucks. As with the delivery of construction materials, the delivery of heavy equipment to the Project site would not occur on a daily basis, but would occur periodically throughout the construction phase based on need.

As shown in Table 4.15-4, all five existing intersections in the Project's study area operate at an acceptable LOS under existing (2015) conditions. Based on the information described above, the addition of temporary, Project-related construction traffic to these transportation facilities is not calculated to degrade LOS to a deficient level. Accordingly, traffic generated by the Project's construction phase would not result in or contribute to a conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. Impacts during the Project's construction phase would be less than significant.

Although the Project would result in a less-than-significant effect to the local circulation system during short-term construction activities, the Project would be required to implement temporary traffic controls in compliance with the California Manual on Uniform Traffic Control Devices, which specify that such traffic controls shall be provided during construction, such as a flag person, during all phases of construction to facilitate the flow of construction traffic on streets abutting the Project site. Compliance would ensure that the Project's construction-related traffic does not result in substantial adverse effects to the local circulation network.

B. Existing plus Project (E+P) Traffic Impact Analysis

Projected ADT volumes and AM and PM peak hour turning movement volumes for E+P traffic conditions are illustrated on Figure 4.15-11, *Existing plus Project (E+P) Traffic Volumes*.

1. Intersection Operations Analysis

Table 4.15-16, *Existing plus Project (E+P) Intersection Analysis*, summarizes the peak hour LOS at Project study area intersections under E+P conditions. As shown in Table 4.15-16, all intersections in the Project study area would operate at acceptable LOS under E+P traffic conditions (Urban Crossroads, 2015a, p. 65). As such, the Project would result in a less-than-significant impact to study area intersections under E+P traffic conditions.

2. Traffic Signal Warrant Analysis

Under E+P traffic conditions, no unsignalized intersections within the Project study area warrant consideration of a traffic signal (Urban Crossroads, 2015a, p. 65). Accordingly, the Project would not cause operations at any unsignalized intersection in the Project study area to degrade to the point that a traffic signal is required to provide adequate, stable traffic flow. The Project's impact would be less than significant.

C. Opening Year (2017) Traffic Impact Analysis (E+A+P)

Projected weekday ADT volumes and peak hour intersection volumes for E+A+P traffic conditions are shown on Figure 4.15-12, *Opening Year (2017) Traffic Volumes (E+A+P)*.



Table 4.15-16 Existing plus Project (E+P) Intersection Analysis

| # | Intersection | Traffic Control ² | Existing (2015) | | | | Existing Plus Project | | | | Acceptable LOS |
|----|----------------------------------|------------------------------|----------------------------|------|------------------|----|----------------------------|------|------------------|----|----------------|
| | | | Delay ¹ (secs.) | | Level of Service | | Delay ¹ (secs.) | | Level of Service | | |
| | | | AM | PM | AM | PM | AM | PM | AM | PM | |
| 1 | Dwy. 1 / Oleander Av. | CSS | Future Intersection | | | | 0.0 | 0.0 | A | A | C |
| 2 | Dwy. 2 / Oleander Av. | CSS | Future Intersection | | | | 8.4 | 8.5 | A | A | C |
| 3 | Dwy. 3 / Oleander Av. | CSS | Future Intersection | | | | 8.4 | 8.6 | A | A | C |
| 4 | Decker Rd. / Oleander Av. | CSS | Future Intersection | | | | 8.5 | 8.7 | A | A | D |
| 5 | Dwy. 4 / Oleander Av. | CSS | Future Intersection | | | | 8.5 | 8.8 | A | A | C |
| 6 | Dwy. 5 / Oleander Av. | CSS | Future Intersection | | | | 8.5 | 8.9 | A | A | C |
| 7 | Dwy. 6 / Oleander Av. | CSS | 8.9 | 0.0 | A | A | 10.2 | 9.5 | B | A | C |
| 8 | Harvill Av. / Harley Knox Bl. | TS | 32.8 | 32.2 | C | C | 33.5 | 34.8 | C | C | D |
| 9 | Harvill Av. / Oleander Av. | TS | 6.5 | 4.6 | A | A | 13.8 | 14.3 | B | B | D |
| 10 | I-215 SB Ramps / Harley Knox Bl. | TS | 37.0 | 26.8 | D | C | 37.1 | 28.4 | D | C | D |
| 11 | I-215 NB Ramps / Harley Knox Bl. | TS | 13.6 | 22.2 | B | C | 15.0 | 28.9 | B | C | D |

¹ Per the 2010 Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

² CSS = Cross-street Stop; TS = Traffic Signal; **CSS** = Improvement

Source: (Urban Crossroads, 2015a, Table 5-1)

1. Intersection Operations Analysis

Table 4.15-17, *Opening Year (2017) Intersection Analysis (E+A+P)*, summarizes the LOS at study area intersections during the AM and PM peak hours under E+A+P traffic conditions. As shown in Table 4.15-17, all intersections in the Project study area would operate at acceptable LOS under E+A+P traffic conditions (Urban Crossroads, 2015a, p. 75). Accordingly, the Project would result in a less-than-significant impact to study area intersections under E+A+P traffic conditions.

2. Traffic Signal Warrant Analysis

Under E+A+P traffic conditions, no unsignalized intersections within the Project study area warrant consideration of a traffic signal (Urban Crossroads, 2015a, p. 75). Accordingly, the Project would not cause operations at any unsignalized intersection in the Project study area to degrade to the point that a traffic signal is required to provide adequate, stable traffic flow. The Project’s impact would be less than significant under E+A+P conditions.

D. Opening Year (2017) plus Cumulative Traffic Impact Analysis (E+A+P+C)

Projected weekday ADT volumes and peak hour intersection volumes for E+A+P+C conditions are shown on Figure 4.15-13, *Opening Year (2017) plus Cumulative Traffic Volumes (E+A+P+C)*.

1. Intersection Operations Analysis

Table 4.15-18, *Opening Year (2017) plus Cumulative Intersection Analysis (E+A+P+C)*, summarizes the LOS at study area intersections during the AM and PM peak hours under E+A+P+C traffic conditions. As shown in Table 4.15-18, all Project study area intersections are anticipated to operate



Table 4.15-17 Opening Year (2017) Intersection Analysis (E+A+P)

| # | Intersection | Traffic Control ² | Existing (2015) | | | | EAP (2017) | | | | Acceptable LOS |
|----|----------------------------------|------------------------------|----------------------------|------|------------------|----|----------------------------|------|------------------|----|----------------|
| | | | Delay ¹ (secs.) | | Level of Service | | Delay ¹ (secs.) | | Level of Service | | |
| | | | AM | PM | AM | PM | AM | PM | AM | PM | |
| 1 | Dwy. 1 / Oleander Av. | CSS | Future Intersection | | | | 0.0 | 0.0 | A | A | C |
| 2 | Dwy. 2 / Oleander Av. | CSS | Future Intersection | | | | 8.4 | 8.5 | A | A | C |
| 3 | Dwy. 3 / Oleander Av. | CSS | Future Intersection | | | | 8.4 | 8.6 | A | A | C |
| 4 | Decker Rd. / Oleander Av. | CSS | Future Intersection | | | | 8.5 | 8.7 | A | A | D |
| 5 | Dwy. 4 / Oleander Av. | CSS | Future Intersection | | | | 8.5 | 8.8 | A | A | C |
| 6 | Dwy. 5 / Oleander Av. | CSS | Future Intersection | | | | 8.5 | 8.9 | A | A | C |
| 7 | Dwy. 6 / Oleander Av. | CSS | 8.9 | 0.0 | A | A | 10.2 | 9.5 | B | A | C |
| 8 | Harvill Av. / Harley Knox Bl. | TS | 32.8 | 32.2 | C | C | 33.2 | 35.0 | C | D | D |
| 9 | Harvill Av. / Oleander Av. | TS | 6.5 | 4.6 | A | A | 13.8 | 14.2 | B | B | D |
| 10 | I-215 SB Ramps / Harley Knox Bl. | TS | 37.0 | 26.8 | D | C | 37.5 | 31.3 | D | C | D |
| 11 | I-215 NB Ramps / Harley Knox Bl. | TS | 13.6 | 22.2 | B | C | 15.1 | 29.5 | B | C | D |

¹ Per the 2010 Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

² CSS = Cross-street Stop; TS = Traffic Signal; CSS = Improvement

Source: (Urban Crossroads, 2015a, Table 6-1)

Table 4.15-18 Opening Year (2017) plus Cumulative Intersection Analysis (E+A+P+C)

| # | Intersection | Traffic Control ² | Existing (2015) | | | | EAPC (2017) | | | | Acceptable LOS |
|----|----------------------------------|------------------------------|----------------------------|------|------------------|----|----------------------------|--------------|------------------|----------|----------------|
| | | | Delay ² (secs.) | | Level of Service | | Delay ² (secs.) | | Level of Service | | |
| | | | AM | PM | AM | PM | AM | PM | AM | PM | |
| 1 | Dwy. 1 / Oleander Av. | CSS | Future Intersection | | | | 0.0 | 0.0 | A | A | C |
| 2 | Dwy. 2 / Oleander Av. | CSS | Future Intersection | | | | 8.4 | 8.5 | A | A | C |
| 3 | Dwy. 3 / Oleander Av. | CSS | Future Intersection | | | | 8.4 | 8.6 | A | A | C |
| 4 | Decker Rd. / Oleander Av. | CSS | Future Intersection | | | | 8.5 | 8.7 | A | A | D |
| 5 | Dwy. 4 / Oleander Av. | CSS | Future Intersection | | | | 8.5 | 8.8 | A | A | C |
| 6 | Dwy. 5 / Oleander Av. | CSS | Future Intersection | | | | 8.5 | 8.9 | A | A | C |
| 7 | Dwy. 6 / Oleander Av. | CSS | 8.9 | 0.0 | A | A | 10.2 | 9.5 | B | A | C |
| 8 | Harvill Av. / Harley Knox Bl. | TS | 32.8 | 32.2 | C | C | 104.4 | 183.7 | F | F | D |
| 9 | Harvill Av. / Oleander Av. | TS | 6.5 | 4.6 | A | A | 10.1 | 13.1 | B | B | D |
| 10 | I-215 SB Ramps / Harley Knox Bl. | TS | 37.0 | 26.8 | D | C | 168.2 | 107.3 | F | F | D |
| 11 | I-215 NB Ramps / Harley Knox Bl. | TS | 13.6 | 22.2 | B | C | 36.8 | 179.8 | D | F | D |

² BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).

¹ Per the 2010 Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

² CSS = Cross-street Stop; TS = Traffic Signal; CSS = Improvement

Source: (Urban Crossroads, 2015a, Table 7-1)



at acceptable LOS under E+A+P+C traffic conditions, with the exception of the following intersections (Urban Crossroads, 2015a, p. 85):

- Harvill Avenue / Harley Knox Boulevard (Intersection #8) in the AM and PM peak hours;
- I-215 Southbound Ramps / Harley Knox Boulevard (Intersection #10) in the AM and PM peak hours; and
- I-215 Northbound Ramps / Harley Knox Boulevard (Intersection #11) in the PM peak hour.

The Project would contribute substantial traffic to the projected cumulative LOS deficiencies at the intersections listed above. Therefore, the Project's contribution to the significant impacts at the above-listed intersections would be cumulatively considerable under E+A+P+C traffic conditions and mitigation is required.

2. Traffic Signal Warrant Analysis

Under E+A+P+C traffic conditions, no unsignalized intersections within the Project study area warrant consideration of a traffic signal (Urban Crossroads, 2015a, p. 89). Therefore, there is no potential to the Project to contribute to a need to install new traffic signals within the Project study area. The Project's impact would be less than significant under E+A+P+C conditions.

E. Horizon Year (2035) Traffic Impact Analysis

Projected weekday ADT volumes and peak hour intersection volumes Horizon Year (2035) traffic conditions are shown on Figure 4.15-14, *Horizon Year (2035) Traffic Volumes*.

1. Intersection Operations Analysis

Table 4.15-19, Horizon Year (2035) Intersection Analysis, summarizes the LOS at study area intersections during the AM and PM peak hours under Horizon Year (2035) traffic conditions. As shown in Table 4.15-19, all Project study area intersections are anticipated to operate at acceptable LOS under Horizon Year (2035) traffic conditions, with the exception of the following intersections (Urban Crossroads, 2015a, p. 100):

- Decker Road / Oleander Avenue (Intersection #4) in the AM and PM peak hours;
- Harvill Avenue / Harley Knox Boulevard (Intersection #8) in the AM and PM peak hours;
- I-215 Southbound Ramps / Harley Knox Boulevard (Intersection #10) in the AM and PM peak hours; and
- I-215 Northbound Ramps / Harley Knox Boulevard (Intersection #11) in the AM and PM peak hours.

The Project would contribute substantial traffic to the projected cumulative LOS deficiencies at the intersections listed above. Therefore, the Project's contribution to the significant impacts at the above-listed intersections would be cumulatively considerable under Horizon Year (2035) traffic conditions and mitigation is required.



Table 4.15-19 Horizon Year (2035) Intersection Analysis

| # | Intersection | Traffic Control ³ | 2035 Without Project | | | | 2035 With Project | | | | Acceptable LOS |
|----|----------------------------------|------------------------------|----------------------------|--------|------------------|----|----------------------------|--------|------------------|----|----------------|
| | | | Delay ² (secs.) | | Level of Service | | Delay ² (secs.) | | Level of Service | | |
| | | | AM | PM | AM | PM | AM | PM | AM | PM | |
| 1 | Dwy. 1 / Oleander Av. | CSS | Future Intersection | | | | 9.9 | 11.7 | A | B | C |
| 2 | Dwy. 2 / Oleander Av. | CSS | Future Intersection | | | | 10.0 | 12.0 | B | B | C |
| 3 | Dwy. 3 / Oleander Av. | CSS | Future Intersection | | | | 10.1 | 12.2 | B | B | C |
| 4 | Decker Rd. / Oleander Av. | CSS | >100.0 | >100.0 | F | F | >100.0 | >100.0 | F | F | D |
| 5 | Dwy. 4 / Oleander Av. | CSS | Future Intersection | | | | 10.0 | 12.2 | B | B | C |
| 6 | Dwy. 5 / Oleander Av. | CSS | Future Intersection | | | | 10.0 | 12.4 | B | B | C |
| 7 | Dwy. 6 / Oleander Av. | CSS | 0.0 | 0.0 | A | A | 11.1 | 16.6 | B | C | C |
| 8 | Harvill Av. / Harley Knox Bl. | TS | 22.7 | 177.4 | C | F | 113.6 | 181.9 | F | F | D |
| 9 | Harvill Av. / Oleander Av. | TS | 24.9 | 25.9 | C | C | 29.8 | 41.4 | C | D | D |
| 10 | I-215 SB Ramps / Harley Knox Bl. | TS | 140.0 | 119.4 | F | F | 156.4 | 139.1 | F | F | D |
| 11 | I-215 NB Ramps / Harley Knox Bl. | TS | 60.8 | >200.0 | E | F | 67.5 | >200.0 | E | F | D |

¹ BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).

² Per the 2010 Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

³ CSS = Cross-street Stop; TS = Traffic Signal; **CSS** = Improvement

Source: (Urban Crossroads, 2015a, Table 8-1)

2. Traffic Signal Warrant Analysis

Without Project Traffic

Under Horizon Year (2035) traffic conditions, no unsignalized intersections in the Project study area warrant a traffic signal with the exception of the Decker Road / Oleander Avenue intersection (Intersection #4) (Urban Crossroads, 2015a, p. 100). The Project would contribute substantial traffic to Intersection #4 under Horizon Year (2035) traffic conditions; therefore, the Project’s contribution to the traffic signal warrant at this intersection is cumulatively considerable and mitigation is required.

Threshold b) Would the Project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

The *Riverside County CMP* prepared by RCTC is applicable to the Project because of the subject property’s proximity to freeway mainline segments and major intersections that are designated as part of the *CMP* roadway system. The *CMP* facilities located within the Project study area were previously described in Subsection 4.15.2G.

As described above under Threshold (a), the Project would result in cumulatively considerable traffic impacts to the following *CMP* intersections that are projected to operate at deficient LOS under Opening Year plus Cumulative (2017, E+A+P+C) and Horizon Year (2035) traffic scenarios.

- I-215 Southbound Ramps / Harley Knox Boulevard (Intersection #10); and
- I-215 Northbound Ramps / Harley Knox Boulevard (Intersection #11).



Accordingly, the Project's contribution to the projected conflict with the *Riverside County CMP* LOS standards at the above-listed intersections would be cumulatively considerable and mitigation is required.

The remainder of the analysis under this Threshold will focus on the Project's potential effects to regional freeway facilities that are part of the *Riverside County CMP* freeway network segments in the Project's vicinity, including I-215 and SR-60. For purposes of this analysis, freeway segments located near the Project site have been broken into smaller segments defined by the freeway-to-arterial interchange locations. The findings of the freeway impact analysis are presented below and in *Technical Appendices J1* and *J2*.

A. Short-Term Construction CMP Impact Analysis

As previously described under the analysis for Threshold (a), above, vehicular traffic associated with construction employees would be less than daily and peak hour traffic volumes generated during Project operational activities, and is not expected to result in a substantial adverse effect to the local roadway system. Deliveries of construction materials to the Project site would also have a nominal effect to the local roadway network. Construction materials would be delivered to the site throughout the construction phase based on need and would not occur on a daily basis. Therefore, the Project is not expected to generate substantial peak-hour traffic during the construction phase. As shown in Table 4.15-7, all of the freeway ramps in the Project's study area provide adequate stacking lengths under existing conditions. Because the Project would not generate substantial peak-hour traffic during the construction phase, the temporary addition of Project-related traffic to freeway ramps has no potential to degrade traffic movement (i.e., stacking) to a deficient level.

As shown in Table 4.15-5, and Table 4.15-6, all freeway mainline segments and freeway ramp merge/diverge areas in the Project's study area operate at acceptable LOS under existing conditions. Because the Project is not expected to generate substantial peak-hour traffic during the construction phase, the temporary addition of Project-related traffic to these freeway facilities has no potential to degrade traffic movement to a deficient level.

Based on the foregoing information, traffic generated by the Project's construction phase would not result in a conflict with an applicable *CMP* because adequate LOS would be maintained on all *Riverside County CMP* freeway facilities in the Project study area. The Project's impacts to *CMP* freeway facilities during the construction phase would be less than significant on a direct basis and would not be cumulatively considerable.

B. Existing plus Project (E+P) CMP Impact Analysis

1. Freeway Mainline Segment Operations Analysis

E+P freeway mainline volumes during the AM and PM peak hours are summarized in Table 4.15-5, *Freeway Mainline Segment Analysis for Existing and Existing plus Project (E+P) Conditions*. As shown in Table 4.15-5, all freeway mainline segments in the vicinity of the Project would operate at



acceptable LOS under E+P conditions (Urban Crossroads, 2015b, p. 7). Therefore, the Project's contribution of traffic to freeway mainline segments under E+P traffic conditions is determined to be less than significant on both a direct and cumulative basis.

The freeway mainline segments listed in Table 4.15-5 include segments that would receive the highest concentration of traffic from the Project. However, Project-related traffic does not stop at the limits of the freeway mainline segments listed in Table 4.15-5. Rather, Project-related traffic continues to travel throughout the Southern California region along the State highway system, dissipating as distance from the Project site increases. As such, Project-related traffic has the potential to travel along freeway mainline segments that experience unacceptable levels of service, including but not limited to *Riverside County CMP* segments of SR-60, SR-91, I-15, I-215, and I-10, as well as freeway segments located outside of Riverside County, such as I-5, I-15, I-110, I-405, and I-710, among others. All State highway system facilities that operate at an unacceptable LOS are considered to be cumulatively impacted; however, because the Project would contribute fewer than 50 peak hour trips to congested freeway segments beyond the Project's study area, the Project's effect to *Riverside County CMP* freeway facilities and other freeway facilities located outside of Riverside County would be less than significant under E+P conditions.

2. Freeway Off-Ramp Queuing Analysis

Table 4.15-20, *Peak Hour Off-Ramp Queuing Summary for Existing plus Project (E+P) Conditions*, summarizes freeway ramp queuing under E+P traffic conditions at study area off-ramps during the AM and PM peak hours. As shown on Table 4.15-20, all freeway ramps in the Project study area are projected to experience acceptable stacking lengths during the AM and PM peak hours under E+P traffic conditions, which would preclude "spill back" of traffic from this interchange onto adjacent freeway mainline segments (Urban Crossroads, 2015a, p. 69). Accordingly, the Project would not cause or contribute to deficient operations at Project study area freeway off-ramps under E+P conditions and the Project's impact to *CMP* freeway off-ramps is determined to be less than significant on a direct and cumulative basis.

3. Freeway Ramp Merge/Diverge Junction Analysis

Table 4.15-21, *Freeway Ramp Junction Merge/Diverge Analysis for Existing plus Project (E+P) Conditions*, summarizes freeway merge/diverge operations within the study area during the AM and PM peak hours under E+P traffic conditions. As shown on Table 4.15-21, all freeway ramp merge/diverge junctions in the Project study area are projected to operate at acceptable LOS during the AM and PM peak hours under E+P traffic conditions (Urban Crossroads, 2015a, p. 69). Accordingly, the Project would not cause or contribute to deficient operations at Project study area freeway ramp merge/diverge junctions under E+P conditions and the Project's impact to *CMP* freeway ramp merge/diverge junctions is determined to be less than significant on a direct and cumulative basis.



Table 4.15-20 Peak Hour Off-Ramp Queuing Summary for Existing plus Project (E+P) Conditions

| Intersection | Movement | Available Stacking Distance (Feet) | Existing (2015) | | | | Existing plus Project | | | |
|-------------------------------------|----------|------------------------------------|---|---------|--------------------------|-----|---|---------|--------------------------|-----|
| | | | 95th Percentile Queue (Feet) ² | | Acceptable? ¹ | | 95th Percentile Queue (Feet) ² | | Acceptable? ¹ | |
| | | | AM Peak | PM Peak | AM | PM | AM Peak | PM Peak | AM | PM |
| I-215 SB Off-Ramp / Harley Knox Bl. | SBL/T | 1,330 | 383 | 339 | Yes | Yes | 379 | 341 | Yes | Yes |
| | SBR | 270 | 44 | 60 | Yes | Yes | 52 | 64 | Yes | Yes |
| I-215 NB Off-Ramp / Harley Knox Bl. | NBL/T | 1,120 | 13 | 22 | Yes | Yes | 51 | 44 | Yes | Yes |
| | NBR | 265 | 47 | 52 | Yes | Yes | 47 | 53 | Yes | Yes |

¹ Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 15 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown on this table, where applicable.

² Maximum queue length for the approach reported.

Source: (Urban Crossroads, 2015a, Table 5-2)

Table 4.15-21 Freeway Ramp Junction Merge/Diverge Analysis for Existing plus Project (E+P) Conditions

| Freeway | Direction | Ramp or Segment | Lanes on Freeway ¹ | Existing (2015) | | | | Existing Plus Project | | | |
|---------------|-----------|-----------------------------------|-------------------------------|----------------------|-----|----------------------|-----|-----------------------|-----|----------------------|-----|
| | | | | AM Peak Hour | | PM Peak Hour | | AM Peak Hour | | PM Peak Hour | |
| | | | | Density ² | LOS | Density ² | LOS | Density ² | LOS | Density ² | LOS |
| I-215 Freeway | SB | Off-Ramp at Harley Knox Boulevard | 3 | 20.2 | C | 27.5 | C | 20.7 | C | 27.7 | C |
| | | On-Ramp at Harley Knox Boulevard | 3 | 15.1 | B | 21.5 | C | 15.2 | B | 21.8 | C |
| | NB | On-Ramp at Harley Knox Boulevard | 3 | 25.8 | C | 21.9 | C | 26.0 | C | 22.4 | C |
| | | Off-Ramp at Harley Knox Boulevard | 3 | 25.1 | C | 20.0 | B | 25.3 | C | 20.0 | C |

¹ Number of lanes are in the specified direction and is based on existing conditions.

² Density is measured by passenger cars per mile per lane (pc/mi/ln).

Source: (Urban Crossroads, 2015a, Table 5-4)



C. Opening Year (2017) CMP Impact Analysis (E+A+P)

1. Freeway Mainline Segment Operations Analysis

Table 4.15-22, *Freeway Mainline Segment Analysis for Opening Year (2017) Conditions*, summarizes the peak hour LOS of freeway mainline segments within the Project study area under E+A+P traffic conditions. As shown in Table 4.15-22, all of the freeway mainline segments in the vicinity of the Project would operate at an acceptable LOS under E+A+P traffic conditions. (Urban Crossroads, 2015b, p. 7) Accordingly, the Project's contribution of traffic to *CMP* freeway mainline segments would not cause or contribute to a projected LOS deficiency under E+A+P conditions and the Project's impact to *CMP* freeway mainline segments is determined to be less than significant on both a direct and cumulative basis.

The freeway mainline segments listed in Table 4.15-22 include the segments that would receive the highest concentration of traffic from the Project. However, Project-related traffic does not stop at the limits of the freeway mainline segments listed in Table 4.15-22. Rather, Project-related traffic continues to travel throughout the Southern California region along the State highway system, dissipating as distance from the Project site increases. As such, Project-related traffic has the potential to travel along freeway mainline segments that experience unacceptable levels of service, including but not limited to *Riverside County CMP* segments of SR-60, SR-91, I-15, I-215, and I-10 as well as freeway segments located outside of Riverside County, such as I-5, I-15, I-110, I-405, and I-710, among others. All State highway system facilities that operate at an unacceptable LOS are considered to be cumulatively impacted, however, because the Project would contribute fewer than 50 peak hour trips to congested freeway segments beyond the Project's study area, the Project's effect to *Riverside County CMP* freeway facilities and other freeway facilities located outside of Riverside County would not be cumulatively considerable under E+A+P traffic conditions.

2. Freeway Off-Ramp Queuing Analysis

Table 4.15-23, *Peak Hour Freeway Off-Ramp Queuing Summary for Opening Year (E+A+P) Conditions*, summarizes freeway ramp queuing under E+A+P traffic conditions at study area off-ramps during the AM and PM peak hours. As shown on Table 4.15-23, all freeway ramps are projected to experience acceptable stacking lengths during the AM and PM peak hours under E+A+P traffic conditions, which would preclude "spill back" of traffic from this interchange onto adjacent freeway mainline segments (Urban Crossroads, 2015a, p. 79). Accordingly, the Project would not cause or contribute to deficient operations at Project study area freeway off-ramps under E+A+P conditions and the Project's impact to *CMP* freeway off-ramps is determined to be less than significant on a direct and cumulative basis.

3. Freeway Ramp Merge/Diverge Junction Analysis

Table 4.15-24, *Freeway Ramp Junction Merge/Diverge Analysis for Opening Year (E+A+P) Conditions*, summarizes freeway ramp merge/diverge junction operations within the study area during the AM and PM peak hours under E+A+P traffic conditions. As shown on Table 4.15-24, all freeway



Table 4.15-22 Freeway Mainline Segment Analysis for Opening Year (2017) Conditions

| Freeway | Direction | Mainline Segment | Lanes ¹ | Time Period | EAP (2017) | | | EAPC (2017) | | |
|----------------------------------|------------|--|--------------------|-------------|---------------------|----------------------|-------------|---------------------|----------------------|----------|
| | | | | | Volume ² | Density ³ | LOS | Volume ² | Density ³ | LOS |
| I-215 Freeway | Southbound | SR-60/SR-91 Freeway to Blaine St. | 5 | AM | 4,490 | 14.3 | B | 5,147 | 16.8 | B |
| | | | | PM | 6,161 | 19.7 | C | 6,551 | 21.2 | C |
| | | Blaine St. to University Av. | 4 | AM | 4,549 | 18.2 | C | 5,265 | 21.8 | C |
| | | | | PM | 4,394 | 17.3 | B | 4,823 | 19.3 | C |
| | | University Av. to Martin Luther King Bl. | 4 | AM | 4,857 | 19.9 | C | 5,632 | 24.2 | C |
| | | | | PM | 5,407 | 21.9 | C | 5,874 | 24.4 | C |
| | | Martin Luther King Bl. to Central Av. | 5 | AM | 3,630 | 11.5 | B | 4,470 | 14.6 | B |
| | | | | PM | 4,716 | 14.8 | B | 5,224 | 16.6 | B |
| | | Central Av. to Box Springs Rd. | 5 | AM | 5,329 | 17.0 | B | 6,230 | 20.5 | C |
| | | | | PM | 7,007 | 22.3 | C | 7,555 | 24.7 | C |
| | | Box Springs Rd. to SR-60/I-215 Freeway | 4 | AM | 4,861 | 19.1 | C | 5,847 | 24.3 | C |
| | | | | PM | 6,223 | 28.2 | D | 6,818 | 28.9 | D |
| | | SR-60 Freeway to Eucalyptus Av. | 5 | AM | 6,559 | 21.0 | C | 7,928 | 27.2 | D |
| | | | | PM | 6,771 | 21.9 | C | 7,605 | 25.4 | C |
| Eucalyptus Av. to Alessandro Bl. | 3 | AM | 3,641 | 19.8 | C | 5,076 | 31.2 | D | | |
| | | PM | 5,391 | 33.0 | D | 6,269 | 44.4 | E | | |
| Alessandro Bl. to Cactus Av. | 4 | AM | 5,236 | 21.1 | C | 6,735 | 30.1 | D | | |
| | | PM | 5,789 | 23.7 | C | 6,710 | 29.2 | D | | |
| Cactus Av. to Van Buren Bl. | <u>4</u> | AM | 4,932 | 27.8 | D | 5,997 | 24.6 | C | | |
| | | PM | 595 | 33.8 | D | 7,122 | 31.8 | D | | |
| Van Buren Bl. to Harley Knox Bl. | 3 | AM | 2,696 | 14.3 | B | 3,753 | 20.9 | C | | |
| | | PM | 4,036 | 21.7 | C | 5,121 | 30.7 | D | | |
| Harley Knox Bl. to Ramona Exwy. | 3 | AM | 2,284 | 12.0 | B | 2,867 | 15.4 | B | | |
| | | PM | 3,605 | 19.1 | C | 4,755 | 27.5 | D | | |
| I-215 Freeway | Northbound | SR-60/SR-91 Freeway to Blaine St. | 5 | AM | 3,688 | 11.7 | B | 4,022 | 12.9 | B |
| | | | | PM | 3,627 | 11.6 | B | 4,338 | 14.2 | B |
| | | Blaine St. to University Av. | 5 | AM | 4,815 | 15.6 | B | 5,182 | 16.8 | B |
| | | | | PM | 4,105 | 13.4 | B | 4,879 | 16.3 | B |
| | | University Av. to Martin Luther King Bl. | 4 | AM | 6,803 | 29.4 | D | 7,204 | 32.6 | D |
| | | | | PM | 6,120 | 25.7 | C | 6,956 | 31.8 | D |
| | | Martin Luther King Bl. to Central Av. | 4 | AM | 5,481 | 22.5 | C | 5,916 | 24.8 | C |
| | | | | PM | 5,582 | 23.1 | C | 6,488 | 28.8 | D |
| | | Central Av. to Box Springs Rd. | 5 | AM | 5,318 | 17.3 | B | 5,787 | 19.0 | C |
| | | | | PM | 5,876 | 19.6 | C | 6,848 | 23.7 | C |
| | | Box Springs Rd. to SR-60/I-215 Freeway | 4 | AM | 6,285 | 25.6 | C | 6,796 | 29.0 | D |
| | | | | PM | 6,595 | 27.4 | D | 7,660 | 35.6 | E |
| | | SR-60 Freeway to Eucalyptus Av. | 3 | AM | 3,732 | 19.7 | C | 4,449 | 24.6 | C |
| | | | | PM | 4,039 | 21.6 | C | 5,514 | 34.6 | D |
| Eucalyptus Av. to Alessandro Bl. | 3 | AM | 4,903 | 27.6 | D | 5,657 | 35.3 | E | | |
| | | PM | 5,623 | 34.3 | D | 7,167 | 62.5 | F | | |
| Alessandro Bl. to Cactus Av. | <u>5</u> | AM | 2,856 | 11.5 | B | 3,647 | 11.9 | B | | |
| | | PM | 2,681 | 10.7 | A | 4,295 | 14.3 | B | | |
| Cactus Av. to Van Buren Bl. | <u>4</u> | AM | 3,850 | 20.6 | C | 5,185 | 21.1 | C | | |
| | | PM | 2,842 | 15.1 | B | 4,216 | 17.2 | B | | |
| Van Buren Bl. to Harley Knox Bl. | 3 | AM | 4,280 | 23.3 | C | 5,279 | 31.9 | D | | |
| | | PM | 3,434 | 18.2 | C | 4,517 | 25.9 | C | | |
| Harley Knox Bl. to Ramona Exwy. | 3 | AM | 3,891 | 20.7 | C | 4,941 | 28.7 | D | | |
| | | PM | 2,900 | 15.2 | B | 3,501 | 18.8 | C | | |

* **BOLD** = Unacceptable Level of Service

¹ Number of lanes are in the specified direction and reflect new auxiliary lanes and assume the HOV lane in each direction.

² Volumes shown on this table have been reduced to account for the proposed HOV lane in each direction.

³ Density is measured by passenger cars per mile per lane (pc/mi/ln).

Source: (Urban Crossroads, 2015b, Table 4)



Table 4.15-23 Peak Hour Freeway Off-Ramp Queuing Summary for Opening Year (E+A+P) Conditions

| Intersection | Movement | Available Stacking Distance (Feet) | Existing (2015) | | | | EAP (2017) | | | |
|-------------------------------------|----------|------------------------------------|---|---------|--------------------------|-----|---|---------|--------------------------|-----|
| | | | 95th Percentile Queue (Feet) ² | | Acceptable? ¹ | | 95th Percentile Queue (Feet) ² | | Acceptable? ¹ | |
| | | | AM Peak | PM Peak | AM | PM | AM Peak | PM Peak | AM | PM |
| I-215 SB Off-Ramp / Harley Knox Bl. | SBL/T | 1,330 | 383 | 339 | Yes | Yes | 390 | 353 | Yes | Yes |
| | SBR | 270 | 44 | 60 | Yes | Yes | 51 | 63 | Yes | Yes |
| I-215 NB Off-Ramp / Harley Knox Bl. | NBL/T | 1,120 | 13 | 22 | Yes | Yes | 51 | 44 | Yes | Yes |
| | NBR | 265 | 47 | 52 | Yes | Yes | 49 | 54 | Yes | Yes |

¹ Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 15 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown on this table, where applicable.

² Maximum queue length for the approach reported.

Source: (Urban Crossroads, 2015a, Table 6-2)

Table 4.15-24 Freeway Ramp Junction Merge/Diverge Analysis for Opening Year (E+A+P) Conditions

| Freeway | Direction | Ramp or Segment | Lanes on Freeway ¹ | Existing (2015) | | | | EAP (2017) | | | |
|---------------|-----------|-----------------------------------|-------------------------------|----------------------|-----|----------------------|-----|----------------------|-----|----------------------|-----|
| | | | | AM Peak Hour | | PM Peak Hour | | AM Peak Hour | | PM Peak Hour | |
| | | | | Density ² | LOS | Density ² | LOS | Density ² | LOS | Density ² | LOS |
| I-215 Freeway | SB | Off-Ramp at Harley Knox Boulevard | 3 | 20.2 | C | 27.5 | C | 21.3 | C | 28.6 | D |
| | | On-Ramp at Harley Knox Boulevard | 3 | 15.1 | B | 21.5 | C | 15.7 | B | 22.5 | C |
| | NB | On-Ramp at Harley Knox Boulevard | 3 | 25.8 | C | 21.9 | C | 26.9 | C | 23.1 | C |
| | | Off-Ramp at Harley Knox Boulevard | 3 | 25.1 | C | 20.0 | B | 26.1 | C | 20.7 | C |

¹ Number of lanes are in the specified direction and is based on existing conditions.

² Density is measured by passenger cars per mile per lane (pc/mi/ln).

Source: (Urban Crossroads, 2015a, Table 6-4)



ramp merge/diverge junctions are projected to operate at acceptable LOS during the AM and PM peak hours under E+A+P conditions (Urban Crossroads, 2015a, p. 79). Accordingly, the Project would not cause or contribute to deficient operations at Project study area freeway ramp merge/diverge junctions under E+A+P conditions and the Project's impact to *CMP* freeway ramp merge/diverge junctions is determined to be less than significant on a direct and cumulative basis.

D. Opening Year (2017) plus Cumulative CMP Impact Analysis (E+A+P+C)

1. Freeway Mainline Segment Operations Analysis

Table 4.15-22 summarizes the LOS of freeway mainline segments within the Project study area under E+A+P+C conditions. As shown in Table 4.15-22, all freeway mainline segments in the Project study area would operate at acceptable LOS under E+A+P+C conditions, with the exception of the following three segments (Urban Crossroads, 2015b, p. 8):

- I-215 Southbound, Eucalyptus Avenue to Alessandro Boulevard (Freeway Segment #8) in the PM peak hour;
- I-215 Northbound, Box Springs Road to SR-60/ I-215 Freeway (Freeway Segment #18) in the PM peak hour; and
- I-215 Northbound, Eucalyptus Avenue to Alessandro Boulevard (Freeway Segment #20) in the AM and PM peak hours.

The Project would contribute substantial traffic to the projected cumulative LOS deficiencies at the freeway mainline segments listed above. Therefore, the Project's traffic contributions at the above-listed *CMP* freeway mainline segments would be cumulatively considerable under E+A+P+C conditions and mitigation is required. (Urban Crossroads, 2015b, p. 8)

The freeway mainline segments listed in Table 4.15-22 include the segments that would receive the highest concentration of traffic from the Project. However, Project-related traffic does not stop at the limited of the freeway mainline segments listed in Table 4.15-22. Rather, Project-related traffic continues to travel throughout the Southern California region along the State highway system, dissipating as distance from the Project site increases. As such, Project-related traffic has the potential to travel along freeway mainline segments that experience unacceptable levels of service, including but not limited to *Riverside County CMP* segments of SR-60, SR-91, I-15, I-215, and I-10 as well as freeway segments located outside of Riverside County, such as I-5, I-15, I-110, I-405, and I-710, among others. All State highway system facilities that operate at an unacceptable LOS are considered to be cumulatively impacted, however, because the Project would contribute fewer than 50 peak hour trips to congested freeway segments beyond the Project's study area, the Project's effect to *Riverside County CMP* freeway facilities and other freeway facilities located outside of Riverside County would not be cumulatively considerable under E+A+P+C traffic conditions.



2. Freeway Off-Ramp Queuing Analysis

Table 4.15-25, *Peak Hour Freeway Off-Ramp Queuing Summary for Opening Year plus Cumulative (E+A+P+C) Conditions*, summarizes peak hour freeway off-ramp queuing in the Project study area under E+A+P+C traffic conditions. As shown on Table 4.15-25, all study area freeway ramps experience acceptable stacking lengths during the AM and PM peak hours under E+A+P+C traffic conditions with the exception of the following ramp (Urban Crossroads, 2015a, p. 89):

- I-215 Southbound Ramps / Harley Knox Boulevard (Ramp #1), southbound shared left-through lane in the AM peak hour.

The Project would contribute substantial traffic to the projected cumulative LOS deficiency at the freeway ramp listed above. Therefore, the Project's traffic contributions at the above-listed *CMP* freeway ramp would be cumulatively considerable under E+A+P+C conditions and mitigation is required.

3. Freeway Ramp Merge/Diverge Junction Analysis

Table 4.15-26, *Freeway Ramp Junction Merge/Diverge Analysis for Opening Year plus Cumulative (E+A+P+C) Conditions*, summarizes peak hour freeway ramp junction merge/diverge operations within the study area under E+A+P+C traffic conditions. As shown in Table 4.15-26, all merge/diverge areas operate at acceptable LOS under E+A+P+C traffic conditions (Urban Crossroads, 2015a, p. 89). Therefore, the Project's effect to *CMP* freeway ramp merge/diverge junctions in the study area would not be cumulatively considerable under E+A+P+C traffic conditions.

E. Horizon Year (2035) CMP Impact Analysis

1. Freeway Mainline Segment Operations Analysis

Table 4.15-27, *Freeway Mainline Segment Analysis for Horizon Year (2035)*, summarizes the LOS along freeway mainline segments within the Project study area under Horizon Year (2035) traffic conditions. As shown in Table 4.15-27, all freeway mainline segments located in the Project study area would operate at acceptable LOS under Horizon Year (2035) traffic conditions with the exception of the following segments (Urban Crossroads, 2015b, p. 8):

- I-215 Southbound, Van Buren Boulevard to Harley Knox Boulevard (Freeway Segment #11) in the AM and PM peak hours;
- I-215 Northbound, Martin Luther King Boulevard to Central Avenue (Freeway Segment #16) in the AM and PM peak hours;
- I-215 Northbound, SR-60 Freeway to Eucalyptus Avenue (Freeway Segment #19) in the AM and PM peak hours; and
- I-215 Northbound, Van Buren Boulevard to Harley Knox Boulevard (Freeway Segment #23) in the AM and PM peak hours.



The Project would contribute substantial traffic to the projected cumulative LOS deficiencies at the freeway mainline segments listed above. Therefore, the Project's traffic contributions at the above-listed *CMP* freeway mainline segments would be cumulatively considerable under Horizon Year (2035) conditions and mitigation is required. (Urban Crossroads, 2015b, p. 8)



Table 4.15-25 Peak Hour Freeway Off-Ramp Queuing Summary for Opening Year plus Cumulative (E+A+P+C) Conditions

| Intersection | Movement | Available Stacking Distance (Feet) | Existing (2015) | | | | EAPC (2017) | | | |
|-------------------------------------|----------|------------------------------------|---|---------|--------------------------|-----|---|--------------------|--------------------------|-----|
| | | | 95th Percentile Queue (Feet) ² | | Acceptable? ¹ | | 95th Percentile Queue (Feet) ² | | Acceptable? ¹ | |
| | | | AM Peak | PM Peak | AM | PM | AM Peak | PM Peak | AM | PM |
| I-215 SB Off-Ramp / Harley Knox Bl. | SBL/T | 1,330 | 383 | 339 | Yes | Yes | 1,910 ³ | 1,014 ³ | No | Yes |
| | SBR | 270 | 44 | 60 | Yes | Yes | 102 | 145 | Yes | Yes |
| I-215 NB Off-Ramp / Harley Knox Bl. | NBL/T | 1,120 | 13 | 22 | Yes | Yes | 52 | 73 | Yes | Yes |
| | NBR | 265 | 47 | 52 | Yes | Yes | 246 ³ | 126 | Yes | Yes |

¹ Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 15 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown on this table, where applicable.

² Maximum queue length for the approach reported.

³ 95th percentile volume exceeds capacity, queue may be longer. Queue shown is maximum after two cycles.

Source: (Urban Crossroads, 2015a, Table 7-2)

Table 4.15-26 Freeway Ramp Junction Merge/Diverge Analysis for Opening Year plus Cumulative (E+A+P+C) Conditions

| Freeway | Direction | Ramp or Segment | Lanes on Freeway ¹ | Existing (2015) | | | | EAPC (2017) | | | |
|---------------|-----------|-----------------------------------|-------------------------------|----------------------|-----|----------------------|-----|----------------------|-----|----------------------|-----|
| | | | | AM Peak Hour | | PM Peak Hour | | AM Peak Hour | | PM Peak Hour | |
| | | | | Density ² | LOS | Density ² | LOS | Density ² | LOS | Density ² | LOS |
| I-215 Freeway | SB | Off-Ramp at Harley Knox Boulevard | 3 | 20.2 | C | 27.5 | C | 29.2 | D | 34.7 | D |
| | | On-Ramp at Harley Knox Boulevard | 3 | 15.1 | B | 21.5 | C | 19.3 | B | 30.0 | D |
| | NB | On-Ramp at Harley Knox Boulevard | 3 | 25.8 | C | 21.9 | C | 33.2 | D | 31.3 | D |
| | | Off-Ramp at Harley Knox Boulevard | 3 | 25.1 | C | 20.0 | B | 32.0 | D | 24.5 | C |

¹ Number of lanes are in the specified direction and is based on existing conditions.

² Density is measured by passenger cars per mile per lane (pc/mi/ln).

Source: (Urban Crossroads, 2015a, Table 7-4)



Table 4.15-27 Freeway Mainline Segment Analysis for Horizon Year (2035)

| Freeway | Direction | Mainline Segment | Lanes ¹ | Time Period | 2035 Without Project | | | 2035 With Project | | |
|----------------------------------|------------|--|--------------------|-------------|----------------------|----------------------|-------------|---------------------|----------------------|-----|
| | | | | | Volume ² | Density ³ | LOS | Volume ² | Density ³ | LOS |
| I-215 Freeway | Southbound | SR-60/SR-91 Freeway to Blaine St. | 5 | AM | 7,169 | 24.7 | C | 7,195 | 24.8 | C |
| | | | | PM | 7,093 | 24.2 | C | 7,106 | 24.7 | C |
| | | Blaine St. to University Av. | 4 | AM | 6,812 | 31.5 | D | 6,837 | 31.7 | D |
| | | | | PM | 6,735 | 30.9 | D | 6,748 | 31.0 | D |
| | | University Av. to Martin Luther King Bl. | 4 | AM | 6,991 | 33.1 | D | 7,017 | 33.3 | D |
| | | | | PM | 6,915 | 32.2 | D | 6,928 | 32.3 | D |
| | | Martin Luther King Bl. to Central Av. | 5 | AM | 8,000 | 28.3 | D | 8,026 | 28.4 | D |
| | | | | PM | 7,919 | 27.7 | D | 7,932 | 27.9 | D |
| | | Central Av. to Box Springs Rd. | 5 | AM | 8,882 | 32.4 | D | 8,908 | 32.6 | D |
| | | | | PM | 8,799 | 31.7 | D | 8,813 | 31.8 | D |
| | | Box Springs Rd. to SR-60/I-215 Freeway | 4 | AM | 6,705 | 30.9 | D | 6,731 | 31.1 | D |
| | | | | PM | 6,607 | 30.0 | D | 6,621 | 30.1 | D |
| | | SR-60 Freeway to Eucalyptus Av. | 5 | AM | 5,506 | 19.6 | C | 5,546 | 19.7 | C |
| | | | | PM | 5,387 | 19.0 | C | 5,407 | 19.2 | C |
| Eucalyptus Av. to Alessandro Bl. | 3 | AM | 5,351 | 33.4 | D | 5,390 | 33.8 | D | | |
| | | PM | 5,231 | 32.0 | D | 5,252 | 32.2 | D | | |
| Alessandro Bl. to Cactus Av. | 4 | AM | 5,500 | 23.1 | C | 5,543 | 23.4 | C | | |
| | | PM | 5,381 | 22.3 | C | 5,403 | 22.6 | C | | |
| Cactus Av. to Van Buren Bl. | 4 | AM | 5,170 | 20.9 | C | 5,212 | 21.2 | C | | |
| | | PM | 6,004 | 25.4 | C | 6,025 | 25.5 | C | | |
| Van Buren Bl. to Harley Knox Bl. | 3 | AM | 5,961 | 38.1 | E | 6,003 | 39.0 | E | | |
| | | PM | 5,903 | 37.4 | E | 5,925 | 37.7 | E | | |
| Harley Knox Bl. to Ramona Exwy. | 3 | AM | 4,421 | 22.8 | C | 4,429 | 22.9 | C | | |
| | | PM | 5,362 | 30.9 | D | 5,381 | 31.1 | D | | |
| I-215 Freeway | Northbound | SR-60/SR-91 Freeway to Blaine St. | 5 | AM | 7,086 | 24.2 | C | 7,098 | 24.3 | C |
| | | | | PM | 7,184 | 24.8 | C | 7,214 | 24.9 | C |
| | | Blaine St. to University Av. | 5 | AM | 6,728 | 22.9 | C | 6,740 | 22.9 | C |
| | | | | PM | 6,826 | 23.3 | C | 6,856 | 23.5 | C |
| | | University Av. to Martin Luther King Bl. | 4 | AM | 6,908 | 32.2 | D | 6,920 | 32.3 | D |
| | | | | PM | 7,006 | 33.2 | D | 7,035 | 33.4 | D |
| | | Martin Luther King Bl. to Central Av. | 4 | AM | 7,912 | 40.0 | E | 7,924 | 40.1 | E |
| | | | | PM | 8,014 | 41.4 | E | 8,045 | 41.7 | E |
| | | Central Av. to Box Springs Rd. | 5 | AM | 8,793 | 31.7 | D | 8,804 | 31.7 | D |
| | | | | PM | 8,897 | 32.5 | D | 8,927 | 32.7 | D |
| | | Box Springs Rd. to SR-60/I-215 Freeway | 4 | AM | 6,599 | 30.0 | D | 6,611 | 30.1 | D |
| | | | | PM | 6,724 | 31.1 | D | 6,754 | 31.3 | D |
| | | SR-60 Freeway to Eucalyptus Av. | 3 | AM | 5,378 | 38.1 | E | 5,396 | 38.3 | E |
| | | | | PM | 5,526 | 40.4 | E | 5,571 | 41.1 | E |
| Eucalyptus Av. to Alessandro Bl. | 3 | AM | 5,223 | 31.9 | D | 5,241 | 32.0 | D | | |
| | | PM | 5,370 | 33.6 | D | 5,416 | 33.6 | D | | |
| Alessandro Bl. to Cactus Av. | 5 | AM | 5,372 | 17.5 | B | 5,392 | 17.6 | B | | |
| | | PM | 5,520 | 18.2 | C | 5,568 | 18.3 | C | | |
| Cactus Av. to Van Buren Bl. | 4 | AM | 6,181 | 26.3 | D | 6,200 | 26.4 | D | | |
| | | PM | 4,535 | 18.1 | C | 4,584 | 18.3 | C | | |
| Van Buren Bl. to Harley Knox Bl. | 3 | AM | 5,889 | 37.4 | E | 5,918 | 37.6 | E | | |
| | | PM | 5,970 | 38.6 | E | 6,018 | 39.2 | E | | |
| Harley Knox Bl. to Ramona Exwy. | 3 | AM | 5,404 | 31.2 | D | 5,421 | 31.3 | D | | |
| | | PM | 4,550 | 23.6 | C | 4,558 | 23.7 | C | | |

¹ **BOLD** = Unacceptable Level of Service

² Number of lanes are in the specified direction and reflect new auxiliary lanes and assume the HOV lane in each direction.

³ Volumes shown on this table have been reduced to account for the proposed HOV lane in each direction.

⁴ Density is measured by passenger cars per mile per lane (pc/mi/ln).

Source: (Urban Crossroads, 2015b, Table 5)



The freeway mainline segments listed in Table 4.15-27 include the segments that would receive the highest concentration of traffic from the Project. However, Project-related traffic does not stop at the limited of the freeway mainline segments listed in Table 4.15-27. Rather, Project-related traffic continues to travel throughout the Southern California region along the State highway system, dissipating as distance from the Project site increases. As such, Project-related traffic has the potential to travel along freeway mainline segments that experience unacceptable levels of service, including but not limited to *Riverside County CMP* segments of SR-60, SR-91, I-15, I-215, and I-10, as well as freeway segments located outside of Riverside County, such as I-5, I-15, I-110, I-405, and I-710, among others. All State highway system facilities that operate at an unacceptable LOS are considered to be cumulatively impacted; however, because the Project would contribute fewer than 50 peak hour trips to congested freeway segment beyond the Project's study area, the Project's effect to *Riverside County CMP* freeway facilities and other freeway facilities located outside of Riverside County would not be cumulatively considerable under Horizon Year (2035) conditions.

2. Freeway Off-Ramp Operations Analysis

Table 4.15-28, *Peak Hour Freeway Off-Ramp Queuing Summary for Horizon Year (2035)*, summarizes peak hour freeway off-ramp queuing in the Project study area under Horizon Year (2035) traffic conditions. As shown on Table 4.15-28, all freeway ramps experience acceptable stacking lengths during the AM and PM peak hours under Horizon Year (2035) conditions, both without and with Project traffic, with the exception of the follow two off-ramp facilities (Urban Crossroads, 2015a, p. 104):

- I-215 Southbound Ramps / Harley Knox Boulevard (Ramp #1), southbound shared left-through lane in the AM peak hour; and
- I-215 Southbound Ramp / Harley Knox Boulevard (Ramp #1), southbound right turn lane in the AM and PM peak hours.

The Project would contribute substantial traffic to the projected cumulative LOS deficiencies at the freeway ramp facilities listed above (Urban Crossroads, 2015a, p. 104). Therefore, the Project's traffic contributions at the above-listed CMP freeway ramp would be cumulatively considerable under Horizon Year (2035) conditions and mitigation is required.

3. Freeway Ramp Merge/Diverge Junction Analysis

As summarized in Table 4.15-29, *Freeway Ramp Junction Merge/Diverge Analysis for Horizon Year (2035)*, the following freeway ramp merge/diverge junctions would operate at unacceptable LOS under Horizon Year (2035) traffic conditions (Urban Crossroads, 2015a, p. 108):

- I-215 Southbound / North of Harley Knox Boulevard (Ramp Junction #1) in the AM and PM peak hours;
- I-215 Southbound / South of Harley Knox Boulevard (Ramp Junction #2) in the PM peak hour;



Table 4.15-28 Peak Hour Freeway Off-Ramp Queuing Summary for Horizon Year (2035)

| Intersection | Movement | Available Stacking Distance (Feet) | 2035 Without Project | | | | 2035 With Project | | | |
|-------------------------------------|----------|------------------------------------|---|-------------------------|--------------------------|-----|---|-------------------------|--------------------------|-----|
| | | | 95th Percentile Queue (Feet) ² | | Acceptable? ¹ | | 95th Percentile Queue (Feet) ² | | Acceptable? ¹ | |
| | | | AM Peak | PM Peak | AM | PM | AM Peak | PM Peak | AM | PM |
| I-215 SB Off-Ramp / Harley Knox Bl. | SBL/T | 1,330 | 1,903 ³ | 1,020 ³ | No | Yes | 1,903 ³ | 1,020 ³ | No | Yes |
| | SBR | 270 | 361 | 771 ³ | No | No | 464 | 852 ³ | No | No |
| I-215 NB Off-Ramp / Harley Knox Bl. | NBL/T | 1,120 | 151 | 640 ³ | Yes | Yes | 146 | 668 ³ | Yes | Yes |
| | NBR | 265 | 481 ³ | 146 | Yes ⁴ | Yes | 414 ³ | 150 | Yes ⁴ | Yes |

¹ **BOLD** = 95th percentile queue is anticipated to exceed available storage.

² Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 15 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown on this table, where applicable.

³ Maximum queue length for the approach reported.

⁴ 95th percentile volume exceeds capacity, queue may be longer. Queue shown is maximum after two cycles.

⁵ Adjacent through lane has sufficient storage to accommodate any spillover from the northbound right turn lane without spilling back and affecting the I-215 Freeway mainline.

Source: (Urban Crossroads, 2015a, Table 8-2)

Table 4.15-29 Freeway Ramp Junction Merge/Diverge Analysis for Horizon Year (2035)

| Freeway | Direction | Ramp or Segment | Lanes on Freeway ¹ | 2035 Without Project | | | | 2035 With Project | | | |
|---------------|-----------|-----------------------------------|-------------------------------|----------------------|-----|----------------------|-----|----------------------|-----|----------------------|-----|
| | | | | AM Peak Hour | | PM Peak Hour | | AM Peak Hour | | PM Peak Hour | |
| | | | | Density ² | LOS | Density ² | LOS | Density ² | LOS | Density ² | LOS |
| I-215 Freeway | SB | Off-Ramp at Harley Knox Boulevard | 3 | 45.7 | F | 44.7 | F | 46.2 | F | 45.0 | F |
| | | On-Ramp at Harley Knox Boulevard | 3 | 31.4 | D | 38.0 | E | 31.4 | D | 38.2 | E |
| | NB | On-Ramp at Harley Knox Boulevard | 3 | 41.6 | F | 45.4 | F | 41.8 | F | 45.9 | F |
| | | Off-Ramp at Harley Knox Boulevard | 3 | 38.1 | E | 33.6 | D | 38.3 | E | 33.7 | D |

¹ **BOLD** = Unacceptable Level of Service

² Number of lanes are in the specified direction and is based on existing conditions.

³ Density is measured by passenger cars per mile per lane (pc/mi/ln).

Source: (Urban Crossroads, 2015a, Table 8-4)



- I-215 Northbound / North of Harley Knox Boulevard (Ramp Junction #3) in the AM and PM peak hours; and
- I-215 Northbound / South of Harley Knox Boulevard (Ramp Junction #4) in the AM peak hour.

The Project would contribute substantial traffic to the projected cumulative LOS deficiencies at the freeway ramp merge/diverge junctions listed above (Urban Crossroads, 2015a, p. 108). Therefore, the Project's contribution to traffic congestion at the above-listed *CMP* freeway ramp merge/diverge junctions would be cumulatively considerable under Horizon (2035) conditions and mitigation is required.

Threshold c) Would implementation of the Project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

The proposed Project does not contain an air travel component (e.g., runways, helipads); thus, air traffic volumes would not be changed as a result of the Project.

As previously described in EIR Section 3.0, *Project Description*, the Project would develop the subject property with two business park warehouse buildings and related improvements, including parking areas, loading bays, detention basins, and landscaping. The tallest features on the Project site would not exceed a height of 45 ~~55~~ feet above finished grade, and would not include any component that would obstruct the flight path or change air traffic patterns. Furthermore, the Project was subject to review by the Riverside County ALUC, which found that the Project would be fully consistent with the March Air Reserve Base ALUCP and would not contain design features that would alter air traffic patterns and/or result in a substantial safety risk to flight. A copy of the ALUC staff report that contains the conditions of approval imposed on the Project by the ALUC are included in Project's Administrative Record for this EIR on file with the County of Riverside.

Based on the foregoing information, the Project would not have the potential to affect air traffic patterns, including an increase in traffic levels or a change in flight path location that results in substantial safety risks. No impact would occur.

Threshold d) Would the Project alter waterborne, rail or air traffic?

As noted above under Threshold (c), the Project does not propose any land uses that would interfere with air traffic. The Project site is approximately 1,500 feet from the nearest railroad track, and does not propose any land uses with a rail component or with potential to conflict with rail traffic. The Project site is not located within the vicinity of waterborne traffic routes, nor does the Project propose any land uses with a potential to conflict with waterborne traffic. Accordingly, the Project would not alter waterborne, rail, or air traffic; no impact would occur.



Threshold e) Would the Project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The Project would be compatible with the “Business Park” and “Light Industrial” land uses planned to the north and west of the Project site by the County of Riverside General Plan. Although areas to the south and west of the Project site are planned by the General Plan for residential land uses, the Project would not send truck traffic to these areas (as previously shown on Figure 4.15-10, all of the Project’s truck traffic would flow east of the Project site, toward I-215). Therefore, implementation of the Project would not create a transportation hazard as a result of an incompatible use.

Proposed roadway improvements along the Project site frontage would occur within the public right-of-ways would be installed in conformance with County design standards. The County of Riverside Transportation Department reviewed the Project’s application materials (refer to EIR Section 3.0, *Project Description*) and determined that no hazardous transportation design features would be introduced by the Project. Additionally, a construction traffic control plan is recommended by this EIR (refer to EIR Subsection 4.15.8) to safely route traffic along abutting roadways during temporary construction activities and to maintain adequate emergency access.

Accordingly, the proposed Project would not create or substantially increase safety hazards due to a design feature or incompatible use. The Project would result in a less-than-significant impact.

Threshold f) Would the Project cause an effect upon, or a need for new or altered maintenance of roads?

The proposed Project would improve public streets along the frontage of the Project site. These improved (i.e., extended, widened) roadways would require routine, intermittent maintenance; but, maintenance of public streets along the Project frontage would not result in any significant impacts to the environment. The Project would contribute traffic to off-site public roadways; however, public roads require periodic maintenance as part of their inherent operational activities, and such maintenance would not result in substantial impacts to the environment. Public roadway maintenance would be funded through the Project Applicant’s payment of Development Impact Fees (DIF) and the Project site owners’ future payment of property taxes. Maintenance of roadways would not result in any new impacts to the environment beyond that which is already disclosed and mitigated by this Environmental Impact Report, and impacts would therefore be less than significant.

Threshold g) Would the Project cause an effect upon circulation during the project’s construction?

As discussed above under Threshold (a) and Threshold (b), circulation facilities in the Project study area would have adequate capacity to accommodate the Project’s construction-related traffic while maintaining acceptable LOS. Impacts would be less than significant.



Threshold h) Would the Project result in inadequate emergency access or access to nearby uses?

During the course of the County of Riverside’s review of the proposed Project, the County evaluated the Project’s design, including but not limited to proposed driveway locations and parking lot/drive aisle configuration, to ensure that adequate access would be provided for emergency vehicles at Project build out. Furthermore, as described above under the response to Threshold (e), the Project would provide adequate emergency access along abutting roadways during temporary construction activities within the public right-of-way. Therefore, the Project would not result in inadequate emergency access and a less-than-significant impact would occur.

The Project site does not provide access to any abutting parcels or nearby uses. Therefore, there is no potential for the Project to result in inadequate access to nearby uses.

Threshold i) Would the Project conflict with adopted policies, plans or programs regarding public transit, bikeways or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities?

The Project is designed to accommodate pedestrians via sidewalks provided along adjacent public roadways. Landscaping is designed to be installed along the Project’s perimeter, which would separate the adjacent public roadway rights-of-way (and their associated streetscapes and sidewalks) from the proposed Project’s interior, eliminating any conflict between Project operations and the sidewalks along perimeter roadways. Furthermore, all Project driveways would be stop-sign controlled and sight distances at each Project driveway would be reviewed by the County of Riverside at the time improvement plans are submitted to ensure that sight distance meets minimum County safety standards.

According to the County of Riverside General Plan, the Project site abuts a planned community trail along Oleander Avenue and Ellsworth Street (“Decker Road.”). The proposed Tentative Parcel Maps for the Building D Site and the Building E Site designate a 14-foot wide trail easement paralleling Oleander Avenue along the Project site’s frontage. Similarly, the proposed Building D Site Tentative Parcel Map designates a 14-foot wide trail easement paralleling the east side of Ellsworth Street along the Building D Site’s frontage. A 5-foot sidewalk would be provided in an 18-foot wide parkway on the west side of Ellsworth Street along the Building E Site’s frontage; a trail easement is not required on the west side of Ellsworth Street. The Project is thus consistent with County plans to provide for community trail segments along Oleander Avenue and Ellsworth Street.

There are no public transit services in the vicinity of the Project site under existing conditions. Accordingly, the Project has no potential to conflict with local public transit service.

The County of Riverside does not have any designated truck routes within County jurisdiction (Urban Crossroads, 2015a, p. 31). However, when Project-related traffic passes through adjacent jurisdictions (like the City of Perris, for example), trucks would be required to use designated truck routes. Mandatory use of designated truck routes would minimize potential real and perceived conflicts



between trucks and passenger vehicles, bicyclists, and pedestrians, and would maximize the safety of the multi-model circulation system.

In summary, the proposed Project has no foreseeable potential to conflict with adopted policies, plans, or programs related to alternative transportation, or otherwise substantially decrease the performance or safety of such facilities. A less-than-significant impact would occur.

4.15.6 CUMULATIVE IMPACT ANALYSIS

The analysis under Threshold (a) disclosed the Project's potential to affect the transportation network on a direct and cumulative basis. As concluded under Threshold (a), the Project would contribute considerable traffic volumes at intersections and roadway segments within the Project study area that are projected to experience significant, cumulative impacts under Opening Year (2017) and/or Horizon Year (2035) traffic conditions. The intersections and roadway segments that would receive cumulatively considerable impacts from the Project are listed below:

Cumulatively Impacted Intersections

- Decker Road / Oleander Avenue (Intersection #4);
- Harvill Avenue / Harley Knox Boulevard (Intersection #8);
- I-215 Southbound Ramps / Harley Knox Boulevard (Intersection #10); and
- I-215 Northbound Ramps / Harley Knox Boulevard (Intersection #11).

The analysis under Threshold (b) evaluated the Project's potential to result in substantial adverse effects to the *Riverside County CMP* roadway network, including *CMP* arterial roadways and freeway facilities. As concluded under Threshold (b), the addition of Project traffic to the existing and planned *CMP* roadway network would result in cumulatively considerable impacts to the following *CMP* intersections:

Cumulatively Impacted CMP Intersections

- I-215 Southbound Ramps / Harley Knox Boulevard (Intersection #10); and
- I-215 Northbound Ramps / Harley Knox Boulevard (Intersection #11).

In addition to the *CMP* intersections listed above, Project would contribute considerable traffic volumes to *CMP* freeway mainline segments, merge/diverge ramp junctions, and ramps within the Project study area that are projected to experience significant, cumulative impacts under Opening Year (2017) and/or Horizon Year (2035) traffic conditions. The *CMP* freeway facilities that would receive cumulatively considerable impacts from the Project are listed below:

Cumulatively Impacted CMP Freeway Mainline Segments

- I-215 Southbound, Eucalyptus Avenue to Alessandro Boulevard (Freeway Segment #8);
- I-215 Southbound, Van Buren Boulevard to Harley Knox Boulevard (Freeway Segment #11);



- I-215 Northbound, Martin Luther King Boulevard to Central Avenue (Freeway Segment #16);
- I-215 Northbound, Box Springs Road to SR-60/I-215 Freeway (Freeway Segment #18);
- I-215 Northbound, SR-60 Freeway to Eucalyptus Avenue (Freeway Segment #19);
- I-215 Northbound, Eucalyptus Avenue to Alessandro Boulevard (Freeway Segment #20); and
- I-215 Northbound, Van Buren Boulevard to Harley Knox Boulevard (Freeway Segment #23).

Cumulatively Impacted CMP Freeway Off-Ramps

- I-215 Southbound Ramps / Harley Knox Boulevard (Ramp #1).

Cumulatively Impacted CMP Freeway Merge/Diverge Junctions

- I-215 Southbound / North of Harley Knox Boulevard (Ramp Junction #1);
- I-215 Southbound / South of Harley Knox Boulevard (Ramp Junction #2);
- I-215 Northbound / North of Harley Knox Boulevard (Ramp Junction #3); and
- I-215 Northbound / South of Harley Knox Boulevard (Ramp Junction #4).

The proposed Project does not have any potential to substantially contribute to cumulative impacts under the topics discussed under Thresholds (c), (d), (e), and (h) because the Project has no potential to result in changes to air traffic patterns; to alter waterborne, rail or air traffic; result in transportation design safety concerns; or adversely affect emergency access.

As presented under Threshold (f), the Project would improve (i.e., extend, widen) public streets along the Project site, which would require maintenance. In addition, Project-related traffic would utilize public streets traveling to-and-from the Project site. However, the Project would pay DIF fees as part of the development process and would pay property tax on an annual basis, a portion of which would be utilized by the County for routine, on-going road maintenance. The Project's payment of DIF fees and annual property taxes would off-set its cumulative contribution to road maintenance. The Project's cumulative contribution to roadway maintenance would be less than significant.

As discussed under Threshold (g), all Project study area circulation facilities would operate at acceptable LOS during Project construction. Accordingly, Project's cumulative contribution of traffic during construction activities would be less than significant.

As presented under Threshold (i), the proposed Project would not conflict with adopted policies or programs regarding public transit, bicycle, or pedestrian facilities and thus has no potential to contribute to a cumulative impact. The Project would have a less-than-significant direct and cumulative impact to adopted policies and programs regarding public transit, bicycle, and pedestrian facilities, as well as a less-than-significant direct and cumulative impact to the performance of such facilities.



4.15.7 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold (a) for the Building D Site and the Building E Site: Significant Cumulatively Considerable Impact. The Project would contribute to LOS deficiencies at numerous Project study area intersections under the Opening Year (2017) plus Cumulative (E+A+P+C) and Horizon Year (2035) traffic scenarios.

Threshold (b) for the Building D Site and the Building E Site: Significant Cumulatively Considerable Impact. The Project would contribute cumulatively considerable traffic volumes at numerous intersections and freeway facilities included within the *Riverside County CMP* roadway network under the Opening Year (2017) plus Cumulative (E+A+P+C) and Horizon Year (2035) traffic scenarios.

Threshold (c) for the Building D Site and the Building E Site: No Impact. There is no potential for the Project to change air traffic patterns or create substantial air traffic safety risks.

Threshold (d) for the Building D Site and the Building E Site: No Impact. There is no potential for the Project to alter waterborne, rail, or air traffic.

Threshold (e) for the Building D Site and the Building E Site: Less-than-Significant Impact. The proposed Project would not substantially increase transportation safety hazards due to design features or incompatible uses.

Threshold (f) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would not cause a significant need for new or altered maintenance of roads.

Threshold (g) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project would not cause a substantial adverse effect upon circulation during the Project's construction phase.

Threshold (h) for the Building D Site and the Building E Site: Less-than-Significant Impact. Adequate emergency access would be provided to the Project site during both short-term construction and long-term operation. The Project would not result in inadequate emergency access to the site or surrounding properties.

Threshold (i) for the Building D Site and the Building E Site: Less-than-Significant Impact. The Project provides for community trail easements along the Project site's frontage with Oleander Avenue and Ellsworth Street, as called for by the planned Riverside County trail network. The Project is designed to minimize potential conflicts with non-vehicular means of transportation. Potential impacts to the performance or safety of transit, bicycle, and pedestrian systems would be less than significant.



4.15.8 MITIGATION

Applicable County Regulations and Design Requirements

The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- Project construction activities are required to comply with the California Manual on Uniform Traffic Control Devices, which specify that temporary traffic controls shall be provided during construction, such as a flag person, during all phases of construction to facilitate the flow of construction traffic on streets abutting the Project site. To implement this requirement, the requirement to comply with the temporary traffic control plan shall be noted on all grading and building plans and also shall be specified in bid documents issued to prospective construction contractors, including the following notes.
 - a. Delivery trucks shall use the most direct route between the construction site and the I-215 Freeway via Harley Knox Boulevard and Harvill Avenue;
 - b. Construction traffic during the AM peak hour (7:00am-9:00am) and PM peak hour (4:00 pm-6:00pm) shall be minimized. The construction contractor shall assure that construction-related trips (passenger cars and trucks) do not exceed 138 trips in the AM peak hour and 151 trips in the PM peak hour (inbound and outbound combined). The construction contractor shall be responsible for periodic monitoring and shall be required to supply the County of Riverside with monitoring records upon the County's request.
- Prior to issuance of building permits, the Project shall comply with the County of Riverside Development Impact Fee (DIF) program, which requires the Project Applicant to pay a fee to the County (less any fee credits), a portion of which is used to fund local roadway improvements.
- Prior to issuance of building permits, the Project shall comply with the Transportation Uniform Mitigation Fee (TUMF) program as administered by the County of Riverside, which requires the Project Applicant to pay a fee that is used to fund regional transportation improvements.

The following mitigation measures address the Project's cumulative impacts to the local roadway network under E+A+P+C and Horizon Year traffic conditions:

- MM 4.15-1 Prior to issuance of building permits, the Project Applicant shall make a fair share monetary contribution to the County of Riverside for improvements to the Ellsworth Street (previously known as Decker Road) / Oleander Avenue intersection which are



not included in the Riverside County Development Impact Fee (DIF) program or the Transportation Uniform Mitigation Fee (TUMF) program, as listed below:

- Install a traffic signal;
- Install southbound left turn lane;
- Install southbound through lane; and
- Install southbound shared through-right turn lane.

The Project's fair share of the above-listed improvements is 5.5%.

MM 4.15-2 Prior to issuance of building permits, the Project Applicant shall make a fair share monetary contribution to the County of Riverside for improvements to the Harvill Avenue / Harley Knox Boulevard intersection that are not included in the Riverside County Development Impact Fee (DIF) program or the Transportation Uniform Mitigation Fee (TUMF) program, as listed below:

- Modify traffic signal to implement overlap phasing on the northbound right turn lanes; and
- Modify traffic signal to implement overlap phasing on the eastbound right turn lane.

The Project's fair share of the above-listed improvements is 5.0%.

The following mitigation measure addresses Project impacts to the State Highway System:

MM 4.15-3 In the event that Caltrans establishes a fair-share funding program for cumulatively considerable impacts to freeway system segments caused by private development projects that would be applicable to the Project site, prior to the issuance of a building permit for the Project, the Project Applicant shall provide evidence to Riverside County that such fair-share fee has been paid. If Caltrans has not established such a fee prior to building permit issuance, the Project Applicant shall have no further obligation associated with this mitigation measure.

The following measures are recommended as best practice measures to assist in avoiding wrong turns and to direct vehicle traffic away from residential neighborhoods:



- MM 4.15-4 The developer or successor in interest shall be required to install and perpetually maintain durable, legible, weather-proof signs at exit driveways that prohibit trucks from traveling south on Ellsworth Street (previously known as Decker Road).
- MM 4.15-5 A provision shall be included in building user lease agreements and sales agreements that require building users to designate truck routing away from southbound Ellsworth Street (previously known as Decker Road) and away from residential neighborhoods.

4.15.9 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold (a) for the Building D Site and the Building E Site: Significant and Unavoidable Cumulatively Considerable Impact. County regulatory requirements and Mitigation Measures MM 4.15-1 and MM 4.15-2 require the Project to pay development impact fees and participate in fair share funding programs to address the Project's direct and cumulative impacts to the local roadway network. Under CEQA, a fair-share monetary contribution to a mitigation fund is adequate mitigation if the funds are part of a reasonable plan that the relevant agency is committed to implementing. The ability of mandatory DIF and TUMF payments and fair share payments under MM 4.15-1 and MM 4.15-2 to alleviate the Project's cumulatively considerable impacts under each analysis scenario is discussed below.

Opening Year plus Cumulative Conditions (E+A+P+C)

As shown in Table 4.15-30, *Opening Year plus Cumulative (E+A+P+C) Intersection Analysis – With Mitigation*, recommended improvements would alleviate all projected LOS deficiencies at intersections in the Project study area under E+A+P+C traffic conditions. However, several of the improvements identified in Table 4.15-30 are either funded by an existing mitigation funding program (i.e., TUMF) with no timetable for construction (meaning the necessary improvements may not be in place when the Project becomes operational and starts to contribute traffic to the facilities, applicable to Intersections #10 and #11), or the improvements are not included in any existing program that would ensure timely construction (such as Intersections #4 and #8). Accordingly, the Project's cumulatively considerable impacts to the intersections listed below would be significant and unavoidable under E+A+P+C traffic conditions. No other feasible mitigation measures for these impacts are available to the Project that would have a proportional nexus to the Project's traffic impact to these facilities.

- Decker Road / Oleander Avenue (Intersection #4) – under jurisdiction of County of Riverside;
- Harvill Avenue / Harley Knox Boulevard (Intersection #8) – under jurisdiction of County of Riverside;
- I-215 Southbound Ramps / Harley Knox Boulevard (Intersection #10) – under jurisdiction of Caltrans and County of Riverside; and
- I-215 Northbound Ramps / Harley Knox Boulevard (Intersection #11) – under jurisdiction of Caltrans and City of Perris.



Horizon Year (2035) Conditions

As shown in Table 4.15-31, *Horizon Year (2035) Intersection Analysis – With Mitigation*, recommended improvements would alleviate all projected LOS deficiencies at intersections in the Project study area under Horizon Year (2035) traffic conditions. However, several of the improvements identified in Table 4.15-31 are either funded by an existing mitigation funding program (i.e., TUMF) with no timetable for construction (meaning the necessary improvements may not be in place when the Project becomes operational and starts to contribute traffic to the facilities, applicable to Intersections #10 and 11), or the improvements are not included in any existing program that would ensure timely construction (such as Intersections #4 and #8). Accordingly, the Project’s cumulatively considerable impacts to the intersections listed below would be significant and unavoidable under Horizon Year (2035) traffic conditions. No other feasible mitigation measures for these impacts are available to the Project that would have a proportional nexus to the Project’s traffic impact to these facilities.

- Decker Road / Oleander Avenue (Intersection #4) – under jurisdiction of County of Riverside;
- Harvill Avenue / Harley Knox Boulevard (Intersection #8) – under jurisdiction of County of Riverside;
- I-215 Southbound Ramps / Harley Knox Boulevard (Intersection #10) – under jurisdiction of Caltrans and County of Riverside; and
- I-215 Northbound Ramps / Harley Knox Boulevard (Intersection #11) – under jurisdiction of Caltrans and City of Perris.

Table 4.15-30 Opening Year plus Cumulative (E+A+P+C) Intersection Analysis – With Mitigation

| # | Intersection | Traffic Control ³ | Intersection Approach Lanes ¹ | | | | | | | | | | | | Delay ² (secs.) | | Level of Service | | | |
|----|----------------------------------|------------------------------|--|---|--------------|------------|---|----------|-----------|---|---|-----------|---|------------------|----------------------------|--------------|------------------|----------|--|--|
| | | | Northbound | | | Southbound | | | Eastbound | | | Westbound | | | AM | PM | AM | PM | | |
| | | | L | T | R | L | T | R | L | T | R | L | T | R | | | | | | |
| 8 | Harvill Av. / Harley Knox Bl. | | | | | | | | | | | | | | | | | | | |
| | - Without Improvements | TS | 1 | 1 | 2 | 1 | 2 | 0 | 2 | 2 | 1 | 2 | 2 | 1 | 104.4 | 183.7 | F | F | | |
| | - With Improvements | TS | 1 | 1 | 2> | 1 | 2 | 0 | 2 | 2 | 1 | 2 | 2 | 1 | 30.4 | 25.4 | C | C | | |
| 10 | I-215 SB Ramps / Harley Knox Bl. | | | | | | | | | | | | | | | | | | | |
| | - Without Improvements | TS | 0 | 0 | 0 | 0 | 1 | 1 | 0 | 2 | d | 1 | 2 | 0 | 168.2 | 107.3 | F | F | | |
| | - With Improvements | TS | 0 | 0 | 0 | 1 | 1 | 0 | 0 | 2 | d | 2 | 2 | 0 | 36.8 | 45.7 | D | D | | |
| 11 | I-215 NB Ramps / Harley Knox Bl. | | | | | | | | | | | | | | | | | | | |
| | - Without Improvements | TS | 0 | 1 | 1 | 0 | 0 | 0 | 1 | 2 | 0 | 0 | 2 | d | 36.8 | 179.8 | D | F | | |
| | - With Improvements | TS | 0 | 1 | 1 | 0 | 0 | 0 | 2 | 2 | 0 | 0 | 2 | 1>> | 13.8 | 30.4 | B | C | | |

* **BOLD** = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).
¹ When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes.
L = Left; T = Through; R = Right; > = Right-Turn Overlap Phasing; >> = Free Right Turn Lane; d = Defacto Right Turn Lane; **1** = Improvement
² Per the 2010 Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.
³ TS = Traffic Signal

Source: (Urban Crossroads, 2015a, Table 7-5)



Table 4.15-31 Horizon Year (2035) Intersection Analysis – With Mitigation

| # | Intersection | Traffic Control ³ | Intersection Approach Lanes ¹ | | | | | | | | | | | | Delay ² (secs.) | | Level of Service | |
|----|---|------------------------------|--|----------|------------|------------|----------|---|-----------|----------|------------|-----------|----------|-------------|-------------------------------|------|------------------|----|
| | | | Northbound | | | Southbound | | | Eastbound | | | Westbound | | | AM | PM | AM | PM |
| | | | L | T | R | L | T | R | L | T | R | L | T | R | | | | |
| 4 | Decker Rd. / Oleander Av. - Without Project - With Project | TS TS | 0 | <u>1</u> | 0 | 0 | <u>1</u> | 0 | <u>1</u> | <u>1</u> | 0 | <u>1</u> | <u>1</u> | 0 | 26.3 | 35.6 | C | D |
| 8 | Harvill Av. / Harley Knox Bl. - Without Project - With Project | TS TS | 1 | 1 | <u>2</u> > | 1 | 2 | 0 | 2 | 2 | <u>1</u> > | 2 | 2 | 1 | 22.0 | 45.0 | C | D |
| 10 | I-215 SB Ramps / Harley Knox Bl. - Without Project - With Project | TS TS | 0 | 0 | 0 | <u>2</u> | 1 | 0 | 0 | 2 | d | <u>2</u> | 2 | 0 | 32.5 | 42.6 | C | D |
| 11 | I-215 NB Ramps / Harley Knox Bl. - Without Project - With Project | TS TS | 0 | 1 | 1 | 0 | 0 | 0 | <u>2</u> | 2 | 0 | 0 | 2 | <u>1</u> >> | 17.6 | 28.2 | B | C |
| | | | 0 | 1 | 1 | 0 | 0 | 0 | <u>2</u> | 2 | 0 | 0 | 2 | <u>1</u> >> | 21.7 | 38.6 | C | D |

¹ When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes.

L = Left; T = Through; R = Right; > = Right-Turn Overlap Phasing; >> = Free Right Turn Lane; d= Defacto Right Turn Lane; 1 = Improvement

² Per the 2010 Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

³ TS = Traffic Signal

Source: (Urban Crossroads, 2015a, Table 8-5)



Threshold (b) for the Building D Site and the Building E Site: Significant and Unavoidable Cumulatively Considerable Impact. All state highway system facilities in the Project study area are under the jurisdiction of Caltrans. As such, the County of Riverside cannot assure the construction of improvements to state highway facilities that may be needed to improve traffic flow. Furthermore, Caltrans does not have any funding mechanism in place at this time to allow development projects to contribute a fair-share payment to contribute to future improvements and off-set cumulatively considerable traffic impacts. Mitigation Measure MM 4.15-3 requires the Project Applicant to pay such fair-share payment to Caltrans, if a fee program is established by Caltrans prior to the issuance of Project building permits; however, there is no assurance that such a fee program will be established. Also, there is no assurance that planned improvements will be in place prior to the time that the Project begins to contribute traffic to the facilities. Accordingly, the Project's contribution of traffic to the freeway facilities listed below under E+A+P+C and/or Horizon Year (2035) conditions would represent a significant and unavoidable cumulative impact.

Cumulatively Impacted CMP Freeway Mainline Segments

- I-215 Southbound, Eucalyptus Avenue to Alessandro Boulevard (Freeway Segment #8);
- I-215 Southbound, Van Buren Boulevard to Harley Knox Boulevard (Freeway Segment #11);
- I-215 Northbound, Martin Luther King Boulevard to Central Avenue (Freeway Segment #16);
- I-215 Northbound, Box Springs Road to SR-60/I-215 Freeway (Freeway Segment #18);
- I-215 Northbound, SR-60 Freeway to Eucalyptus Avenue (Freeway Segment #19);
- I-215 Northbound, Eucalyptus Avenue to Alessandro Boulevard (Freeway Segment #20); and
- I-215 Northbound, Van Buren Boulevard to Harley Knox Boulevard (Freeway Segment #23).

Cumulatively Impacted CMP Freeway Off-Ramps

- I-215 Southbound Ramps / Harley Knox Boulevard (Ramp #1).

Cumulatively Impacted CMP Freeway Merge/Diverge Junctions

- I-215 Southbound / North of Harley Knox Boulevard (Ramp Junction #1);
- I-215 Southbound / South of Harley Knox Boulevard (Ramp Junction #2);
- I-215 Northbound / North of Harley Knox Boulevard (Ramp Junction #3); and
- I-215 Northbound / South of Harley Knox Boulevard (Ramp Junction #4).

As shown in Table 4.15-30 and Table 4.15-31, Intersections #10 and #11 would operate at acceptable LOS under E+A+P+C and Horizon Year (2035) conditions with the addition of recommended improvements. The improvements recommended for Intersections #10 and #11 are programmed – but not yet fully funded – by TUMF. The Project would contribute to the TUMF program as a standard regulatory requirement. Furthermore, portions of Intersections #10 and #11 are located outside of the



jurisdiction of the County of Riverside (portions of Intersection #10 are under the jurisdiction of Caltrans and portions of Intersection #11 are under the jurisdiction of the City of Perris), meaning the County cannot assure the necessary improvements would not be in place when the Project becomes operational and starts to contribute traffic to the facilities. Because there is no timetable for constructing the TUMF-programmed improvements at Intersections #10 and #11 and because the County cannot assure the construction of the recommended improvements by their time of need, the Project's cumulative impact at these intersections is determined to be significant and unavoidable under E+A+P+C and Horizon Year (2035) conditions.

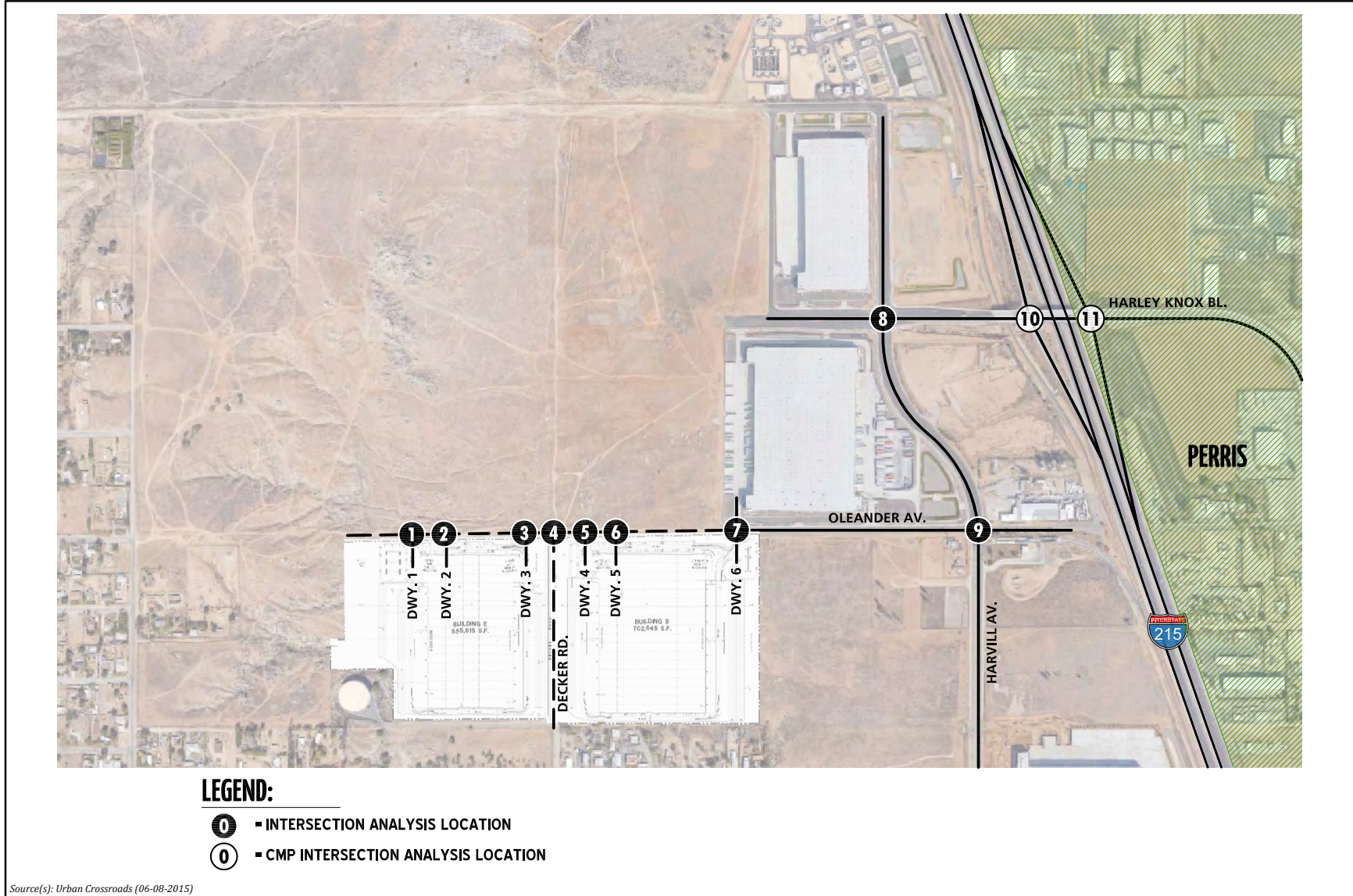
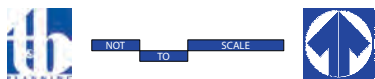
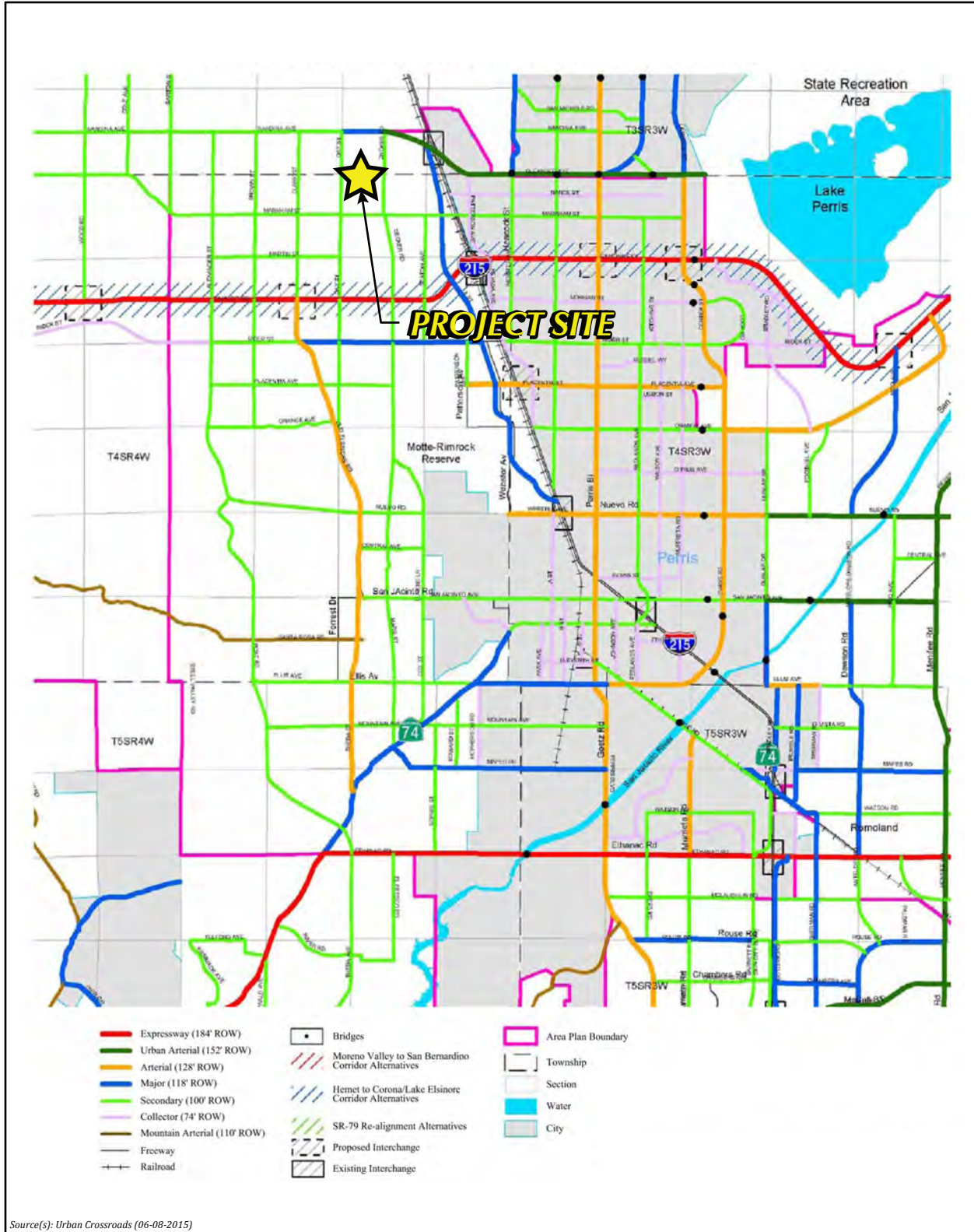


Figure 4.15-1



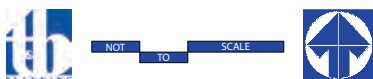
STUDY AREA INTERSECTION LOCATIONS

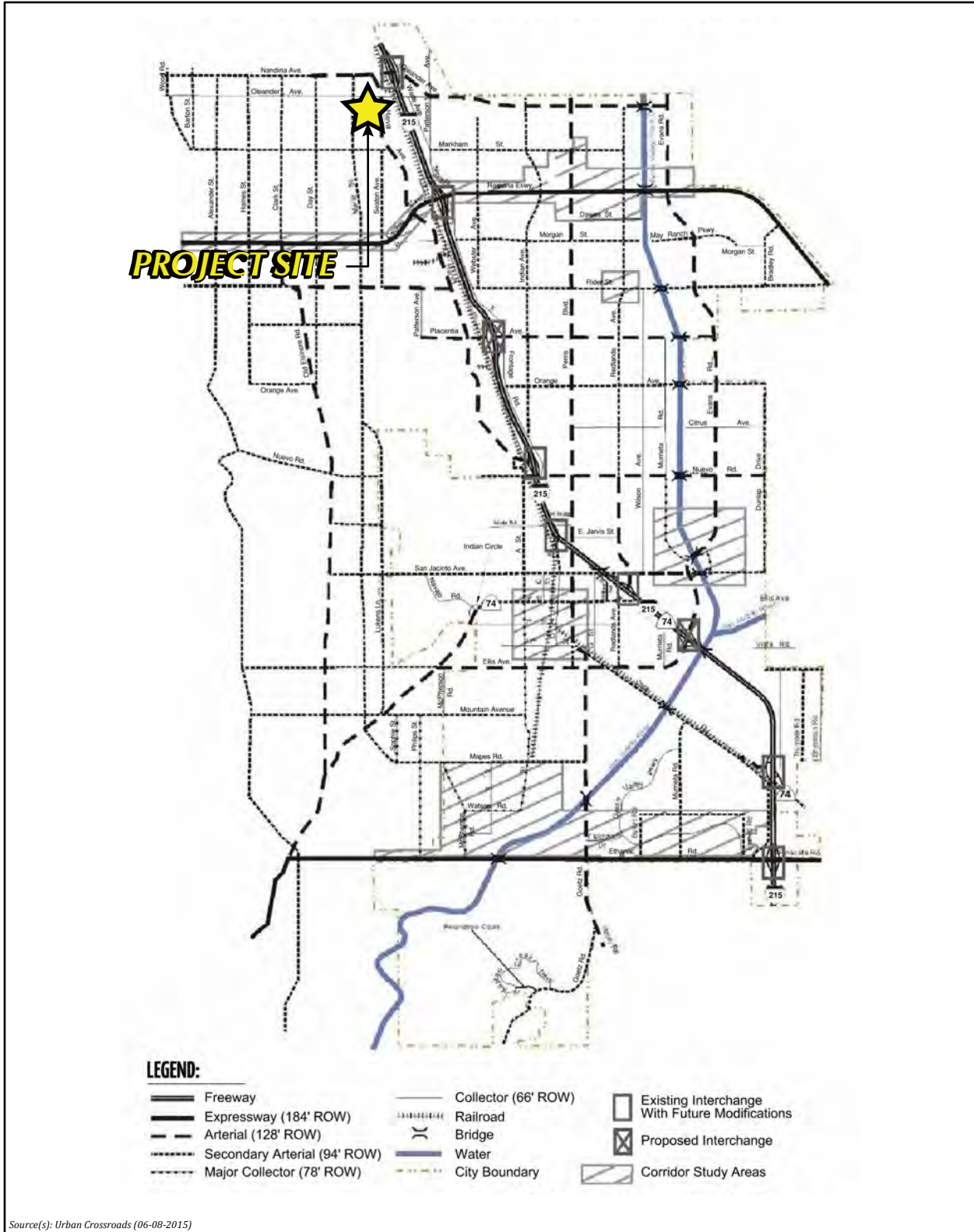


Source(s): Urban Crossroads (06-08-2015)

Figure 4.15-2

**COUNTY OF RIVERSIDE
 GENERAL PLAN CIRCULATION ELEMENT**





Source(s): Urban Crossroads (06-08-2015)

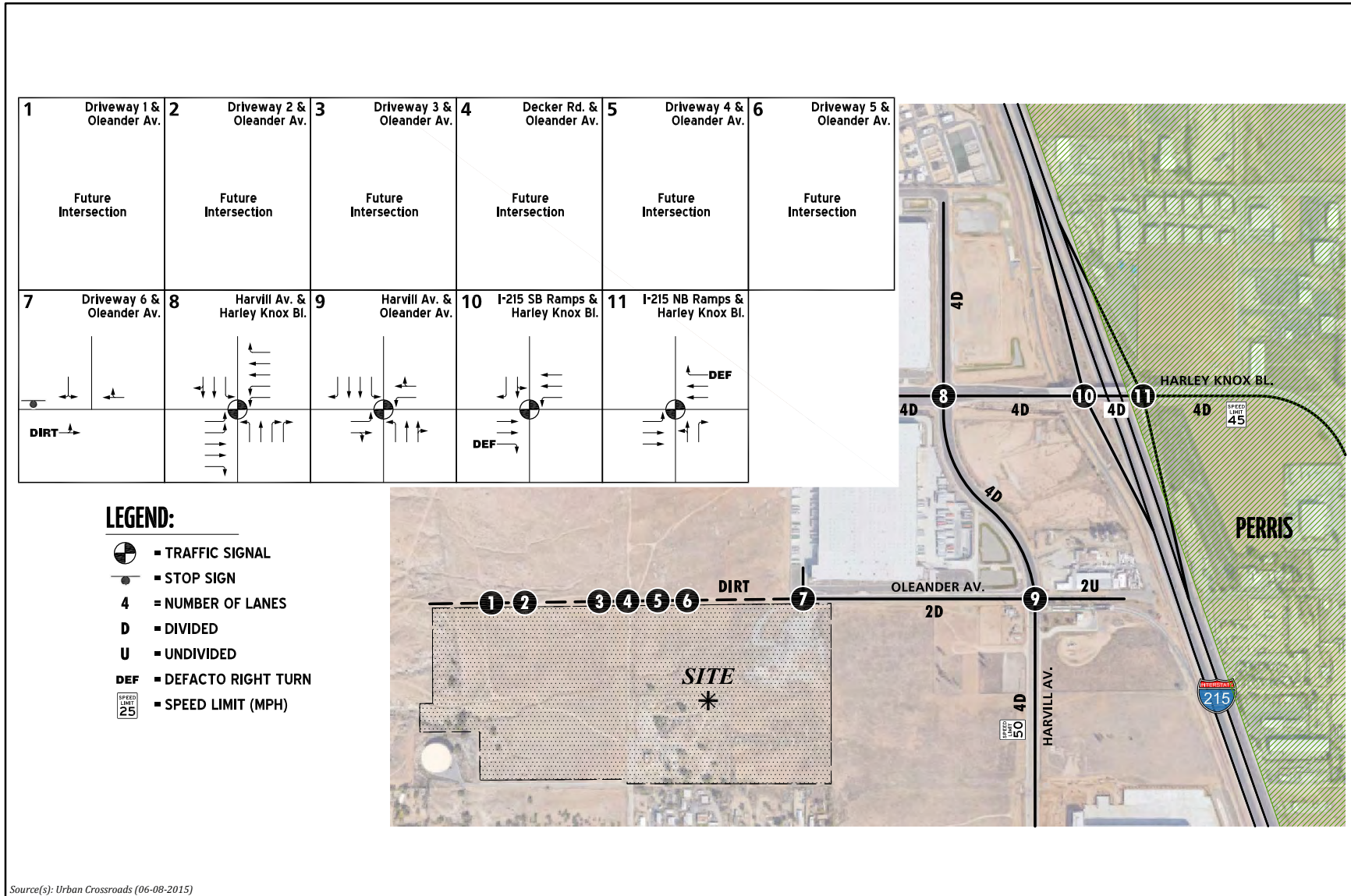
Figure 4.15-3



NOT TO SCALE

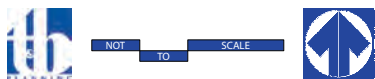


CITY OF PERRIS GENERAL PLAN CIRCULATION PLAN



Source(s): Urban Crossroads (06-08-2015)

Figure 4.15-4



EXISTING NUMBER OF THROUGH LANES AND INTERSECTION CONTROLS

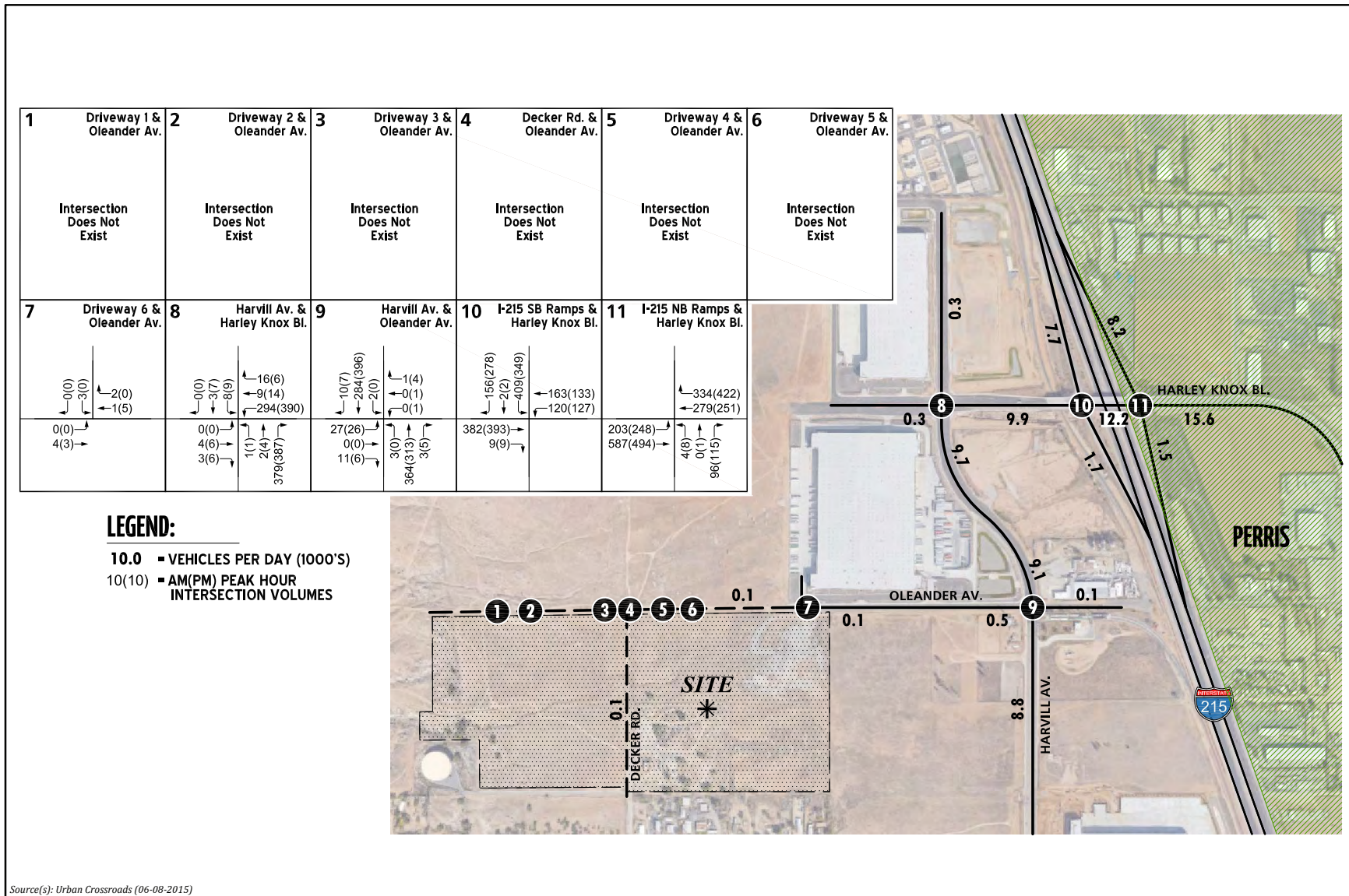
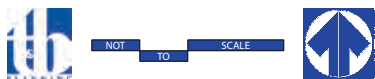


Figure 4.15-5



EXISTING AVERAGE DAILY TRAFFIC (ADT)

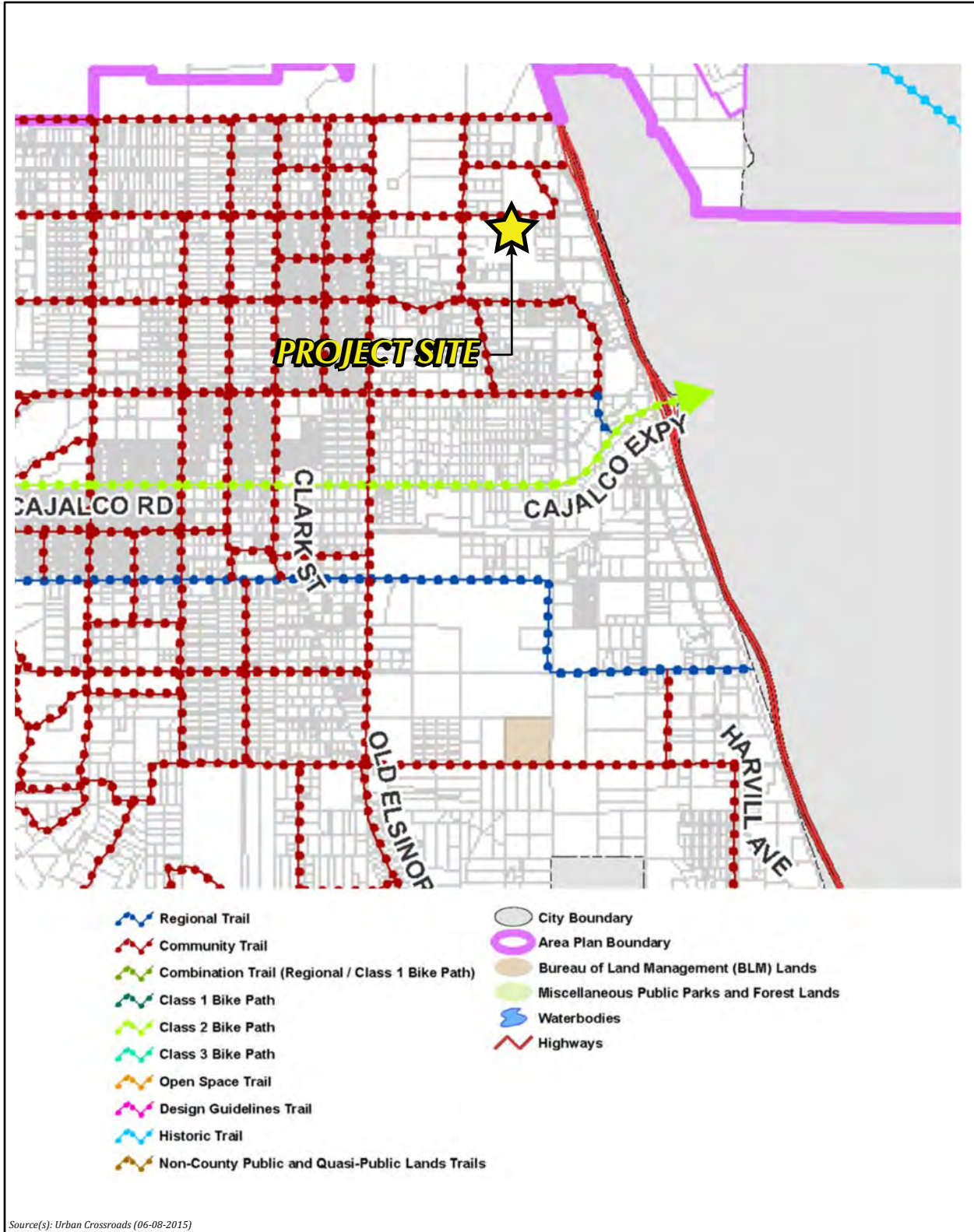


Figure 4.15-6



NOT TO SCALE



RIVERSIDE COUNTY TRAILS AND BIKEWAY SYSTEM

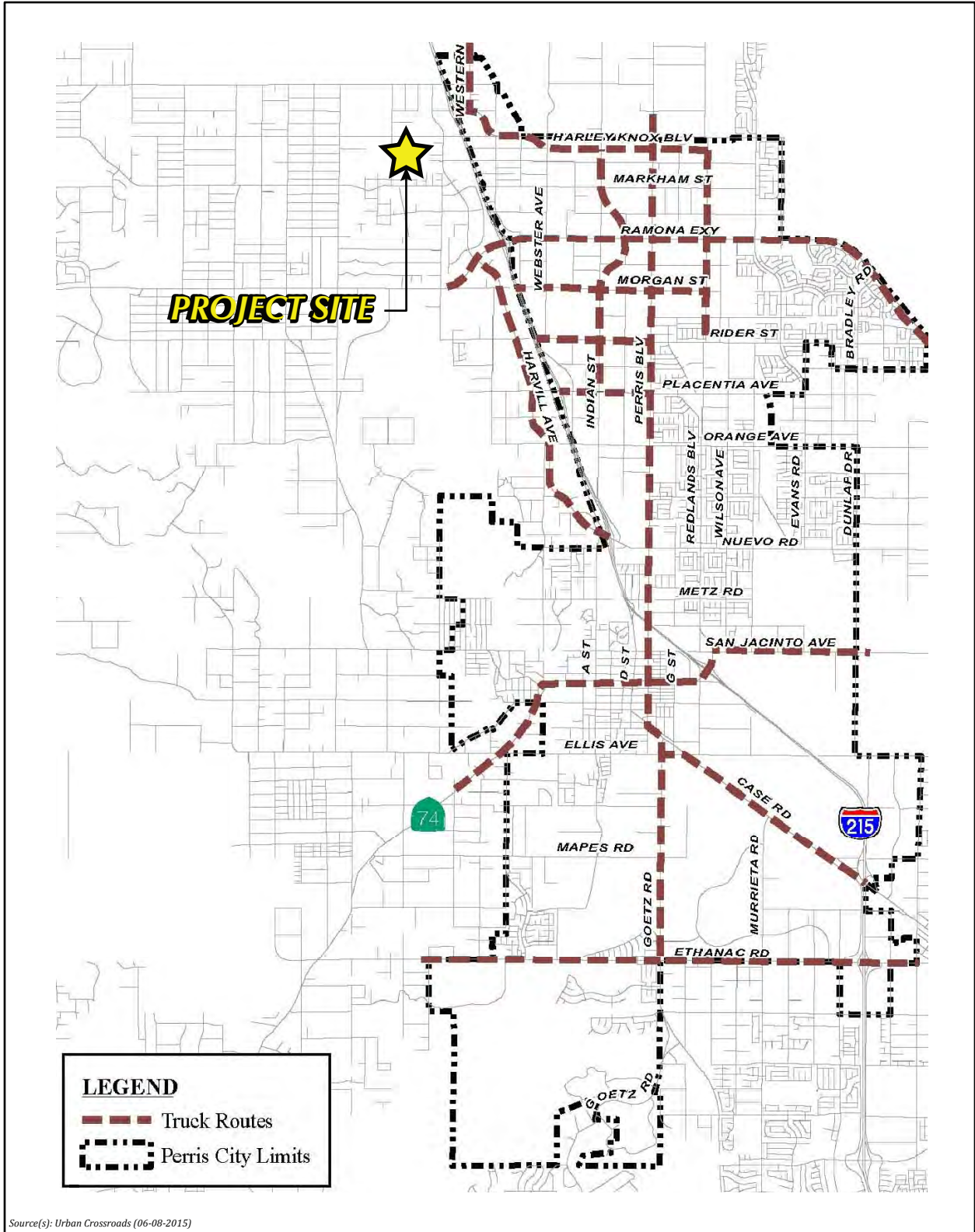


Figure 4.15-7



NOT TO SCALE



CITY OF PERRIS TRUCK ROUTES

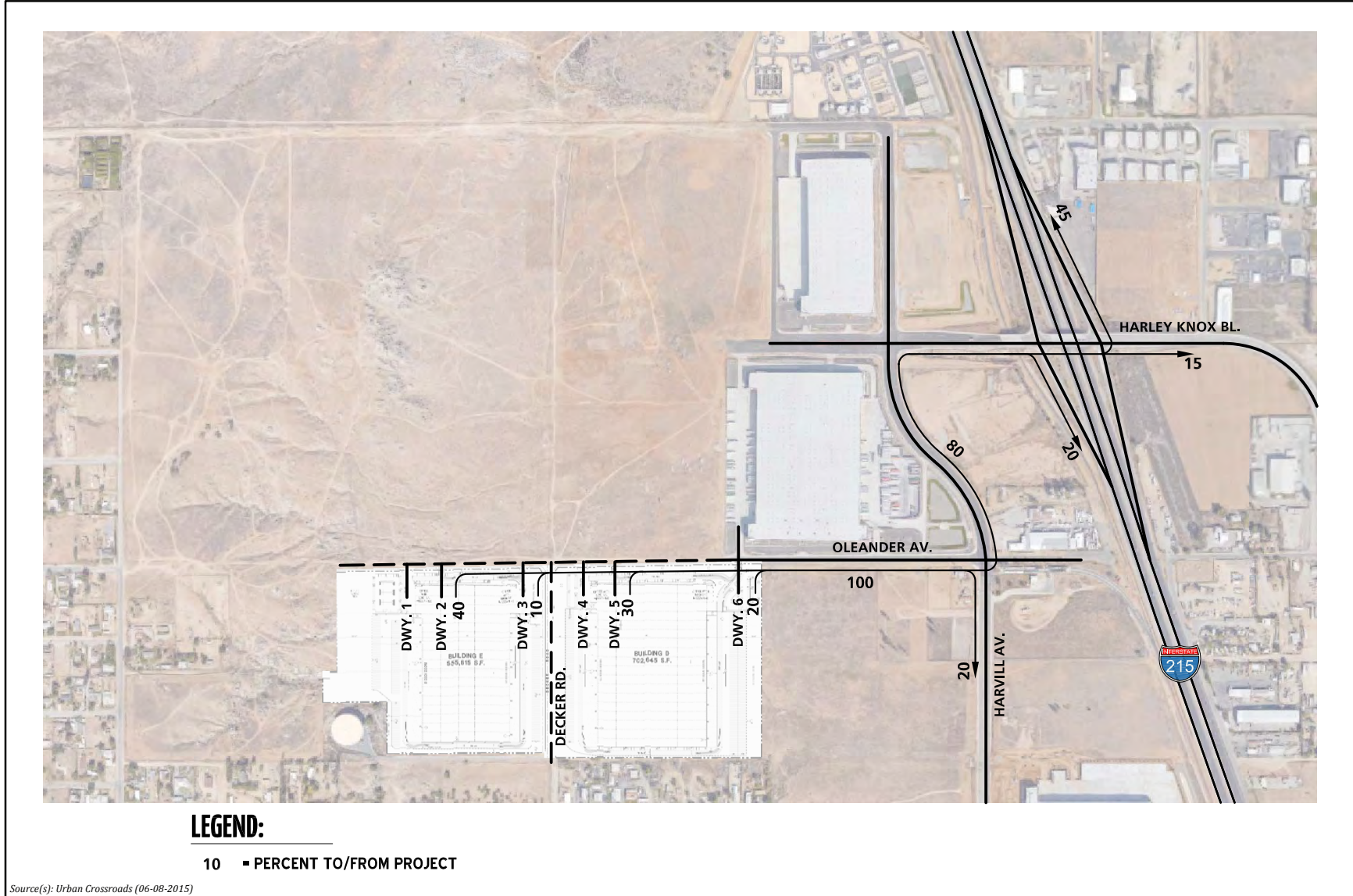
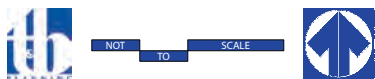


Figure 4.15-8



PROJECT PASSENGER CARS TRIP DISTRIBUTION

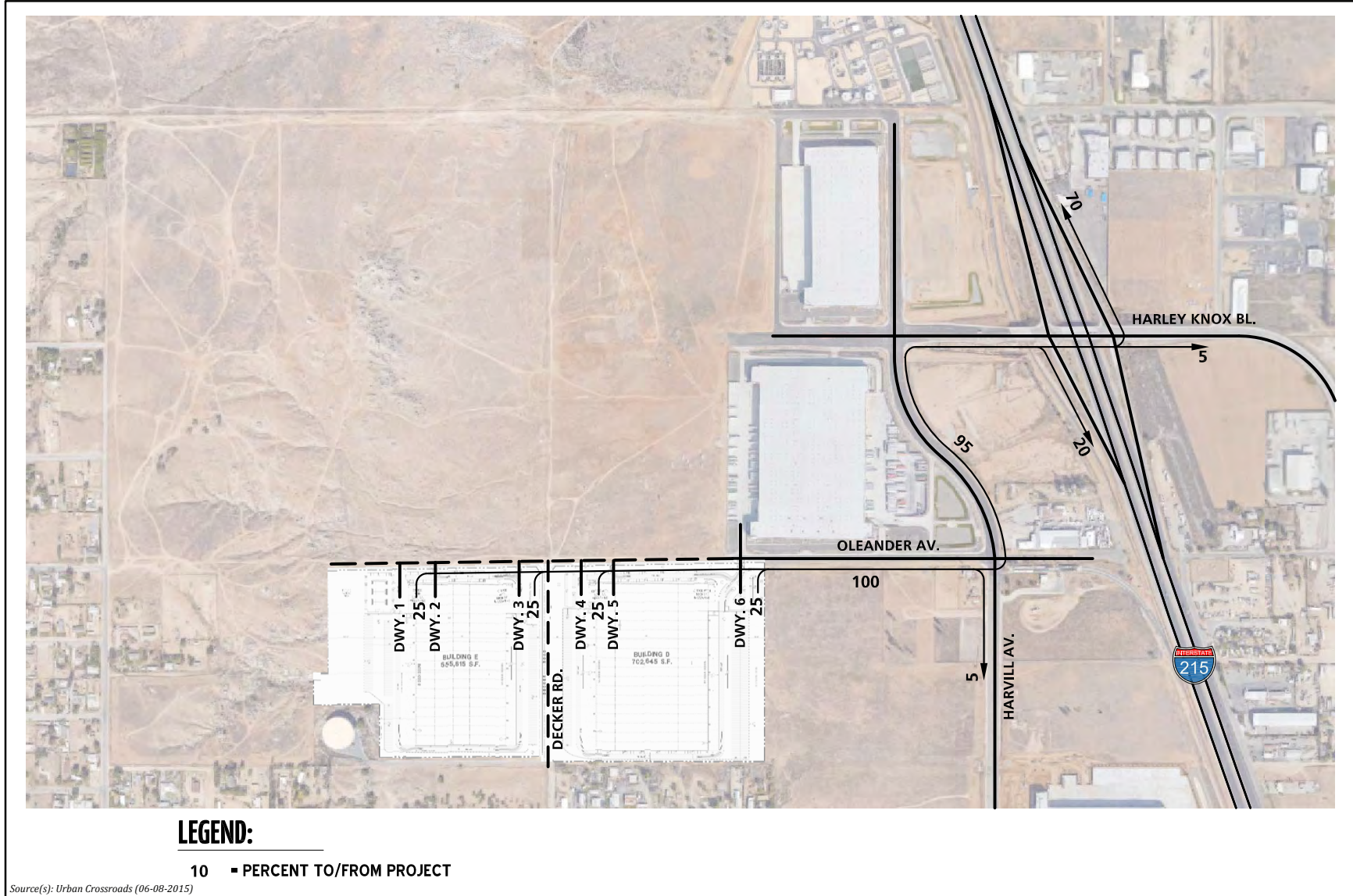
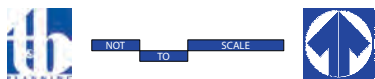


Figure 4.15-9



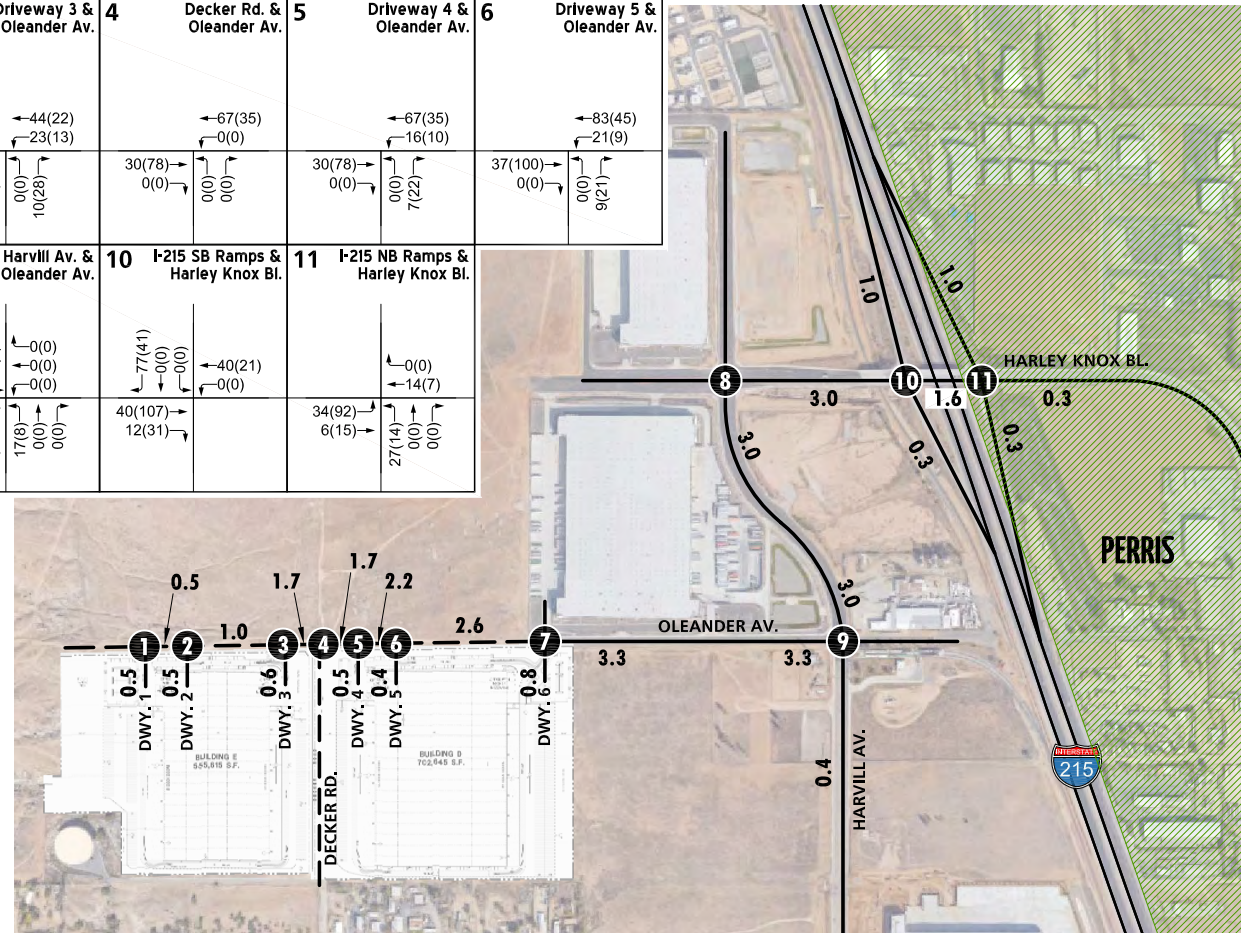
PROJECT TRUCKS TRIP DISTRIBUTION



| | | | | | |
|---|---|---|---|---|---|
| 1 Driveway 1 & Oleander Av. | 2 Driveway 2 & Oleander Av. | 3 Driveway 3 & Oleander Av. | 4 Decker Rd. & Oleander Av. | 5 Driveway 4 & Oleander Av. | 6 Driveway 5 & Oleander Av. |
| ←0(0) ←16(10) 0(0)→ 0(0)→ 0(0)→ 7(22)→ | ←16(10) ←28(12) 7(22)→ 0(0)→ 0(0)→ 12(28)→ | ←44(22) ←23(13) 20(50)→ 0(0)→ 0(0)→ 10(28)→ | ←67(35) ←0(0) 30(78)→ 0(0)→ 0(0)→ 0(0)→ | ←67(35) ←16(10) 30(78)→ 0(0)→ 0(0)→ 7(22)→ | ←83(45) ←21(9) 37(100)→ 0(0)→ 0(0)→ 9(21)→ |
| 7 Driveway 6 & Oleander Av. | 8 Harvill Av. & Harley Knox Bl. | 9 Harvill Av. & Oleander Av. | 10 I-215 SB Ramps & Harley Knox Bl. | 11 I-215 NB Ramps & Harley Knox Bl. | |
| ←0(0) ←0(0) ←0(0) ←0(0) 47(121)→ 0(0)→ 0(0)→ 13(36)→ | ←0(0) ←0(0) ←0(0) ←0(0) 0(0)→ 0(0)→ 0(0)→ 52(139)→ | ←117(62) ←0(0) ←0(0) ←0(0) 52(139)→ 8(18)→ 17(8)→ 0(0)→ 0(0)→ | ←77(41) ←0(0) ←0(0) ←40(21) 40(107)→ 12(31)→ | ←0(0) ←14(7) 34(92)→ 6(15)→ 27(14)→ 0(0)→ 0(0)→ | |

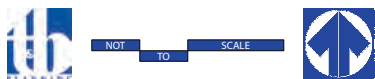
LEGEND:

- 10.0** = VEHICLES PER DAY (1000'S)
- 10(10)** = AM(PM) PEAK HOUR INTERSECTION VOLUMES



Source(s): Urban Crossroads (06-08-2015)

Figure 4.15-10



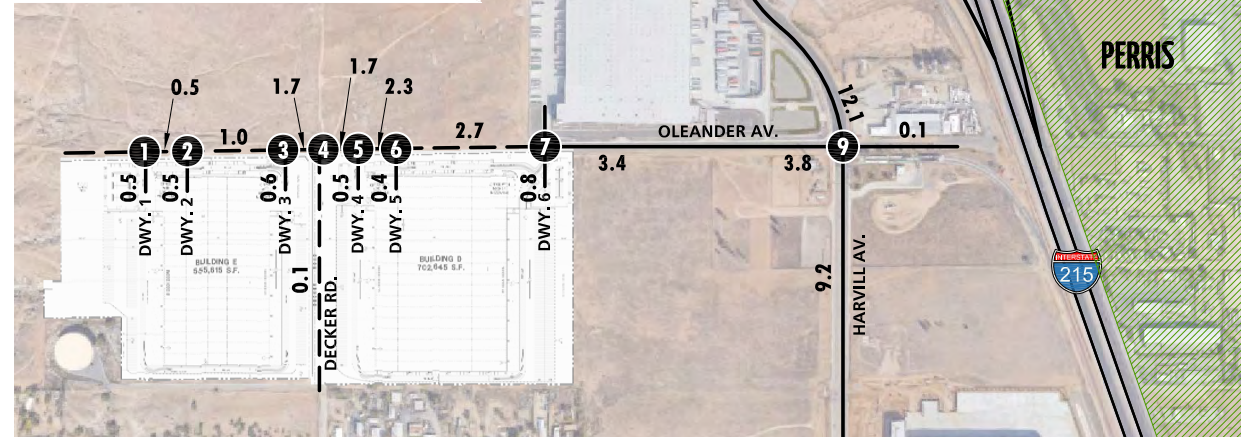
PROJECT TRAFFIC VOLUMES



| | | | | | |
|---|--|---|---|--|---|
| 1 Driveway 1 & Oleander Av. | 2 Driveway 2 & Oleander Av. | 3 Driveway 3 & Oleander Av. | 4 Decker Rd. & Oleander Av. | 5 Driveway 4 & Oleander Av. | 6 Driveway 5 & Oleander Av. |
| ←0(0) ←16(10) 0(0)→ 0(0)→ 0(0)→ 7(22)→ | ←16(10) ←28(12) 7(22)→ 0(0)→ 0(0)→ 12(28)→ | ←44(22) ←23(13) 20(50)→ 0(0)→ 0(0)→ 10(28)→ | ←67(35) ←1(5) 30(78)→ 0(0)→ 0(0)→ 4(3)→ | ←68(40) ←16(10) 34(81)→ 0(0)→ 0(0)→ 7(22)→ | ←84(50) ←21(9) 41(103)→ 0(0)→ 0(0)→ 9(21)→ |
| 7 Driveway 6 & Oleander Av. | 8 Harvill Av. & Harley Knox Bl. | 9 Harvill Av. & Oleander Av. | 10 I-215 SB Ramps & Harley Knox Bl. | 11 I-215 NB Ramps & Harley Knox Bl. | |
| ←0(0) ←0(0) ←3(0) ←2(0) ←105(59) ←30(16) 0(0)→ 51(124)→ 0(0)→ 0(0)→ 13(36)→ | ←0(0) ←3(7) ←8(9) ←16(6) ←9(14) ←411(452) 0(0)→ 4(6)→ 3(6)→ 1(1)→ 2(4)→ 431(526)→ | ←127(69) ←284(396) ←2(0) ←1(4) ←0(1) ←0(1) 79(165)→ 0(0)→ 19(24)→ 20(8)→ 364(313)→ 3(5)→ | ←233(319) ←2(2) ←409(349) ←203(154) ←120(127) 422(500)→ 21(40)→ | ←334(422) ←293(258) 237(340)→ 593(509)→ 31(22)→ 0(1)→ 96(115)→ | |

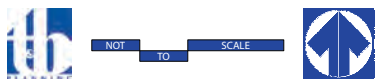
LEGEND:

- 10.0** = VEHICLES PER DAY (1000'S)
- 10(10)** = AM(PM) PEAK HOUR INTERSECTION VOLUMES



Source(s): Urban Crossroads (06-08-2015)

Figure 4.15-11



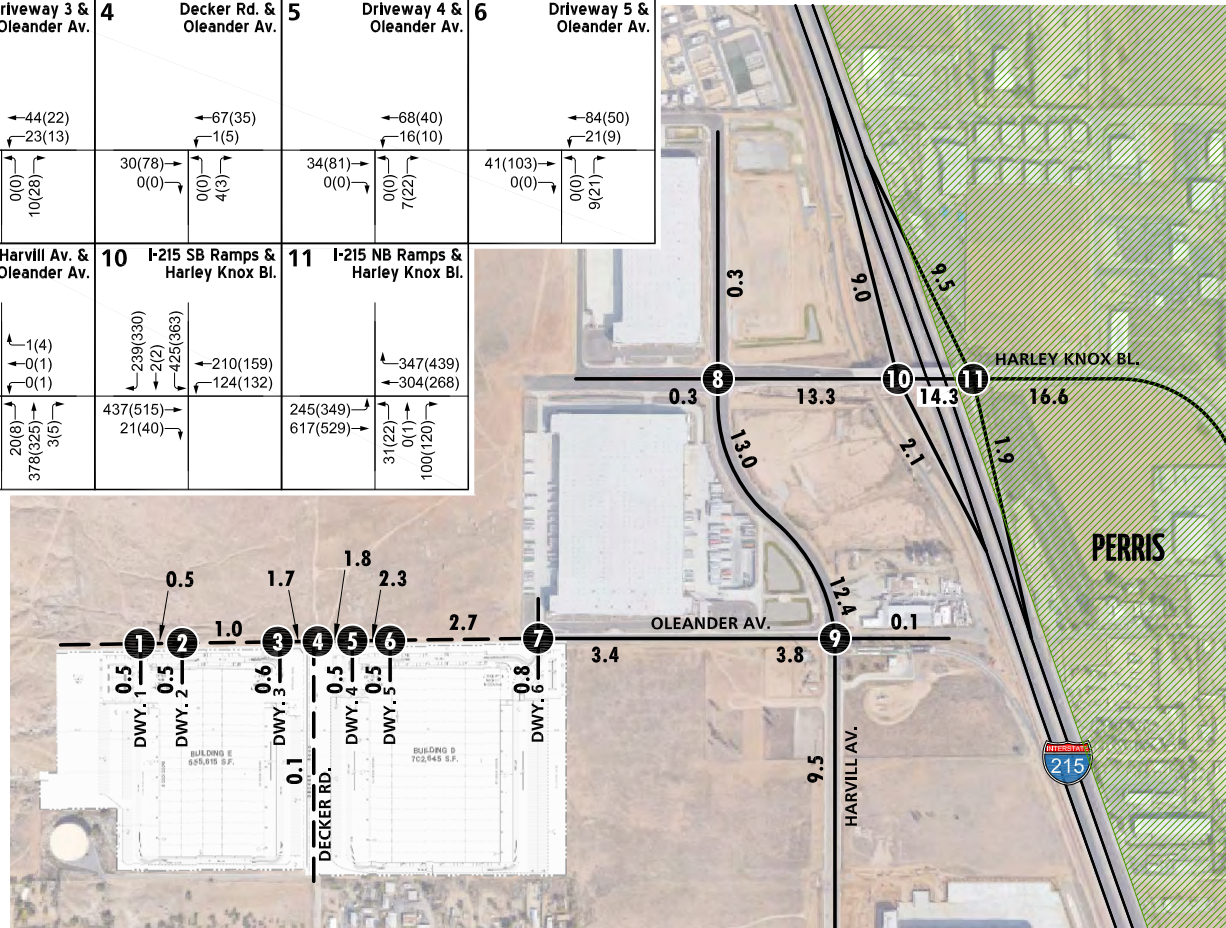
EXISTING PLUS PROJECT (E + P) TRAFFIC VOLUMES



| | | | | | |
|---------------------------------------|--|--|---|---|---------------------------------------|
| 1 Driveway 1 & Oleander Av. | 2 Driveway 2 & Oleander Av. | 3 Driveway 3 & Oleander Av. | 4 Decker Rd. & Oleander Av. | 5 Driveway 4 & Oleander Av. | 6 Driveway 5 & Oleander Av. |
| ←0(0) ←16(10) | ←16(10) ←28(12) | ←44(22) ←23(13) | ←67(35) ←1(5) | ←68(40) ←16(10) | ←84(50) ←21(9) |
| 0(0)→ 0(0)→ 0(0)→ 7(22)→ | 7(22)→ 0(0)→ 0(0)→ 12(28)→ | 20(50)→ 0(0)→ 0(0)→ 10(28)→ | 30(78)→ 0(0)→ 0(0)→ 4(3)→ | 34(81)→ 0(0)→ 0(0)→ 7(22)→ | 41(103)→ 0(0)→ 0(0)→ 9(21)→ |
| 7 Driveway 6 & Oleander Av. | 8 Harvill Av. & Harley Knox Bl. | 9 Harvill Av. & Oleander Av. | 10 I-215 SB Ramps & Harley Knox Bl. | 11 I-215 NB Ramps & Harley Knox Bl. | |
| ←0(0) ←0(0) ←3(0) | ←0(0) ←3(7) ←8(9) | ←17(6) ←9(15) ←8(9) | ←239(330) ←2(2) ←425(363) | ←210(159) ←124(132) | ←347(439) ←304(268) |
| 0(0)→ 0(0)→ 0(0)→ 13(36)→ | 0(0)→ 4(6)→ 3(6)→ 1(1)→ 2(4)→ 446(541)→ | 80(166)→ 0(0)→ 19(24)→ 20(8)→ 378(325)→ 3(5)→ | 437(515)→ 21(40)→ | 245(349)→ 617(529)→ 31(22)→ 0(1)→ 100(120)→ | |

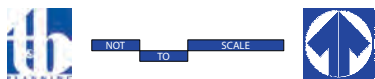
LEGEND:

- 10.0** = VEHICLES PER DAY (1000'S)
- 10(10) = AM(PM) PEAK HOUR INTERSECTION VOLUMES



Source(s): Urban Crossroads (06-08-2015)

Figure 4.15-12



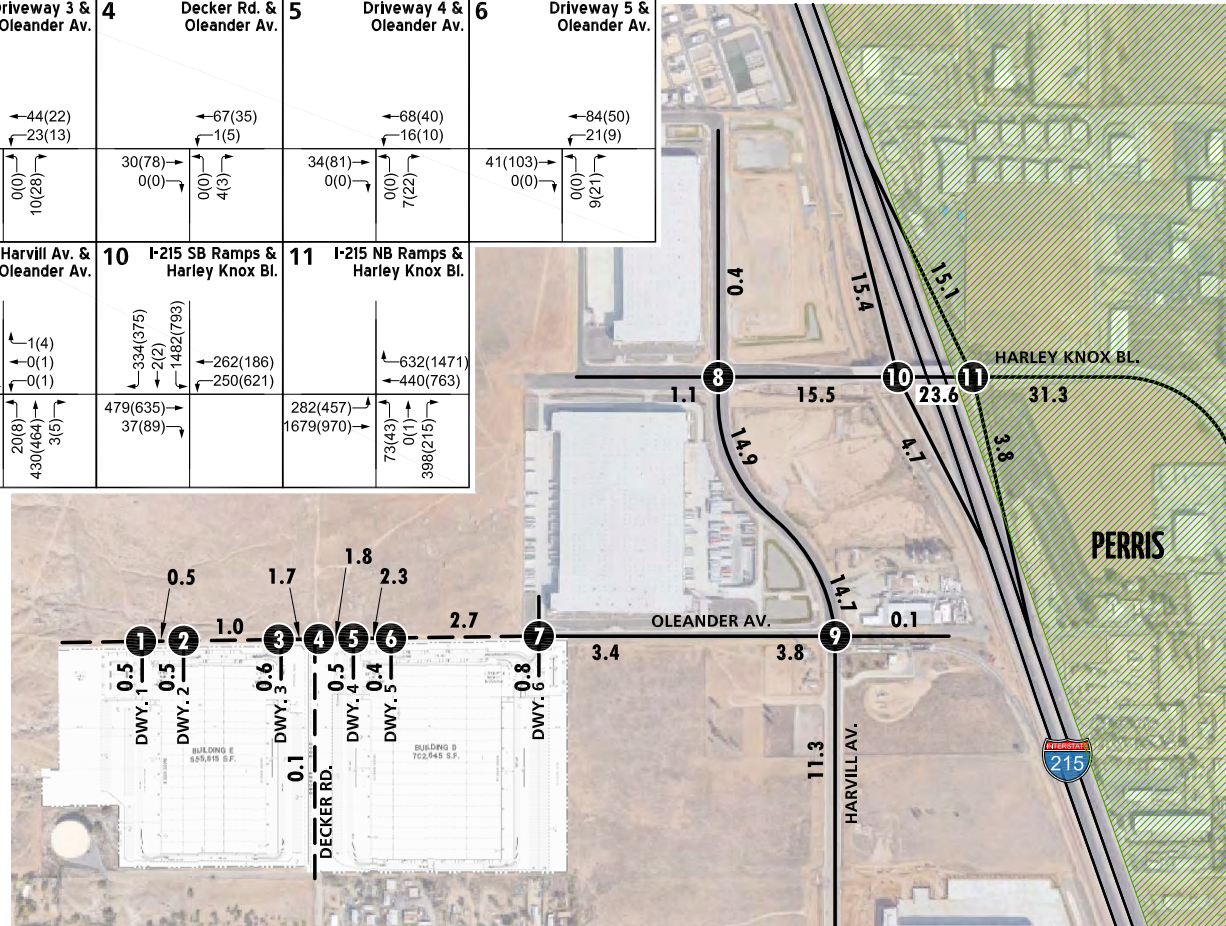
OPENING YEAR (2017) TRAFFIC VOLUMES (E+A+P)



| | | | | | |
|---------------------------------------|---|--|---|---|---------------------------------------|
| 1 Driveway 1 & Oleander Av. | 2 Driveway 2 & Oleander Av. | 3 Driveway 3 & Oleander Av. | 4 Decker Rd. & Oleander Av. | 5 Driveway 4 & Oleander Av. | 6 Driveway 5 & Oleander Av. |
| ←0(0) ←16(10) | ←16(10) ←28(12) | ←44(22) ←23(13) | ←67(35) ←1(5) | ←68(40) ←16(10) | ←84(50) ←21(9) |
| 0(0)→ 0(0)→ | 7(22)→ 0(0)→ | 20(50)→ 0(0)→ | 30(78)→ 0(0)→ | 34(81)→ 0(0)→ | 41(103)→ 0(0)→ |
| 0(0)← 7(22)← | 0(0)← 12(28)← | 0(0)← 10(28)← | 0(0)← 4(3)← | 0(0)← 7(22)← | 0(0)← 9(21)← |
| 7 Driveway 6 & Oleander Av. | 8 Harvill Av. & Harley Knox Bl. | 9 Harvill Av. & Oleander Av. | 10 I-215 SB Ramps & Harley Knox Bl. | 11 I-215 NB Ramps & Harley Knox Bl. | |
| ←0(0) ←0(0) ←3(0) | ←17(6) ←45(37) ←6(9) ←8(9) | ←127(69) ←412(474) ←2(0) | ←334(375) ←2(2) ←1482(793) | ←632(1471) ←440(763) | |
| 0(0)→ 51(124)→ 0(0)→ | 0(0)→ 21(50)→ 8(12)→ | 80(166)→ 0(0)→ 19(24)→ | 479(635)→ 37(89)→ | 282(457)→ 1679(970)→ | |
| 0(0)← 0(0)← 13(36)← | 0(0)← 8(9)← 5(6)← 487(666)← | 20(6)← 430(464)← 3(6)← | | 73(43)← 0(1)← 398(215)← | |

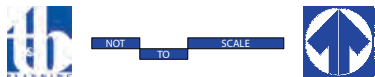
LEGEND:

- 10.0** = VEHICLES PER DAY (1000'S)
- 10(10) = AM(PM) PEAK HOUR INTERSECTION VOLUMES



Source(s): Urban Crossroads (06-08-2015)

Figure 4.15-13



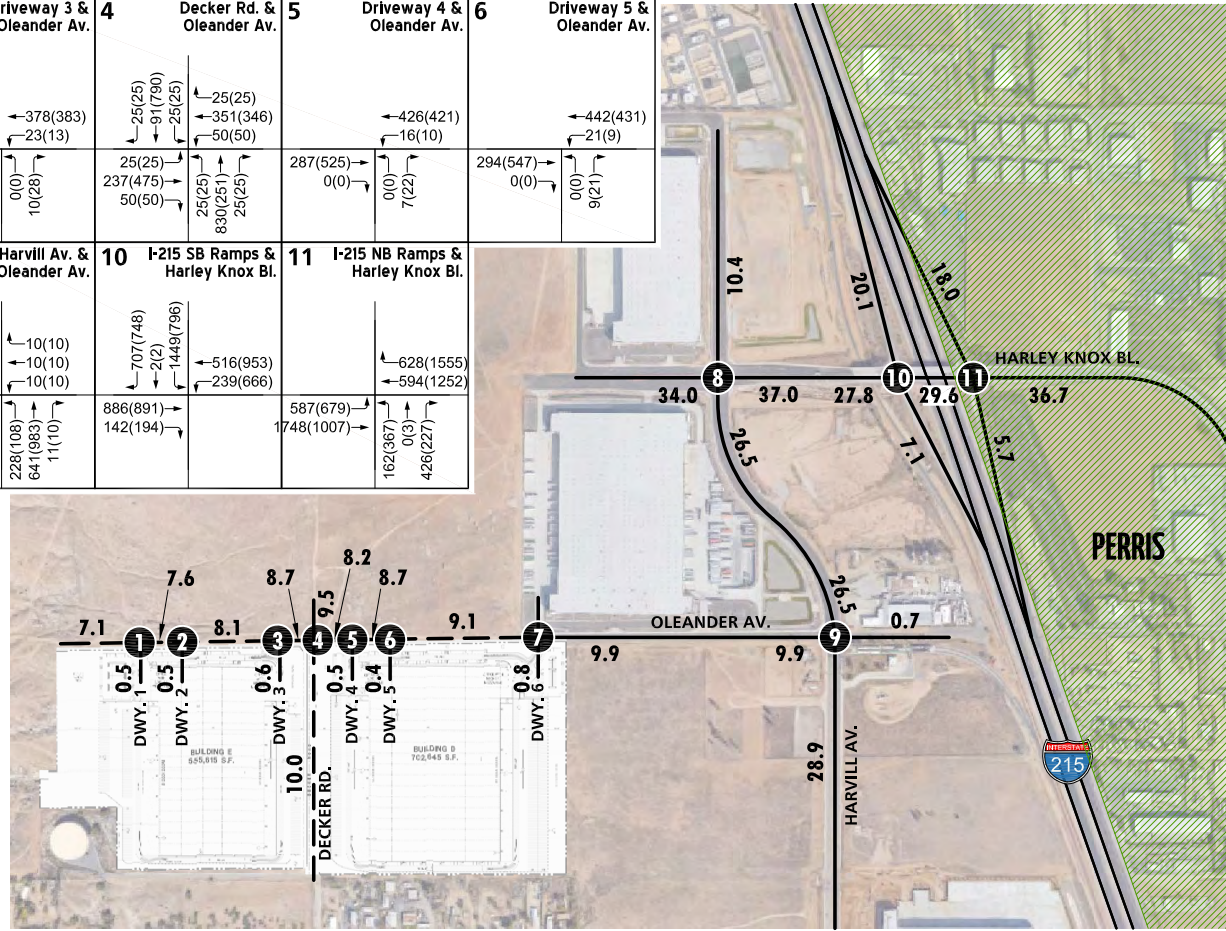
OPENING YEAR (2017) PLUS CUMULATIVE TRAFFIC VOLUMES (E+A+P+C)



| | | | | | |
|---|--|--|--|---|---------------------------------------|
| 1 Driveway 1 & Oleander Av. | 2 Driveway 2 & Oleander Av. | 3 Driveway 3 & Oleander Av. | 4 Decker Rd. & Oleander Av. | 5 Driveway 4 & Oleander Av. | 6 Driveway 5 & Oleander Av. |
| ←334(361) ←16(10) | ←350(371) ←28(12) | ←378(383) ←23(13) | ←25(25) ←91(790) ←25(25) ←351(346) ←50(50) | ←426(421) ←16(10) | ←442(431) ←21(9) |
| 282(472)→ 0(0)→ 0(0)→ 7(22)→ | 289(494)→ 0(0)→ 0(0)→ 12(28)→ | 302(522)→ 0(0)→ 0(0)→ 10(28)→ | 25(25)→ 237(475)→ 50(50)→ 25(25)→ 830(251)→ 25(25)→ | 287(525)→ 0(0)→ 0(0)→ 7(22)→ | 294(547)→ 0(0)→ 0(0)→ 9(21)→ |
| 7 Driveway 6 & Oleander Av. | 8 Harvill Av. & Harley Knox Bl. | 9 Harvill Av. & Oleander Av. | 10 I-215 SB Ramps & Harley Knox Bl. | 11 I-215 NB Ramps & Harley Knox Bl. | |
| ←0(0) ←0(0) ←0(0) | ←12(128) ←7(331) ←56(10) ←49(406) ←499(572) ←675(723) | ←255(338) ←454(1479) ←11(10) ←10(10) ←10(10) ←10(10) | ←707(748) ←2(2) ←1449(796) ←516(953) ←239(666) | ←628(1555) ←594(1252) | |
| 0(0)→ 304(568)→ 0(0)→ 0(0)→ 13(36)→ | 4(497)→ 201(143)→ 11(740)→ 17(248)→ 6(149)→ 771(932)→ | 183(369)→ 10(10)→ 125(225)→ 228(108)→ 641(983)→ 11(10)→ | 886(891)→ 142(194)→ 587(679)→ 1748(1007)→ 162(367)→ 426(227)→ | 0(0)→ 0(0)→ 0(0)→ 0(3)→ 426(227)→ | |

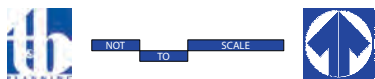
LEGEND:

- 10.0** = VEHICLES PER DAY (1000'S)
- 10(10) = AM(PM) PEAK HOUR INTERSECTION VOLUMES



Source(s): Urban Crossroads (06-08-2015)

Figure 4.15-14



HORIZON YEAR (2035) TRAFFIC VOLUMES



4.16 UTILITIES AND SERVICE SYSTEMS

This subsection addresses the topics of water service and supply; wastewater collection and treatment; storm water conveyance facilities; solid waste collection and disposal; and utility connections. The information concerning water supplies and the Project's estimated water demand is based in part on information contained in the *Water Supply Assessment for the Knox Business Park*, dated October 21, 2015 and prepared by the Eastern Municipal Water District (EMWD, 2015). A copy of the Water Supply Assessment (WSA) is provided as *Technical Appendix K* to this EIR. Please note that *Technical Appendix K* was prepared prior to the Project Applicant's decision to reduce the size of the Building E Site and the size of its proposed building to the current configurations described in EIR Section 3.0, *Project Description*. Therefore, the utility demand calculations presented herein are based on a larger sized Building E than is currently proposed. Because the water demand calculations in *Technical Appendix K* overstates the Project's demand, it was not necessary to update the WSA to show a lesser Project impact for purposes of analysis under CEQA. Thus, all Project service demand impacts stated herein overstate the actual expected impact.

The analysis contained in this Subsection also is based in part on information obtained from the Project's preliminary hydrology reports prepared for Buildings D and E, which are contained in EIR *Technical Appendices H1 and H2*, respectively (DEA, 2017) (DEA, 2017b). This Subsection also relies upon the Eastern Municipal Water District (EMWD) 2010 Urban Water Management Plan (UWMP) (EMWD, 2011), and the California Department of Resources Recycling and Recovery website (CalRecycle, 2015).

4.16.1 EXISTING CONDITIONS

A. Water Service

The Project site is located in the service area of the EMWD for potable water service. The EMWD is a retail water supplier that serves an approximately 555 square mile area that encompasses the Cities of Hemet, Menifee, Moreno Valley, Murrieta, Perris, San Jacinto, and Temecula, as well as unincorporated portions of western Riverside County, including the communities of Homeland, Lakeview, Nuevo, Quail Valley, Romoland, Valle Vista, and Winchester (EMWD, 2011, p. 9).

The Project site is largely undeveloped under existing conditions, with the exception of the southwestern portion of the Building D Site which contains a mobile home and a concrete pad that is used for the storage of construction equipment. Under existing conditions, the Project site has only a nominal demand for water resources.

EMWD Urban Water Management Plan Overview

Water Code § 1062(a) of the California Urban Water Management Planning Act requires every urban water supplier to prepare and adopt an urban water management plan and conduct updates every five years. In addition to meeting the requirements of this Act, urban water management plans are to be used to support water supply assessments and verifications required by California Senate Bills 610 and



221 of 2001. These bills require that water supply information be provided to counties and cities for projects of a certain size prior to their approval.

EMWD prepared a UWMP dated June 2011 that provides for the long-range planning efforts of water purveyance within its district. The EMWD UWMP is herein incorporated by reference and is available for review at the EMWD offices at 2270 Trumble Road, Perris, CA 92570. The UWMP includes a water system analysis; identifies improvements to correct existing deficiencies and serve projected future growth; and identifies contingency measures to ensure the EMWD's continued ability to provide potable water service during multiple-year drought conditions. As concluded by the UWMP, the EMWD anticipates that it will be able to meet projected demand for water within its service boundaries until at least the year 2035 in all types of climate situations, including normal, dry, and multiple consecutive dry weather years (EMWD, 2011, Tables 3.2 through 3.4).

Water Shortage Contingency Planning

At the time the NOP was issued for this EIR (2015), California was experiencing severe drought conditions. In response, the State Water Resources Control Board adopted emergency state-wide urban water conservation regulations that became effective in July 2014 and remained in place until April 2015. Subsequently, the California Governor issued a State of Emergency and Continued State of Emergency in 2014 in response to the persistent state-wide drought. On April 1, 2015, California Governor Jerry Brown issued Executive Order B-29-15 which orders the State Water Resources Control Board (SWRCB) to impose mandatory water use restrictions to achieve a 25 percent reduction in potable urban water usage through February 18, 2016. It addresses facilitating funding for projects designed to increase local water supplies and improve water supply reliability. It also orders more frequent reporting and modifications to the State's Model Water Efficient Landscape Ordinance; mandates Agricultural water suppliers to prepare their Agricultural Water Management Plans by specific dates; and orders the State to coordinate their water conservation related goals with other state departments like the California Department of Fish and Wildlife, Forestry and Fire Protection, and the Energy Commission. In addition, Executive Order B-29-15 requires that the SWRCB impose restrictions that require commercial, industrial, and institutional properties to implement water efficiency measures to reduce potable water usage to meet this mandated water usage reduction target.

A Water Shortage Contingency Plan (WSCP) also is included in the UWMP, which would be implemented by the EMWD in cases of future water deficiencies caused by limitations on supply or the EMWD's delivery system. The WSCP applies regulations and restrictions on the delivery and consumption of potable outdoor water use during water shortages. The WSCP applies specific reduction requirements and restrictions to each of four separate groups of customer types: single-family residential, multi-family residential, and landscape customers; commercial, industrial, and institutional (CII); agricultural; and wholesale (EMWD, 2011, p. 63).

Over 90 percent of EMWD's customers are either single-family residential, multi-family residential, or landscape customers. These customers are subject to a budget-based tiered rate. There are four tiers in EMWDs rate structure; the first two tiers apply to indoor and outdoor use, respectively; the third tier



is applied to water use up to 50 percent above the tier one and two budgets; and tier four is applied to any water use in excess of tier three. In times of water shortage, penalties are added to the highest tier and tiers two and three are reduced as shortage levels increase. Under the most extreme shortage conditions, no outdoor water use is allowed (EMWD, 2011, p. 63).

CII and agricultural customers must reduce demand during periods of shortage. CII customers face event driven penalties and could face fines if found violating water use restrictions. Agricultural customers are required to reduce demand over historical use and face penalties for use over allocation. Wholesale customers are allocated water using the formula and methodology based on MWD's Water Supply Allocation Plan (EMWD, 2011, p. 63).

In addition, EMWD expects that the region's unprecedented water shortages will be addressed through the principles of the Water Surplus and Drought Management Plan (WSDMP) as described in the Metropolitan Water District's (MWD) 2010 Regional Urban Water Management Plan (RUWMP). The WSDMP identifies the expected sequence of resource management actions that MWD will execute during surpluses and shortages to minimize the probability of severe shortages and reduce the possibility of extreme shortages and shortage allocations. In February 2008, MWD's Board adopted a Water Supply Allocation Plan (WSAP), which is intended to create an equitable needs-based allocation during drought conditions. The WSAP includes a formula that is intended to balance the impacts of a shortage at the retail level while maintaining equity on the wholesale level for shortages of Metropolitan supplies of up to 50 percent. The formula takes into account growth, local investments, changes in supply conditions, and the demand hardening aspects of non-potable recycled water use and the implementation of conservation savings programs (MWD, 2010, pp. 2-21 and 2-22).

Additionally, the Water Conservation Act of 2009, Senate Bill 7 x-7, set a requirement for water agencies to reduce their per capita water use by the year 2020. The overall goal is to reach a state-wide reduction of per capita urban water use of 20 percent by December 31, 2020, with an intermediate 10 percent reduction by December 31, 2015. Demand reduction can be achieved through both conservation and the use of recycled water as a potable demand offset. EMWD committed to reducing potable water demand to meet the goals of SB 7x-7 in two ways: using recycled water to offset potable water demand and reducing demand for water through conservation. EMWD identified three methods for conserving water: 1) a budget based tiered rate, 2) requirements for water efficiency in new construction, and 3) an active conservation program. Water use reduction will be focused on outdoor demand reduction by all customer types. Table 4.16-1, *Estimated Water Efficiency Savings (2005-2035)*, summarizes water savings by type (EMWD, 2015, p. 12).



Table 4.16-1 Estimated Water Efficiency Savings (2005-2035)

| Saving Type | 2005 | 2010 | 2015 | 2020 | 2025 | 2030 | 2035 |
|-------------------------------|--------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Recycled Water Potable Offset | 3,601 | 4,041 | 5,000 | 6,300 | 11,500 | 13,900 | 14,300 |
| Tiered Rate | 0 | 8,700 | 8,700 | 8,700 | 8,700 | 8,700 | 8,700 |
| New Construction | 0 | 200 | 2,000 | 4,100 | 6,100 | 8,000 | 9,600 |
| Active Conservation | 1,500 | 3,400 | 6,500 | 9,500 | 10,700 | 11,700 | 12,600 |
| Total | 5,101 | 16,341 | 22,200 | 28,600 | 37,000 | 42,300 | 45,200 |

Note: Recycled water will be used to offset potable demand through the expansion of the existing recycled water system.
 (EMWD, 2015, Table 5)

Water Supply Sources

EMWD has four sources of water supply: imported water purchased from MWD, local potable groundwater, local desalted groundwater, and recycled water. Imported water accounts for approximately 67 percent, local potable groundwater is approximately 12 percent, desalted groundwater is three percent, and recycled water is 19 percent of supply. Table 4.16-2, *Water Supply (2005-2010)*, which incorporates information from the 2010 UWMP, lists the historic supply quantities by source (EMWD, 2015, p. 4).

Table 4.16-2 Water Supply (2005-2010)

| Type | Source | 2010 | 2011 | 2012 | 2013 | 2014 |
|----------------------------|--|----------------|----------------|----------------|----------------|----------------|
| Imported | Metropolitan Water District | 75,000 | 72,500 | 75,900 | 78,200 | 82,100 |
| Imported – Locally Treated | Metropolitan Water District | 16,600 | 17,000 | 20,300 | 18,200 | 21,600 |
| Groundwater | West San Jacinto Management Area | 15,800 | 17,400 | 15,500 | 18,800 | 12,700 |
| Desalination | West San Jacinto Management Area | 5,800 | 5,700 | 5,700 | 5,000 | 6,800 |
| Recycled Water | EMWD Regional Water Reclamation Facilities | 28,200 | 31,000 | 36,800 | 34,500 | 38,800 |
| Total | | 141,400 | 143,700 | 154,200 | 154,700 | 162,000 |

Note: Values shown are acre-feet per year (AFY).
 (EMWD, 2015, Table 2)

It is anticipated that the majority of the water demands within EMWD’s jurisdiction caused by future development will be met through additional water imports from MWD, as summarized in Table 4.16-3, *EMWD Existing Water Supply Resources – Average Year Hydrology (2015-2035)*. Imported sources will be supplemented by an increase in desalination of brackish groundwater, recycled water use, and water use efficiency. In Metropolitan Water District’s (MWD) 2010 Regional Urban Water



Management Plan (RUWMP), MWD analyzed the reliability of water delivery through the State Water Project (SWP) and the Colorado River Aqueduct (CRA), and concluded that with the storage and transfer programs developed by MWD, MWD will have a reliable source of water to serve its member agencies' needs through 2030 during normal, historic single-dry, and historic multiple-dry years within a 20-year projection (EMWD, 2015, p. 6).

EMWD also has identified several projects that would supplement imported supplies, retrofit potable water landscape customers, improve indirect potable recharge, and identify additional water use efficiency measures. These projects will offset the demand of existing water and free up resources for new development. Table 4.16-4, *EMWD Potential Additional Water Supply Sources (2015-2035)*, provides a summary of additional potential local supplies. These projects are in the planning stage of development and costs and implementation timelines are subject to change. New development will be required to help fund new water supply sources. The extent of additional funding will be determined by the EMWD and may take the form of a new component of connection fees or a separate charge. Details about funding for individual projects are developed in conjunction with the required plans of service (EMWD, 2015, p. 6).

Table 4.16-3 EMWD Existing Water Supply Resources – Average Year Hydrology (2015-2035)

| | 2015 | 2020 | 2025 | 2030 | 2035 |
|--------------------------------|----------------|----------------|----------------|----------------|----------------|
| Metropolitan Water District | 149,300 | 170,700 | 190,700 | 210,000 | 226,200 |
| Recycled Water | 43,900 | 50,000 | 53,900 | 54,900 | 55,300 |
| Groundwater | 13,200 | 13,200 | 13,200 | 13,200 | 13,200 |
| Existing Desalter | 7,500 | 7,500 | 7,500 | 7,500 | 7,500 |
| Total Existing Supplies | 213,900 | 241,400 | 265,300 | 285,600 | 302,200 |

Note: Values shown are acre-feet per year (AFY). Data is based on an average of 2004-2009 conditions. (EMWD, 2015, Table 3)

Table 4.16-4 EMWD Potential Additional Water Supply Sources (2015-2035)

| | 2015 | 2020 | 2025 | 2030 | 2035 |
|---------------------------------|---------------|---------------|---------------|---------------|---------------|
| Additional Recycled Water | 6,100 | 13,500 | 16,400 | 22,200 | 28,200 |
| Desalination | 4,500 | 4,500 | 4,500 | 4,500 | 4,500 |
| Planned Additional Conservation | 0 | 0 | 1,300 | 4,300 | 6,400 |
| Water Transfers/Exchanges | 0 | 0 | 0 | 0 | 0 |
| Total | 10,600 | 18,000 | 22,200 | 31,000 | 39,100 |

(EMWD, 2015, Table 4)



Water Demand Sources

EMWD’s primary retail customers can be divided into residential, commercial, industrial, institutional, and landscape sectors. Although the residential section is by far EMWD’s largest customer segment, each market segment plays a role in the growth and development of EMWD’s service area. Commercial demands account for approximately five percent of EMWD’s retail demand; institutional uses account for four percent of retail demand; agriculture uses comprise four percent of EMWD’s potable water market; and industrial uses account for less than one percent of retail demand (EMWD, 2011, pp. 21-22). Table 4.16-5, *EMWD Total Actual and Projected Water Demand (2005-2035)*, summarizes the EMWD’s actual and projected water demand between 2005 and 2035.

Table 4.16-5 EMWD Total Actual and Projected Water Demand (2005-2035)

| | Actual | | Projected | | | | |
|-------------------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
| | 2005 | 2010 | 2015 | 2020 | 2025 | 2030 | 2035 |
| Retail Potable Water Sales | 84,900 | 77,700 | 113,800 | 120,700 | 136,100 | 150,300 | 162,200 |
| Water Sales to Other Agencies | 29,400 | 27,100 | 47,600 | 61,600 | 65,000 | 69,000 | 72,400 |
| Other Water Uses/Losses | 47,300 | 49,900 | 52,500 | 59,100 | 64,200 | 66,300 | 67,600 |
| Total | 161,600 | 154,700 | 213,900 | 241,400 | 265,300 | 285,600 | 302,200 |

Note: Values shown are AFY.
(EMWD, 2015, Table 9)

Existing Water Infrastructure

Under existing conditions, a 12-inch water line runs parallel to the Project site’s southern boundary west of Ellsworth Street, which continues to the south within Ellsworth Street. There are no potable water connections on site under existing conditions.

B. Wastewater Service and Treatment

The EMWD provides wastewater service and treatment within the Project area. Wastewater flows from the Project area are conveyed to the Perris Valley Regional Water Reclamation Facility (PVRWRF). The PVRWRF is the largest of four operating plants within EMWD’s service area. The plant produces tertiary-treated water and can store more than two billion gallons of recycled water for use by surrounding agricultural customers. The plant receives sewage from a 120-square-mile area surrounding Perris, Menifee, Romoland, Homeland, Winchester, and beyond. The facility is located on approximately 300 acres just west of I-215 and south of Case Road (EMWD, 2014).

In March 2014, EMWD completed the most recent expansion of the PVRWRF. Table 4.16-6, *PVRWRF Existing and Projected Sewer Flows and Capacity*, summarizes the current flows, along with an estimate of current and ultimate capacity. With an ultimate capacity of 100 million gallons per day (mgd), the facility is poised to meet the current and future demands of the region as well as help to meet the increasing demand for recycled water throughout EMWD’s service area. Before the expansion, its capacity was 14 mgd and typical daily flows were 13.8 mgd. The most recent expansion



allows EMWD to meet the projected demands of anticipated development in the region, while also meeting more stringent environmental requirements for wastewater treatment and recycled water quality. The PVWRF also includes two new 300-kilowatt fuel cells powered by methane gas from three new anaerobic sludge digesters. Those methane-gas powered fuel cells will provide roughly 30 percent of the power needed to run the facility, substantially reducing EMWD’s reliance on the region’s power grid and stabilizing future energy costs (EMWD, 2014).

Table 4.16-6 PVRWRF Existing and Projected Sewer Flows and Capacity

| | |
|----------------------|-------|
| Typical daily flows: | 13.8 |
| Previous capacity: | 14.0 |
| Current capacity: | 22.0 |
| Ultimate capacity: | 100.0 |

Note: Values shown are million gallons per day (mgd).
 (EMWD, 2014)

Under existing conditions, the Project site is largely undeveloped, with the exception of the southwestern portion of the Building D Site which contains a mobile home and a concrete pad that is used for the storage of construction equipment. The Project site has only a nominal demand for wastewater service and treatment under existing conditions. Existing wastewater facilities in the Project site’s vicinity include an 8-inch sewer line within the alignment of Oleander Road, near the northeast corner of the site. This sewer line conveys sewer flows to the east, and ultimately discharges to the PVRWRF.

C. Stormwater Conveyance Facilities

Under existing conditions, the Project site is mostly undeveloped, with the exception of the southwestern portion of the Building D Site which contains a mobile home and a concrete pad that is used for the storage of construction equipment. As previously depicted on EIR Figures 4.9-2 and 4.9-3, under existing conditions the Project site exhibits a largely natural drainage pattern. The majority of the site’s drainage sheet flows and discharges towards Oleander Avenue near the northeast corner of the site. Most of the remaining drainage sheet flows and discharges along the southern boundary just west of the Building E Site, with a small portion of the drainage discharging along the southern boundary in the central portion of the Building D Site. Flows from the Project site are conveyed easterly to existing drainage facilities, and ultimately discharge into the Perris Storm Drain. Runoff is then conveyed towards the San Jacinto River, to Lake Elsinore, and ultimately to the Santa Ana River. Under existing conditions, the only drainage improvement is an existing 60-inch-diameter storm drain line near the Building D Site’s northeastern corner.

D. Solid Waste Collection and Disposal

The Riverside County Waste Management Department (RCWMD) is responsible for the efficient and effective landfill disposal of non-hazardous waste. To accomplish this, the RCWMD operates six active landfills and administers a contract agreement for waste disposal at the private El Sobrante



Landfill. The RCWMD also oversees several transfer station leases, as well as a number of recycling and other special waste diversion programs (Riverside County, 2014, p. 4.17-36).

All of the active landfills currently located in Riverside County are rated as Class III landfills according to Title 27 of the California Code of Regulations (CCR). Such landfills only accept nonhazardous, municipal solid wastes. Franchise solid waste collection companies are granted permits to collect commercial and residential waste throughout unincorporated Riverside County under Riverside County's general operating authority. These companies are regulated by the Riverside County Department of Environmental Health (RCDEH). In addition, County landfills accept waste collected in incorporated cities. Within these cities, solid wastes are either collected by the city as a municipal service or are collected by private firms pursuant to a franchise agreement with the city. As part of its long-range planning and management activities, the RCWMD also ensures that Riverside County has a minimum of 15 years of capacity, at any time, for future landfill disposal (Riverside County, 2014, p. 4.17-36).

All of Riverside County's sanitary landfills accept normal solid wastes, household refuse, and yard trimmings as well as furniture, household appliances, televisions and computers, and other electronic wastes. Household hazardous wastes (i.e., cleaners, pesticides, pool chemicals, paints, aerosol cans, etc.), explosives or ammunition, untreated medical or infectious wastes (including sharps) and/or items containing asbestos (such as some floor tile and roofing materials) are not allowed to be disposed of in any of Riverside County's sanitary landfills (Riverside County, 2014, p. 4.17-36 and -37).

The County of Riverside also operates separate collection facilities for household hazardous wastes (HHW) and offers free one- and two-day HHW collection events throughout the year to provide residents with an environmentally safe way to properly dispose of or recycle their HHW. As defined by the State Health and Safety Code, HHW are hazardous wastes generated incidentally to the owning and maintaining of a residence. They do not include hazardous wastes generated by commercial, industrial, or medical uses, even if such use occurs in a residence. (Riverside County, 2014, p. 4.17-37).

In addition to the HHW facilities, there are three regional "antifreeze, batteries, oil, and paint" (ABOP) facilities within Riverside County. The facilities accept ABOP, which includes oil filters and paint, but only latex. They do not accept any other types of HHW. For automotive oil and filters, there are also Certified Used Oil Collection Centers throughout California that accept used vehicle oils of five gallons or less, often for free (Riverside County, 2014, p. 4.17-37).

Hazardous waste that inadvertently enters Riverside County landfills is handled through a Load Check Program, which consists of random waste load inspections, temporary storage of any discovered/recovered hazardous waste at the Lamb Canyon's central accumulation facility, and removal of the accumulated hazardous waste by a licensed hazardous waste hauler for recycling and disposal (Riverside County, 2014, p. 4.17-37).



As noted above, the County operates six active landfills and administers a contract agreement for waste disposal at the private El Sobrante Landfill. Two of these landfills accept solid waste from the Project site's vicinity, as described below (Riverside County, 2014, p. 4.17-41):

- **Badlands Landfill:** The local service area for the Badlands Landfill is generally considered to include the City of Moreno Valley and surrounding cities and unincorporated communities. The landfill accepts residual waste from the Robert A. Nelson Transfer Station/Materials Recovery Facility, which primarily serves the City of Riverside. As a regional disposal facility, the landfill is also permitted to receive waste from the cities and unincorporated communities of the Coachella Valley in the eastern portion of Riverside County. This landfill has a permitted daily capacity of 4,000 tons per day (tpd), and has an estimated closure date of 2024 (Riverside County, 2014, p. 4.17-41 and Table 4.17-L).
- **El Sobrante Landfill:** The local service areas for the El Sobrante Landfill typically include cities/communities within southwestern Riverside County, as well as multiple jurisdictions within the counties of Los Angeles, Orange, San Bernardino, and San Diego. Located near the center of the highly populated western third of Riverside County, according to Waste Management, Inc., the landfill's operator, it processes approximately 43 percent of Riverside County's annual waste. This landfill has a permitted daily capacity of 5,000 tpd, and an estimated closure date of 2045 (Riverside County, 2014, p. 4.17-41 and Table 4.17-L).

E. Applicable Environmental Regulations

1. Federal Regulations

Resource Conservation and Recovery Act (RCRA)

The Resource Conservation and Recovery Act (RCRA) was enacted in 1976 and is the principal federal law in the United States governing the disposal of solid waste and hazardous waste. The U.S. Environmental Protection Agency (US EPA) oversees waste management regulation pursuant to Title 40 of the Code of Federal Regulations. Under RCRA, however, states are authorized to carry out many of the functions of the federal law through their own hazardous waste programs and laws, as long as they are at least as stringent (or more so) than the federal regulations. Thus, CalRecycle manages the State of California's solid waste and hazardous materials programs pursuant to US EPA approval.

Federal Safe Drinking Water Act

The Safe Drinking Water Act (SDWA, Health and Safety Code, §§ 116350–116405) was passed in 1974 and is intended to protect public health by regulating the nation's public drinking water supply. The Federal SDWA authorizes the US EPA to set national standards for drinking water to protect against contaminants. Amendments in 1996 expanded the focus of the SDWA from primarily water treatment to enhanced source water protection, operator training, funding for water system improvements, and public information as important components of protecting drinking water supplies. The SWDA applies to every public water system in the United States and sets the enforceable maximum contaminant levels (MCLs) for drinking water supplies.



2. State Regulations

California Safe Drinking Water Act

California enacted its own Safe Drinking Water Act and granted primary enforcement responsibility to the California Department of Health Services (DHS). Title 22 of the California Code of Regulations (CCR) (Division 4, Chapter 15, “Domestic Water Quality and Monitoring Regulations”) established DHS authority and provides drinking water quality and monitoring requirements, which are equal to or more stringent than federal standards.

California Water Code Section 10910 (SB 610)

Pursuant to Senate Bill 610 (SB 610), California Water Code Section 10910 requires cities and counties to request that water purveyors prepare water supply assessments for certain projects (as defined in Water Code Section 10912) subject to CEQA. In accordance with Section 10912 (a)(5) of the California Water Code, a proposed industrial, manufacturing, processing plant, or industrial park planned to employ more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area must have a water supply assessment (WSA). The WSA is required to identify if projected supply for the next 20 years (based on normal, single dry, and multiple dry water years) would meet the water demand projected for a proposed Project plus the water purveyor’s other commitments to deliver water.

Senate Bill 221 (SB 221)

SB 221 requires land use planning agencies, such as Riverside County, to include (as a condition in any tentative map that includes a subdivision involving more than 500 dwelling units) a requirement to obtain written verification that sufficient water supplies are available for the subdivision from the applicable public water system, or, where there is no existing water supplier, from a consultant directed by the County. SB 221 also addresses the issue of land use and water supply, but at a different point in the planning process than does SB 610. SB 221 requires a city or county to deny approval of a tentative or parcel map if the city or county finds that the project does not have a sufficient, reliable water supply as defined in the bill.

Urban Water Management Planning Act

The Urban Water Management Planning Act (UWMP Act) (California Water Code, Division 6, Part 2.6, Section 10610 et seq.) was enacted in 1983. The UWMP Act applies to municipal water suppliers that serve more than 3,000 customers or provide more than 3,000 acre-feet per year (AFY) of water. The UWMP Act requires these suppliers to update their Urban Water Management Plan (UWMP) every five years to demonstrate an appropriate level of reliability in supplying anticipated short-term and long-term water demands during normal, dry, and multiple dry years.

Water Conservation in Landscaping Act:

The Water Conservation in Landscaping Act of 2006 (Assembly Bill 1881) required cities and counties, including charter cities and charter counties, to adopt landscape water conservation



ordinances by January 1, 2010. The Department of Water Resources (DWR) prepared an updated Model Water Efficient Landscape Ordinance, as contained in California Code of Regulations Title 23, Division 2, Chapter 2.7. Cities and counties had the option to adopt DWR's ordinance or to develop their own. If a local agency had not adopted its own ordinance on or before January 1, 2010, the DWR ordinance became applicable to the jurisdiction of the local agency.

DWR's ordinance identifies the landscape documentation that needs to be submitted to the local agency, including a completed Water Efficient Landscape Worksheet that estimates total water use and compares it to the Maximum Applied Water Allowance (MAWA) based on the annual reference evapotranspiration value for the project area. The MAWA is considered the water budget and should not be exceeded by the estimated water use. Standards for soil management, landscape design, irrigation design and efficiency, grading design, irrigation scheduling, maintenance, audit and survey of water use, recycled water, storm water management, public education, and wastewater prevention are provided to reduce irrigation water demand.

Water Conservation Act of 2009 (Senate Bill 7)

Senate Bill 7 (SB 7) was enacted in November 2009, requiring all water suppliers to increase water use efficiency. The bill also requires, among other things, that the DWR, in consultation with other state agencies, develop a single standardized water use reporting form, which would be used by both urban and agricultural water agencies. The legislation sets an overall goal of reducing per capita urban water use by 20 percent by December 31, 2020. The State was required to make incremental progress towards this goal by reducing per capita water use by at least 10 percent by December 31, 2015. Each urban retail water supplier also was required to develop water use targets and an interim water use target by July 1, 2011. Additionally, SB 7 requires agricultural water suppliers to adopt a pricing structure for water customers based at least in part on the quantity delivered. Effective 2013, agricultural water suppliers who do not meet the water management planning requirements established by this bill became ineligible for state water grants or loans. Urban retail water suppliers are required to meet the water conservation requirements of SB 7 by 2016 or the water supplier will not be eligible for state water grants or loans (DWR, 2015b).

Executive Order B-29-15

On April 1, 2015, Governor Jerry Brown signed Executive Order B-29-15, which directs the State Water Resources Control Board to implement mandatory water reductions in cities and towns across California through February 18, 2016 to reduce water usage by 25 percent. This savings amounts to approximately 1.5 million acre-feet of water over the following nine months. To save more water the Executive Order directed the following actions: (Office of the Governor, 2015):

- Replace 50 million square feet of lawns throughout the state with drought tolerant landscaping in partnership with local governments;
- Direct the creation of a temporary, state-wide consumer rebate program to replace old appliances with more water and energy efficient models;



- Require campuses, golf courses, cemeteries, and other large landscapes to make significant cuts in water use;
- Prohibit new homes and developments from irrigating with potable water unless water-efficient drip irrigation systems are used, and ban watering of ornamental grass on public street medians; and
- Prohibit irrigation with potable water outside of newly constructed homes and buildings that is not delivered by drip or microspray systems.

The SWRCB regulations identified the EMWD as an urban water agency that would be required to reduce overall water usage by 25 percent. As mentioned above, the provisions of the Executive Order extend through February 18, 2016, and the proposed Project is not expected to complete construction until November 2017. Therefore, it cannot be determined if the water restrictions will be in place when the Project becomes operational. Furthermore, the legality of the SWRCB mandated cutbacks has been challenged in court, and the challenge is still pending.

Sustainable Groundwater Management Act (SGMA)

The SGMA is comprised of three pieces of legislation (AB 1739, SB 1313, and SB 1168) which were signed on September 16, 2014, and requires local agencies to adopt customized groundwater sustainability plans tailored to regional economic and environmental needs. This package of legislation recognizes the need for local management of groundwater basins to ensure sustainable water supplies. The act defines sustainable groundwater management as “the management and use of groundwater in a manner that can be maintained during the planning and implementation horizon without causing undesirable results” (California, 2015). The timeline for the implementation of the statutes included in the SGMA are as follows:

- By 2017, local groundwater sustainability agencies must be identified.
- By 2020, overdrafted basins must be covered by a groundwater sustainability plan. Other high and medium priority basins not in overdraft must have plans by 2022.
- By 2040, each high and medium priority basin must achieve sustainability, though this can be extended by 10 years for good cause.

Based on the prioritization standards for the State’s Groundwater Basins, the Project site is located in Basin Number 8-5, which is classified as “high priority” based on DWR standards (DWR, 2014). According to this priority level, the basin will be required to create a “Groundwater Sustainability Agency” and then adopt a groundwater sustainability plan to effectively manage groundwater supplies at the local level.

Water Efficient Landscape Ordinance

On July 15, 2015, the California Water Commission approved the updated State Model Water Efficient Landscape Ordinance to comply with the Governor’s Executive Order B-29-15. Its goal is to increase water efficiency standards for new and retrofitted landscapes through more efficient irrigation systems,



greywater usage, on-site storm water capture, and by limiting the portion of landscapes that can be covered in turf. It also required reporting on the implementation and enforcement of local ordinances, with required reports due by December 31, 2015 (DWR, 2015b).

CalRecycle

CalRecycle is the term the State of California uses for its Department of Resources Recycling and Recovery, formerly known as the California Integrated Waste Management Board (CIWMB). This state agency performs a variety of regulatory functions pursuant to CCR Title 27 and other regulations. Among other things, CalRecycle set minimum standards for the handling and disposal of solid waste designed to protect public health and safety, as well as the environment (CCR § 20050, for example). It is also the lead agency for implementing the State of California municipal solid waste program deemed adequate by the US EPA for compliance with RCRA (Riverside County, 2014, pp. 4.17-43 and 4.17-44).

Mandatory Diversion and Recycling (AB 341)

Approved in 2011, this act amended the California Public Resources Code (Section 42649 et seq.) to address solid waste diversion (i.e., recycling) targets to decrease the amount of wastes going to landfills and thus extend their usable lives. AB 341 requires cities and counties, including Riverside County, to include source reduction, recycling, and composting in their integrated waste management plans (IWMP). In addition, under AB 341 counties were required to “divert 50% of all solid waste from landfill disposal or transformation [e.g., incineration] by January 1, 2000, through source reduction, recycling and composting activities.” By 2020, the target rises to “not less than 75% of solid waste.” The RCWMD is responsible for implementing AB 341 in the unincorporated portions of Riverside County. The annual progress report on Riverside County’s status towards attaining AB 341 requirements is also prepared by the RCWMD. In addition, AB 341 also requires the County of Riverside (i.e., the Riverside County Waste Management Department [RCWMD]) to implement a commercial solid waste recycling program meeting specific elements outlined in the law. It sets new commercial solid waste recycling requirements. And, it also required “commercial or public entities” that “generate more than 4 cubic yards of commercial solid waste per week” and “multifamily residential dwelling[s] of five units or more” to source separate recyclable materials and arrange for recycling services starting July 1, 2012 (Riverside County, 2014, p. 4.17-44).

California Integrated Waste Management Act (AB 939)

The California Integrated Waste Management Act (AB 939) required local jurisdictions to meet solid waste diversion goals of 25 percent by 1995 and 50 percent by 2000. The California Integrated Waste Management Board (CIWMB) determines this diversion by looking at the base-year solid waste generation (waste normally disposed of into landfills) to determine the amount of solid waste diverted. To help increase diversion rates, each jurisdiction is required to maintain and enforce an Integrated Waste Management Plan that looks at recycling programs, purchasing of recycled products, and waste minimization (Riverside County, 2014, p. 4.17-44).



California Solid Waste and Recycling Access Act of 1991

Subsequent to enactment of the California Integrated Waste Management Act, additional legislation was passed to assist local jurisdictions in accomplishing the goals of AB 939. The California Solid Waste Reuse and Recycling Access Act of 1991 (Public Resources Code Section 42900–42911) directs the CIWMB to draft a “model ordinance” governing adequate areas for collection and loading of recyclable materials in development projects. If by September 1, 1994, a local agency did not adopt its own ordinance based on the CIWMB model, the CIWMB model took effect for that local agency. The County’s municipal code incorporates requirements for the provision of areas for the collection and loading of recyclables in compliance with the California Solid Waste Reuse and Recycling Access Act of 1991.

Title 24 Energy Efficiency Standards

California’s Energy Efficiency Standards for Residential and Non-residential Buildings was established in 1978 in response to a mandate to reduce the state’s energy consumption. These standards are promulgated under California Code of Regulations Title 24, Part 6 and are commonly referred to as “Title 24.” The Title 24 standards are periodically updated to reflect new or improved energy efficiency technologies and methods. The 2013 Standards went into effect on July 1, 2014, and supersede earlier versions of the standards. A new development project is required to incorporate the most recent Title 24 standards in effect at the time the building permit application is submitted.

Title 24 Green Building Standards

Part 11 of the State’s CBSC contains the state-wide Green Building Standards Code, which was adopted to enhance the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practice in the following categories: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency (including solid waste reduction and diversion from landfills (recycling); and environmental quality. The provisions of the Green Building Standards are enforced in the County of Riverside as part of the County’s building permit issuance process (BSC, 2013).

3. Local Regulations

Riverside County Water-Efficient Landscape Requirements (Ordinance No. 859)

Riverside County Ordinance No. 859 establishes the County’s water-efficient landscape requirements. Ordinance No. 859 applies to all rehabilitated landscapes associated with commercial and industrial uses requiring a discretionary permit and/or approval, and certain types of residential developments. The ordinance requires the submittal of detailed landscape documents that include water budget calculations to demonstrate compliance with the landscape and irrigation efficiency measures specified in the ordinance.



Countywide Integrated Waste Management Plan

The Countywide Integrated Waste Management Plan (CIWMP) was prepared in accordance with the California Integrated Waste Management Act of 1989, Chapter 1095 (AB 939), and is updated every five years. The CIWMP outlines and codifies the goals, policies, and programs the County of Riverside and its cities are implementing to create an integrated and cost-effective waste management system that complies with the provisions of AB 939 and its diversion mandates. The CIWMP's components include the Countywide Summary Plan, the Countywide Siting Element, the Source Reduction and Recycling Element, the Household Hazardous Waste Element, and Non-Disposal Facility Element. Each of these Elements addresses plans for both Riverside County and each of its cities. The Riverside Countywide Integrated Waste Management Plan was approved by the California Integrated Waste Management Board in September of 1996 and has subsequently been updated at five-year intervals as required by law (Riverside County, 2014, p. 4.17-45).

The RCWMD is specifically charged with the responsibility of: 1) implementing programs that adhere to the goals, policies, and objectives outlined in Riverside County's Source Reduction and Recycling Element (SRRE) to ensure that unincorporated Riverside County achieves 50 percent diversion of solid waste from landfill disposal; 2) implementing programs that adhere to the goals, policies, and objectives outlined in Riverside County's Household Hazardous Waste Element to reduce the amount of HHW disposed within landfills; 3) continuing to meet the solid waste disposal needs of all Riverside County residents into the future; and 4) maintaining and updating the CIWMP and reporting to the CIWMB on Riverside County's progress in complying with AB 939 (Riverside County, 2014, p. 4.17-45).

The RCWMD prepares an Annual Report each August that is submitted to CalRecycle. The Annual Report serves as a basis for determining if the Siting Element and Summary Plan should be revised to include additional disposal capacity, reflect new or changed local and regional solid waste management issues, or include new or changed goals and objectives. The Annual Report is reviewed by the State of California to determine if the County of Riverside is making progress toward meeting its goals and objectives. The CIWMP is also subject to a five-year review to assess if revision is necessary and to determine that Riverside County's waste management practices remain consistent with the hierarchy of waste management practices (Riverside County, 2014, p. 4.17-45).

RCWMD Design Guidelines for Refuse and Recyclables Collection and Loading Areas

Part of the RCMWD Planning Section's review of land-use/development projects is to ensure adequate space is provided for collection of recyclables and that solid waste disposal capacity of Riverside County facilities is not overburdened. As such, most new development projects are required to provide refuse/recycling collection and loading areas, as well as submit a Waste Recycling Plan. Specifically, the County of Riverside requires recycling storage/collection areas provided within new commercial, industrial, and multi-family developments. The Design Guidelines are intended to assist project proponents in identifying space and other design considerations for refuse and recyclables collection and loading areas per the California Solid Waste Reuse and Recycling Act of 1991. Compliance with the Guidelines is necessary for obtaining RCWMD clearance in order to obtain a building permit within



unincorporated Riverside County. In addition, projects that have the potential to generate construction or demolition (C&D) waste are required to complete a County of Riverside Waste Recycling Plan (WRP) to identify the estimated quantity and location of recycling for C&D waste resulting from construction and demolition activities. As part of the WRP, a waste recycling report is required upon completion of project construction demonstrating the actual quantity of C&D waste recycled (Riverside County, 2014, p. 4.17-45).

4.16.2 BASIS FOR DETERMINING SIGNIFICANCE

The proposed Project would result in a significant impact to utilities and service systems if the Project or any Project-related component would:

- a) *Require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects;*
- b) *Result in a determination by the local water agency that it has insufficient water supplies available to serve the project from existing entitlements and resources, resulting in the need for new or expanded entitlements needed;*
- c) *Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, the construction of which would cause significant environmental effects;*
- d) *Result in a determination by the wastewater treatment provider that serves or may service the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments;*
- e) *Be served by a landfill that does not have the permitted capacity to accommodate the project's solid waste disposal needs;*
- f) *Conflict with federal, state, and local statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan); or*
- g) *Result in impacts to one or more of the following facilities, requiring or resulting in the construction of new facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects:*
 - i. *Electricity*
 - ii. *Natural gas*
 - iii. *Communications systems*
 - iv. *Storm water drainage*
 - v. *Street lighting*
 - vi. *Maintenance of public facilities, including roads*
 - vii. *Other governmental services*



4.16.3 IMPACT ANALYSIS

- Threshold a)** *Would the proposed Project require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects?*
- Threshold b)** *Would the proposed Project result in a determination by the local water agency that it has insufficient water supplies available to serve the project from existing entitlements and resources, resulting in the need for new or expanded entitlements?*

Water demand associated with the proposed Project would consist of interior plumbing devices (e.g., sinks, toilets, faucets) as well as outdoor landscape irrigation. Water service to the proposed Project would be provided by the EMWD via connections to 12-inch-diameter water lines installed beneath the paved Oleander Avenue segment that abuts the northeastern corner of the Building D Site and beneath an unnamed, private EMWD water tank access road that abuts the southern Project site boundary. As shown previously on EIR Figures 3-18 and 3-19, the Project would install a 12-inch-diameter water line that connects to the existing water line that abuts the southern Project site boundary, travels north beneath Ellsworth Street to Oleander Avenue, travels west beneath Oleander Avenue between Ellsworth Street and the western boundary of the Building E Site, and travels east beneath Oleander Avenue from Ellsworth Street to approximately 1,055 feet east of the Oleander Avenue/Ellsworth Street intersection, where it connects to the existing water line that abuts the northeastern corner of the Building D Site. Buildings D and E would connect to the proposed water line beneath Oleander Avenue. A loop system of 10-inch pipelines for fire hydrants also would traverse the Project site and connect to existing and proposed water lines within Oleander Road and Ellsworth Street. The installation of these lines has the potential to cause environmental effects associated with short-term air pollutant emissions, noise, and traffic movement disruptions and is an inherent part of the Project's construction process. Environmental impacts associated with the construction of water lines as needed to serve the Project are evaluated throughout this EIR. Where significant impacts are identified, feasible and enforceable mitigation measures are imposed on the Project to reduce impacts to the maximum practical effect. There are no unique impacts associated with the installation of water lines to serve the Project, and impacts would be less than significant.

The EMWD prepared a Water Supply Assessment (WSA) for the proposed Project (based on a larger sized Building E than is currently proposed), the results of which are included in EIR *Technical Appendix K*. As summarized in Table 4.16-7, *Project Water Demand*, the EMWD estimates that the Project's two business park warehouse buildings would result in a demand for approximately 38,890 gallons per day (gpd) of potable water, which translates into an annual demand of approximately 44 AFY. The EMWD indicates that the water demand for the proposed Project is within the limits of projected demand accounted for in the 2010 UWMP and is included in the projected demand shown previously in Table 4.16-5 (EMWD, 2015, p. 17).

The EMWD's determination that it has adequate water to serve the Project is based on EMWD's estimate of demand and supplies during average, single, and multiple dry years. Table 4.16-8 through



Table 4.16-10, *EMWD Existing Water Resources*, summarizes the estimated supplies and demand between 2015 and 2035 for the average year, dry year, and multiple dry year scenarios, respectively. As shown, EMWD anticipates that the majority of water for future development will be supplied by imported water from MWD during single dry years. Typically, MWD does not place imported water limits on a member agency, but predicts the future water demand based on regional growth information. MWD stated in its 2010 RUWMP that with the addition of all water supplies, existing and planned, MWD would have the ability to meet all of its member agencies' projected supplemental demand through 2035, even under a repeat of historic drought scenarios (EMWD, 2015, p. 20).

Furthermore, in March of 2014, EMWD updated its Water Shortage Contingency Plan (WSCP). In the case of shortage EMWD will reduce demand using substantial penalties for wasteful water. EMWD's WSCP details the plan for demand reduction for several stages of shortage through a 50 percent or greater reduction. Additional information about contingency planning is included in Section 5 of EMWD's 2010 UWMP. The WSCP is located in Title 5, Article 10 of the EMWD Administrative Code and is available on EMWD's website. As of December 2015, EMWD was in Stage 4 of the WSCP in response to current state-wide drought conditions. MWD is allocating water as described in its Water Supply Allocation Plan, and EMWD has reduced water demand to meet allocation targets. Current actions being undertaken by the EMWD are consistent with EWMD contingency planning (EMWD, 2015, p. 20).

Table 4.16-7 Project Water Demand

| Description | Quantity | Demand Factor | Average Day Demand | Annual Demand | |
|--|----------|---------------|--------------------|---------------|-----------|
| | | gpd/unit | gpd | MG | AFY |
| Business Park / Light Industrial / Warehouse | 70.7 ac | 550/ac | 38,890 | 14 | 44 |
| TOTAL | | | 38,890 | 14 | 44 |

Notes: ac = acres; gpd = gallons per day; MG = million gallons; AFY = acre-feet per year. (EMWD, 2015, Table 10)

Note: The above calculations are based on a larger-sized project than is currently proposed and thus overstates the Project's water demand. The Project is proposed on 58.6 acres, resulting in a water demand of 32,230 gallons per day.



Table 4.16-8 EMWD Existing Water Resources - Average Year Hydrology (2015-2035)

| | 2015 | 2020 | 2025 | 2030 | 2035 |
|--------------------------------|----------------|----------------|----------------|----------------|----------------|
| Metropolitan Water District | 149,300 | 170,700 | 190,700 | 210,000 | 226,200 |
| Recycled | 43,900 | 50,000 | 53,900 | 54,900 | 55,300 |
| Groundwater | 13,200 | 13,200 | 13,200 | 13,200 | 13,200 |
| Existing Desalter | 7,500 | 7,500 | 7,500 | 7,500 | 7,500 |
| Total Existing Supplies | 213,900 | 241,400 | 265,300 | 285,600 | 302,200 |
| Total Projected Demands | 213,900 | 241,400 | 265,300 | 285,600 | 302,200 |
| Shortfall/Surplus | 0 | 0 | 0 | 0 | 0 |

Based on a repeat of 2004- 2009 conditions
(EMWD, 2015, Table 11)

Table 4.16-9 EMWD Existing Water Resources - Dry Year Hydrology (2015-2035)

| | 2015 | 2020 | 2025 | 2030 | 2035 |
|--------------------------------|----------------|----------------|----------------|----------------|----------------|
| Metropolitan Water District | 155,300 | 177,600 | 198,300 | 218,300 | 235,100 |
| Recycled | 45,500 | 51,800 | 55,800 | 56,900 | 57,300 |
| Groundwater | 13,200 | 13,200 | 13,200 | 13,200 | 13,200 |
| Existing Desalter | 7,500 | 7,500 | 7,500 | 7,500 | 7,500 |
| Total Existing Supplies | 221,500 | 250,100 | 274,800 | 295,900 | 313,100 |
| Total Projected Demands | 221,500 | 250,100 | 274,800 | 295,900 | 313,100 |
| Shortfall/Surplus | 0 | 0 | 0 | 0 | 0 |

Note: Based on a repeat of 1977 conditions
(EMWD, 2015, Table 12)



Table 4.16-10 EMWD Existing Water Resources – Multiple Dry Year Hydrology (2015-2035)

| | 2015 | 2020 | 2025 | 2030 | 2035 |
|--------------------------------|----------------|----------------|----------------|----------------|----------------|
| Metropolitan Water District | 156,600 | 179,000 | 199,800 | 219,900 | 236,900 |
| Recycled | 45,800 | 52,200 | 56,200 | 57,300 | 57,700 |
| Groundwater | 13,200 | 13,200 | 13,200 | 13,200 | 13,200 |
| Existing Desalter | 7,500 | 7,500 | 7,500 | 7,500 | 7,500 |
| Total Existing Supplies | 223,100 | 251,900 | 276,700 | 297,900 | 315,300 |
| Total Projected Demands | 223,100 | 251,900 | 276,700 | 297,900 | 315,300 |
| Shortfall/Surplus | 0 | 0 | 0 | 0 | 0 |

Note: Based on a repeat of 1990-1992 conditions (EMWD, 2015, Table 13)

Based on the foregoing analysis, the EMWD would have sufficient supplies to meet its anticipated demand for the foreseeable future, and no new or expanded entitlements would be needed to serve the Project. Although additional water usage reduction measures have been implemented in the form of the activated Stage 4 WSCP, the EMWD’s UWMP and Project-specific WSA accounted for these possible conditions (Refer to EIR *Technical Appendix K*). Additionally, the Project would be required to comply with the provisions of the County’s Water-Efficient Landscape Requirements (Ordinance No. 859), and also may be required by EMWD to install reclaimed water lines as part of the future Plan of Service, if available in the Project area, to further reduce the Project’s water demand. Moreover, there are no unique conditions associated with the Project’s proposed water service connections that would result in impacts to the environment that have not already been addressed by this EIR. Accordingly, impacts due to the construction of new or expanded water treatment facilities would be less than significant.

Threshold c) *Would the proposed Project require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, the construction of which would cause significant environmental effects?*

Threshold d) *Would the proposed Project result in a determination by the wastewater treatment provider that serves or may service the project that it has inadequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?*

The Project does not propose any septic tanks, and no impacts would occur in association with septic systems.



Wastewater conveyance services would be provided by EMWD. Under existing conditions, an 8-inch-diameter sewer line is installed beneath the paved Oleander Avenue segment that abuts the northeastern corner of the Building D Site. As depicted on the utility plans shown in Figure 3-18 and Figure 3-19, in EIR Section 3.0, *Project Description*, the Project proposes to install an 8-inch-diameter sewer line beneath Oleander Avenue, between the western portion of the Building E Site and the existing wastewater line that abuts the northeastern corner of the Project site. Buildings D and E would connect to the proposed wastewater line beneath Oleander Avenue.

All sewer line installation work that occurs within a public street right-of-way must adhere to the construction control practices that reduce impacts that are specified in the State of California Department of Transportation Construction Manual, dated September 2014, published by Caltrans (Caltrans, 2014). The composition of wastewater produced by uses at proposed Building D and Building E would be similar to composition of wastewater generated within homes, small businesses, offices, retail shops, industrial developments, etc. and would not require any alterations to the EMWD wastewater treatment requirements or to their treatment facilities. Impacts associated with the construction of the proposed sewer facilities are an inherent part of the Project's construction process and environmental effects associated with the Project's construction phase have been evaluated throughout this EIR. Mitigation measures have been identified to reduce construction-related impacts to the maximum feasible extent, and there are no environmental impacts attributable solely to the Project's sewer connections. Impacts would be less than significant.

Sewer flows from the Project area are conveyed to the Perris Valley Regional Water Reclamation Facility (PVWRF). As previously indicated in Table 4.16-6, the PVWRF has a current capacity of 22.0 mgd, and receives typical daily flows of approximately 13.8 mgd. In addition, the PVWRF has an ultimate capacity of 100.0 mgd that could be accommodated through further upgrades to the existing facility.

According to information contained in Riverside County EIR No. 521, industrial uses generate approximately 1,500 gpd of wastewater per acre (Riverside County, 2014, Table 4.19-BL). Thus, the 58.6 acres of business park warehouse development proposed by the Project would result in the generation of approximately 84,900 gpd ($58.6 \text{ ac} \times 1,500 \text{ gpd} = 84,900 \text{ gpd}$) of wastewater requiring treatment, or approximately 0.08 mgd. Wastewater from the Project site would comprise approximately 0.36 percent ($0.08 \text{ mgd} \div 22.0 \text{ mgd} = 0.36\%$) of the 22.0 mgd of available capacity at the PVWRF as of April 2014. Under long-term conditions and with planned improvements to the PVWRF to achieve an ultimate capacity of 100.0 mgd, the Project's wastewater demand would comprise approximately 0.08 percent ($0.08 \div 100.0 \text{ mgd} = 0.08\%$). Accordingly, adequate wastewater treatment capacity exists to serve the proposed Project, and the Project would not result in or require the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Impacts would be less than significant.



Threshold e) Would the proposed Project be served by a landfill that does not have the permitted capacity to accommodate the project's solid waste disposal needs?

Construction and operation of the proposed Project would result in the generation of typical municipal solid wastes, requiring disposal at a landfill; each is discussed below.

Construction Impact Analysis

Construction of the proposed Project would result in the generation of construction-related waste, primarily consisting of discarded materials and packaging. Based on the maximum building square footage of 1,113,627 square feet (s.f.) and the U.S. EPA's construction waste generation factor of 4.34 pounds per s.f., approximately 2,417 tons of waste ($1,113,627 \text{ s.f.} \times 4.34 \text{ lbs per s.f.} = 4,833,141 \text{ pounds} = 2,417 \text{ tons}$) would be generated during the building construction phase (U.S. EPA, 2009). The Project's building construction would occur over a period of approximately 225 days, which corresponds to approximately 10.74 tons of construction waste being generated per day of building construction activity ($2,417 \text{ tons} \div 225 \text{ days} = 10.74 \text{ tpd}$) (Urban Crossroads, Inc., 2015a). Additional waste would be expected from infrastructure installation and other Project-related construction activities. The California Building Standards Code (CBSC) Title 24 (CalGreen) requires that a minimum of 65% of construction wastes be recycled.

Construction wastes associated with the proposed Project that are not recycled or reused would require disposal at either the Badlands Landfill or the El Sobrante Landfill, which have adequate disposal capacity to receive construction waste generated by the Project. Capacity information is given below under the Operational Impact Analysis subheading. Impact to landfill capacity due to Project construction-related activities would be less than significant.

Operational Impact Analysis

During the lifetime of Project operation and based on a daily waste generation factor of 10.8 tons per 1,000 square feet of building space per year, the Project's proposed 1,113,627 s.f. of business park building space would generate approximately 12,027 tons of solid waste per year, or approximately 33.0 tpd ($12,027 \text{ tons per year} \div 365 \text{ days} = 33.0 \text{ tpd}$). As required by state law, a minimum of 50 percent of the solid waste generated by the Project would be diverted from the waste stream; thus, under long-term operating conditions, the Project would require approximately 16.5 tons per day ($33.0 \text{ tpd} \times 50\% = 16.5 \text{ tpd}$) of landfill disposal capacity.

Solid waste generated by the Project that is not recycled or reused would require disposal at either the Badlands Landfill, with a 2010 remaining daily capacity of 2,333 tpd, or the El Sobrante Landfill, with a 2010 remaining capacity of 2,799 tpd. Thus, the 16.5 tpd that would be generated by the Project upon buildout and would require disposal at a landfill would comprise approximately 0.71 percent ($16.5 \text{ tpd} \div 2,333 \text{ tpd} = 0.71\%$) of the 2010 remaining daily capacity at the Badlands Landfill and 0.59 percent ($16.5 \text{ tpd} \div 2,799 \text{ tpd} = 0.59\%$) of the 2010 remaining daily capacity at the El Sobrante Landfill. Accordingly, and based on the foregoing analysis, the Project would be served by a landfill with



sufficient permitted capacity to accommodate the Project's solid waste disposal needs, and impacts would be less than significant.

Threshold f) Would the proposed Project conflict with federal, state, and local statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?

The California Integrated Waste Management Act (Assembly Bill [AB] 939), signed into law in 1989, established an integrated waste management system that focused on source reduction, recycling, composting, and land disposal of waste. In addition, the bill established a 50 percent waste reduction requirement for cities and counties by the year 2000, along with a process to ensure environmentally safe disposal of waste that could not be diverted. Per the requirements of the Integrated Waste Management Act, areas within Riverside County are subject to the County's Integrated Waste Management Plan (CIWMP), which outlines the goals, policies, and programs the County and its cities implement to create an integrated and cost effective waste management system that complies with the provisions of AB 939 and its diversion mandates.

Part of the RCWMD Planning Section's review of land-use/development projects is to ensure that adequate space is provided for collection of recyclables and that the solid waste disposal capacity of Riverside County facilities is not overburdened. As such, most new development projects are required to provide refuse/recycling collection and loading areas, as well as submit a Waste Recycling Plan (WRP). Specifically, the County of Riverside requires recycling storage/collection areas provided within new commercial, industrial, and multi-family developments. The collection areas are required to be shown on construction drawings and be in place before occupancy permits are issued. In addition, projects that have the potential to generate construction or demolition (C&D) waste are required to complete a County of Riverside WRP to identify the estimated quantity and location of recycling for C&D waste resulting from construction. As part of the WRP, a waste recycling report is required upon completion of project construction demonstrating the actual quantity of C&D waste recycled. Compliance with the RCWMD's "Design Guidelines for Recyclable Collection and Loading Areas" is necessary for obtaining RCWMD clearance in order to obtain a building permit within unincorporated Riverside County. The implementation of these mandatory requirements would reduce the amount of solid waste generated by the Project and diverted to landfills, which in turn will aid in the extension of the life of affected disposal sites. The Project would be required by law to comply with all applicable solid waste statutes and regulations; as such, impacts related to solid waste statutes and regulations would be less than significant (Riverside County, 2014, p. 4.17-45).



Threshold g) *Would the proposed Project result in impacts to one or more of the following facilities, requiring or resulting in the construction of new facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects:*

- i. Electricity?***
- ii. Natural gas?***
- iii. Communications systems?***
- iv. Storm water drainage?***
- v. Street lighting?***
- vi. Maintenance of public facilities, including roads?***
- vii. Other governmental services?***

The proposed Project would include connections to existing electricity, natural gas, and communications infrastructure that already exist in this area, and all such connections would be accomplished in conformance with the rules and standards enforced by the applicable service provider. Impacts associated with the construction and operation of electricity, natural gas, communications systems, street lighting, public facilities maintenance, and other governmental services are an inherent part of the Project's construction process and operational characteristics, and the environmental effects associated with the Project's construction phase have been evaluated throughout this EIR. Mitigation measures have been identified to reduce construction- and operational-related impacts to the maximum feasible extent. There are no unique conditions associated with the Project's proposed utility service connections that would result in impacts to the environment that have not already been addressed by this EIR. Impacts would be less than significant.

In regards to storm water drainage, impacts associated with the construction and operation of Project-related storm water drainage facilities also are an inherent part of the Project's construction process and operational characteristics, and the environmental effects associated with the Project's construction and operation have been evaluated throughout this EIR. Mitigation measures have been identified to reduce construction- and operational-related impacts to the maximum feasible extent. There is one unique condition associated with the Project's proposed storm water drainage system, which is related to an interim improvement at the southwestern corner of the Building D Site to handle run-on from properties located to the southwest. Upstream flows from the areas south and west of the Building D Site that are not tributary to Lateral F-4 would be accommodated by interim improvements installed by the Project Applicant until Lateral F-3 is fully implemented by others to the east as planned for and directed by the Riverside County Flood Control and Water Conservation District (RCFCWCD) as part of the Perris Valley Master Drainage Plan (MDP). Under the near-term scenario, a portion of Lateral F-3 would be installed on the south side of the Building D Site to convey runoff from the off-site tributary area and discharge it at an outlet with energy dissipater near the southeast corner of the proposed Building D Site. The energy dissipater is a Project design feature that would preclude substantial erosion effects on the adjacent property that would receive the discharge at this concentrated flow point. With installation of the dissipater, off-site erosion would be less-than-significant as detailed in *Technical Appendix H* (DEA, 2017).



4.16.4 CUMULATIVE IMPACT ANALYSIS

The analysis of potential cumulative impacts to utilities and service systems is divided into five general topics of discussion by combining the Thresholds of Significance (listed above in Subsection 4.16.2) into groupings of like topics, as follows: 1) water facilities; 2) wastewater treatment facilities; 3) solid waste collection and disposal; and 4) other utilities (electricity, natural gas, storm water drainage facilities, etc.).

Water Supplies and Facilities (Thresholds a and b)

The cumulative study area for water supply and water service-related issues is the EMWD's service area. Existing and future development within EMWD's service area would create a demand for additional water supplies. Increases in population and development intensity would contribute to increases in the overall regional water demand. According to the WSA prepared by the EMWD for the proposed Project (see EIR *Technical Appendix K*), and based on the demonstrated reliability of its water supply sources at the time the WSA was prepared, the EMWD has sufficient, reliable, and sustainable water supplies to meet Project water demands in addition to existing and future demands over the next 20 years and through 2035, including during single and multiple dry years (EMWD, 2015, p. 21). The EMWD has already activated Stage 4 of its Water Shortage Contingency Plan based on direction from the California Public Utilities Commission (CPUC) and will continue to implement the Contingency Plan if the drought continues. Mandatory implementation of the EMWD's Water Shortage Contingency Plan would ensure that water supplies are managed to ensure sufficient long-term supplies, even with the addition of cumulative development in the EMWD's service area. Thus, the proposed Project's effects on water supply would be less-than-cumulatively considerable.

The proposed Project would connect to existing water conveyance infrastructure installed beneath the paved Oleander Avenue segment that abuts the northeastern corner of the Building D Site and beneath an unnamed, private EMWD water tank access road that abuts the southern Project site boundary. None of the other pending projects identified in the list of Cumulative Projects (see EIR Table 4.0-1) would connect to that water line. The EMWD is projected to have adequate water supply for projected growth through at least 2035 in normal, single dry, and multiple-dry years. For these reasons, no cumulatively considerable impacts on water infrastructure or water supply would result from construction or operation of the proposed Project.

Wastewater Conveyance and Treatment Capacity (Thresholds c and d)

The cumulative study area for wastewater conveyance and treatment capacity is the EMWD's service area. As previously discussed, construction of additional or expanded regional wastewater treatment facilities would not be required for this Project. Wastewater generated by the proposed Project would be conveyed via local sewer lines into the EMWD's regional sewer system for conveyance to the PVWRF. EMWD has adopted regulations for waste discharge and sewer use as part of Ordinance No. 59.6 (EMWD, 2013). The EMWD also charges Financial Participation Charges. These charges require all industrial companies discharging to the EMWD's sewerage system to pay connection fees, which include fees for sewer participation and sewer treatment plant capacity. The EMWD uses the fees for the expansion and improvement of their facilities, as needed, to serve existing and anticipated



developments (Riverside County, 2014, p. 4.16-5). Other future projects being served by the EMWD would be subject to EMWD's Ordinance No. 59.6 and would be required to pay applicable connections fees, which would be used by EMWD to expand and improve their facilities to serve existing and anticipated development. The PVWRF has a current capacity of 22.0 mgd and receives 13.8 mgd. Ultimate capacity is 100 mgd. Thus, there is adequate treatment capacity available to service the Project and cumulative development. Therefore, the Project's impacts to wastewater treatment facilities are determined to be less-than-cumulatively considerable.

Solid Waste Collection and Disposal (Thresholds e and f)

The cumulative study area for solid waste collection and disposal are the areas of Riverside County and surrounding areas that are served by either the Badlands Landfill or the El Sobrante Landfill (refer to Subsection 4.16.1.D for a summary of areas served by these landfills).

Near-term construction activities associated with the Project would generate approximately 10.74 tpd of solid waste. Construction wastes associated with the proposed Project that are not recycled or reused would require disposal at either the Badlands Landfill or the El Sobrante Landfill. The Project's construction waste represents only 0.46 percent of the reported 2010 remaining daily capacity at the Badlands Landfill, and approximately 0.38 percent of the reported 2010 remaining daily capacity at the El Sobrante Landfill. Accordingly, the Project's generation of solid waste during construction would be less than significant on a cumulative basis.

Under long-term operating conditions, the Project would generate approximately 33.0 tpd of solid waste, of which up to 16.5 tpd would be conveyed to landfills for disposal. The 16.5 tpd that would be generated by the Project upon buildout would comprise approximately 0.71 percent of the 2010 remaining daily capacity at the Badlands Landfill and 0.59 percent of the 2010 remaining daily capacity at the El Sobrante Landfill. Due to the Project's small percentage of landfill capacity need compared to the amount of available capacity, the Project's operational impacts associated with solid waste would be less than cumulatively considerable.

Additionally, the Project and other cumulative developments in the western Riverside County and surrounding jurisdictions would be required to comply with all applicable solid waste statutes and regulations, including the requirement to divert at least 50 percent of solid waste materials from landfills. Accordingly, the Project and other cumulative developments have no potential to conflict with federal, state, and local statutes and regulations related to solid waste, and impacts would be less than significant on a cumulative basis, and the Project's contribution would be less than cumulatively considerable.

Utilities (Threshold g)

Impacts associated with the construction of electricity, natural gas, communications systems, storm water drainage, street lighting, public facilities maintenance, and other governmental services are an inherent part of the Project's construction process and environmental effects, including cumulatively-considerable effects, associated with the Project's construction phase have been evaluated throughout



this EIR. Mitigation measures have been identified in other sections of the EIR that reduce construction-related cumulatively-considerable impacts to the maximum feasible extent. There are no unique conditions associated with the Project's proposed utility service connections that would result in impacts to the environment that have not already been addressed by this EIR. The Project's storm water drainage system interim outlet at the southeastern corner of the Building D Site would result in less-than-significant off-site erosion impacts because an energy dissipater will be installed in this location as a design feature of the Project to slow flows and minimize the potential for erosion. Accordingly, Project impacts due to the construction of utility connections would be less-than-cumulatively considerable.

4.16.5 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Thresholds (a) and (b) for the Building D Site and the Building E Site: Less-Than-Significant Impact.

The EMWD has sufficient capacity to serve the Project with water in light of its existing and projected commitments, and no new entitlements would be required. The Project would not have an adverse effect on the ability of the EMWD to implement its Water Shortage Contingency Plan prepared in response to Executive Order B-29-15. Impacts associated with the installation of on-site and off-site water infrastructure are evaluated throughout the EIR and mitigation measures are identified for construction-related effects that would reduce construction-phase impacts to the maximum feasible extent. There would be no significant impacts specifically related to the installation of water infrastructure beyond the overall construction-related effects of the Project as a whole.

Thresholds (c) and (d) for the Building D Site and the Building E Site: Less-Than-Significant Impact.

The proposed Project's wastewater generation would not exceed the capacity of the EMWD's Perris Valley Regional Water Reclamation Facility (PVWRF) and payment of mandatory connection fees and surcharges established by the EMWD's Wastewater Ordinance No. 59.6 would reduce the Project's incremental effect to a level of less than significant. Additionally, impacts associated with the construction of the proposed sewer facilities are an inherent part of the Project's construction process and environmental effects associated with the Project's construction phase have been evaluated throughout this EIR. Regulatory requirements, project design features, and mitigation measures have been identified to reduce construction-related impacts to the maximum feasible extent, and there are no environmental impacts attributable solely to the Project's sewer connections. Impacts would be less than significant.

Threshold (e) for the Building D Site and the Building E Site: Less-Than-Significant Impact.

The proposed Project's solid waste disposal needs can be accommodated by existing Riverside County Waste Management Department (RCWMD) landfills (i.e., Badlands Landfill and/or El Sobrante Landfill), and the Project would be fully consistent with the Countywide Integrated Waste Management Plan (CIWMP) and its requirements. Project impacts would be less than significant.

Threshold (f) for the Building D Site and the Building E Site: Less-Than-Significant Impact.

The Project would be required to comply with all applicable solid waste statutes and regulations; as such, impacts related to solid waste statutes and regulations would be less than significant.



Threshold (g) for the Building D Site and the Building E Site: Less-Than-Significant Impact. Impacts associated with the construction of electricity, natural gas, communications systems, storm water drainage, street lighting, public facilities maintenance, and other governmental services are an inherent part of the Project's construction process and environmental effects associated with the Project's construction phase have been evaluated throughout this EIR. Regulatory requirements, project design features, and mitigation measures have been identified in other sections of the EIR that reduce construction-related impacts to the maximum feasible extent. There are no unique conditions associated with the Project's proposed utility service connections that would result in impacts to the environment that have not already been addressed by this EIR. Impacts would be less than significant.

4.16.6 MITIGATION

Project impacts to utilities and service systems would be less than significant. No mitigation is required.



4.17 PALEONTOLOGICAL RESOURCES

As discussed in Section 3.0, *Project Description*, the proposed Project involves the development of two properties located south of Oleander Avenue and both east and west of Ellsworth Street totaling approximately 58.6 acres. The Building D Site is located on approximately 37.1 acres east of Ellsworth Street, and the Building E Site is located on approximately 21.5 acres west of Ellsworth Street. Both properties are collectively referred to as the “Project site.” For purposes of evaluation herein, the two properties are referred to individually as the “Building D Site” and the “Building E Site.”

The analysis in this subsection is based on two paleontological resource assessments. The paleontological resource assessment prepared for the Building D Site is titled, “Paleontological Resource Assessment for the Decker Parcels I Project,” prepared by BFSAs, dated April 28, 2015, and appended to this EIR as *Technical Appendix D3*. The paleontological resource assessment prepared for the Building E Site is titled “Paleontological Resource Assessment for the Decker Parcels II Project,” prepared by BFSAs, dated April 28, 2015, and appended to this EIR as *Technical Appendix D4*. Please note that *Appendix D4* was prepared prior to the Project Applicant’s decision to reduce the size of the Building E Site to its current configuration; therefore, the report covers additional acreage (west of the Building E Site) that is no longer in the Project site boundary and is not applicable to the discussion herein of potential on-site impacts. A Paleontological Resource Impact Mitigation Program (PRIMP), dated November 1, 2017 and appended to this EIR *Technical Appendix D5* also was prepared by BFSAs (BFSAs, 2017). These and all references used in this Subsection are included in EIR Section 7.0, *References*.

4.17.1 EXISTING CONDITIONS

A. Paleontological Resources

The Paleontological Resources Preservation Act (P.L. 111-011 Omnibus Public Land Management Act of 2009) defines the term “paleontological resource” as any fossilized remains, traces, or imprints of organisms, preserved in or on the earth’s crust, that are of paleontological interest and that provide information about the history of life on earth, except that the term does not include: a) any materials associated with an archaeological resource (as defined in section 3(1) of the Archaeological Resources Protection Act of 1979 (16 U.S.C. 470bb(1)); or b) any cultural item (as defined in section 2 of the Native American Graves Protection and Repatriation Act (25 U.S.C. 3001) (Congress, 2009).

Riverside County GIS maps the majority of the Building D Site and the entire Building E Site as having “Low Potential” paleontological sensitivity (refer to Figure 4.17-1, *Paleontological Sensitivity Map*). “Low Potential” paleontological sensitivity is defined by County of Riverside EIR No. 521 as lands for which previous field surveys and documentation demonstrate as having a low potential for containing significant paleontological resources subject to adverse impacts. The mapping of low potential was determined based on actual documentation and was not generalized to cover all areas of a particular rock unit on a geologic map. (Riverside County, 2015d, p. 4.9-10) In addition, BFSAs determined that the Cretaceous granitic rocks that underlie the majority of the Project site have no potential for the discovery of fossils or fossil-bearing materials (BFSAs, 2015b, p. 2).

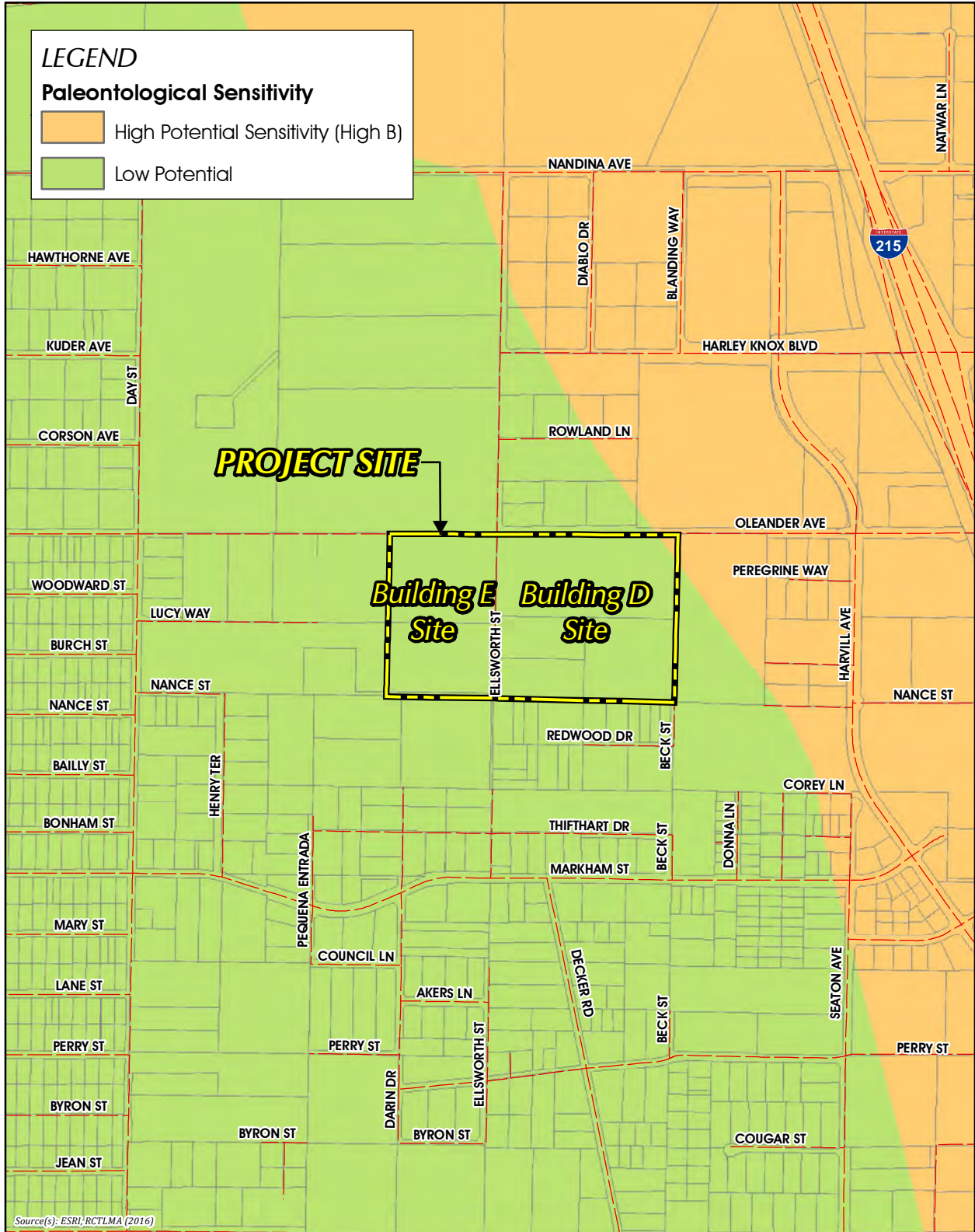
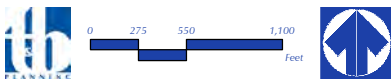


Figure 4.17-1



PALEONTOLOGICAL SENSITIVITY MAP



The likelihood of finding fossils in granitic rocks on the Project site is very low. Any thin cover of Holocene alluvial deposits derived from the upslope exposures of these granitic rocks also would be too minor and geologically too young to contain fossils or fossil remains. (BFSA, 2015c, pp. 1-2)

Riverside County GIS maps the northeastern corner of the Building D Site as having “High B” paleontological sensitivity (refer to Figure 4.17-1, *Paleontological Sensitivity Map*). The High B paleontological sensitivity rating encompasses only the outcrop areas of the mapped Quaternary very old alluvial fan sediments. (BFSA, 2015b, pp. 2-3) According to County of Riverside EIR No. 521, sedimentary rock units with a high potential for containing significant non-renewable paleontological resources include rock units in which vertebrate or significant invertebrate fossils have been found or are determined as likely to be present. These units include, but are not limited to, sedimentary formations which contain significant nonrenewable paleontological resources anywhere within their geological extent and sedimentary rock with the physical character of a rock or rock formation suitable for the preservation of fossils. High sensitivity includes not only the potential for yielding an abundance of vertebrate fossils but also areas that may produce a few important fossils that may provide new and relevant data. High sensitivity is mapped as either “High A” or “High B.” “High A” is based on the geologic formations or mapped rock units that are known to contain or have the correct age and depositional conditions to contain significant paleontological resources. These include rocks that have the potential to contain remains of fossilized fish and rocks that contain fossilized body elements such as tracks, nests, and eggs. High B sensitivity is equivalent to High A sensitivity but is based on the occurrence of fossils at or below 4 feet in depth. (Riverside County, 2015d, p. 4.9-17)

A pedestrian field survey conducted by BFSA in 2014 did not reveal the presence of any fossils or fossil-bearing sedimentary units across the Building D Site or the Building E Site. (BFSA, 2015b, p. 2), (BFSA, 2015c, pp. 1-2)

4.17.2 BASIS FOR DETERMINING SIGNIFICANCE

The proposed Project would result in a significant impact to paleontological resources if the Project or any Project-related component would:

- a) *Directly or indirectly destroy a unique paleontological resource, or site, or unique geologic feature.*

4.17.3 IMPACT ANALYSIS

Threshold a) Would the Project directly or indirectly destroy a unique paleontological resource, or site, or unique geologic feature?

1. Building D Site

The majority of the Building D Site is mapped as having “Low Potential” paleontological sensitivity. In addition, BFSA determined that the Cretaceous granitic rocks that underlie the majority of the Building D Site have no potential for the discovery of fossils or fossil-bearing materials. However,



the outcrop areas of the mapped Quaternary very old alluvial fan sediments in the northeastern corner of the Building D Site are mapped as having “High B” paleontological sensitivity. (BFSA, 2015b, pp. 2-3).

Grading and excavation activities on the Building D Site that occur greater than 4.0 feet in depth and are mapped Quaternary very old alluvial fan sediments in the northeastern corner of the Building D Site (which are mapped by Riverside County as having “High B” paleontological sensitivity), have the potential to unearth paleontological resources that may exist below the ground surface. If significant paleontological resources are unearthed there is a potential for a significant impact if the resources are not properly identified and treated. Therefore, the Project’s potential to directly or indirectly destroy unique paleontological resources that may be present beneath the ground surface in the northeastern corner of the Building D Site is a potentially significant impact and mitigation is required. Refer to Subsection 4.17.6 for applicable mitigation measures.

2. *Building E Site*

The entire Building E Site, which is underlain by granitic rocks, is mapped by Riverside County as having “Low Potential” paleontological sensitivity. The likelihood of finding fossils in granitic rocks is nil. Because the granitic rocks that underlie the Building E Site have no potential to contain fossils or fossil remains, the proposed Project would have no potential to directly or indirectly destroy a unique paleontological resource or site or unique geological feature on the Building E Site. No impact to paleontological resources would occur as a result of implementing the proposed Project on the Building E Site.

4.17.4 CUMULATIVE IMPACT ANALYSIS

This cumulative impact analysis considers development of the Project site in conjunction with other development projects that would disturb geologic structures with paleontological sensitivity and the potential to contain fossils, resulting from full General Plan buildout in the parts of the Riverside County General Plan covered by the Harvest Valley/Winchester Area Plan (HVWAP), the Lakeview/Nuevo Area Plan (LNAP), and the Mead Valley Area Plan (MVAP), in addition to the City of Moreno Valley, the City of Perris, and the City of Riverside.

No paleontological resources have been identified on or near the Project site; however, grading and excavation activities on the Building D Site that occur greater than 4.0 feet in depth and are mapped Quaternary very old alluvial fan sediments in the northeastern corner of the Building D Site (which are mapped by Riverside County as having “High B” paleontological sensitivity), have the potential to unearth paleontological resources that may exist below the ground surface. Similarly, cumulative development in this same geologic formation have the potential to unearth paleontological resources. Therefore, the Project’s potential to result in a cumulatively considerable impact to unique paleontological resources is a significant impact for which mitigation is required.



4.17.5 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold (a) for the Building D Site: Significant Direct and Cumulatively Considerable Impact. Construction activities on the Building D Site have the potential to unearth and adversely impact paleontological resources that may be buried beneath the ground in Quaternary very old alluvial fan sediments located in the northeastern corner of the Building D Site mapped as having “High B” paleontological sensitivity. Impacts would be significant on a direct and cumulatively considerable basis if discovered resources are significant and are not properly identified and treated.

Threshold (a) for the Building E Site: Less-than-Significant Impact. The Project as proposed on the Building E Site would not directly or indirectly destroy a unique paleontological resource, or site, or unique geologic feature.

4.17.6 MITIGATION

The following mitigation measure applies to the Building D Site.

MM 4.17-1 The County of Riverside shall require that for any mass grading and excavation-related activities, including utility trenching, that will exceed 4.0 feet in depth during construction activities in the Area of Potential Effect (APE), i.e., areas of exposed Quaternary very older alluvial fan sediments (Qof) located in the northeast fringe of the property, the County of Riverside shall require that the Project’s Paleontological Resource Impact Mitigation Program (PRIMP) (EIR No. 546 Technical Appendix D5) be implemented by a qualified paleontologist. The PRIMP shall be consistent with current regulations implemented by the County of Riverside and the proposed guidelines of the Society of Vertebrate Paleontology. The PRIMP shall be prepared and submitted by a qualified paleontologist to the County of Riverside prior to the issuance of a grading permit for the Building D Site. The PRIMP shall outline the locations where monitoring by a qualified paleontologist would be required and the protocols to be followed in the event that fossils are discovered to ensure that significant resources are properly identified and treated and that no significant paleontological resource, site, or unique geologic feature is destroyed. The protocols documented in the PRIMP are required to be followed.

4.17.7 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold (a) for the Building D Site: Less-than-Significant with Mitigation. Implementation of MM 4.17-1 would ensure the proper identification and subsequent treatment of any significant paleontological resource, site, or unique geologic feature that may be encountered during ground-disturbing activities associated with Project excavation activities in the northeast fringe of the Building D Site mapped as Quaternary older alluvial fan sediments. Therefore, with implementation of MM 4.17-1, the Project’s potential to impact paleontological resources on the Building D Site would be reduced to less-than-significant.



4.18 TRIBAL CULTURAL RESOURCES

NOTE: This Subsection 4.18 of the Final EIR contains information specific to the topic of tribal cultural resources, which appeared in the Draft EIR under Subsection 4.5, *Cultural Resources*. Although this entire subsection is underlined, the information is not new and the conclusions are the same as disclosed in the Draft EIR.

As discussed in Section 3.0, *Project Description*, the proposed Project involves the development of two properties located south of Oleander Avenue and both east and west of Ellsworth Street (also called “Decker Road” in this EIR and its associated Technical Appendices) totaling approximately 58.6 acres. The Building D Site is located on approximately 37.1 acres east of Ellsworth Street, and the Building E Site is located on approximately 21.5 acres west of Ellsworth Street. Both properties are collectively referred to in this EIR as the “Project site.” For purposes of evaluation herein, the two properties are referred to individually as the “Building D Site” and the “Building E Site.”

The analysis in this Subsection is based in part on two site-specific cultural resources assessments. The cultural resources assessment prepared for the Building D Site is titled, “A Phase I and II Cultural Resources Assessment for the Decker Parcels I Project,” prepared by Brian F. Smith and Associates, Inc., (hereafter BFSFA) dated June 24, 2015, and appended to this EIR as *Technical Appendix D1* (BFSFA, 2015a). The cultural resources assessment prepared for the Building E Site is titled, “A Phase I and II Cultural Resources Assessment for the Decker Parcels II Project,” prepared by BFSFA, dated April 29, 2016, and appended to this EIR as *Technical Appendix D2* (BFSFA, 2016a). Please note that *Technical Appendix D2* was prepared prior to the Project Applicant’s decision to reduce the size of the Building E Site to its current configuration; therefore, the report covers additional acreage (12.1 acres west of the Building E Site) that is no longer in the Project site boundary and is not applicable to the discussion herein of potential on-site impacts.

All references used in this Subsection are included in EIR Section 7.0, *References*. Confidential information has been redacted from *Technical Appendices D1 and D2* for purposes of public review. In addition, much of the written and oral communication between Native American tribes, the County of Riverside, and BSFA is considered confidential in respect to places that have tribal cultural significance (Gov. Code § 65352.4), and although relied upon in part to inform the preparation of this EIR Subsection, those communications are treated as confidential and are not available for public review. Under existing law, environmental documents must not include information about the location of archeological sites or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act (Cal. Code Regs. § 15120(d)).

4.18.1 EXISTING CONDITIONS

A. *Cultural Setting of the Project Site*

The two site-specific cultural resources assessments prepared for the Project site detail the prehistoric setting of the Project area. The prehistoric context summarizes the history of the Project area (starting with the early pre-historic period), the known archaeology of the Project area, and the known



indigenous culture of the Project area. A brief summary of the prehistoric setting of the Project area is provided below. Refer to *Technical Appendices D1 and D2* for more detail.

Paleo Indian, Archaic Period Milling Stone Horizon, and the Late Prehistoric Shoshonean groups are the three general cultural periods represented in western Riverside County, the area in which the Project site is located. Because these culture sequences have been used to describe archaeological events, actions, or objects in the region, the following discussion references the cultural chronology of the Project area, which is associated with the following geologic divisions of time (epochs): Late Pleistocene, the early Holocene, the middle Holocene, and the late Holocene. Refer to Table 2.3-1 of *Technical Appendices D1 and D2* for a summary of the regional chronologies in relationship to the geologic framework. The Late Prehistoric component in the area of western Riverside County was represented by the Luiseño with influences from the Gabrielino, Cahuilla, and Serrano Indians. (BFSA, 2015a, pp. 2.0-5 through 2.07) (BFSA, 2016a, pp. 2.0-5 through 2.0-7)

1. Late Pleistocene / Paleo Indian Period (11,500 to circa 9,000 YBP)

In North America, the Paleo Indian Period began at approximately 11,500 years before present (YBP) with the Clovis culture. Large, fluted points in addition to knives, scrapers, choppers, perforators, and casual flake tools characterize the Clovis culture as big game hunters. Clovis sites have not been identified in the Project area, although isolated Clovis-like fluted points have been found in a variety of settings in southern California including passes in the Cuyamaca and Tehachapi mountains, valleys in the Mojave Desert and Owen Valley, and shorelines of Little Lake, Searles Lake, Panmint Lake, and ancient Lake Mojave. The recovery of isolated fluted points would suggest that at the end of the Pleistocene, small groups of people, which shared Clovis-like traits, were present in southern California. The recovery of fluted points in a variety of settings would suggest that Paleo Indians were likely attracted to multiple habitat types including mountains, marshlands, estuaries, and lakeshores. Rather than being big-game hunters, these people likely subsisted using a more generalized hunting, gathering, and collecting adaption utilizing a variety of resources including birds, mollusks, and large and small mammals. (BFSA, 2015a, p. 2.0-6) (BFSA, 2016a, pp. 2.0-6)

2. Early and Middle Holocene / Archaic Period (circa 9,000 to 1,300 YBP)

The Archaic Period in southern California is associated with a number of different cultures, complexes, traditions, or horizons including Western Pluvial Lakes, San Dieguito, La Jolla, Encinitas, Milling Stone, Pauma, and Sayles (BFSA, 2015a, P. 2.0-9) (BFSA, 2016a, p. 2.0-9).

Archaeological research indicates that southern California was occupied between 9,000 to 1,300 YBP by population(s) that utilized a wide range of both marine and terrestrial resources. Overlapping radiocarbon dates and artifact types between sites identified as Western Pluvial lakes, San Dieguito, La Jolla, Encinitas, Milling Stone, Sayles, and/or Pauma suggest a generalized hunting and gathering pattern that was employed for over 8,000 years. The large amount of marine shell and fish along with some mammal bone next to coastal lagoons changes as one moves inland and an increase in flakes, tools, and bone is seen at these sites along with a decrease in shell. This transition in sites and artifact assemblages is believed to reflect the same people moving along drainages between the coast and



mountains, exploiting both marine (fish and mollusks) and terrestrial (small and large game, plants, and stone materials) resources. (BFSa, 2015a, pp. 2.0-16 through 2.0-17) (BFSa, 2016a, pp. 2.0-16 through 2.0-17)

3. Late Holocene / Late Prehistoric / San Luis Rey Period (1,300 YBP to 1769)

Approximately 1,350 YBP, a Shoshone-speaking group from the Great Basin moved into Riverside County, marking the transition to the Late Prehistoric Period. This period is characterized by higher population densities and the expansion of social, political, and technological systems. Economic systems diversified and intensified during this period with the continued growth of trade networks, the use of shell-bead currency, and the appearance of more labor-intensive, yet effective, technological innovations such as the bow and arrow. This period is divided into two phases, the San Luis Rey I and San Luis Rey II, the division of which is based on the introduction of pottery. The introduction of pottery and the initiation of San Luis Rey II began at approximately A.D. 1300. San Luis Rey I is characterized by the use of portable, shaped or unshaped slab metates (milling stones), shaped or unshaped manos and pestles, and non-portable bedrock milling features. Cremations, bone awls, and stone and shell ornaments are also prominent in the material culture. Ceramic cooking and storage vessels, cremation urns, and multi-color (polychrome) rock art images created by the means of painting using dyes and pigments (pictographs) augment the later San Luis Rey II assemblage. The fluorescence of rock art likely appeared as the result of increased populations and sedentism. Flaked stone dart points were the dominant flaked stone tool utilized for cutting, scraping, and carving but serrated styles were also used. Subsistence is thought to have focused on the utilization of acorns, a storable species that allowed sedentism and increased population densities. (BFSa, 2015a, pp. 2.0-17 and 2.0-18) (BFSa, 2016a, p. 2.0-17)

4. Late Holocene / Protohistoric Period / Ethnographic Groups (1790 to Present)

Evidence indicates that three Shoshonean-speaking groups occupied portions of Riverside County including the Cahuilla, the Gabrielino, and the Luiseño. The geographic boundaries of these groups in pre-and proto-historic times are difficult to place but the Project site is well within the borders of Luiseño territory. This group was a seasonal hunting and gathering people with cultural elements that were very distinct from Archaic Period peoples. These distinctions include cremation of the dead, the use of the bow and arrow, and the exploitation of the acorn as the main food staple. Along the coast, the Luiseño made use of available marine resources by fishing and collecting mollusks for food. Seasonally available terrestrial resources, including acorns and game, were also sources of nourishment for Luiseño groups. Elaborate kinship and clan systems between the Luiseño and other groups facilitated a wide-reaching network that included trade of Obsidian Butte obsidian and other resources from the eastern deserts, as well as steatite from the Channel Islands. The primary settlements of late Prehistoric Luiseño Indians in the San Jacinto Plain were represented by *Ivah* and *Soboba* near Soboba Springs, *Jusipah* near the town of San Jacinto, *Ararah* in Webster's Canyon en route to Idyllwild, *Pahsitha* near Big Springs Ranch southeast of Hemet, and *Corova* in Castillo Canyon. These locations share features such as the availability of food and water resources. Features of this land use include petroglyphs and pictographs, as well as widespread milling, which is evident in bedrock and portable implements. (BFSa, 2015a, p. 2.0-18) (BFSa, 2016a, p. 2.0-18)



B. Archaeological Resources

An archaeological records search of previously recorded archaeological sites, conducted at the Eastern Information Center, reported that 63 prehistoric resource properties are located within a one-mile radius of the Building D Site and the (formerly larger) Building E Site. The 63 prehistoric resources recorded within a one-mile radius of the Building D Site and Building E Site (not including the Project site and the 12.1 acres of the formerly larger Building E site that are studied in detail in *Technical Appendix D2* (BFSA, 2016a).), include 63 bedrock milling sites. Brief descriptions of the recorded sites located within one-mile of the Building D Site and the (formerly larger) Building E Site are provided in Table 4.1-1 of the Building D Site and Building E Site cultural resources assessment reports prepared by BFSA (*Technical Appendices D1 and D2*).

The records search indicates that 50 cultural resource studies were previously conducted within a one-mile radius of the Building D Site and the (formerly larger) Building E Site. The previous studies conducted within one-mile of the Building D Site and (formerly larger) Building E Site are referenced in Table 4.1-2 of *Technical Appendices D1 and D2*. The archaeological records search results are bound separately as Appendix C to *Technical Appendices D1 and D2* as Confidential Appendices. (BFSA, 2015a, pp. 4.0-1 through 4.0-8) (BFSA, 2016a, pp. 4.0-1 through 4.0-8) The results are confidential because the California Government Code § 6254(r) does not require the disclosure of records of Native American graves, cemeteries, and sacred places and records of Native American places, features, and objects described in § 5097.9 and § 5097.993 of the Public Resources Code maintained by or in the possession of, the NAHC, another state agency, or a local agency.

In addition, BFSA requested a review of the Sacred Lands File (SLF) by the Native American Heritage Commission (NAHC) to determine if any recorded Native American sacred sites or locations of religious or ceremonial importance are present within one-mile of the Building D Site or the (formerly larger) Building E Site. The NAHC SLF search did not indicate the presence of any sacred sites within the search radius. BFSA's analysis of site components and artifacts did not indicate Native American religious, ritual, or other special activities on the Building D Site or the (formerly larger) Building E Site. A list of Native American contacts was provided by the NAHC and the original correspondence is contained in Appendix D of *Technical Appendices D1 and D2*. (BFSA, 2015a, p. 3.0-5) (BFSA, 2016a, p. 3.0-3)

As part of the SB18 and AB52 consultation processes, the County of Riverside received information from the Pechanga Band of Luiseño Indians asserting that the Project area is part of a tribal cultural landscape extending several miles around the Project site and consisting of related archaeological sites associated with either the village of *Qazáalku* or a smaller (unnamed) village. The Tribe cited Tribal knowledge, oral history, internal Tribe records, ethnological documentation, and the archaeological research conducted for the Building D Site and (formerly larger) Building E Site by BFSA as the basis of this assertion, although a large majority of the documentation submitted by the Tribe to Riverside County contained a summary of Tribal knowledge and oral tradition, supported by limited scientific analysis and ethnographic data. (Pechanga, 2015; Pechanga, 2016) While it is acknowledged that the archaeological resources identified on the Project site (discussed below) are part of Luiseño settlement



and subsistence history, substantial evidence required by CEQA has not been provided by the Tribe or other party, or is known to Riverside County, to distinguish the Project site or the presumed larger tribal cultural landscape as unique or significant among the many other lands inhabited by Native Americans across California and North America. The Tribe refers to a cultural landscape generally, and has not provided geographic definition as to its scope and boundaries. Further, a possible cultural landscape is not necessarily a tribal cultural resource (TCR) as defined under AB-52. AB-52 does not provide that all cultural landscapes qualify as TCRs unless the landscape meets the definition given in Public Resources Code § 21074(b). While the Project site may or may not have some association to a village as asserted by the Pechanga Tribe, the Tribe has not supplied the substantial evidence necessary for the County to conclude that the individual resources on the Project site, or the wider landscape, qualifies as a significant archaeological resource or TCR as defined by the Public Resources Code and State CEQA Guidelines. Nonetheless, the information supplied by the Tribe in written form (Pechanga, 2015; Pechanga, 2016) and in oral form during consultation meetings with the County and field visits in County staff's presence, was important to the County's deliberative process and was taken into consideration by the County when determining the potential significance of the on-site resources (according to the criteria presented in Subsection 4.5.2, below), and in determining the significance of the proposed Project's impacts to these resources. In addition, the presence of archaeological resources of concern to the Tribe west of the currently-proposed western boundary of the Building E Site was a contributing factor to the Project Applicant's decision to reduce the size of the Building E Site (by 12.1 acres) compared to the size of the Building E Site studied in *Technical Appendix D2*.

1. Building D Site

The methodology employed by BFSa for the cultural resources assessment of the Building D Site consisted of an institutional records search at the Eastern Information Center, an intensive pedestrian survey, significance testing of two prehistoric milling sites (one of which contained a historic trash scatter), and additional field visits accompanied by the County Geologist, County Archaeologist, and representatives of the Pechanga Band of Luiseño Indians and Soboba Band of Luiseño Indians. Refer to *Technical Appendix D1* for a detailed description of the archaeological records search, the field methodology, and the laboratory methods employed by BFSa for the Building D Site. (BFSa, 2015a, Section 3.0 Methodology)

An archaeological records search for the Building D Site and the surrounding area within a one-mile radius was conducted by the Eastern Information Center (EIC) at the University of California, Riverside (UCR). The EIC reported that two cultural resources (Site RIV-8401 and Site RIV-8402) were previously recorded as occurring within the Building D Site. Although the Building D Site was never formally surveyed in the past, both Site RIV-8401 and Site RIV-8402 were recorded in 2007 as part of a proposed Plot Plan for a different project. Records are not clear where the Plot Plan was located and no significance testing was conducted at that time. (BFSa, 2015a, p. 4.0-11)

The Building D Site is relatively flat, with elevations that range from 1,558 above mean sea level (ASML) at the property's northeast corner to 1,607 ASML at its southwest corner. Highly weathered



and deteriorating bedrock outcrops are scattered throughout the Building D Site. During the pedestrian survey conducted by BFSFA on September 4, 2014, the Building D Site was observed as disturbed by previous agricultural use, gravel dispersal, and the use of a rural residence with associated outbuildings. Subsequent field visits in 2015 and 2016 affirmed these findings. The majority of the Building D Site appeared to have been cleared and tilled in the past. This characterization of the Building D Site as moderately to severely disturbed is relevant to the consideration of the presence of cultural resources within the Project area; disturbance can result in the damage and removal of resources and/or can make visually obscured resources more visible. The source of previous disturbance appears to be the result of farming, general land clearing, and residential use. The survey conducted by BFSFA confirmed the presence of the two previously recorded bedrock milling sites (RIV-8401 and RIV-8402). (BFSFA, 2015a, p. 4.0-8) A site significance testing program was undertaken by BFSFA to evaluate Site RIV-8401 and Site RIV-8402 under CEQA for significance, as described below. (BFSFA, 2015a, p. 1.0-2)

When considering the association of RIV-8401 and RIV-8402 to a possible cultural landscape, the County determined that the Pechanga Tribe has not provided geographical definition to a tribal cultural landscape encompassing the Building D Site in terms of the size and scope of the landscape. Further, there is a lack of substantial evidence upon which the County can conclude that RIV-8401 and RIV-8402 are individually or collectively unique archaeological resource(s) that significantly contribute to the integrity of a possible cultural landscape. The preponderance of evidence provided in *Technical Appendix D1* and in confidential communications between Riverside County, the Pechanga Tribe, and BFSFA, indicate that RIV-8401 and RIV-8402 are not significant under CEQA. In addition, there is a lack of substantial evidence to consider the landscape a TCR as defined by Public Resources Code § 21074 and § 5024.1. AB 52, Section 21074(b), requires that for a cultural landscape to be a TCR, the landscape must meet the criteria of a TCR and be defined in terms of “size and scope of the landscape.” Because the substantial evidence that is needed to conclude that the subject property is a cultural landscape is lacking, the Project site is not deemed by Riverside County to be part of a cultural landscape or a TCR under AB 52. Additional information is provided below about each site to support this conclusion.

Site RIV-8401

Site RIV-8401 was recorded in 2007 as a single bedrock milling feature, which consisted of three milling slicks on a single granite boulder. The 2014 investigation conducted by BFSFA confirmed the presence of the bedrock milling feature recorded in 2007 and identified three additional milling features. The testing program employed by BFSFA for Site RIV-8401 consisted of recording the four bedrock milling features and conducting subsurface investigations. During BFSFA’s testing program, eight shovel test pits (STPs) were placed in the vicinity of the bedrock milling features. No subsurface cultural materials were encountered during BFSFA’s testing program. Because the study of Site RIV-8401 did not produce any artifacts or evidence of a subsurface deposit, BFSFA determined that Site RIV-8401 is not unique and not significant under CEQA criteria due to a lack of both subsurface deposit and the ability to provide any further research potential. (BFSFA, 2016a, pp. 4.0-11 and 4.0-12 and 4.0-14 through 4.0-19)



Site RIV-8402

Site RIV-8402 was recorded in 2007 and characterized as four milling slicks on three granitic outcrops. The 2014 investigation conducted by BFSa confirmed the presence of the bedrock milling features recorded in 2007 and identified two additional milling features. The testing program for Site RIV-8402 consisted of recording the five bedrock milling features. During the testing program, 11 STPs were placed in the vicinity of the bedrock milling features. (BFSa, 2015a, p. 4.0-11) In addition, BFSa identified historic trash scatter on the Project site; however, BFSa concluded that the historic component of Site RIV-8402 is not significant, as single episodes of historic dumping are common for rural areas and the items discarded could not be associated with any specific household or group of people. (BFSa, 2015a, p. 4.0-34) Refer to Subsection 4.5, *Cultural Resources*, for more detail.

Based upon BFSa's surface inspection across the Building D Site and the STP results, Site RIV-8402 is characterized as a temporary seasonal prehistoric milling location that lacks any encampment or long-term use. These milling features are common to Late Prehistoric subsidence patterns for the region and match the pattern of milling stations to the north and west of the Building D Site. (BFSa, 2015a, p. 4.0-34) For these reasons, BFSa determined that Site RIV-8402 is not unique and not significant under CEQA.

2. Building E Site

The methodology employed by BFSa for the cultural resources assessment of the Building E Site consisted of an institutional records search at the Eastern Information Center, an intensive pedestrian survey, significance testing of three prehistoric milling sites, and additional field visits accompanied by the County Geologist, County Archaeologist, and representatives of the Pechanga Band of Luiseño Indians and Soboba Band of Luiseño Indians. Refer to *Technical Appendix D2* for a detailed description of the archaeological records search, the field methodology, and the laboratory methods employed by BFSa for the Building E Site (BFSa, 2016a, Section 3.0 Methodology). Please note that the area of study covered by *Technical Appendix D2* includes 12.1 acres that are no longer within the Building E Site boundary because *Technical Appendix D2* was prepared prior to the Project Applicant's decision to reduce the size of the Building E Site to its current configuration. As such, information contained in *Technical Appendix D2* that pertains to these 12.1 acres (west of the currently-proposed Building E Site) and that are no longer in the Project site boundary is not applicable to the discussion herein of potential on-site impacts. An archaeological records search for the (formerly larger) Building E Site and the surrounding area within a one-mile radius was conducted by the EIC at UCR. The EIC reported that two cultural resources (RIV-1330/H and RIV-8901) were previously recorded as occurring within the (formerly larger) Building E Site, which still fall within the currently-proposed smaller Building E Site. (BFSa, 2016a, pp. 3.0-1 and 4.0-1)

The topography of the Building E Site is characterized by an east-facing slope on the west side of the property and an ephemeral drainage in the southwestern corner. With the exception of the east-facing slope, the remainder of the property is flat. During the pedestrian survey conducted by BFSa on December 29, 2014, the Building E Site was observed as disturbed by past agricultural use and the property appeared to have been cleared and tilled in the past. Subsequent field visits in 2015 and 2016



affirmed these findings. This characterization of a disturbed agricultural landscape is relevant to the consideration of the presence of cultural resources within the area; disturbance can result in the damage and removal of resources and/or can make visually obscured resources more visible. Many areas in and around the Building E Site have been disturbed by agricultural use and to a lesser extent by the construction of the water tank adjacent to the southwest corner of the Building E Site. (BFSA, 2016a, p. 4.0-8)

As mentioned above, the records searches for the (formerly larger) Building E Site identified two cultural resources (RIV-1330/H and RIV-8901) on the Building E Site and both of the sites were recorded as continuing off the Building E Site to adjacent properties. As a result of BFSA's 2014 field survey, RIV-1330/H and RIV-8901 were confirmed to be present. In addition, one prehistoric milling station site was discovered. DPR primary site record forms were prepared by BFSA for the discovered prehistoric milling station (RIV-11,874) and site update forms were prepared for sites RIV-1330/H and RIV-8901. A site significance testing program was undertaken by BFSA to evaluate Site RIV-1330/H, Site RIV-8901, and Site RIV-11,874 under CEQA criteria for significance, as described below. (BFSA, 2016a, p. 1.0-2)

When considering the association of RIV-1330/H, RIV-8901, and RIV-11,874 to a possible cultural landscape, the County determined that the Pechanga Tribe has not provided geographical definition to a cultural landscape encompassing the Building E Site in terms of the size and scope of the landscape. Further, there is a lack of substantial evidence upon which the County can conclude that RIV-1330/H, RIV-8901, and RIV-11,874 are individually or collectively unique archaeological resource(s) that significantly contribute to the integrity of a possible cultural landscape. The preponderance of evidence provided in *Technical Appendix D2* and in confidential communications between Riverside County, the Pechanga Tribe, and BSFA, indicate that RIV-1330/H, RIV-8901, and RIV-11,874 are not significant under CEQA. In addition, there is a lack of substantial evidence to consider the landscape a TCR as defined by Public Resources Code § 21074 and § 5024.1. AB 52, Section 21074(b), requires that for a cultural landscape to be a TCR, the landscape must meet the criteria of a TCR and be defined in terms of "size and scope of the landscape." Because the substantial evidence that is needed to conclude that the subject property is a cultural landscape is lacking, the Project site is deemed by Riverside County as part of neither a cultural landscape nor a TCR under AB 52. Additional information is provided below about each site to support this conclusion.

Site RIV-1330/H

BFSA identified 13 milling features within the formerly larger Building E Site, scattered on various exposed bedrock outcrops. Within the currently-proposed Building E Site, there are only three milling features. Due to the disturbance of a large portion of the Building E Site by the modern construction of the existing off-site water tank, fewer recorded milling features were recorded during the 2014 study than in previous studies. BFSA observed and collected only three surface artifacts consisting of a mano, and two metate fragments. Due to the fact that all subsurface tests were negative and long berms of mounded dirt are located along the east side of the Building E Site, BFSA reached the conclusion that grading and clearing activities conducted in conjunction with the site preparation for the new off-



site water tank resulted in the scraping away of the topsoil within Site RIV-1330/H to create soil berms downslope of the water tank. The berms are thought to have been intended to be erosion control features. The grading of the topsoil within Site RIV-1330/H into berms resulted in the removal of any artifact-containing soil in areas where past studies indicated that artifacts were discovered. The original site form for Site RIV-1330/H previously recorded (Swenson, 1978), noted the possibility of rock art at this location. It was unclear in 1978 if rock art was actually present on the site due to the high level of graffiti that was present at that time, and which continues to this day. BFSA did not observe any rock art at Site RIV-1330/H during their field visits and verified that the possible rock art is absent from the site.

Because Site RIV-1330/H did not produce any evidence of subsurface cultural deposits as part of BFSA's study, BFSA concluded that Site RIV-1330/H is not significant under CEQA criteria due to the lack of both a subsurface deposit and the ability to provide any further research potential. (BFSA, 2016a, pp. 4.0-29 through 4.0-42)

After a review of *Technical Appendix D2*, and in consultation with the Pechanga Tribe as part of the AB 52 consultation process, the County of Riverside required that prior to the initiation of any grading for the Building E Site, that pollen and protein residue analyses be conducted for existing bedrock milling features. Although BFSA determined that superficially the milling features of RIV-1330/H appeared to be poor candidates for this type of test, BFSA completed the analysis to assure the County and Native American community that all possible research efforts were exhausted prior to the removal of the milling features during development of the Building E Site. Residue analyses are used to identify the presence of prehistoric food and plants that may have been exploited by the native inhabitants of a given site. The pollen and protein residues identified by the analysis process include those present in plant tissues and animals. (BFSA, 2016a, p. 5.0-1)

For Site RIV-1330/H, pollen and protein residue analyses were conducted to investigate potential evidence of floral remains, plant proteins, and animal proteins still present on the milling features identified within the Building E Site. The goal was to provide paleoenvironmental and dietary data for Site RIV-1330/H, which is assumed to be representative of other milling features on the Project site. Thirteen (13) milling features were identified at RIV-1330/H (on- and off-site of the currently proposed Building E Site) with a total of forty-two (42) separate milling elements. These elements include four mortars, one basin, four rubs, and 33 slicks. Based upon the frequency of milling features and the condition of those features, the Riverside County Archaeologist suggested the sampling of eight milling elements and a single (1) artifact (i.e., mano). All sampling was conducted by BFSA and the samples were submitted to PaeloResearch Institute, Inc. in Golden, Colorado for analysis. (BFSA, 2016a, pp. 4.0-42 and 4.0-44). The analysis identified a range of potential protein residues and pollens, which were prehistorically present within Site RIV-1330/H (BFSA, 2016a, p.5.0-1). The analysis results are included as Appendix F of *Technical Appendix D2*. Although the results provided environmental information about the plants and animal species that were once present in the area, the analyses did not reveal any information that would indicate that RIV-1330/H is unique or significant among other similar sites found throughout southern California that had similar environmental



conditions. Further data analysis is not warranted, as it would only add similar information to the current body of knowledge.

Site RIV-8901

The portion of Site RIV-8901 that extends into the formerly larger Building E Site consists of 10 bedrock milling features situated on a moderate, east-facing slope. Within the currently-proposed Building E Site, there is only one milling feature. The elements of Site RIV-8901 previously identified off-site were recorded with the same characteristics as scattered bedrock outcrops with occasional evidence of minimal milling use. Aside from the milling features observed, no surface artifacts or evidence of potential cultural deposits was detected by BFSa. (BFSa, 2016a, p. 4.0-45) A series of 24 STPs were excavated around the milling feature in order to determine if any associated surface artifacts were present. None of the STPs produced any artifacts or evidence of a subsurface cultural deposit. Based upon the surface inspection across Site RIV-8901 and the STP results, Site RIV-8901 is characterized by BFSa as a temporary seasonal milling location that lacks any evidence of encampment or long-term use. This type of site is common to the Late Prehistoric subsistence pattern for the region and matches the pattern of milling stations to the north and east of the Building E Site. Because the study of Site RIV-8901 did not produce any artifacts or evidence of a subsurface deposit, it was evaluated as not significant under CEQA criteria due to a lack of both a subsurface deposit and the ability to provide any further research potential. (BFSa, 2016a, pp. 1.0-3 and 4.0-45 through 4.0-61)

Site RIV-11,874

Site RIV-11,874 is an isolated milling station that is part of the pattern of milling stations reported in the surrounding area. Site RIV-11,874 is located on a single bedrock exposure on the Building E Site. Aside from the milling feature observed, no surface artifacts or evidence of potential cultural deposits were detected by BFSa. This is consistent with the information for Site RIV-8901 to the north and east, where milling stations lacked any artifact collection. The single milling feature at Site RIV-11,874 contained a single slick. Three STPs were excavated around the milling feature in order to determine if any subsurface deposits were present. None of the STPs produced any artifacts or evidence of a subsurface cultural deposit. Based upon the surface inspection across Site RIV-11,874 and the results of the STPs, Site RIV-11,874 is determined by BFSa as a temporary seasonal milling location that lacks any evidence of encampment or long-term use. This type of site is common to the Late Prehistoric subsistence pattern for the region and matches the pattern of the milling station to the north and east of the Building E Site. (BFSa, 2016a, pp. 4.0-62 through 4.0-66) For this reason, BFSa concluded that Site RIV-11,874 is not significant under CEQA.

4.18.2 APPLICABLE REGULATORY SETTING

California Senate Bill 18 (SB18) (Chapter 905, Statutes of 2004)

The California Office of Planning and Research (OPR) is required to implement various long-range planning and research policies and goals that are intended to shape statewide development patterns and influence the quality of the state's environment. California Senate Bill (SB) 18 required that the OPR



guidelines contain advice, developed in consultation with the NAHC for consulting with California Native American tribes for the preservation of, or the mitigation of impacts to, specified Native American places, features, and objects. SB18 also required those guidelines to address procedures for identifying the appropriate California Native American tribes, for consultation. SB18 requires that, prior to the adoption or amendment of a city or county's general plan, the city or county conduct consultations with California Native American tribes for the purpose of preserving specified places, features, and objects (known as Traditional Tribal Cultural Places) that are located within the city or county's jurisdiction. (See Senate Bill 18 Chapter 905 for full context) (California State Legislature, 2004). The consultation process must be completed prior to project approval. Because the proposed Project includes a General Plan Amendment, the County of Riverside as the CEQA lead agency for the proposed Project is subject to all requirements associated with the SB 18 process for Native American consultation.

❑ **California Assembly Bill No. 52 (AB52), 2014**

California Assembly Bill 52 (AB52) Chapter 532 is an act to amend Section 5097.94 of, and add Sections 21073, 21074, 21080.3.1, 21080.3.2, 21802.3, 21083.09, 21084.2 and 21084.3 to the California Public Resources Code, relating to Native Americans. AB 52 Chapter 532 was approved by the California Governor on September 25, 2014. (Assembly Bill No. 52 Chapter 532, 2014)

If the tribes desire notification of proposed projects in that area that may cause a substantial adverse change in the significance of a cultural resource, AB52 requires that Native American tribes send written notice of their geographic areas of traditional and cultural affiliation to CEQA lead agencies. The CEQA lead agency is then required to provide such notification and consult with the tribe(s) if the tribe(s) requests consultation.

The provisions listed in AB52 are applicable to projects that have a notice or preparation or a notice of negative declaration filed on or after July 1, 2015. By requiring the CEQA lead agency to consider the effects relative to cultural resources and to conduct consultation with California Native American tribes, AB52 imposes a state-mandated local program. AB52 additionally requires the NAHC to provide each California Native American tribe, as defined, on or before July 1, 2016, with a list of all public agencies that may be a lead agency within a geographic area in which the tribe is traditionally or culturally affiliated; the contact information of those agencies; and information on how the tribe may request those public agencies to notify the tribe of projects within the jurisdiction of those public agencies for the purposes of requesting consultation. See AB52 Chapter 532 for full context (Assembly Bill No. 52 Chapter 532, 2014).

According to CEQA Statute § 21074.

(a) "Tribal cultural resources" are either of the following:

(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:



(A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.

(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

(b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

4.18.3 BASIS FOR DETERMINING SIGNIFICANCE

- a) The proposed Project would result in a significant impact to tribal cultural resources if the Project or any Project-related component would: Restrict existing religious or sacred uses within the potential impact area; or
- b) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074.

4.18.4 IMPACT ANALYSIS

Threshold a) Would the Project restrict existing religious or sacred uses within the potential impact area?

BFSA’s analysis of the historic and archaeological site components and artifacts identified on the Building D Site and the Building E Site and identified in Subsection 4.5, *Cultural Resources*, of this EIR did not identify any Native American religious, ritual, or other special activities. In addition, BFSA requested a review of the Sacred Lands File (SLF) by the NAHC to determine if any recorded Native American sacred sites or locations of religious or ceremonial importance are present within one-mile of the Building D Site and the formerly larger Building E Site. The NAHC SLF did not indicate the presence of a sacred site within the search radius. A list of Native American contacts was also provided by the NAHC and non-confidential correspondence letters are contained in Appendix D of *Technical Appendix D1*. (BFSA, 2015a, p. 3.0-5) BFSA did not receive any direct responses to these inquiries.



As part of the SB18 and AB52 consultation processes required by State law, Riverside County sent notification of the proposed Building D Site project and formerly larger Building E Site project to the following Native American tribes with possible traditional or cultural affiliation to the area: Agua Caliente Band of Cahuilla Indians; San Manuel Band of Mission Indians, Pala Band of Mission Indians, Morongo Band of Mission Indians, Pechanga Band of Luiseño Indians; Rincon Band of Luiseño Indians; and the Soboba Band of Luiseño Indians. The Pechanga Band of Luiseño Indians and the Soboba Band of Luiseño Indians requested consultation. The Pechanga Band of Luiseño Indians stated in their written responses that the Project site is located in a culturally sensitive area within the Pechanga's aboriginal territory and part of Payómkawichum (Luiseño). (Pechanga, 2015) Field visits conducted by the County Archaeologist in the presence of Pechanga Band of Luiseño Indians and the Soboba Band of Luiseño Indians representatives did not reveal any religious or sacred uses of the property. Residue test results from milling sites in Building E Site revealed that some of the milled materials may have had medicinal purposes, but there is no evidence to suggest that there was religious or sacred use of the property.

The proposed Project's mass grading and excavation activities would disturb the entire Building D Site and the entire Building E Site. However, because the property does not contain religious or sacred uses, development of the proposed Project has no potential to restrict a religious or sacred use. Thus, no impact would occur.

Threshold b) Would the Project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?

As part of the SB18 and AB52 consultation processes required by State law, Riverside County sent notification of the proposed Building D Site project and formerly larger Building E Site project to the following Native American tribes with possible traditional or cultural affiliation to the area: Agua Caliente Band of Cahuilla Indians; San Manuel Band of Mission Indians, Pala Band of Mission Indians, Morongo Band of Mission Indians, Pechanga Band of Luiseño Indians; Rincon Band of Luiseño Indians; and the Soboba Band of Luiseño Indians. The Pechanga Band of Luiseño Indians and the Soboba Band of Luiseño Indians responded and requested consultation. The Pechanga Band of Luiseño Indians asserted in their initial written response that the Project site is located in a culturally sensitive area within the Pechanga's aboriginal territory as evidenced by Payómkawichum (Luiseño) cultural resources in the area. (Pechanga, 2015)

Field visits of the Project site conducted by the County Archaeologist in the presence of the Pechanga Band of Luiseño Indians and the Soboba Band of Luiseño Indians representatives did not reveal any additional cultural resources on the Project site beyond those identified by BFSAs as follows: Site RIV-8401 (a bedrock milling feature) and Site RIV-8402 (four milling slicks on three granitic outcrops) on the Building D Site, and Site RIV-1330/H (three milling features scattered on various exposed bedrock outcrops), Site RIV-8901 (one bedrock milling feature situated on a moderate, east-facing slope) and Site RIV-11,874 (an isolated milling station) on the Building E Site.



BFSA subsequently performed a pollen and residue analysis of bedrock milling features for Site RIV-1330/H, the results of which are contained in Appendix F of *Technical Appendix D2* (BFSA, 2016a, p.5.0-1). Although the results provided environmental information about the plants and animal species that were once present in the area, the analyses did not reveal any information that would indicate that RIV-1330/H or other nearby sites are unique or significant among other similar sites found throughout southern California that had similar environmental conditions. Further data analysis is not warranted, as it would only add similar information to the current body of knowledge which indicates that the archaeological resources present on the Project site do not meet the definition of a significant archaeological resource under CEQA Guidelines § 15064.5. Although the Pechanga Band and Soboba Band of Luiseño Indians consider these features as important links to their ancestors, the Tribes have not provided substantial evidence that the on-site features qualify as significant tribal cultural resources under the law.

According to CEQA Statute § 21074(a), “Tribal cultural resources” are either of the following:

- (1) *Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:*
 - (A) *Included or determined to be eligible for inclusion in the California Register of Historical Resources.*
 - (B) *Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.*

Although the archaeological resources on the Project site have cultural value to Native American tribes, they are not listed in a local register of historical resources or in the California Register of Historic Places. Further, there is no substantial evidence to indicate that the resources are eligible for listing in the California Register. To be eligible for the Register, (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852), the resource must have including the following:

- (A) *Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;*
- (B) *Is associated with the lives of persons important in our past;*
- (C) *Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or*
- (D) *Has yielded, or may be likely to yield, information important in prehistory or history.*



The archaeological resources on the Project site do not meet any of the four criteria listed above to be eligible for the California Register. The Pechanga Tribe opined in communications with the County that the archaeological sites recorded on the property and a larger presumed tribal cultural landscape are eligible under Criteria C and D.

Regarding Criterion C, a resource must embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of an important creative individual, or possesses high artistic values. None of the archaeological sites on the Project site meet this criterion. The resources are comprised of milling features and a historic trash scatter that are not significant or unique when considered in context with other similar sites throughout southern California and the surrounding landscape. Repeated review of the property over the past several years has noted the absence of rock art, although possible rock art was noted at the site in a prior survey. If rock art was ever present at the site, it no longer exists. There is no evidence of “the work of an important creative individual” or “high artistic value” because a pictograph must be present in order to be evaluated, and none are present. Because the pictograph no longer exists, if it ever did, it lacks any form of integrity, and as a result, cannot be evaluated as a significant resource under Criterion C.

Regarding Criterion D, the Pechanga Tribe opined that because the area once contained archaeological resources in addition to those that are currently present, it will offer additional information that could add to the current body of information already available regarding land use, settlement patterns and the prehistoric lifeways of the region’s traditional people. However, the archaeological evidence gathered during the field investigations at the subject property and documented in *Technical Appendices D1 and D2* has provided the substantial evidence from which to conclude that the research potential for each site has been exhausted. Although additional data may be available, that data would not substantially improve or change the understanding of the sites and would only produce data for data’s sake. Additionally, no subsurface cultural resource deposits were identified within the Project site during the archaeological field surveys documented in *Technical Appendices D1 and D2*.

- (2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.*

Section 5024.1 of the Public Resources Code states that a cultural landscape is a TCR if the landscape is geographically defined in terms of the size and scope of the landscape and if it meets the definition of a “tribal cultural resource” as stated in CEQA Section 21074. As stated:

- (b) A cultural landscape that meets the criteria of subdivision (a) [CEQA Statute § 21074(a)] is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.*



(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a) [CEQA Statute § 21074(a)].

As noted above, the TCR must meet the eligibility criteria for the California Register of Historic Resources, which the Project site and resources on the Project site do not. Further, the size and scope of a potential cultural landscape that includes the Project site not been defined by the Tribe or any other entity. Thus, there is no substantial evidence to indicate that the Project site is a TCR.

Implementation of the proposed Project would directly impact Site RIV-8401 and Site RIV-8402 on the Building D Site and Site RIV-11,874 on the Building E Site, and a portion of Site RIV-1330/H and a portion of Site RIV-8901 on the Building E Site. The Project Applicant has also agreed to attempt to move some of the milling features within the Project’s impact footprint into proposed landscaped areas on the Building D Site and Building E Site as discussed in Subsection 4.5, *Cultural Resources*. The physical feasibility of moving the rocks that contain these features has been evaluated by the Riverside County Geologist, and mapping of the features that may be possible to move without damage has been provided to the Tribes. Because there is a lack of substantial evidence of a TCR being located on the property, impacts to tribal cultural resources would be less than significant.

4.18.5 CUMULATIVE IMPACT ANALYSIS

This cumulative impact analysis considers development of the Project site in conjunction with other development projects in the vicinity of the Project site resulting from full General Plan buildout in the parts of the Riverside County General Plan covered by the Harvest Valley/Winchester Area Plan (HVWAP), the Lakeview/Nuevo Area Plan (LNAP), and the Mead Valley Area Plan (MVAP), in addition to the City of Moreno Valley, the City of Perris, and the City of Riverside. An archaeological resources search conducted by BFSa reported that 63 prehistoric resources (all bedrock milling sites) are located within a one-mile radius of the Building D Site and the formerly larger Building E Site.

The proposed Project would directly impact Site RIV-8401 and Site RIV-8402RIV on the Building D Site and Site RIV-11,874 on the Building E Site, and a portion of Site RIV-1330/H and a portion of Site RIV-8901 on the Building E Site. The Project Applicant has offered to attempt the relocation of several milling sites into landscaped areas on Building D Site and Building E Site as discussed in Subsection 4.5, *Cultural Resources*. Notwithstanding the fact that the on-site archaeological sites are found to be not unique and not significant under CEQA (refer to Subsection 4.5, *Cultural Resources*), the Native American tribal groups from this area consider these features as important links to their ancestors. As part of the SB18 and AB52 consultation processes, the County of Riverside received information from the Pechanga Band of Luiseño Indians asserting that the Project area is part of a tribal cultural landscape extending several miles around the Project site and consisting of related archaeological sites associated with either the village of Qazáalku or a smaller (unnamed) village. The Tribe cited Tribal knowledge, oral history, internal Tribe records, ethnological documentation, and the archaeological research conducted for the Building D Site and formerly larger Building E Site by BFSa



as the basis of this assertion, although a large majority of the documentation submitted by the Pechanga Tribe to Riverside County contained a summary of Tribal knowledge and oral tradition, supported by limited scientific analysis and ethnographic data. (Pechanga, 2015; Pechanga, 2016) While it is acknowledged that the archaeological resources identified on the Project site are part of Luiseño settlement and subsistence history, the substantial evidence that is required by CEQA to distinguish the Project site or the presumed larger cultural landscape as unique or significant among the many other lands inhabited by Native Americans across California and North America has not been provided. In AB 52 consultation communications with Riverside County, the Tribe refers to a tribal cultural landscape generally, but does not provide geographic definition as to the scope and boundaries of the landscape. Therefore, an analysis of cumulative effects on a geographically undefined landscape is speculative. Based upon a simple aerial photographic review of the Project site and the properties surrounding the Project site for several miles, any possible cultural landscape (the scale of which is undefined by the Pechanga Tribe) would lack integrity under existing conditions. This is evident based upon the amount of development, general environmental change, agriculture, and historic settlement that has occurred in and surrounding the Project site for the last 150 years. Integrity is a property's historic/prehistoric identity evidenced by the survival of physical characteristics from the property's historic or prehistoric period. The seven qualities of integrity are: location, setting, feeling, association, design, workmanship, and materials. Together, evaluations of significance and integrity, when combined with historic research, documentation of existing conditions, and analysis findings, influence later treatment and interpretation decisions. AB 52, Section 21084.3(2A) states that integrity is of high importance when considering TCRs and their protection under CEQA. If the resources within the Project site, or on adjacent properties, do not meet the threshold for integrity, then the conclusion that an area is a cultural landscape that qualifies as a TCR cannot be made.

Further, a possible cultural landscape is not necessarily a TCR as defined under AB 52. AB 52 does not provide that all cultural landscapes qualify as TCRs unless the landscape meets the definition given in Public Resources Code § 21074(b). The preponderance of factual evidence available to Riverside County indicates that the resources present on the Project site do not meet the minimum thresholds under Public Resources Code § 21074(b) to qualify as a cultural landscape or TCR. Considering the fact that a cultural landscape and TCR are not present based on the definitions given in Public Resources Code § 21074(b), development of the Project as proposed, when considered in context with other cumulative development in the area, would have a less than cumulatively considerable impact on the cultural landscape.

Finally, due to mandatory compliance required of all ground-disturbing construction activities with the provisions of California Health and Safety Code § 7050.5 as well as Public Resources Code § 5097 et. seq., human remains would be assured proper treatment if encountered. Because all other development projects within the region similarly would be required to comply with State law, any cumulative impact associated with human remains discovery would be reduced to below a level of significance.

4.18.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION



Threshold (a) for the Building D Site and Building E Site: No Impact. The Project has no potential to restrict a religious or sacred use.

Threshold (b) for the Building D Site and Building E Site: Less-than-Significant Impact. Tribal cultural resources as defined in Public Resources Code 21074 are not present on the Project site and impacts would be less than significant.

4.18.7 MITIGATION

Impacts would be less than significant; therefore, mitigation is not required.



5.0 OTHER CEQA CONSIDERATIONS

5.1 SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

The CEQA Guidelines require that an EIR disclose the significant environmental effects of a project which cannot be avoided if the proposed project is implemented (CEQA Guidelines § 15126(b)). As described in detail in Section 4.0, *Environmental Analysis*, of this EIR, the proposed Project is anticipated to result in impacts to the environment that cannot be reduced to below a level of significance after implementation of relevant standard conditions of approval, compliance with applicable regulations, and application of feasible mitigation measures. The significant impacts that cannot be mitigated to a level below significant consist of the following:

- Air Quality - Significant and Unavoidable Direct and Cumulatively Considerable Impact. There are no feasible mitigation measures to eliminate or offset the Project's inconsistency with SCAQMD's 2012 AQMP due to exceedance of SCAQMD daily emissions thresholds.
- Air Quality - Significant and Unavoidable Direct and Cumulatively Considerable Impact. Even after the application of feasible mitigation measures, the Project's VOCs and NO_x daily operational emissions would exceed the SCAQMD's significance thresholds. Emissions of NO_x are primarily a result of mobile source emissions (i.e., vehicles traveling to and from the Project site), which are regulated by state and federal emissions and fuel use standards, and beyond the direct control of the Project Applicant and/or future users of the Project site's buildings.
- Land Use and Planning – Significant and Unavoidable Direct and Cumulatively Considerable Impact. The Project would develop the subject property with two business park warehouse buildings and associated site improvements, including, but not limited to, surface parking areas, vehicle drive aisles, truck courts, utility infrastructure, landscaping, exterior lighting, signage, walls and fencing, and water quality/detention basins. The changes to the Project site represent a substantial alteration to the site's present land use, construction and operation of which would result in significant effects to the environment that cannot be reduced to less-than-significant levels through the application of feasible mitigation.
- Noise (Traffic Related) – Significant and Unavoidable Direct Impact. No feasible mitigation measures are available to reduce the Project's transportation-related noise impacts along the Oleander Avenue segments west of Harvill Avenue and east of the Project's Driveway #6 under Existing + Project and Project Opening Year 2017 conditions. Although noise levels along the affected segments of Oleander Avenue would not exceed the County's 65 dBA CNEL standard for noise-sensitive uses, the Project's contribution to existing noise levels would represent a substantial noise increase over existing conditions, and residential structures would be affected. The affected residential parcels are non-conforming and designated by the Riverside County



General Plan for “Business Park” land uses. By the Year 2035, the Project’s contribution of transportation-related noise along the above-listed segments of Oleander Avenue would be reduced to less than significant levels, because as ambient traffic volumes increase on the road, the Project’s overall percentage of the noise contribution would diminish. Although the Project’s impact would be significant and unavoidable, the impact in Year 2035 would be less than significant.

- Transportation (Local Roadway System) - Significant and Unavoidable Cumulatively Considerable Impact. The Project Applicant would pay development impact fees and participate in fair share funding programs to mitigate the Project’s direct and cumulative impacts to the local roadway network. However, several of the needed transportation improvements are either funded by existing mitigation funding programs (including TUMF) with no timetable for construction (meaning the necessary improvements may not be in place when the Project becomes operational and starts to contribute traffic to the facilities), or the improvements are not included in any existing mitigation funding program (therefore, there is no mechanism currently available for development projects to contribute toward the construction of needed improvements, and thus no assurance that the improvements would be implemented). Accordingly, the Project’s cumulatively considerable impacts to four (4) intersections in the Existing + Ambient Growth + Project + Cumulative (E+A+P+C) analysis scenario are concluded to be unavoidable. The affected intersections are: 1) Decker Road / Oleander Avenue; 2) Harvill Avenue / Harley Knox Boulevard; 3) I-215 Southbound Ramps / Harley Knox Boulevard; and 4) I-215 Northbound Ramps / Harley Knox Boulevard.
- Transportation (State Highway System) – Significant and Unavoidable Cumulatively Considerable Impact. The Project would contribute traffic to the state highway system, which is under the jurisdiction of Caltrans. As such, the County of Riverside cannot assure the construction of improvements to state highway facilities. Furthermore, Caltrans does not have funding mechanism in place to allow development projects to contribute fair-share payments. Although a mitigation measure is recommended that requires the Project Applicant to offer fair share fee contributions to Caltrans to fund improvements to state highway system facilities that the Project’s traffic would impact, there is no assurance that Caltrans will develop a fee program and implement the improvements prior to the time that the Project begins to contribute traffic to the facilities. Accordingly, the Project’s contribution of traffic to the state highway system facilities under E+A+P+C and/or Horizon Year (2035) conditions is concluded to be a significant and unavoidable cumulative impact.

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES WHICH COULD BE CAUSED BY THE PROPOSED PROJECT SHOULD IT BE IMPLEMENTED

The CEQA Guidelines require EIRs to address any significant irreversible environmental changes that would be involved in the proposed action should it be implemented (CEQA Guidelines §15126.2(c)). An environmental change would fall into this category if: a) the project would involve a large



commitment of non-renewable resources; b) the primary and secondary impacts of the project would generally commit future generations to similar uses; c) the project involves uses in which irreversible damage could result from any potential environmental accidents; or d) the proposed consumption of resources are not justified (e.g., the project results in the wasteful use of energy).

Determining whether the proposed Project may result in significant irreversible environmental changes requires a determination of whether key non-renewable resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. Natural resources, in the form of construction materials and energy resources, would be used in the construction of the proposed Project. The consumption of these natural resources would represent is an irreversible change to the environment. However, development of the Project site as proposed would have no measurable adverse effect on the availability of such resources, including resources that may be non-renewable (e.g., fossil fuels). Additionally, the Project is required by law to comply with the California Building Standards Code (CALGreen), which will minimize the Project's demand for energy, including energy produced from non-renewable sources. A more detailed discussion of energy consumption is provided below in Subsection 5.4.

Implementation of the Project would commit future generations to two large business park warehouse buildings on the Project site. As demonstrated in the analysis presented throughout EIR Section 4.0, construction and long-term operation of the proposed Project would be compatible with existing and planned future land uses that surround the Project site and would not result in significant physical environmental effects to nearby properties. Although the Project would cause unavoidable impacts to the environment associated with air quality, land use and planning, noise, and traffic as summarized above in Subsection 5.1, these effects would not commit surrounding properties to land uses other than those that are present under existing conditions or planned by the County of Riverside General Plan. For this reason, the Project would not result on a significant, irreversible change to nearby, off-site properties.

EIR Subsection 4.8, *Hazards and Hazardous Materials*, provides an analysis of the proposed Project's potential to transport or handle hazardous materials which, if released into the environment, could result in irreversible damage to the environment. As concluded in the analysis, compliance with federal, state, and local regulations related to hazardous materials would be required of all contractors working on the property during the Project's construction and of all users that occupy the Project's buildings. As such, construction and long-term operation of the proposed Project would not have the potential to cause significant irreversible damage to the environment, including damage that may result from upset or accident conditions.

As discussed under Subsection 5.4, the Project would not result in a wasteful consumption of energy. Accordingly, the Project would not result in a significant, irreversible change to the environment related to energy use.



5.3 GROWTH-INDUCING IMPACTS OF THE PROPOSED PROJECT

CEQA requires a discussion of the ways in which the proposed Project could be growth inducing. The CEQA Guidelines identify a project as growth inducing if it would foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment (CEQA Guidelines §15126.2(d)). New employees and new residential populations represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area.

Because users of the Project's buildings are not yet known, the number of jobs that the Project would generate cannot be precisely determined; therefore, for purposes of analysis, employment estimates were calculated using data and average employment density factors utilized in the County of Riverside General Plan. The General Plan estimated that light industrial business would employ one (1) worker for every 1,030 s.f. of building area. Based on this employment generation rate, the Project is expected to create approximately 1,081 new recurring jobs (1,113,627 s.f. ÷ 1,030). (Riverside County, 2003a, Appendix E) The proposed Project also would create short-term construction-related jobs. It is expected that the majority of the construction-related employees would be drawn from the existing labor force that would be available in the County of Riverside, as the County has a shortage of jobs. The overall jobs-to-housing ratio in the County is 1.07 jobs per household; however, this number is skewed by the number of jobs within the incorporated areas of the County. In unincorporated areas of western Riverside County, like the Project area, there is only 0.66 jobs per household, which represents a severe shortage of jobs. SCAG considers a jobs-to-housing ratio between 1.0 and 1.29 to be balanced. (Riverside County, 2015c, p. H-57)

A project could indirectly induce growth at the local level by increasing the demand for additional goods and services associated with an increase in population or employment and thus reducing or removing the barriers to growth. This typically occurs in suburban or rural environs where population growth results in increased demand for service and commodity markets responding to the new population of residents or employees. Economic growth would likely take place as a result of the proposed Project's operation as two business park warehouse buildings. The Project's construction-related and operational-related employees would purchase goods and services in the region, but any secondary increase in employment associated with meeting these goods and services needs is expected to be marginal, accommodated by existing goods and service providers, and highly unlikely to result in any new physical impacts to the environment based on the amount of available commercial and retail services available in areas near the Project site, including the Cities of Perris, Moreno Valley, and Riverside. In addition, the Project would create jobs which likely would serve the housing units either already built or planned for development within Riverside County, based on the severe shortage of jobs per household in western Riverside County (as noted above). Accordingly, the on-site employment generation would not induce substantial growth in the area because it is anticipated that the Project's future employees would already be living in the Riverside County area.



Under CEQA, growth inducement is not considered necessarily detrimental, beneficial, or of little significance to the environment. Typically, growth-inducing potential of a project would be considered significant if: 1) development fosters growth or a concentration of population in excess of what is assumed in pertinent master plans, land use plans, or in projections made by regional planning agencies such as SCAG; or 2) if a project provides infrastructure or service capacity to accommodate growth beyond the levels currently permitted by local or regional plans and policies. In general, growth induced by a project is considered a significant impact if it can be demonstrated that the potential growth significantly affects the environment in some other way.

Related to the first item in the paragraph above, the land uses proposed by the Project would differ substantially than the land uses that are permitted on the Project site under existing conditions and, in fact, the Project would develop the Project site at a lower intensity than what is permitted on the Project site under existing conditions. Therefore, the Project would not foster growth or a concentration of population in excess of what is assumed on local and regional planning documents. Related to the second item in the paragraph above, the Project would install new public infrastructure improvements, including roads, drainage infrastructure, and other utility improvements; however, these infrastructure improvements are sized to primarily serve the Project and to provide a future connection point for land uses planned by the Riverside County General Plan. There are no development proposals in the immediate Project vicinity that would utilize the same infrastructure as the Project; therefore, it is speculative to conclude whether or not the Project's installation of new infrastructure would induce substantial, unanticipated growth. Based on the foregoing, the Project is not expected to directly or indirectly induce growth in the local area.

5.4 ENERGY CONSERVATION

This Subsection is based in part on a technical report prepared by Urban Crossroads, Inc. titled, "Knox Business Park Energy Analysis, County of Riverside," dated January 28, 2016 and appended to this EIR as *Technical Appendix L*. (Urban Crossroads, Inc., 2016d) Please note that *Technical Appendix B1* and *Technical Appendix L* was prepared prior to the Project Applicant's decision to reduce the size of the Building E Site and the size of its proposed building to the current configurations described in EIR Section 3.0, *Project Description*. Therefore, the energy use calculations presented herein for Building E and the overall Project site overstate the amount of energy that the Project will consume. Based on the currently-proposed size of Building E, the Project's overall traffic generation (and thus fuel use) would be reduced by approximately 12% that disclosed in *Technical Appendix L*.

Federal and state agencies regulate energy use and consumption through various means and programs. On the federal level, the United States Department of Transportation (DOT), the United States Department of Energy (DOE), and the United States Environmental Protection Agency (EPA) are three federal agencies with substantial influence over energy policies and programs. On the state level, the Public Utilities Commission (PUC) and the California Energy Commissions (CEC) are two agencies with authority over different aspects of energy. Relevant federal and state energy-related laws and



plans are summarized below. Project consistency with applicable federal and state regulations is presented below each regulation.

5.4.1 APPLICABLE FEDERAL AND STATE POLICIES AND REQUIREMENTS

A. Federal Regulations

1. *Intermodal Surface Transportation Efficiency*

The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) promoted the development of inter-modal transportation systems to maximize mobility as well as address national and local interests in air quality and energy. ISTEA contained factors that Metropolitan Planning Organizations (MPOs) were to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values guiding transportation decisions. (Urban Crossroads, Inc., 2016d, p. 13)

Project Consistency: Transportation and access to the Project site is provided primarily by the local and regional roadway systems. The Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be realized pursuant to ISTEA because SCAG is not planning for intermodal facilities on or through the Building D Site or the Building E Site. (Urban Crossroads, Inc., 2016d, p. 13)

2. *Transportation Equity Act for the 21st Century (TEA-21)*

The Transportation Equity Act for the 21st Century (TEA-21) was signed into law in 1998 and builds upon the initiatives established in the ISTEA legislation, discussed above. TEA-21 authorizes highway, highway safety, transit, and other efficient surface transportation programs. TEA-21 continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of wise transportation decisions. TEA-21 also provides for investment in research and its application to maximize the performance of the transportation system through, for example, deployment of Intelligent Transportation Systems, to help improve operations and management of transportation systems and vehicle safety. (Urban Crossroads, Inc., 2016d, p. 13)

Project Consistency: The Project site is located near major transportation corridors with proximate access to the interstate freeway system. The site selected for the Project facilitates access, acts to reduce vehicle miles traveled, takes advantage of existing infrastructure systems, and promotes land use compatibilities through collocation of similar uses. The Project supports the strong planning process through TEA-21. The Project is therefore consistent with, and would not otherwise interfere with, nor obstruct implementation of TEA-21. (Urban Crossroads, Inc., 2016d, p. 13)



B. California Regulations

1. Integrated Energy Policy Report

Senate Bill 1389 (Bowen, Chapter 568, Statutes of 2002) requires the California Energy Commission (CEC) to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing California's electricity, natural gas, and transportation fuel sectors and provides policy recommendations. The 2014 Integrated Energy Policy Report Update (2014 IEPR Update), focuses on next steps for transforming transportation energy use in California. The 2014 IEPR Update addresses the role of transportation in meeting state climate, air quality, and energy goals; the Alternative and Renewable Fuel and Vehicle Technology Program; current and potential funding mechanisms to advance transportation policy; the status of statewide plug-in electric vehicle infrastructure; challenges and opportunities for electric vehicle infrastructure deployment; measuring success and defining metrics within the Alternative and Renewable Fuel and Vehicle Technology Program; market transformation benefits resulting from Alternative and Renewable Fuel and Vehicle Technology Program investments; the state of hydrogen, zero-emission vehicle, biofuels, and natural gas technologies over the next ten years; transportation linkages with natural gas infrastructure; evaluation of methane emissions from the natural gas system and implications for the transportation system; changing trends in California's sources of crude oil; the increasing use of crude-by-rail in California; the integration of environmental information in renewable energy planning processes; an update on electricity reliability planning for Southern California energy infrastructure; and an update to the electricity demand forecast. (Urban Crossroads, Inc., 2016d, pp. 14-15)

Project Consistency: 2014 IEPR Update is a State Policy report. An individual development project such as the proposed Project has no ability to comply with or conflict with this report.

2. State of California Energy Plan

The CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The Plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators and encouragement of urban designs that reduce vehicle miles traveled and accommodate pedestrian and bicycle access. (Urban Crossroads, Inc., 2016d, p. 15)

Project Consistency: The Project site is located along major transportation corridors with proximate access to the Interstate freeway system. The site selected for the Project facilitates access, acts to reduce vehicle miles traveled, takes advantage of existing infrastructure systems, and promotes land use compatibilities through the development of business park warehouse buildings in the Mead Valley community. The Project therefore supports urban design and planning processes identified under the State of California Energy Plan, is consistent with, and would not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan. (Urban Crossroads, Inc., 2016d, p. 15)



3. California Code Title 24, Part 6, Energy Efficiency Standards

California Code Title 24, Part 6 (also referred to as the California Energy Code), was promulgated by the CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption. To these ends, the California Energy Code provides energy efficiency standards for residential and nonresidential buildings. California's building efficiency standards are updated on an approximately three-year cycle. The 2013 Standards for building construction, which went into effect on July 1, 2014, improved upon the former 2008 Standards for residential and nonresidential buildings. (Urban Crossroads, Inc., 2016d, pp. 15-16)

Project Consistency: The Project is required by State law to be designed, constructed, and operated to meet or exceed Title 24 Energy Efficiency Standards. On this basis, the Project is determined to be consistent with, and would not interfere with, nor otherwise obstruct implementation of Title 24 Energy Efficiency Standards. (Urban Crossroads, Inc., 2016d, pp. 15-16)

4. California Renewable Portfolio Standards (SB 1078)

SB 1078 requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to 20 percent by 2010 and 33 percent by 2020.

Project Consistency: Energy directly or indirectly supplied to the Project by electric corporations is required by law to comply with SB 1078.

5.4.2 ENERGY CONSUMPTION ANALYSIS

In compliance with CEQA Guidelines Appendix F, below is an analysis of the proposed Project's anticipated energy use to determine if the Project would result in the wasteful, inefficient or unnecessary consumption of energy, or result in a substantial increase in demand or transmission service, resulting in the need for new or expanded sources of energy supply or new or expanded energy delivery systems or infrastructure.

In addition, CEQA Guidelines Appendix F states that the means of achieving the goal of energy conservation includes the following:

- Decreasing overall per capita energy consumption;
- Decreasing reliance on fossil fuels such as coal, natural gas and oil; and
- Increasing reliance on renewable energy sources.

A. Methodology

Information from the CalEEMod 2013.2.2 outputs for the Project's Air Quality Impact Analysis (*Technical Appendix B1*) was utilized in the Project's Energy Analysis (*Technical Appendix L*) and the analysis presented herein, detailing Project-related construction equipment, transportation energy



demands, and facility energy demands. These outputs are referenced in Appendix 3.1 of *Technical Appendix L*. (Urban Crossroads, Inc., 2016d, p. 17)

B. Construction Equipment Electricity Usage

Based on the *2015 National Constructor Estimator*, the typical power cost per 1,000 s.f. of building construction per month is estimated to be \$2.28. The Project plans to develop approximately 1,259,050 s.f. of building space over the course of 19 months. Based on these numbers, the total power cost of on-site electricity usage during the construction of the proposed Project is estimated to be approximately 54,542.05. As of February 2015, SCE's general service rate for an industrial land use is \$.07 per kilowatt hours (kWh) of electricity. Accordingly, the total electricity usage from on-site Project construction-related activities is calculated by Urban Crossroads, Inc. to be approximately 779,172 kWh. (Urban Crossroads, Inc., 2016d, p. 17)

C. Energy and Fuel Use for Project Construction

The Project's construction process would consume electrical energy and fuel. Project construction would represent a "single-event" electric energy and fuel demand and would not require on-going or permanent commitment of energy or diesel fuel resources for this purpose. In summary, the Project's construction process is estimated to consume approximately 779,172 kWh of electricity and an estimated 153,293 gallons of diesel fuel (see detailed discussion below). (Urban Crossroads, Inc., 2016d, p. 25)

Diesel fuel would be supplied by county and regional commercial vendors. Indirectly, construction energy efficiencies and energy conservation would be achieved through the use of bulk purchases, transport, and use of construction materials. The 2014 IEPR published by the CEC shows that fuel efficiencies are improving for on and off-road vehicle engines due to more stringent government requirements. This amount of energy and fuel use anticipated by the Project's construction activities are typical for the type of construction proposed because there are no aspects of the Project's proposed construction process that are unusual or energy-intensive, and Project construction equipment would conform to the applicable CARB emissions standards, acting to promote equipment fuel efficiencies. CCR Title 13, Title 13, Motor Vehicles, Section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Applicable Mitigation Measures contained in EIR Section 4.3, *Air Quality* will inform construction equipment operators of this requirement. Enforcement of idling limitations is realized through periodic site inspections conducted by County building officials, and/or in response to citizen complaints. As supported by the preceding discussions, Project construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. (Urban Crossroads, Inc., 2016d, p. 25)

1. Construction Equipment Fuel Use

Fuel consumed by construction equipment would be the primary energy resource expended over the course of Project construction. The aggregate fuel consumption rate for all equipment is estimated at



18.5 horsepower hours per gallon (hp-hr-gal.), obtained from CARB 2013 Emissions Factors Tables and cited fuel consumption rate factors presented in Table D-24 of the Moyer guidelines. For the purposes of the Energy Analysis (*Technical Appendix L*) and the analysis presented herein, the calculations are based on all construction equipment being diesel-powered which is standard practice consistent with industry standards. Diesel fuel would be supplied by existing commercial fuel providers serving Riverside County and the region. Project construction activities would consume an estimated 153,293 gallons of diesel fuel. Project construction would represent a “single-event” diesel fuel demand and would not require ongoing or permanent commitment of diesel fuel resources for this purpose. (Urban Crossroads, Inc., 2016d, p. 18/)

2. Construction Worker Fuel Use

Urban Crossroads, Inc. applied a reasonable assumption in their Energy Analysis (*Technical Appendix L*) that all construction worker trips to and from the Project site would be in light duty autos (LDA) along area roadways. With respect to estimated vehicle miles traveled (VMT), the construction worker trips would generate an estimated 3,170,496 VMT based on an average 14.7 mile average trip length and the number of construction days reported in EIR Section 3.0, *Project Description*. (Urban Crossroads, Inc., 2016d, p. 20)

As generated by EMFAC 2014, an aggregated fuel economy of LDAs ranging from model year 1974 to model year 2017 have a fuel efficiency of 26.27 miles per gallon (MPG). Urban Crossroads, Inc. calculated that 120,605 gallons of fuel would be consumed related to construction worker trips for the proposed Project. Project construction worker trips would represent a “single-event” gasoline fuel demand and would not require on-going or permanent commitment of fuel resources for this purpose. (Urban Crossroads, Inc., 2016d, p. 20) Refer to Table 4-4 of *Technical Appendix L* for the construction worker fuel consumption calculations.

3. Construction Vendor Fuel Use

With respect to estimated VMT, the Project’s construction vendor trips would generate an estimated 319,815 VMT along area roadways based on a 6.9-mile average trip length and the number of construction days reported in EIR Section 3.0, *Project Description*. In their analysis, Urban Crossroads, Inc. applied a reasonable assumption that 50% of all vendor trips would be from medium-heavy duty trucks (MHD) and 50% would be from heavy-heavy duty trucks (HHD). These assumptions are consistent with the 2013.2.2 CalEEMod defaults utilized within the Project’s Air Quality Impact Analysis (*Technical Appendix B1*). Vehicle fuel efficiencies for MHD and HHD trucks were based on information generated within EMFAC 2014. For purposes of the Energy Analysis (*Technical Appendix L*) and herein, EMFAC 2014 was run for the MHD and HHD vehicle class within the California sub-area for a 2017 calendar year (consistent with the opening year of the Project). As generated by EMFAC 2014, an aggregated fuel economy of MHD trucks ranging from model year 1974 to model year 2017 are calculated to have a fuel efficiency of 8.13 MPG. Additionally, HHD trucks are estimated to have a fuel efficiency of 5.70 MPG. Data from EMFAC 2014 is shown in Appendix 3.2 of *Technical Appendix L*. (Urban Crossroads, Inc., 2016d, p. 21)



Fuel consumption from construction vendor trips (medium and heavy-duty trucks) would total approximately 47,723 gallons. Project construction vendor trips would represent a “single-event” diesel fuel demand and would not require on-going or permanent commitment of diesel fuel resources for this purpose. (Urban Crossroads, Inc., 2016d, p. 22) Refer to Table 4-5 and 4-6 of *Technical Appendix L* for the construction vendor fuel consumption calculations.

D. Energy Use for Project Operation

1. Transportation Energy Demands

Energy that would be consumed by Project-generated traffic is a function of total VMT and estimated vehicle fuel economies of vehicles accessing the Project site. As summarized in Table 5-1, *Project-Generated Traffic Fuel Consumption (All Vehicles)*, Urban Crossroads, Inc. calculates that the Project would result in 24,064,351 annual VMT and an estimated annual fuel consumption of 2,696,114 gallons of fuel. (Urban Crossroads, Inc., 2016d, p. 28 and Table 4-11)

Table 5-1 Project-Generated Traffic Fuel Consumption (All Vehicles)

| Vehicle Type | Annual Miles Traveled | Estimated Annual Fuel Consumption (gallons) |
|-----------------------------|------------------------------|--|
| Light Duty Autos | 7,379,362 | 280,905 |
| LHD Trucks | 3,675,703 | 287,389 |
| MHD Trucks | 2,946,569 | 362,432 |
| HHD Trucks | 10,062,717 | 1,765,389 |
| Total (All Vehicles) | 24,064,351 | 2,696,114 |

(Urban Crossroads, Inc., 2016d, Table 4-11)

Fuel would be provided by commercial vendors. Trip generation and VMT generated by the Project are consistent with other warehouse uses of similar scale and configuration, as reflected in the Institute of Transportation Engineers (ITE) Trip Generation Manual (9th Ed., 2012); and CalEEMod v2013.2.2. That is, the Project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips and VMT, nor associated excess and wasteful vehicle energy consumption. (Urban Crossroads, Inc., 2016d, p. 30)

Enhanced fuel economies realized pursuant to federal and state regulatory actions, and related transition of LDVs and HDVs to alternative energy sources (e.g., electricity, natural gas, bio fuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT. Location of the Project proximate to regional and local roadway systems tends to reduce VMT within the region, acting to reduce regional vehicle energy demands. The Project also would implement sidewalks that would facilitate and encourage pedestrian access and subsequently reduce VMT and associated energy consumption. As supported by the preceding discussions, Project transportation energy consumption



would not be considered inefficient, wasteful, or otherwise unnecessary. (Urban Crossroads, Inc., 2016d, p. 30)

Also, depending on the nature of the building occupants' operating characteristics, VMT may actually be reduced as a result of the Project site being located closer to origins and destinations for the building occupant's goods and services. For example, QVC reported in 2015 that its occupancy of a building in the Inland Empire is projected to reduce the company's national trucking VMT by more than 10 million miles annually. (PR Newswire, 2015)

2. Facility Energy Demands

Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building such as in plug-in appliances. In California, the California Building Standards Code Title 24 governs energy consumed by the built environment, mechanical systems, and some types of fixed lighting. Non-building energy use or "plug-in" energy use can be further subdivided by specific end-use (refrigeration, cooking, appliances, etc.). (Urban Crossroads, Inc., 2016d, p. 28)

Project building operations and Project site maintenance activities would result in the consumption of natural gas and electricity. As part of the Project's design, all on-site outdoor cargo handling equipment (CHE) (including yard trucks, hostlers, yard goats, pallet jacks, forklifts, and other on-site equipment) would be powered by diesel-fueled engines that comply with the CARB/USEPA Tier IV Engine standards for off-road vehicles or better (defined as 0.015 g/bhp-hr. for PM₁₀) or better and all on-site indoor forklifts would be powered by electricity, compressed natural gas, or propane. (Urban Crossroads, Inc., 2016d, p. 1)

Natural gas would be supplied to the Project by The Gas Company and electricity would be supplied to the Project by Southern California Edison (SCE). Annual natural gas and electricity demands of the Project are summarized in Table 5-2, *Project Annual Operational Energy Demand Summary*. As shown in Table 5-2, Project facility operational energy demands are estimated at 2,142,900 kBtu/year of natural gas and 4,381,622 kWh/year of electricity. (Urban Crossroads, Inc., 2016d, p. 30 and Table 4-12)

Energy efficiency/energy conservation attributes of the Project would be complemented by increasingly stringent state and federal regulatory actions addressing vehicle fuel economies and vehicle emissions standards; and enhanced building/utilities energy efficiencies mandated under California building codes (e.g., Title 24, California Green Building Code). In this latter regard, pursuant to the County of Riverside's Screening Table for Greenhouse Gas Implementation Measures, several project design features would be implemented that reduce energy associated with the building envelope, indoor space efficiencies, irrigation and landscaping, potable water use,



Table 5-2 Project Annual Operational Energy Demand Summary

| Natural Gas Demand | kBTU/year |
|---|----------------------------|
| Parking Lot | 0 |
| Unrefrigerated Warehouse | 2,142,900 |
| Total Project Natural Gas Demand | 2,142,900 kBTU/year |

| Electricity Demand | kWh/year |
|---|---------------------------|
| Parking Lot | 727,232 |
| Unrefrigerated Warehouse | 3,654,390 |
| Total Project Electricity Demand | 4,381,622 kWh/year |

(Urban Crossroads, Inc., 2016d, Table 4-12)

employment and trip reductions beyond existing requirements. A summary of the measures that would be incorporated into the project design are summarized in Table 4-13 of the Project's Energy Analysis (*Technical Appendix L*). (Urban Crossroads, Inc., 2016d, p. 28)

The Project proposes conventional warehouse uses reflecting contemporary energy efficient/energy conserving designs and operational programs. Uses proposed by the Project are not inherently energy intensive, and the Project energy demands in total would be comparable to, or less than, other warehouse projects of similar scale and configuration. Based on the preceding, Project facilities energy demands and energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. (Urban Crossroads, Inc., 2016d, p. 30)

E. Energy Consumption Summary

Project design features, mandatory compliance with CALGreen, and the implementation of the mitigation measures contained in the site-specific Air Quality Impact Analysis (*Technical Appendix B1*), Mobile Source Diesel Health Risk Assessment (*Technical Appendix B2*), and the Greenhouse Gas Analysis (*Technical Appendix F*), demonstrate evidence of the Project's efficient use of energy. The Project would provide for, and promote, energy efficiencies beyond those required under other applicable federal or State of California standards and regulations; therefore, the Project would meet or exceed all CALGreen regulations. Moreover, energy consumed by the Project is calculated by Urban Crossroads, Inc. to be comparable to, or less than, energy consumed by other warehouse uses of similar scale and intensity than are currently constructed and operating in California. On this basis, the Project would not result in the inefficient, wasteful, or unnecessary consumption of energy. Furthermore, the Project would not cause or result in the need for additional energy facilities or energy delivery systems. (Urban Crossroads, Inc., 2016d, pp. 1-2)

As supported by the preceding analyses, Project construction and operations would not result in the inefficient, wasteful or unnecessary consumption of energy. Further, the energy demands of the Project



can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in the wasteful or inefficient uses of energy and the Project aims to achieve energy conservation goals within the State of California. Thus, the Project would not have any long-term effects on an energy providers' future energy development or energy conservation strategies. (Urban Crossroads, Inc., 2016d, p. 31)

5.5 EFFECTS FOUND NOT TO BE SIGNIFICANT AS PART OF THE INITIAL STUDY PROCESS

CEQA Guidelines § 15128 requires that an EIR:

“...contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR.”

An Initial Study was prepared for the proposed Project, which is included as *Technical Appendix A* to this EIR. Through the Initial Study process, the County of Riverside determined that the proposed Project could potentially cause adverse effects, and an EIR is required. One (1) environmental subject was determined by the County to have no potential to be significantly impacted by the Project, as concluded by the Project's Initial Study. Therefore, this issue area is not required to be discussed in Section 4.0, *Environmental Analysis*, of this EIR. A brief summary of the one (1) issue found not to be significant is presented below, with a more detailed analysis provided in the Project's Initial Study contained in *Technical Appendix A*.

A. Mineral Resources

The proposed Project is not located within an area known to be underlain by regionally-or locally important mineral resources or within an area that has the potential to be underlain by regionally or locally important mineral resources, as disclosed by the Riverside County General Plan. Accordingly, implementation of the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State of California. Accordingly, impacts to the environmental issue of Mineral Resources would not occur.



6.0 ALTERNATIVES TO THE PROPOSED PROJECT

CEQA Guidelines §15126.6(a) describes the scope of analysis that is required when evaluating alternatives to proposed projects, as follows:

“An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selection of a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.”

As discussed in Section 4.0, *Environmental Analysis*, the proposed Project would result in significant adverse environmental effects that cannot be mitigated to below levels of significance after the implementation of Project design features, mandatory regulatory requirements, and feasible mitigation measures. The unavoidable significant impacts are:

- Air Quality - Significant and Unavoidable Direct and Cumulatively Considerable Impact. There are no feasible mitigation measures to eliminate or offset the Project’s inconsistency with SCAQMD’s 2012 AQMP due to exceedance of the SCAQMD emissions thresholds.
- Air Quality - Significant and Unavoidable Direct and Cumulatively Considerable Impact. Even after the application of feasible mitigation measures, the Project’s VOCs and NO_x daily operational emissions would exceed the SCAQMD’s significance thresholds. Emissions of NO_x are primarily a result of mobile source emissions (i.e., vehicles traveling to and from the Project site), which are regulated by state and federal emissions and fuel use standards, and beyond the direct control of the Project Applicant and/or future users of the Project site’s buildings.
- Land Use and Planning – Significant and Unavoidable Direct and Cumulatively Considerable Impact. The Project would develop the subject property with two business park warehouse buildings and associated site improvements, including, but not limited to, surface parking areas, vehicle drive aisles, truck courts, utility infrastructure, landscaping, exterior lighting, signage, walls and fencing, and water quality/detention basins. The changes to the Project site represent a substantial alteration to the site’s present land use. Construction and operation of two business center buildings on the property would result in significant effects to the



environment that cannot be reduced to less-than-significant levels through the application of feasible mitigation.

- Noise (Traffic Related) – Significant and Unavoidable Direct Impact. No feasible mitigation measures are available to reduce the Project’s transportation-related noise impacts along the Oleander Avenue segments west of Harvill Avenue and east of the Project’s Driveway #6 under Existing + Project and Project Opening Year 2017 conditions. Although noise levels along the affected segments of Oleander Avenue would not exceed the County’s 65 dBA CNEL standard for noise-sensitive uses, the Project’s contribution to existing noise levels would represent a substantial noise increase over existing conditions, and residential structures would be affected. The affected residential parcels are non-conforming and designated by the Riverside County General Plan for “Business Park” land uses. By the Year 2035, the Project’s contribution of transportation-related noise along the above-listed segments of Oleander Avenue would be reduced to less than significant levels, because as ambient traffic volumes increase on the road, the Project’s overall percentage of the noise contribution would diminish. Although the Project’s noise impact would be significant and unavoidable, the impact would be less than significant by the Year 2035.
- Transportation (Local Roadway System) - Significant and Unavoidable Cumulatively Considerable Impact. The Project Applicant would pay development impact fees and participate in fair share funding programs to mitigate the Project’s direct and cumulative impacts to the local roadway network. However, several of the needed transportation improvements are either funded by existing mitigation funding programs (including TUMF) with no timetable for construction (meaning the necessary improvements may not be in place when the Project becomes operational and starts to contribute traffic to the facilities), or the improvements are not included in any existing mitigation funding program (therefore, there is no mechanism currently available for development projects to contribute toward the construction of needed improvements, and thus no assurance that the improvements would be implemented). Accordingly, the Project’s cumulatively considerable impacts to four (4) intersections in the Existing + Ambient Growth + Project + Cumulative (E+A+P+C) analysis scenario are concluded to be unavoidable. The affected intersections are: 1) Ellsworth Street / Oleander Avenue; 2) Harvill Avenue / Harley Knox Boulevard; 3) I-215 Southbound Ramps / Harley Knox Boulevard; and 4) I-215 Northbound Ramps / Harley Knox Boulevard.
- Transportation (State Highway System) – Significant and Unavoidable Cumulatively Considerable Impact. The Project would contribute traffic to the state highway system, which is under the jurisdiction of Caltrans. As such, the County of Riverside cannot assure the construction of improvements to state highway facilities. Furthermore, Caltrans does not have funding mechanism in place to allow development projects to contribute fair-share payments. Although a mitigation measure is recommended that requires the Project Applicant to offer fair share fee contributions to Caltrans to fund improvements to state highway system facilities that the Project’s traffic would impact, there is no assurance that Caltrans will develop a fee



program and implement the improvements prior to the time that the Project begins to contribute traffic to the facilities. Accordingly, the Project's contribution of traffic to the state highway system facilities under E+A+P+C and/or Horizon Year (2035) conditions is concluded to be a significant and unavoidable cumulative impact.

6.1 ALTERNATIVES UNDER CONSIDERATION

CEQA Guidelines § 15126.6(e) requires that an EIR include an alternative that describes what would reasonably be expected to occur on the property in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services (i.e., "no project" alternative). For development projects that include a revision to an existing land use plan, the "no project" alternative is considered to be the continuation of the existing land use plan into the future. For projects other than a land use plan (for example, a development project on an identifiable property), the "no project" alternative is considered to be a circumstance under which the project does not proceed (CEQA Guidelines § 15126(e)(3)(A-B)). For the alternatives analysis in this EIR, the potential scenario where the Project does not proceed is considered to be the "No Development Alternative," while the potential scenario where the existing land use plan is continued into the future is considered to be the "No Project Alternative / Existing General Plan Designation Alternative."

The following scenarios are identified by the County of Riverside as potential alternatives to implementation of the proposed Project.

6.1.1 NO PROJECT/NO DEVELOPMENT ALTERNATIVE

The No Project/No Development Alternative considers no development/disturbance on the Project site beyond that which occurs under existing conditions. As such, the entire 58.6-acre site would remain vacant and undeveloped with exception of the southwestern portion of the Building D Site which contains a mobile home, outbuildings, and a concrete pad that is used for the storage of construction equipment. The undeveloped portions of the Project site would continue to be regularly maintained for weed abatement and wildfire suppression purposes. Under this alternative, no improvements would be made to the Project site and none of the Project's roadway, utility and other infrastructure improvements would occur. This alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would leave the property in its existing condition.

Because this alternative would avoid all of the Project's impacts, it warrants consideration as the "environmentally superior alternative." However, pursuant to CEQA Guidelines § 15126.6(e)(2), if a no project alternative is identified as the "environmentally superior alternative" then the EIR shall also identify an environmentally superior alternative among the other alternatives. The Building D Only Alternative, as described in Subsection 6.1.3, below, is identified as the "environmentally superior alternative."



6.1.2 NO PROJECT / EXISTING GENERAL PLAN DESIGNATION ALTERNATIVE

The No Project/Existing General Plan Alternative considers development of the Project site with a mixture of uses that are in conformance with the Project site’s existing Riverside County General Plan and Mead Valley Area Plan land use designation and applicable policies. As previously shown on Figure 2-2, *Existing General Plan Land Use Designations*, the majority of the Building D Site is designated for “Community Development–Light Industrial (CD-LI)” land uses and the southwest portion of the Building D Site is designated for “Community Development-Business Park (CD-BP)” land uses. The entirety of the Building E Site is designated for “Community Development-Business Park (CD-BP)” land uses. The “Community Development–Light Industrial (CD-LI)” land use designation allows for industrial and related uses including warehousing/distribution, assembly and light manufacturing, repair facilities, and supporting retail uses with a building intensity range from a minimum 0.25 floor-to-area ratio (FAR) to a maximum building intensity of 0.60 FAR. The “Community Development-Business Park (CD-BP)” land use designation allows for employee-intensive uses, including research & development, technology centers, corporate offices, clean industry, and supporting retail uses with a building intensity range from a minimum of 0.25 FAR to a maximum building intensity of 0.60 FAR.

For analysis purposes, the areas designated “Community Development–Light Industrial (CD-LI)” under existing conditions are assumed to be developed with one 558,000 s.f. general warehouse building with surface parking lot on approximately 1,224,171 s.f. of building area (28.1 acres) for a FAR of 0.46. The areas designated “Community Development-Business Park (CD-BP)” are assumed to be developed with four buildings comprised of approximately 550,000 s.f. of building area and surface parking lots on approximately 1,353,275 s.f. of building area (31.0 acres) to house employee-intensive uses such as allowed by the “Community Development-Business Park (CD-BP)” land use designation for a FAR of 0.41.

This alternative was selected to compare the environmental effects of the proposed Project with a land use scenario comprised of a land use mixture that is planned for the property by the Riverside County General Plan.

6.1.3 BUILDING D ONLY ALTERNATIVE – THE ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Under the Building D Only Alternative, the Building D Site would be developed as described in Subsection 3.3.1 “Building D Applications” of EIR Section 3.0, *Project Description*. Building D would contain 702,645 s.f. of building space, including 677,645 s.f. of warehouse floor space, 15,000 s.f. of ground floor office space, and 10,000 s.f. of mezzanine office space. There would be 54 loading docks on the west side of the building and 55 docks on the east side of the building (109 total docks). No development would occur on the Building E Site. The Building E Site would remain vacant and would be regularly maintained for weed abatement and wildfire suppression purposes. This alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would pursue development on only the eastern portion of the Project site, in a location east of Ellsworth Street.



The Building D Alternative would not meet Project Objective B and Objective G and would only partially meet Objectives A, C, D, E, and F. Because this alternative would physically disturb less land and a lesser amount of building space would be constructed by eliminating development on the Building E Site, thereby generating less traffic and vehicular and operational-related effects. This alternative is considered to be environmentally superior to the proposed Project. In addition, because this alternative would reduce all of the Project’s impacts to a greater degree than the other alternatives evaluated herein, pursuant to CEQA Guidelines § 15126.6, the Building D Only Alternative is identified as the “environmentally superior alternative.”

6.1.4 REDUCED PROJECT / TRUCK TRAILER STORAGE ALTERNATIVE

Under the Reduced Project / Truck Trailer Storage Alternative, the Building D Site would be developed as described in Subsection 3.3.1 “Building D Applications” of EIR Section 3.0, *Project Description*. Building D would contain 702,645 s.f. of building space, including 677,645 s.f. of warehouse floor space, 15,000 s.f. of ground floor office space, and 10,000 s.f. of mezzanine office space. There would be 54 loading docks on the west side of the building and 55 docks on the east side of the building (109 total docks). The Building E Site would be developed as a truck trailer parking yard to service the building constructed on the Building D Site. This alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would allow an intensification of surface parking to accommodate a building user that requires a substantial amount of on-site truck trailer storage parking space.

6.1.5 LARGER BUILDING ALTERNATIVE

Under the Larger Building Alternative, a 1,250,000 s.f. high cube warehouse building would be constructed on the Building D Site and the Building E Site, spanning the two areas. The segment of Ellsworth Street that segregates the two Sites would be vacated as a public right-of-way to allow for construction of the building. There would be 125 loading docks on the north side of the building and 125 loading docks on the south side of the building (150 total docks). This alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would allow for the construction of a larger building, with approximately the same amount of building space that would be provided by proposed Building D and Building E combined.

6.2 ALTERNATIVES CONSIDERED AND REJECTED

An EIR is required to identify any alternatives that were considered by the Lead Agency but were rejected as infeasible. Among the factors described by CEQA Guidelines § 15126.6 in determining whether to exclude alternatives from detailed consideration in the EIR are: a) failure to meet most of the basic project objectives, b) infeasibility, or c) inability to avoid significant environmental impacts. With respect to the feasibility of potential alternatives to the proposed Project, CEQA Guidelines § 15126.6(f) (1) notes:



“Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries...and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site...”

In determining an appropriate range of alternatives to be evaluated in this EIR, alternative sites were considered and, for a variety of reasons, rejected. Two other alternatives, a trailer truck parking alternative, and a larger Building E alternative were considered but rejected from consideration. Alternatives can be dismissed from analysis because either: 1) they could not accomplish the basic objectives of the Project, 2) they would not have resulted in a reduction of significant adverse environmental impacts, or 3) they were considered infeasible to construct or operate. A summary of the alternatives that were considered but rejected from further evaluation are described below.

6.2.1 TRAILER TRUCK PARKING ALTERNATIVE

An alternative that contemplated using the entire Building D Site and Building E Site for truck trailer parking and storage was considered by the County of Riverside but rejected from further consideration because such an alternative would not meet the Project’s objectives. A truck trailer parking alternative would not result in developing vacant or underutilized property in Mead Valley with Class A business park warehouse buildings, would not make efficient use of a property by maximizing its buildout potential for employment-generating uses, would not attract new employment-generating businesses along the I-215 corridor, and would not help to provide a more equal jobs-housing balance in Riverside County. In addition, a truck trailer storage yard would be less economically feasible to construct and operate and would bring fewer, if any, direct and indirect economic benefits to the County and surrounding area. A large truck trailer parking yard also has the potential to be incompatible with the character of the surrounding community, which includes business park buildings, vacant land, and rural residential homes and business enterprises.

6.2.2 LARGER BUILDING E ALTERNATIVE

An alternative that contemplated a larger Building E and a larger Building E Site footprint for the development and operation of one high-cube warehouse on the Building E Site was considered by the County of Riverside but rejected from further consideration because such an alternative would result in the need for a change to the General Plan Foundation Component for a portion of the larger Building E Site. The Larger Building E Alternative was filed by the Project Applicant in 2015, processed by the County of Riverside, and then reduced in size to the currently-proposed Project in February 2017. The NOP for this EIR was based on the larger Building E Alternative.

Compared to the proposed Project, the Larger Building E Alternative includes an additional 12.1 acres of land to the west of the Building E Site, a portion of which is designated “Rural Community-Very Low Density Residential (RC-VLDR)” by the Riverside County General Plan. The Larger Building E Alternative would have required a change to the General Plan Foundation Component to change the existing land use designation from “Rural Community-Very Low Density Residential (RC-VLDR) to



“Community Development-Light Industrial (CD-LI).” Also, the additional land west of the Building E Site is zoned “Light Agriculture (A-1-1)” under existing conditions. Therefore, this alternative also would require a Change of Zone application to change that portion of the property zoned “Light Agriculture (A-1-1)” so that the entire Project site would be zoned “Industrial Park (I-P).”

6.2.3 ALTERNATIVE SITES

CEQA does not require that an EIR always include an analysis of alternative sites. However, if the surrounding circumstances make it reasonable to consider an alternative site then the alternative should be considered and analyzed in the EIR. In making the decision to include or exclude analysis of an alternative site, the *“key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR”* (CEQA Guidelines § 15126.6(f) (2)).

Under existing conditions, the approximately 58.6-acre Project site is vacant and undeveloped with exception of a mobile home, outbuildings, and a concrete pad that is used for the storage of construction equipment on the southwestern portion of the Building D Site. Nearly the entire property has been previously disturbed either by past activities associated within installation of the off-site water tank, or by on-going weed abatement. The Project site does not contain any ornamental landscaping and the vegetation that exists on the property is mostly characterized by ruderal plants and weeds. An ephemeral drainage is located on the site that does not connect to navigable waters and is dominated by upland vegetation. The Project site is located within the I-215 corridor, which over the past decade has been transitioning into an important industrial and economic center for Riverside County and the nearby cities of Perris, Moreno Valley, and Riverside.

Lands north of the Project site are largely undeveloped, with exception of a recently-constructed industrial warehouse building located north of Oleander Avenue and east of Harvill Avenue. To the south of the Project site are scattered, rural residences and business ventures, and undeveloped land. Near the southwest corner of the Project site is a water tank owned by the Eastern Municipal Water District (EMWD). To the west of the Project site are undeveloped lands, beyond which are single family homes. To the east of the Project site are undeveloped lands, several scattered single-family residences, and an industrial warehouse building located along the eastern edge of Harvill Avenue. Approximately 0.4 miles to the east is I-215, beyond which are the March Air Reserve Base (MARB) and an area of the City of Moreno Valley mostly developed with industrial warehouse buildings. Based on review of aerial photography, the Riverside County General Plan Land Use Map, and a list of approved/pending development proposals in the nearby areas of unincorporated Riverside County, the City of Moreno Valley, City of Perris, and City of Riverside (refer to Figure 4.0-1, *Cumulative Development Location Map*, and Table 4.0-1, *Cumulative Project List*), there are no other available, undeveloped properties of similar size (approximately 58 acres), that the Project Applicant has the reasonable possibility of controlling and that would have fewer developmental and environmental constraints than the Project site evaluated in this EIR.



Development of the Project in an alternate location would have similar impacts as would occur with implementation of the Project at its proposed location, with the potential for greater impacts. All undeveloped land within the surrounding area that is similar in size to the Project site (i.e., approximately 58 acres) that would be available for Community Development-Light Industrial CD-LI) land use and that is not already part of an approved/pending development proposal is located farther from I-215 than the Project site. Therefore, operational impacts associated with traffic and vehicular noise and air emissions would be greater as the vehicles traveling to and from the proposed Project would need to travel farther distances on local roads to reach the state highway system. Therefore, operational impacts associated with traffic and vehicular noise and air emissions would be greater as the vehicles would need to travel farther distances on local roads to reach the state highway system.

In addition, according to SCAG's *Comprehensive Regional Goods Movement Plan and Implementation Strategy*, there is great demand in the SCAG region for warehouse and industrial building space on suitably zoned vacant land (SCAG, 2013, pp. 4-39). Thus, it is likely that selection of an alternative site would not eliminate environmental effects, but merely displace the development activity proposed by the Project to another location resulting in the same or greater environmental effects in the region, given the regional demand for logistics and warehousing space in southern California.

For these reasons, an alternative sites analysis is not required for the proposed Project.

6.3 ALTERNATIVES ANALYSIS

The following discussion compares the impacts of each alternative considered by the Lead Agency with the impacts of the proposed Project, as detailed in Section 4.0, *Environmental Analysis*, of this EIR. A conclusion is provided to indicate if selection of the alternative would result in one of the following: (1) reduction or elimination of the proposed Project's impact, (2) a greater impact than would occur under the proposed Project, (3) the same impact as the proposed Project, or (4) a new impact in addition to the proposed Project's impacts. ~~Table 6-1~~ Table 6-4, *Alternatives to the Proposed Project – Comparison of Environmental Impacts*, at the end of this Section compares the environmental hazard and resource impacts of the alternatives with those of the proposed Project and identifies the ability of each alternative to meet the basic objectives of the Project.

The underlying purpose of the proposed Project and the County's primary objective is to entitle property in the Mead Valley community for business park warehouse development to bring new business and jobs to the area. The objectives pertinent to the proposed Project are as follows:

- A. To develop vacant or underutilized property in Mead Valley in close proximity to I-215 with business park warehouse buildings offering loading bays that can be used as part of the Southern California goods movement network.



- B. To make efficient use of a property in Mead Valley by maximizing its buildout potential for employment-generating uses.
- C. To attract new employment-generating businesses along the I-215 corridor thereby growing the economy and providing a more equal jobs-housing balance in the Riverside County/Inland Empire area that will reduce the need for members of the local workforce to commute outside the area for employment.
- D. To develop Class A business park warehouse buildings in Mead Valley that meet industry standards for modern, operational design criteria and can accommodate a wide variety of users.
- E. To develop vacant or underutilized property in Mead Valley with structures that have architectural design and operational characteristics that complement other new developments in the immediate vicinity.
- F. To develop business park warehouse buildings that are economically competitive with similar buildings in the local area and region.

6.3.1 NO PROJECT/NO DEVELOPMENT ALTERNATIVE

The No Project/No Development Alternative considers no development/disturbance on the Project site beyond that which occurs under existing conditions. As such, the entire 58.6-acre site would remain vacant and undeveloped with exception of the southwestern portion of the Building D Site which contains a mobile home, outbuildings, and a concrete pad that is used for the storage of construction equipment. The undeveloped portions of the Project site are regularly maintained for weed abatement and wildfire suppression purposes. Under this alternative, no improvements would be made to the Project site and none of the Project's roadway, utility and other infrastructure improvements would occur. This alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would leave the property in its existing condition.

A. Aesthetics

The Project site does not contain any unique aesthetic resources, nor does it serve as a prominent scenic vista. The site is mostly vacant and undeveloped with exception of a mobile home, outbuildings, and a concrete pad that is used for the storage of construction equipment on the southwestern portion of the Building D Site. Under the No Project/No Development Alternative, the visual character and quality of the site would be maintained in its existing condition. No structures or landscaping would be introduced on the property beyond that which occurs under existing conditions. Selection of the No Project/No Development Alternative would result in no impact to scenic resources, community character, or light and glare, because no development would occur. The proposed Project's impacts would be less-than-significant. Buildout of the Building D Site and Building E Site as proposed by the Project would create a business park with two buildings in a contemporary architectural design that



would be landscaped and served by improved roadways along the property's street frontages. In these regards, the proposed Project would have a higher aesthetic value than this alternative.

In conclusion, the proposed Project would result in less-than-significant aesthetic impacts. This alternative would result in no aesthetic impacts; thus, the Project's less-than-significant aesthetic impacts would be avoided.

B. Agriculture and Forest Resources

No forestry resources are located on the Project site or in the immediate vicinity of the Project site. Therefore, neither the proposed Project nor this alternative would impact forest resources.

There are no lands currently used for commercial agricultural purposes on the Project site or in the area immediately surrounding the Project site. According to the State's Farmland Mapping and Monitoring Program (FMMP) Farmlands Map, no portions of the Project site contain Prime Farmland, Farmland of Statewide Importance, or Unique Farmland ("Farmland"). According to the CDC classifications, the portion of the Project site that is designated Farmland of Local Importance likely carries this designation because the soils in this area are capable of agricultural production, but the property has never been used for agriculture and lacks available irrigation water for use in agricultural crop production. In addition, most of this area contains soils that have Storie Index Grades of 3, 4, or 5, which indicates that these soils have severe limitations for agricultural use. Because no evidence exists that the Project site was ever used for agricultural use, the site is not surrounded by lands under active agricultural production, and the majority of the Project site is not suitable for productive farmland according to the land capability classification of the USDA Storie Index, it is highly unlikely that the Project site would ever be used for agricultural purposes under the No Project/No Development Alternative. For these reasons, impacts to agricultural resources would be the same under this alternative as they would be for the proposed Project. With mandatory compliance to Ordinance No. 625, as would be required by the County, Project impacts would be less than significant.

In conclusion, the proposed Project would result in less-than-significant agriculture impacts and no impacts to forest resources. This alternative would result in no agriculture impacts and no forest resource impacts; thus, the Project's less-than-significant agriculture impacts would be avoided.

C. Air Quality

Under the No Project/No Development Alternative, no development would occur on the Project site; therefore, there would be no potential sources of short-term (construction) or long-term (operational) air pollutant emissions associated with the proposed business park land uses. All of the Project's short- and long-term air quality impacts would be avoided under this alternative. No impacts associated with air quality would occur under this alternative. However, significant and unavoidable operational impacts associated with emissions of VOCs and NOx would occur under the proposed Project, for which feasible mitigation is not available.



Although selection of the No Project/No Development Alternative would prevent the Project site from new development, it would not necessarily prevent the Project or another project of its nature from being developed in another location in response to the demand for warehouse and industrial land use space in western Riverside County. As such, it is possible that selection of the No Project/No Development Alternative would merely displace the Project's air pollutant emissions and significant and unavoidable air quality impacts to another location in the South Coast Air Basin (SCAB) resulting in the same or greater environmental effects to air quality.

In conclusion, the proposed Project would result in significant and unavoidable air quality impacts with mitigation. This alternative would result in no air quality impacts; thus, the Project's significant and unavoidable air quality impacts would be avoided.

D. Biological Resources

The No Project/No Development Alternative would leave the property in its existing condition; however, routine weed abatement (discing) would continue. Although disturbance of the property would occur under this alternative due to mandatory maintenance obligations for weed abatement, impacts would be less than the proposed Project because the property would be disturbed temporarily and periodically as compared to permanent disturbance that would occur as the result of the Project's proposed development. Accordingly, the No Project/No Development Alternative would avoid all of the Project's potential impacts to special-status wildlife species, to protected, nesting migratory birds, and to the ephemeral drainage that occurs on the property. No impacts would occur under this alternative. Less-than-significant impacts with mitigation would occur under the proposed Project.

In conclusion, the proposed Project would result in less-than-significant biological resource impacts with mitigation. This alternative would result in no biological resource impacts; thus, the Project's biological resource impacts would be avoided.

E. Cultural Resources

No known historic resources, unique geological features, or human remains are present on the Project site under existing conditions. Five recorded archaeological sites are recorded on the Project site, of which three sites would be fully impacted and two sites would be partially impacted as a result of the Project. None of the sites meet the definition of a unique or significant resource according to CEQA § 15064.5(a) ~~and there is insufficient substantial evidence to conclude that the sites either individually or collectively when considered in the context of a several mile radius the meet the minimum thresholds under Public Resources Code § 21074(b) to qualify as a recognized TCL or TCR.~~ The No Project/No Development Alternative would avoid the Project's impact to these resources, and also would avoid the possibility of unearthing archaeological and human remains, ~~and tribal cultural resources~~ during the Project's grading operation. While no grading would occur on the Project site under the No Project/No Development Alternative, periodic weed abatement activities would continue, although the depth of discing would be shallow. Therefore, this alternative has no potential to impact subsurface



historic or archeological resources or human remains, ~~or tribal cultural resources~~ that may exist in undisturbed soils beneath the ground surface.

In conclusion, the proposed Project would result in less-than-significant cultural resource impacts with mitigation. This alternative would result in no cultural resource impacts; thus, the Project's cultural resource impacts would be avoided.

F. Geology and Soils

The No Project/No Development Alternative would result in no grading of the property; therefore, no impacts to geology or soils would occur. Because no new structures would be constructed, there would be no increased risks associated with seismic ground shaking or geologic hazards. No impacts would occur under this alternative. Less-than-significant impacts would occur under the proposed Project.

In conclusion, the proposed Project would result in less-than-significant geology and soils impacts. This alternative would result in no geology and soils impacts; thus, the Project's geology and soils impacts would be avoided.

G. Greenhouse Gas Emissions

Under the No Project/No Development Alternative, no new development would occur on the Project site; therefore, there would be no potential sources of near-term or long-term greenhouse gas (GHG) emissions. Selection of this alternative would avoid all of the proposed Project's near- and long-term effects associated with GHG emissions. No impacts would occur under this alternative. Less-than-significant impacts would occur under the proposed Project with mitigation, because the Project would comply with the Riverside County Climate Action Plan (CAP).

Although selection of the No Project/No Development Alternative would prevent the Project site from new development, it would not necessarily prevent the Project or another project of its nature from being developed in another location in response to the demand for warehouse and industrial land use space in western Riverside County. As such, it is possible that selection of the No Project/No Development Alternative would merely displace the Project's GHG emissions to another location in the SCAB resulting in the same or greater environmental effects.

In conclusion, the proposed Project would result in less-than-significant greenhouse gas emissions impacts with mitigation. This alternative would result in no on-site related greenhouse gas emissions impacts; thus, the Project's on-site related impacts would be avoided.

H. Hazards and Hazardous Materials

Because no development would occur under the No Project/No Development Alternative, no impacts related to hazards or hazardous materials would occur. Routine discing would continue to occur on the Project site to remove dry/dead vegetation that has the potential to pose a fire hazard, as required by the Fire Department. Selection of this alternative would avoid the Project's less-than-significant



impacts related to hazards and hazardous materials. Because no development would occur on the property, this alternative would eliminate the possibility of chemical and cleaning agent use on the property that is typical in business park developments. Buildings also would not be built on the site that fall under the review authority of the Riverside County Airport Land Use Commission (ALUC) for the March Air Reserve Base (MARB). No hazard impacts would occur under this alternative. Less-than-significant impacts would occur under the proposed Project, with mandatory compliance to the conditions of approval imposed on the Project by the ALUC.

In conclusion, the proposed Project would result in less-than-significant hazards and hazardous materials impacts. This alternative would result in no hazards and hazardous materials impacts; thus, the Project's hazards and hazardous materials impacts would be avoided.

I. Hydrology and Water Quality

The No Project/No Development Alternative would result in no grading or development of the property; therefore, no impacts to hydrology or water quality would occur. No drainage improvements or water quality features would be installed and runoff would continue to flow off of the site as it does under existing, uncontrolled conditions. The selection of this alternative would avoid the Project's impacts to hydrology and water quality. Erosion and sedimentation may be greater under this alternative, because the site would not receive benefit from the storm water drainage and water quality filtration features proposed by the Project. No impacts would occur under this alternative, although erosion and sedimentation off-site may be greater than would occur under the proposed Project. Less-than-significant impacts with mandatory compliance to regulatory requirements would occur under the proposed Project.

In conclusion, the proposed Project would result in less-than-significant hydrology and water quality impacts. This alternative would result in no hydrology and water quality impacts; thus, the Project's hydrology and water quality impacts would be avoided.

J. Land Use and Planning

The No Project/No Development Alternative would leave the property in its existing condition as vacant, disturbed, mostly undeveloped land and the property would not be developed in accordance with the Riverside County General Plan and Mead Valley Area Plan's vision for developing a majority of the site with employment-generating uses. Although the Project proposes General Plan Amendment and Change of Zone applications on portions of the Project site, selection of the No Project/No Development Alternative would not fulfill Riverside's vision for the subject property. Regardless, no physical effects to the environment would occur from implementation of the No Project/No Development Alternative.

In conclusion, the proposed Project would result in significant and unavoidable land use and planning impacts. This alternative would result in no land use and planning impacts; thus, the Project's land use and planning impacts would be avoided.



K. Noise

Because no development would occur on the Project site under this alternative, no new sources of stationary noise and no new traffic trips would be generated; thus, the No Project/No Development Alternative would not contribute to an incremental increase in area-wide noise levels. Significant and unavoidable noise impacts would occur under the proposed Project because the Project would contribute substantial transportation-related noise compared to existing conditions along Oleander Avenue west of Harvill Avenue and east of the Project's Driveway #6 under near-term conditions. Although adjoining properties are designated for business park development in the long-term, there are several non-conforming homes located along the road. By the Year 2035, the Project's contribution of transportation-related noise along Oleander Avenue would be reduced to less than significant levels, because as ambient traffic volumes increase on the road, the Project's overall percentage of the noise contribution would diminish. Selection of this alternative would avoid all Project-related noise impacts.

In conclusion, the proposed Project would result in significant and unavoidable noise impacts after mitigation. This alternative would result in no noise impacts; thus, the Project's noise impacts would be avoided.

L. Population and Housing

To implement the Project, one mobile home would be removed from the Building D Site. Selection of the No Project/No Development Alternative would retain this home on the property. Neither this alternative nor the proposed Project would displace substantial numbers of existing housing units, people, or create a demand for additional housing. Because this alternative would allow development of the property, no employment opportunities would be created on the property and there would be no potential for indirect population growth, and no provision of jobs for existing residents in the surrounding area. No impacts would occur under this alternative.

In conclusion, the proposed Project would result in less-than-significant population and housing impacts. This alternative would result in no population and housing impacts; thus, the Project's population and housing impacts would be avoided.

M. Public Services

The No Project/No Development Alternative would not result in any development on the property requiring increased fire protection services, sheriff's protection services, and other services such as public schools, libraries, and health services. Compared to the proposed Project, demand would be lessened, although the Project does not result in any significant public service impacts that would be eliminated by the selection of this alternative. Although demands would be greater, the Riverside County Fire Department (RCFD) does not have plans to construct a new fire station or physically expand fire protection facilities in the Project site's vicinity. Similarly, the Riverside County Sheriff's Department (RCSD) does not have plans to construct or expand sheriff facilities. Therefore, the Project would have no physical environmental effects on public service facilities. Increased demand is not an



environmental effect under CEQA. No impacts would occur under the No Project/No Development Alternative. Because no development would occur on the Project site, this alternative would not contribute any payments toward the County's Development Impact Fee (DIF) Ordinance (Riverside County Ordinance No. 659), which the County uses to fund public facility improvements. In addition, no payments would be made under the provisions of California Government Code §§ 65995.5-65998 to the Val Verde Unified School District (VVUSD). Under the proposed Project, the Project Applicant would pay County DIF Ordinance fees and VVUSD fees.

In conclusion, the proposed Project would result in less-than-significant public services impacts. This alternative would result in no public services impacts; thus, the Project's public services impacts would be avoided.

N. Recreation

Because no development would occur on the Project site under this alternative, there would be no impacts to recreational facilities. Similarly, the proposed Project would not physically impact recreational facilities and would not preclude the County's ability to implement a community trail segment along Oleander Avenue, as called for by the MVAP. No impacts would occur under this alternative. Less-than-significant impacts would occur under the proposed Project.

In conclusion, the proposed Project would result in less-than-significant recreation impacts. This alternative would result in no recreation impacts; thus, the Project's recreation impacts would be avoided.

O. Transportation and Traffic

Under the No Development Alternative, no new development would occur on the property and no traffic would be generated. Because there would be no new development on the Project site under this alternative, the significant and unavoidable traffic impacts of the proposed Project would be avoided through selection of the No Project/No Development Alternative. However, because there would be no new development on the Project site under this alternative, no monetary contributions would be made by the Project Applicant to the Riverside County DIF program or the Transportation Uniform Mitigation Fee (TUMF) program to assist in the funding of needed local and regional circulation network improvements. Other fair share fee payments toward needed transportation improvements also would not be made. No transportation impacts would occur from the selection of this alternative. The proposed Project would result in significant and unavoidable cumulatively considerable effects to four (4) local roadway intersections and to state highway facilities under the jurisdiction of Caltrans.

In conclusion, the proposed Project would result in significant and unavoidable transportation and traffic impacts after mitigation. This alternative would result in no transportation and traffic impacts; thus, the Project's transportation and traffic impacts would be avoided.



P. Utilities and Service Systems

No additional domestic water or sewer facilities would be needed for the No Project/No Development Alternative, and no domestic water use or wastewater generation increases would occur. Also, this alternative would not generate increases in the demand for electricity, natural gas, transportation fuels, and other forms of energy, or demand for solid waste collection and disposal. Neither the proposed Project nor the No Project/No Development Alternative would result in significant or cumulatively considerable impacts to utilities and service systems. Nonetheless, selection of this alternative would avoid all of the Project's demand placed on utilities and service systems.

In conclusion, the proposed Project would result in less-than-significant utilities and service system impacts. This alternative would result in no utilities and service system impacts; thus, the Project's utilities and service system impacts would be avoided.

Q. Paleontological Resources

No known paleontological resources are present on the Project site under existing conditions. The No Project/No Development Alternative would avoid the Project's impact to mapped Quaternary very old alluvial fan sediments in the northeastern corner of the Building D Site that are mapped as having "High B" paleontological sensitivity. (BFSA, 2015b, pp. 2-3) (BFSA, 2015c, pp. 2-3). Because no development would occur, there is no potential for the No Project/No Development Alternative to unearth resources in this area and no mitigation would be required. The Project's potential impact to paleontological resources, in the unlikely event that such resources are unearthed, would be avoided by the selection of this alternative.

In conclusion, the proposed Project would result in less-than-significant paleontological resources impacts after mitigation. This alternative would result in no paleontological resources impacts; thus, the Project's paleontological resources impacts would be avoided.

R. Tribal Cultural Resources

Five archaeological sites are recorded on the Project site, of which three sites would be fully impacted and two sites would be partially impacted as a result of the Project. None of the sites meet the definition of a tribal cultural resource under Public Resources Code § 21074(b) and the Project site also does not qualify as a cultural landscape under Public Resources Code § 21074(b). Thus, the proposed Project would have a less-than-significant impact to tribal cultural resources. Because the No Project/No Development Alternative would leave the Project site in its existing condition with the exception of periodic weed abatement activities, and because there are no resources on the site that meet the definition of a tribal cultural resource, this alternative has no potential to impact tribal cultural resources.



S. Conclusion

The No Project/No Development Alternative would result in no physical environmental impacts to the Project site beyond those that have already occurred on the property and ongoing, required weed abatement. All significant effects of the Project would be avoided or lessened by the selection of the No Project/No Development Alternative. The No Project/No Development Alternative would fail to meet all of the Project's objectives, as indicated in ~~Table 6-4~~ Table 6-4, Alternatives to the Proposed Project – Comparison of Environmental Impacts (see the end of this EIR Section).

6.3.2 NO PROJECT / EXISTING GENERAL PLAN DESIGNATION ALTERNATIVE

The No Project/Existing General Plan Alternative considers development of the Project site with a mixture of uses that are in conformance with the Project site's existing Riverside County General Plan and Mead Valley Area Plan land use designation and applicable policies. As previously shown on Figure 2-2, *Existing General Plan Land Use Designations*, the majority of the Building D Site is designated for "Community Development–Light Industrial (CD-LI)" land uses and the southwest portion of the Building D Site is designated for "Community Development-Business Park (CD-BP)" land uses. The entirety of the Building E Site is designated for "Community Development-Business Park (CD-BP)" land uses. The "Community Development–Light Industrial (CD-LI)" land use designation allows for industrial and related uses including warehousing/distribution, assembly and light manufacturing, repair facilities, and supporting retail uses with a building intensity range from a minimum 0.25 floor-to-area ratio (FAR) to a maximum building intensity of 0.60 FAR. The "Community Development-Business Park (CD-BP)" land use designation allows for employee-intensive uses, including research & development, technology centers, corporate offices, clean industry, and supporting retail uses with a building intensity range from a minimum of 0.25 FAR to a maximum building intensity of 0.60 FAR. To accommodate the "Community Development-Business Park (CD-BP)" land use designation, this alternative would be developed with numerous small buildings on the areas of the Project site that are designated "Community Development-Business Park (CD-BP)". The "Community Development-Business Park (CD-BP)" land uses result in a higher Institute of Transportation of Engineers (ITE) trip generation rate than Community Development-Light Industrial (CD-LI)" land uses, as shown on Table 6-3, *No Project/Existing General Plan Alternative Trip Generation Summary (Actual Vehicles)*.

For analysis purposes, the areas designated "Community Development–Light Industrial (CD-LI)" under existing conditions are assumed to be developed with one 558,000 s.f. general warehouse building with surface parking lot on approximately 1,224,171 s.f. of building area (28.1 acres) for a FAR of 0.46. The areas designated "Community Development-Business Park (CD-BP)" are assumed to be developed with four buildings comprised of approximately 550,000 s.f. of building area and surface parking lots on approximately 1,353,275 s.f. of building area (31.0 acres) to house employee-intensive uses such as allowed by the "Community Development-Business Park (CD-BP)" land use designation for a FAR of 0.41.



This alternative was selected to compare the environmental effects of the proposed Project with a land use scenario comprised of a land use mixture that is planned for the property by the Riverside County General Plan.

A. Aesthetics

The Project site does not contain any unique aesthetic resources, nor does it serve as a prominent scenic vista. Under the No Project/Existing General Plan Designation Alternative, the visual character and quality of the site would be more varied than what would occur under the proposed Project, although it is assumed that the site would be master-planned and have a cohesive design. Under this alternative, the building to be constructed on the land designated for “Community Development-Light Industrial (CD-LI)” would have similar mass and bulk to that of the proposed Project. The four buildings that would be constructed in the area of the Project site designated as “Community Development-Business Park (CD-BP) land uses would be substantially smaller in mass and bulk to the two buildings proposed by the Project. The selection of this alternative would result in similar aesthetic effects associated with changes to existing visual quality, character, and the introduction of light and glare sources. Therefore, under both this alternative and the proposed Project, aesthetic impacts would be less than significant.

In conclusion, the proposed Project would result in less-than-significant aesthetic impacts. This alternative would result in the same less-than-significant aesthetic impacts.

B. Agriculture and Forest Resources

No forestry resources are located on the Project site or in the immediate vicinity of the Project site. Therefore, neither the proposed Project nor this alternative would impact forest resources.

Because no evidence exists that the Project site was ever used for agricultural use, the site is not surrounded by lands under active agricultural production, and the majority of the Project site is not suitable for productive farmland according to the land capability classification of the USDA Storie Index, it is highly unlikely that the Project site would ever be used for agricultural purposes under the No Project/Existing General Plan Land Use Alternative. For these reasons, impacts to agricultural resources would be the same under this alternative as they would be for the proposed Project. With mandatory compliance to Ordinance No. 625, as would be required by the County, impacts would be less than significant.

In conclusion, the proposed Project would result in less-than-significant agriculture impacts and no impacts to forest resources. This alternative would result in the same less-than-significant agriculture impacts and no impacts to forest resources. Thus, the Project’s impacts would not be reduced or avoided.

C. Air Quality

Under this alternative, the construction schedule would likely be more intense on a daily basis than would occur under the proposed Project because the multiple buildings could be constructed



simultaneously, whereas the proposed Project would construct Building D and Building E serially. As such, total daily emissions during construction activities on the Project site would be increased as compared to the proposed Project's daily emissions reported in Subsection 4.3 of this EIR. Therefore, it is possible that emissions of VOC, NO_x, and particulate matter could not be feasibly mitigated under this alternative to a less-than-significant level. Therefore, this alternative would result in increased construction-related air quality impacts as compared to the proposed Project and air quality impacts under this alternative would likely be significant and unavoidable.

Because the No Project/Existing General Plan Designation Alternative would generate a substantially more traffic than the proposed Project (approximately 7,501 ~~8,016~~ daily vehicle trips as compared to the proposed Project's 2,115 daily trips), mobile source air emissions would be substantially increased by the selection of this alternative. The maximum operational emissions for the No Project/Existing General Plan Land Use Designation Alternative were calculated by Urban Crossroads, Inc. and are shown in Table 6-1, Summary of Maximum Operational Emissions (No Project/Existing General Plan Designation Alternative). To show a comparison of operational air emissions for the No Project/Existing General Plan Designation Alternative versus the proposed Project, Table 6-2, Summary of Maximum Operational Emissions (No Project/Existing General Plan Designation Alternative vs. Proposed Project), also is provided below. As indicated in Table 6-2, compared to the air pollutant emissions that would be emitted under the proposed Project, development under the No Project/Existing General Plan Designation Alternative would cause an increased quantity of air pollutant emissions in every pollutant category with the exception of VOC emissions, which would be slightly reduced under this alternative.

None of the Project's significant air quality impacts would be avoided and the Project's significant and unavoidable impact associated with ~~VOC and~~ NO_x emissions ~~also~~ would be increased by nearly ~~400~~ 45 percent. In addition, the VOC and NO_x emissions would cumulatively contribute to an existing air quality violation in the SCAB (i.e., NO_x and O₃ concentrations, which do not meet regional attainment status). Due to the substantial increase in vehicle trips, the selection of this alternative also has the potential to result in increased diesel particulate matter (DPM) emissions; however, with feasible restrictions placed on on-site operating equipment, it is unlikely that the more severe impacts associated with DPM would exceed the SCAQMD's significance threshold of 10 in one million.

In conclusion, the proposed Project would result in significant and unavoidable air quality impacts with mitigation associated with VOC and NO_x emissions. This alternative would result in greater NO_x emissions and slightly less VOC emissions. This alternative would also produce more CO, SO_x, PM₁₀, and PM_{2.5}, although the emissions quantities would remain below the daily significance thresholds. ~~quality impacts;~~ Thus, the Project's significant and unavoidable NO_x air quality impacts would not be reduced or avoided by this alternative. The VOC emissions would be slightly reduced but remain significant and unavoidable.



Table 6-1 Summary of Maximum Operational Emissions (No Project/Existing General Plan Designation Alternative)

| Operational Activities – Summer Scenario | Emissions (pounds per day) | | | | | |
|---|----------------------------|-----------------|---------------|-----------------|------------------|-------------------|
| | VOC | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
| Area Source | 28.99 | 1.09E-03 | 0.12 | 0.00 | 4.20E-04 | 4.20E-04 |
| Energy Source | 0.58 | 5.31 | 4.46 | 0.03 | 0.40 | 0.40 |
| Mobile (Trucks) | 26.99 | 591.54 | 252.51 | 1.88 | 76.12 | 28.45 |
| Mobile (Passenger Cars) | 10.01 | 13.04 | 179.99 | 0.62 | 58.47 | 15.67 |
| Total Maximum Daily Emissions (No Project) | 66.57 | 609.89 | 437.08 | 2.53 | 134.99 | 44.52 |
| SCAQMD Regional Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| Threshold Exceeded? | YES | YES | NO | NO | NO | NO |

| Operational Activities – Winter Scenario | Emissions (pounds per day) | | | | | |
|---|----------------------------|-----------------|---------------|-----------------|------------------|-------------------|
| | VOC | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
| Area Source | 28.99 | 1.09E-03 | 0.12 | 0.00 | 4.20E-04 | 4.20E-04 |
| Energy Source | 0.58 | 5.31 | 4.46 | 0.03 | 0.40 | 0.40 |
| Mobile (Trucks) | 27.42 | 616.53 | 263.67 | 1.88 | 76.13 | 28.46 |
| Mobile (Passenger Cars) | 9.32 | 13.80 | 151.93 | 0.56 | 58.47 | 15.67 |
| Total Maximum Daily Emissions (No Project) | 66.31 | 635.64 | 420.18 | 2.47 | 135.00 | 44.53 |
| SCAQMD Regional Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| Threshold Exceeded? | YES | YES | NO | NO | NO | NO |

(Urban Crossroads, 2018a, Table 1)

Table 6-2 Summary of Maximum Operational Emissions (No Project/Existing General Plan Designation Alternative vs. Proposed Project)

| Operational Activities – Summer Scenario | Emissions (pounds per day) | | | | | |
|---|----------------------------|-----------------|----------------|-----------------|------------------|-------------------|
| | VOC | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
| No Project/Existing General Plan Alternative | 66.57 | 609.89 | 437.08 | 2.53 | 134.99 | 44.52 |
| DEIR Total | 72.01 | 421.51 | 217.01 | 1.39 | 60.09 | 22.14 |
| Variance | -5.44 | +188.38 | +220.07 | +1.14 | +74.9 | +22.38 |
| Operational Activities – Winter Scenario | Emissions (pounds per day) | | | | | |
| | VOC | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
| No Project/Existing General Plan Alternative | 66.31 | 635.64 | 420.18 | 2.47 | 135.00 | 44.53 |
| DEIR Total | 72.16 | 438.40 | 220.83 | 1.38 | 60.09 | 22.15 |
| Variance | -5.85 | +197.24 | +199.35 | +1.09 | +74.91 | +22.38 |

Note: “DEIR Total” refers to the Project’s air pollutant emissions disclosed in Section 4.3, *Air Quality*, Table 4.3.6, with slight differences to the one-tenth decimal point due to re-running the analysis method for the purposes of comparison.
 (Urban Crossroads, 2018a, Table 2)



D. Biological Resources

Because the No Project/Existing General Plan Designation Alternative would disturb the same amount of land as the proposed Project, all of the potential impacts to sensitive species would remain the same.

E. Cultural Resources

No known historic resources, unique geological features, significant archaeological resources, or human remains are present on the Project site under existing conditions. Because the No Project/Existing General Plan Designation Alternative would disturb the same amount of land as the proposed Project, all of the potential impacts to cultural resources would remain the same.

F. Geology and Soils

Because the No Project/Existing General Plan Designation Alternative would result in the same amount of ground-disturbing physical impacts, impacts to geology and soils would be the same as those described in EIR Subsection 4.6, *Geology and Soils*.

G. Greenhouse Gas Emissions

Because the No Project/Existing General Plan Designation Alternative would generate substantially more traffic than the proposed Project (approximately 7,501 ~~8,016~~ daily vehicle trips as compared to the proposed Project's 2,115 daily trips), mobile source greenhouse gas (GHG) emissions would be substantially increased by the selection of this alternative. Because the No Project/Existing General Plan Designation Alternative is not designed, it is speculative to conclude whether or not this alternative would be able to achieve at least 100 points (equivalent to an approximate 15% reduction in GHG emissions) on the Riverside County Climate Action Plan's (CAP's) Screening Tables. The proposed Project would achieve the 100 points with mitigation and result in a less-than-significant impact. In comparison, this alternative would generate more GHG emissions and may or may not be able to reduce its effects to less than significant levels.

In conclusion, the proposed Project would result in less-than-significant greenhouse gas emissions impacts with mitigation. This alternative would result in greater greenhouse gas emissions impacts; thus, the Project's greenhouse gas emissions impacts would be increased, and would not be reduced or avoided.

H. Hazards and Hazardous Materials

Because the No Project/Existing General Plan Designation Alternative would house similar types of building occupants as the Project, the potential for hazards and hazardous materials would be similar to the Project. Potential construction-related hazards and hazardous materials impacts would also be similar. As with the proposed Project, mandatory compliance to federal, state, and local regulations during construction and long-term operation would ensure that the proposed development would not create a significant hazard to the environment due to routine transport, use, disposal, or upset of hazardous materials. Assuming mandatory compliance with standard ALUC conditions of approval,



the building that would be constructed on the portion of the site designated Community-Development-Light Industrial (CD-LI)” under the No Project/Existing General Plan Designation Alternative would have the same building height range as proposed by the Project, which was determined by the Riverside County Airport Land Use Commission (ALUC) to be consistent with the restrictions and requirements of the March ARB/IPA Compatibility Plan. Similarly, the buildings that would be constructed on the portion of the site designated for “Community-Development-Business Park (CD-BP)” land uses would also be required to be consistent with the restrictions and requirements of the March ARB/IPA Compatibility Plan. Thus, impacts associated with hazards and hazardous materials would be the same as the proposed Project. Impacts associated with hazards and hazardous materials would be less than significant under this alternative and the proposed Project.

In conclusion, the proposed Project would result in less-than-significant hazards and hazardous materials impacts. This alternative would result in the same hazards and hazardous materials impacts; thus, the Project’s hazards and hazardous materials impacts would be reduced or avoided.

I. Hydrology and Water Quality

The No Project/Existing General Plan Designation Alternative would have a near-identical drainage system design. Neither the proposed Project nor the No Project/Existing General Plan Designation Alternative would result in substantial alterations to the drainage pattern of the site or would result in substantial erosion effects (with mandatory compliance with a Storm Water Pollution Prevention Plan (SWPPP). Accordingly, implementation of either the proposed Project or this alternative would result in less-than-significant impacts to existing drainage patterns. Similar to the proposed Project, this alternative would require compliance with a site-specific Water Quality Management Plan (WQMP) and its associated Best Management Practices (BMPs.) Therefore, implementation of this alternative would result in less-than-significant water quality impacts with compliance to a SWPPP and a site-specific WQMP and its associated BMPs and result in similar impacts as would the proposed Project.

In conclusion, the proposed Project would result in less-than-significant hydrology and water quality impacts. This alternative would result in the same hydrology and water quality impacts; thus, the Project’s hydrology and water quality impacts would not be reduced or avoided.

J. Land Use and Planning

The No Project/Existing General Plan Designation Alternative would not require a General Plan Amendment or a Change of Zone. There would be no change to the planned land uses of the site. Regardless, the No Project/Existing General Plan Designation Alternative would result in a substantial alteration to the Project site’s existing land use and would result in the same significant and unavoidable land use and planning impacts as the proposed Project, as described in EIR Subsection 4.10, *Land Use and Planning*.



In conclusion, the proposed Project would result in significant and unavoidable land use and planning impacts. This alternative would result in the same land use and planning impacts; thus, the Project's land use and planning impacts would not be reduced or avoided.

K. Noise

As with the proposed Project, noise associated with this alternative would occur during near-term construction activities and under long-term operation. Under this alternative, the construction schedule would likely be more intense on a daily basis than would occur under the proposed Project because the multiple buildings could be constructed simultaneously, whereas the proposed Project would construct Building D and Building E serially; therefore, it is likely that short-term construction noise would be increased under this alternative versus the proposed Project. However, because the same type of construction activities would occur as a result of this alternative, short-term construction impacts under this alternative would be significant and direct, the same as the proposed Project. Also, because the No Project/Existing Plan General Plan Designation Alternative would generate substantially more traffic than the proposed Project (approximately 7,501 ~~8,016~~ daily vehicle trips as compared to the proposed Project's 2,115 daily trips), vehicular noise would be substantially increased by the selection of this alternative. Long-term operational noise generated by this alternative would be associated with substantially more vehicles traveling to and from the Project Site and on-site vehicle idling, maneuvering, and parking. In addition, the contribution of traffic noise levels along Oleander Avenue would be substantially greater under this alternative. Thus, long-term operational impacts related to traffic would be greater under this alternative than under the proposed Project.

In conclusion, the proposed Project would result in significant and unavoidable noise impacts after mitigation. This alternative would result in greater noise impacts; thus, the Project's noise impacts would not be reduced or avoided.

L. Population and Housing

The No Project/Existing General Plan Land Use Designation Alternative would construct a similar amount of building space as the proposed Project; however, because the "Community Development-Business Park (CD-BP)" land uses under this alternative would consist of employee-intensive uses, including research & development, technology centers, corporate offices, clean industry, and supporting retail uses, this alternative has the potential to result in the demand for additional employees generated by the Community Development-Business Park (CD-BP) land uses. Nonetheless, these would not be skilled trade jobs that would require the relocation of people to fill the jobs. Therefore, this alternative would result in less-than-significant impacts associated with population and housing.

In conclusion, the proposed Project would result in less-than-significant population and housing impacts. This alternative would have the same level of impact; thus, the Project's population and housing impacts would not be reduced or avoided.



M. Public Services

Because the No Project/Existing General Plan Designation Alternative would construct approximately the same amount of building space as the proposed Project's business park uses, approximately the same amount of demand would be placed on public service providers. As described in EIR Subsection 4.13, *Public Services*, increased demand is not an environmental effect under CEQA, and no physical impacts to public service facilities would occur. Impacts would be the same under this alternative as they would be for the proposed Project. Less-than-significant impacts would occur under the proposed Project and this alternative.

In conclusion, the proposed Project would result in less-than-significant public services impacts. This alternative would result in the same level of public services impacts; thus, the Project's public services impacts would not be reduced or avoided.

N. Recreation

Neither the proposed Project nor the No Project/Existing General Plan Designation Alternative would physically impact recreational facilities. Also, neither the proposed Project nor the No Project/Existing General Plan Designation Alternative would preclude the County's ability to implement a community trail segment along Oleander Avenue, as called for by the MVAP. Impacts would be the same under this alternative as they would be for the proposed Project. Less-than-significant impacts would occur under the proposed Project and this alternative.

In conclusion, the proposed Project would result in less-than-significant recreation impacts. This alternative would result in the same recreation impacts; thus, the Project's recreation impacts would not be reduced or avoided.

O. Transportation

The No Project/Existing General Plan Designation Alternative would generate approximately 7,501 ~~8,016~~ daily vehicle trips as shown below in Table 6-3, *No Project/Existing General Plan Alternative Trip Generation Summary (Actual Vehicles)*. These trips are calculated by applying the Institute of Transportation Engineers (ITE) 9th Edition Trip Generation Manual industrial code to 558,000 square feet of light industrial development (yielding ~~4,016~~ 3,889 trips), and the ITE warehouse code to 550,000 of general warehouse use (yielding ~~3,950~~ 1,958 trips). This calculates to approximately 3.5 ~~3.7~~ times the amount of traffic that would be generated by the proposed Project (2,115 daily trips). Under both this alternative and the proposed Project, there would be significant and unavoidable cumulatively considerable effects to four (4) local roadway intersections and to state highway facilities under the jurisdiction of Caltrans. Under this alternative, these and likely many more transportation facilities would be significantly impacted. Thus, impacts associated with Project-generated traffic would be substantially increased by the selection of this alternative.



In conclusion, the proposed Project would result in significant and unavoidable transportation and traffic impacts after mitigation. This alternative would result in more traffic and greater transportation and traffic impacts; thus, the Project’s transportation and traffic impacts would be increased.

**Table 6-3 No Project/Existing General Plan Alternative Trip Generation Summary
(Actual Vehicles)**

| Land Use | Quantity | Units ¹ | AM Peak Hour | | | PM Peak Hour | | | Daily |
|--|----------|--------------------|--------------|-----------|------------|--------------|------------|------------|--------------|
| | | | In | Out | Total | In | Out | Total | |
| Warehousing | 550,000 | TSF | | | | | | | |
| Passenger Cars: | | | 105 | 26 | 131 | 35 | 105 | 140 | 1,558 |
| Truck Trips: | | | | | | | | | |
| 2-axle: | | | 5 | 1 | 6 | 2 | 5 | 6 | 68 |
| 3-axle: | | | 6 | 2 | 8 | 2 | 6 | 8 | 91 |
| 4+-axle: | | | 16 | 4 | 20 | 5 | 16 | 22 | 241 |
| - Net Truck Trips (Actual Trucks) ² | | | 27 | 7 | 34 | 9 | 27 | 36 | 400 |
| WAREHOUSING TOTAL NET TRIPS (Actual Vehicles)³ | | | 132 | 33 | 165 | 44 | 132 | 176 | 1,958 |
| General Light Industrial | 558,000 | TSF | | | | | | | |
| Passenger Cars: | | | 355 | 48 | 404 | 53 | 373 | 425 | 3,057 |
| Truck Trips: | | | | | | | | | |
| 2-axle: | | | 36 | 5 | 41 | 5 | 38 | 43 | 311 |
| 3-axle: | | | 18 | 2 | 20 | 3 | 18 | 21 | 152 |
| 4+-axle: | | | 43 | 6 | 49 | 6 | 45 | 51 | 369 |
| - Net Truck Trips (Actual Trucks) ² | | | 97 | 13 | 110 | 14 | 102 | 116 | 832 |
| GENERAL LI TOTAL NET TRIPS (Actual Vehicles)³ | | | 452 | 61 | 513 | 67 | 474 | 541 | 3,889 |
| TOTAL | | | 584 | 94 | 678 | 111 | 606 | 717 | 5,847 |

1 TSF -thousand square feet

2 Vehicle Mix Source: Total truck percentage source from ITE Trip Generation manual. Truck mix by axle type) source from SCAQMD for high-cube warehouse use and from the City of Fontana Truck Generation Study for warehousing and general light industrial uses.

3 Total Net Trips (Actual Vehicles) = Passenger Cars + Net Truck Trips (Actual Trucks).
(Urban Crossroads, Inc., 2018a, Table 3)

P. Utilities and Service Systems

Because the No Project/Existing General Plan Designation Alternative would construct approximately the same amount of building space as proposed by the Project, a similar amount of water demand, wastewater generation, electricity, natural gas, and solid waste generation would occur as discussed in EIR Subsection 4.16, *Utilities and Service Systems*. This alternative would result in more fuel use (energy) demand as a result of the substantially higher number of daily traffic trips that would be generated under this alternative. Also, the same connections to existing water, sewer and storm drainage systems would be required. Neither the proposed Project nor the No Project/Existing General Plan Designation Alternative would result in significant or cumulatively considerable impacts to utilities and service systems.



In conclusion, the proposed Project would result in less-than-significant utilities and service system impacts. This alternative would result in the same utilities and service system impacts; thus, the Project's utilities and service system impacts would not be reduced or avoided.

Q. Paleontological Resources

No known paleontological resources are present on the Project site under existing conditions. The northeastern corner of the Building D Site is mapped as having "High B" paleontological sensitivity. Because this alternative would disturb the same amount of land, potential impacts to paleontological resources would be the same as the proposed Project. (BFSA, 2015b, pp. 2-3) (BFSA, 2015c, pp. 2-3).

In conclusion, the proposed Project would result in less-than-significant paleontological resources impacts after mitigation. This alternative would result in the same paleontological resources impacts; thus, the Project's paleontological resources impacts would not be reduced or avoided.

R. Tribal Cultural Resources

Five archaeological sites are recorded on the Project site, of which three sites would be fully impacted and two sites would be partially impacted as a result of either the proposed Project or this alternative. None of the sites meet the definition of a tribal cultural resource under Public Resources Code § 21074(b) and the Project site also does not qualify as a cultural landscape under Public Resources Code § 21074(b). Thus, the proposed Project and this alternative would have a less-than-significant impact to tribal cultural resources. Because the No Project/Existing General Plan Designation Alternative would disturb the same amount of land as the proposed Project, the impact conclusions would remain the same.

S. Conclusion

Selection of the No Project/Existing General Plan Designation Alternative would result in similar impacts as would occur under the proposed Project to the topics of aesthetics, agricultural and forestry resources, biological resources, cultural resources, geology/soils, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, public services, recreation, ~~and~~ paleontological resources, and tribal cultural resources as the proposed Project. Because the "Community Development-Business Park (CD-BP)" land use under this alternative would consist of employee-intensive uses, including research & development, technology centers, corporate offices, clean industry, and supporting retail uses, this alternative could result in the demand for additional housing for the additional employees generated by the "Community Development-Business Park (CD-BP) land uses. In addition, because this alternative would generate approximately 3.5 3-7 times more traffic than the proposed Project, increased impacts would occur in the areas of short-term construction and long-term transportation and vehicular-related air emissions, GHG emissions, short-term and long-term noise, and traffic/transportation. In summary, no environmental effects of the Project would be reduced by the selection of this alternative and many environmental effects would be increased.



The No Project/Existing General Plan Designation Alternative would meet Project objectives B, C, and E by developing the site with employment generating uses. This alternative would partially meet the Project's other objectives, A, D, and F except for the fact that the site would not be developed entirely with business park warehouse buildings under this alternative. Regardless of its ability to meet or partially meet the Project's objectives, this alternative would not result in any environmental advantages, and would increase impacts to the environment in terms of air quality, greenhouse gas emissions, noise, and traffic impacts. Because this alternative would result in greater impacts to air quality, greenhouse gas emissions, noise, and transportation and traffic, this alternative is not considered to be environmentally superior to the proposed Project.

6.3.3 BUILDING D ONLY ALTERNATIVE – THE ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Under this alternative, the Building D Site would be developed as described in Subsection 3.3.1 “Building D Applications” of EIR Section 3.0, *Project Description*. Building D would contain 702,645 s.f. of building space, including 677,645 s.f. of warehouse floor space, 15,000 s.f. of ground floor office space, and 10,000 s.f. of mezzanine office space. There would be 54 loading docks on the west side of the building and 55 docks on the east side of the building (109 total docks). No development would occur on the Building E Site. The Building E Site would remain vacant and would be regularly maintained for weed abatement and wildfire suppression purposes. Oleander Road and Ellsworth Street would be improved along the frontage of the Building D Site; no roadway frontage improvements would occur abutting the Building E Site. This alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would pursue development on only the eastern portion of the Project site, and east of Ellsworth Street.

Because this alternative would reduce all of the Project's impacts to a greater degree than the other alternatives evaluated herein, pursuant to CEQA Guidelines § 15126.6, it is identified as the “environmentally superior alternative.”

A. Aesthetics

The Project site does not contain any unique aesthetic resources, nor does it serve as a prominent scenic vista. Under the Building D Only Alternative, the visual character and quality of the Building E Site would be maintained in its existing condition. No structures or landscaping would be introduced on the Building E Site beyond that which occurs under existing conditions. The Building D Site would be developed as described in EIR Section 3.0, *Project Description*, and evaluated throughout this EIR. The selection of this alternative would result in fewer aesthetic effects associated with changes to existing visual quality, character, and the introduction of light and glare sources, because only approximately half of the Project site would be developed with one building as compared to the entire Project site developed with two buildings as proposed by the Project. Under either this alternative or the proposed Project, aesthetic impacts would be less-than-significant. Buildout of the Building D Site would develop one building in a contemporary architectural design that would be landscaped and served by improved roadways along the property's street frontages.



In conclusion, the proposed Project would result in less-than-significant aesthetic impacts. This alternative would result in fewer aesthetic impacts; thus, the Project's less-than-significant aesthetic impacts would be reduced.

B. Agriculture and Forest Resources

No forestry resources are located on the Project site or in the immediate vicinity of the Project site. Therefore, neither the proposed Project nor this alternative would impact forest resources.

Because no evidence exists that the Project site was ever used for agricultural use, the site is not surrounded by lands under active agricultural production, and the majority of the Project site is not suitable for productive farmland according to the land capability classification of the USDA Storie Index, it is highly unlikely that the Project site would ever be used for agricultural purposes under the Building D Alternative. The selection of this alternative would place less business park development within 300 feet of off-site property zoned for agricultural use, although those off-site properties are not currently used for any agricultural purposes. Under this alternative, the Project's less-than-significant impact (placement of uses within 300 feet of property zoned for agriculture) would be reduced.

In conclusion, the proposed Project would result in less-than-significant agriculture impacts and no impacts to forest resources. This alternative would result in fewer agriculture impacts and no forest resource impacts; thus, the Project's less-than-significant agriculture impacts would be reduced.

C. Air Quality

Under this alternative, the construction schedule would be reduced as compared to the proposed Project because only one building would be constructed instead of two buildings. As such, construction-related air quality emissions would occur over a slightly shorter period of time. Total daily emissions during construction activities on the Building D Site would be the same as the proposed Project's daily emissions reported in Subsection 4.3 of this EIR. Therefore, air quality pollutant emissions associated with short-term construction would be identical between the proposed Project and the Building D Only Alternative. With mitigation, these impacts would be reduced to below a level of significance.

Because the Building D Only Alternative would construct 410,982 s.f. less building space than proposed by the Project, the Alternative would produce a concomitant reduction in traffic compared to the proposed Project and require a concomitant reduction of energy use. Under the Building D Only Alternative, 1,181 daily vehicle trips would be generated, including 731 passenger cars and 450 trucks. As such, mobile source and energy source air emissions would be reduced by approximately 44% ($934 \text{ daily vehicle trips} \div 2,115 \text{ daily vehicle trips} = 44\%$) compared to the Project. None of the Project's significant air quality impacts would be avoided and the Project's significant and unavoidable impacts associated with VOC and NO_x emissions also would not be eliminated. After the application of design features, mandatory regulatory requirements, and feasible mitigation measures, the Building D Only Alternative's long-term operational-related VOC and NO_x emissions would still exceed the SCAQMD numerical thresholds for daily emissions. In addition, the VOC and NO_x emissions would



cumulatively contribute to an existing air quality violation in the SCAB (i.e., NO_x and O₃ concentrations, which do not meet regional attainment status).

The Project would result in DPM exposure to the maximally exposed residential receiver, worker, and school child below the SCAQMD's significance threshold of 10 in one million. Thus, the Project's impacts associated with the exposure of sensitive receptors to substantial pollutant concentrations would be less than significant. Because the Building D Only Alternative would generate less traffic than the Project and use fewer pieces of on-site diesel fueled equipment than the proposed Project, there would be a concomitant reduction in DPM emissions at the Project site, which would further reduce the Project's less-than-significant impact.

In conclusion, the proposed Project would result in significant and unavoidable air quality impacts with mitigation. This alternative would result in fewer air quality impacts; thus, the Project's significant and unavoidable air quality impacts would be reduced.

D. Biological Resources

The Building D Only Alternative would permanently impact the Building D Site, while the Building E Site would remain in its existing condition and continue to be subject to mandatory weed abatement (i.e., discing). Although the Building D Site Only Alternative would permanently impact a smaller portion of the subject property than the Project, this alternative would be subject to the same regulatory requirements and mitigation measures as the Project to reduce impacts to less-than-significant levels. Under the Building D Only Alternative, impacts to the ephemeral drainage feature that would occur on the Building E Site under the proposed Project (0.11-acre (690 linear feet)) would be avoided, and fees would not be paid to the Riverside Corona Resource Conservation District in-lieu fee program, or comparable program, to compensate for that impact. Also, because less of the Project site would be developed under the Building D Only Alternative, smaller fee amounts would be paid under the Western Riverside County MSHCP Fee Program Ordinance and the Stephens' Kangaroo Rat (SKR) Mitigation Fee Ordinance.

In conclusion, the proposed Project would result in less-than-significant biological resource impacts with mitigation. This alternative would result in fewer biological resource impacts; thus, the Project's biological resource impacts would be reduced.

E. Cultural Resources

No known historic resources, unique geological features, or human remains are present on the Project site under existing conditions. Five recorded archaeological sites are recorded on the Project site, of which three sites would be fully impacted and two sites would be partially impacted as a result of the Project. The Building D Only Alternative would permanently impact only two of the recorded sites, Site RIV-8401 (as single milling feature) and Site SV RIV-8402 (four milling slicks on three granitic outcrops). Although the Building D Site Only Alternative would permanently impact a smaller portion of the subject property than the Project, and thus have a lower probability of unearthing significant



archaeological resources that may be buried, this alternative would be subject to the same regulatory requirements and mitigation measures as the Project to reduce impacts to less-than-significant levels.

In conclusion, the proposed Project would result in less-than-significant cultural resource impacts with mitigation. This alternative would result in fewer cultural resource impacts; thus, the Project's cultural resource impacts would be reduced.

F. Geology and Soils

The Building D Only Alternative would result in grading less of the property than would occur under the proposed Project; therefore, fewer potential impacts to geology or soils would occur. Because only one structure would be built instead of two structures, there would be fewer increased risks to new construction associated with seismic ground shaking or geologic hazards. Thus, this alternative would reduce but not avoid the Project's other less-than-significant impacts associated with geology and soils.

In conclusion, the proposed Project would result in less-than-significant geology and soils impacts. This alternative would result in fewer geology and soils impacts; thus, the Project's geology and soils impacts would be reduced.

G. Greenhouse Gas Emissions

The Building D Only Alternative would involve the construction and operation of 702,645 s.f. of building space, which would generate approximately 1,181 actual daily vehicle trips (not adjusted for PCE). Mobile-source (i.e., vehicle-related) emissions account for approximately 84.5 percent of the Project's greenhouse gas (GHG) emissions (refer to Table 4.7-5, *Project Greenhouse Gas Emissions*, in EIR Subsection 4.7). Therefore, due to the reduction in the amount of actual daily vehicle trips associated with this alternative (approximately 934 fewer actual daily vehicle trips than the Project), the Building D Only Alternative would substantially reduce the Project's mobile source GHG emissions. Additionally, because this alternative would involve less building area, non-mobile source operational GHG emissions (fossil fuel use for building operation) also would be reduced under this alternative. Regardless, both the proposed Project and this alternative would result in less-than-significant GHG emission impacts with mitigation, because development under either scenario would achieve at least 100 points (equivalent to an approximate 15% reduction in GHG emissions) on the Riverside County Climate Action Plan's Screening Tables, therefore, neither the proposed Project or this alternative would - conflict with the County of Riverside's CAP or with the State's ability to achieve the reduction targets defined in Assembly Bill 32 (AB 32). Although fewer GHG emissions would be generated by selection of the Building D Only Alternative, both the Project and this alternative would result in less-than-significant impacts.

In conclusion, the proposed Project would result in less-than-significant greenhouse gas emissions impacts with mitigation. This alternative would result in fewer greenhouse gas emissions impacts; thus, the Project's greenhouse gas emissions impacts would be reduced.



H. Hazards and Hazardous Materials

The Building D Only Alternative would attract the same types of building occupants as the Project; therefore, the potential for hazards and hazardous materials associated with this alternative would be similar to the Project, although the potential for the use and storage of hazardous materials common in business park development would occur over a smaller physical area. Potential construction-related hazards and hazardous materials impacts would be reduced under this alternative due to the reduction of the physical area proposed for development. As with the proposed Project, mandatory compliance to federal, state, and local regulations during construction and long-term operation would ensure that the proposed development would not create a significant hazard to the environment due to routine transport, use, disposal, or upset of hazardous materials. Assuming mandatory compliance with standard ALUC conditions of approval, the buildings constructed under the Building D Only Alternative would have the same building heights as proposed by the Project, which were determined by the Riverside County Airport Land Use Commission (ALUC) to be consistent with the restrictions and requirements of the March ARB/IPA Compatibility Plan. Impacts would be less than significant under both the proposed Project and the Building D Only Alternative.

In conclusion, the proposed Project would result in less-than-significant hazards and hazardous materials impacts. This alternative would result in fewer hazards and hazardous materials impacts; thus, the Project's hazards and hazardous materials impacts would be reduced.

I. Hydrology and Water Quality

Although the Building D Only Alternative would disturb a smaller physical area than the proposed Project, neither the proposed Project nor the Building D Only Alternative would result in substantial alterations to the drainage pattern of the site or would result in substantial erosion effects (with mandatory compliance with a Storm Water Pollution Prevention Plan (SWPPP). Accordingly, implementation of either the proposed Project or this alternative would result in less-than-significant impacts to existing drainage patterns. In the long-term, potential hydrology and water quality effects on the undeveloped Building E Site would be identical to existing conditions. On the developed, Building D Site portion of the property, this alternative would introduce a business park site, which would result in the potential for urban pollutants to be carried off-site by storm water runoff. However, like the proposed Project, this alternative would require compliance with a site-specific Water Quality Management Plan (WQMP) and its associated Best Management Practices (BMPs.) Therefore, implementation of this alternative would result in less-than-significant impacts with compliance to a SWPPP and a site-specific WQMP and its associated BMPs and result in similar impacts as would the proposed Project, although over a smaller land area. Erosion and sedimentation may be greater under this alternative associated with the undeveloped Building E Site, because the site would not receive benefit from the storm water drainage and water quality filtration features proposed by the Project. In conclusion, the proposed Project would result in less-than-significant hydrology and water quality impacts. This alternative would result in fewer hydrology and water quality impacts; thus, the Project's hydrology and water quality impacts would be reduced.



J. Land Use and Planning

Under this alternative, the Building D Site would be developed with 702,645 s.f. of building space, while no development would occur on the Building E Site. Under existing conditions, the Building D Site is designated “Community Development-Light Industrial (CD-LI)” and “Community Development-Business Park (CD-BP)” by the Riverside County General Plan. A General Plan Amendment would change the land use designation of the portion of the property designated CD-BP to CD-LI so that the entire Building D Site is designated CD-LI. Also, a Change of Zone would be required to change the zoning designation on the portions of the property zoned “Manufacturing – Medium (M-M)” and “Rural Residential (R-R)” to “Industrial Park (I-P).” As discussed in EIR Subsection 4.10, *Land Use and Planning*, development on the Building D Site, considering the design features proposed, would result in a substantial change to the planned land use of the area; but, would be compatible with surrounding zoning and land uses and would not result in significant environmental effects associated with the land use and zoning designation changes. The Building D Only Alternative would leave the Building E Site in its existing condition as vacant, disturbed, mostly undeveloped land, which means that the Building E Site would not be developed in accordance with the Riverside County General Plan and Mead Valley Area Plan’s vision for developing a majority of the site with employment-generating uses. Under both the proposed Project and this alternative, land use and planning impacts would be significant and unavoidable; however, impacts under this alternative would be reduced as compared to the proposed Project because this alternative would retain the Building E Site in its existing condition.

In conclusion, the proposed Project would result in significant and unavoidable land use and planning impacts. This alternative would result in fewer land use and planning impacts; thus, the Project’s land use and planning impacts would be reduced.

K. Noise

As with the proposed Project, noise associated with this alternative would occur during near-term construction activities and under long-term operation. The Building D Only Alternative would have the same ground-disturbing physical impacts as the proposed Project on the Building D Site, which is the portion of the Project site nearest to the most noise-sensitive receptors. Therefore, noise associated with short-term construction activities would be similar between the proposed Project and this alternative, although the duration of construction activities would be shorter. Building construction activities would be less intense under this alternative, and would result in less noise impacts than the Project, due to the smaller building area.

Similar to the proposed Project, under long-term operations, noise generated by this alternative would be associated with vehicles traveling to and from the Building D Site and on-site vehicle idling, maneuvering and parking. This alternative would generate fewer vehicle trips than would be generated by the proposed Project and therefore would generate less vehicle-related noise than the Project. Although contributions to traffic noise levels along Oleander Avenue would be less under this alternative, they would not be reduced to below a level of significance. Significant and unavoidable



noise impacts would occur under the proposed Project and under this alternative in the near-term because substantial transportation-related noise would be contributed compared to existing conditions along Oleander Avenue between Ellsworth Street and Harvill Avenue. The Project's noise impacts along Oleander Avenue, west of Ellsworth Street, would be eliminated by this alternative because no development on the Building E Site, west of Ellsworth Street, would occur. The Building D Only Alternative would therefore reduce but not avoid the Project's significant and unavoidable short-term transportation related noise impact.

In conclusion, the proposed Project would result in significant and unavoidable noise impacts after mitigation. This alternative would result in fewer noise impacts; thus, the Project's noise impacts would be reduced.

L. Population and Housing

To implement either the proposed Project or this alternative, one mobile home would be removed from the Building D Site. Neither this alternative nor the proposed Project would displace substantial numbers of existing housing units, people, or create a demand for additional housing. Because this alternative would develop only the Building D Site portion of the property, fewer employment opportunities would be created as compared to the Project, reducing the potential for indirect population growth. Less-than-significant impacts would occur under either the proposed Project or the Building D Only Alternative.

In conclusion, the proposed Project would result in less-than-significant population and housing impacts. This alternative would result in fewer population and housing impacts; thus, the Project's population and housing impacts would be reduced.

M. Public Services

The Building D Only Alternative would result in less development on the Project site as compared to the proposed Project, which would be less direct demand on fire protection services, sheriff's protection services, and less indirect demand other services such as public schools, libraries, and health services. Compared to the proposed Project, demand would be lessened, although the Project would not result in any significant public service impacts that would be eliminated by the selection of this alternative. The Riverside County Fire Department (RCFD) does not have plans to construct a new fire station or physically expand fire protection facilities in the Project site's vicinity. Similarly, the Riverside County Sheriff's Department (RCSD) does not have plans to construct or expand sheriff facilities. Therefore, neither the Building D Only Alternative nor the proposed Project would have physical environmental effects on public service facilities. Increased demand is not an environmental effect under CEQA. Because no development would occur on the Building E Site, this alternative would contribute a lesser payment amount toward public services that are funded by the County's Development Impact Fee (DIF) Ordinance (Riverside County Ordinance No. 659). In addition, a lower fee payment would be made under the provisions of California Government Code §§ 65995.5-65998 to the Val Verde Unified School District (VVUSD).



In conclusion, the proposed Project would result in less-than-significant public services impacts. This alternative would result in fewer public services impacts; thus, the Project's public services impacts would be reduced.

N. Recreation

Neither the proposed Project nor the Building D Only Alternative would physically impact recreational facilities. Also, neither the proposed Project nor the Building D Only Alternative would preclude the County's ability to implement a community trail segment along Oleander Avenue, as called for by the MVAP. Less-than-significant impacts would occur under the proposed Project and this alternative.

In conclusion, the proposed Project would result in less-than-significant recreation impacts. This alternative would result in fewer recreation impacts; thus, the Project's utilities and service system impacts would be avoided.

O. Transportation

The Building D Only Alternative is estimated to generate approximately 1,181 actual vehicle trips on a daily basis (utilizing the ITE trips generation rates for high-cube warehouse uses, not adjusted for PCE). For comparison purposes, the proposed Project would generate approximately 2,115 actual vehicle trips on a daily basis (not adjusted for PCE). Although less traffic would be generated, the significant and unavoidable traffic impacts of the proposed Project would not be avoided through selection of the Building D Only Alternative. Also, because less building square footage would be developed, a lower monetary contribution would be made by the Project Applicant to the Riverside County DIF program and the Transportation Uniform Mitigation Fee (TUMF) program to assist in the funding of needed local and regional circulation network improvements. Other fair share fee payments toward needed transportation improvements also would be less. Under both the proposed Project and this alternative, there would be significant and unavoidable cumulatively considerable effects to four (4) local roadway intersections and to state highway facilities under the jurisdiction of Caltrans.

In conclusion, the proposed Project would result in significant and unavoidable transportation and traffic impacts after mitigation. This alternative would result fewer transportation and traffic impacts; thus, the Project's noise impacts would be reduced.

P. Utilities and Service Systems

This alternative represents a 410.982 s.f. reduction in building space as compared to the proposed Project. As such, water demand, wastewater generation, electricity, natural gas, fuel use (energy) demand, and solid waste generation would be reduced, compared to the proposed Project. Nonetheless, the same types of connections to existing water, sewer and storm drainage systems would be required. Neither the proposed Project nor the Building D Only Alternative would result in significant or cumulatively considerable impacts to utilities and service systems.



In conclusion, the proposed Project would result in less-than-significant utilities and service system impacts. This alternative would result in fewer utilities and service system impacts; thus, the Project's utilities and service system impacts would be reduced.

Q. Paleontological Resources

Under the Building D Only Alternative, the same potential impacts to paleontological resources would occur as would occur under the proposed Project because the only area of the Project site that may contain such resources is located on the Building D Site portion of the property. Paleontological resource impact potential would be identical under this alternative and the proposed Project.

In conclusion, the proposed Project would result in less-than-significant paleontological resources impacts after mitigation. This alternative would result in the same paleontological resources impacts; thus, the Project's paleontological resources impacts would not be reduced or avoid.

R. Tribal Cultural Resources

Five archaeological sites are recorded on the Project site, of which three sites would be fully impacted and two sites would be partially impacted as a result of the Project. The Building D Only Alternative would permanently impact only two of the recorded sites, Site RIV-8401 (as single milling feature) and Site SV RIV-8402 (four milling slicks on three granitic outcrops). None of the sites meet the definition of a tribal cultural resource under Public Resources Code § 21074(b) and the Project site also does not qualify as a cultural landscape under Public Resources Code § 21074(b). Thus, both the proposed Project and this alternative would have a less-than-significant impact to tribal cultural resources. Although the impact conclusion would remain the same, because this alternative would disturb less land area than the proposed Project, the Project's less-than-significant impacts would be reduced under this alternative.

S. Conclusion

Selection of the Building D Only Alternative would reduce, but not avoid the Project's significant unavoidable impacts to air quality, land use and planning, noise, and transportation. The Building D Only Alternative would result in similar less-than-significant impacts to aesthetics, agricultural and forestry resources, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, population and housing, public services, recreation, and utilities and service systems, and tribal cultural resources as the proposed Project. However, the Project's impacts under all of these topics would be reduced with selection of the Building D Only Alternative because less land would be physically disturbed and less building space would be constructed, which would result in generating less traffic and vehicular- and operational-related effects.

The Building D Alternative would fail to meet most of the Project's objectives, specifically, this alternative would not meet Objective B and Objective G and would only partially meet Objectives A, C, D, E, and F. Most particularly, because the Building D Only Alternative would leave an entire parcel vacant and unproductive, this alternative would provide fewer economic opportunities, job



growth, and generate less tax revenue for the County of Riverside. In addition, the selection of this alternative, while preventing full development of the property with business park uses, would not satisfy demand for logistics business park development in the SCAG region to the same extent as the proposed Project. Thus, the regional demand for logistics buildings and the environmental effects associated with the development of these uses would very likely be displaced to other properties.

Although this alternative would fail to meet most of the Project's Objectives, because this alternative would physically disturb less land and less building space would be constructed, thereby generating less traffic and vehicular and operational-related effects, it is considered to be environmentally superior to the proposed Project.

6.3.4 REDUCED PROJECT / TRUCK TRAILER STORAGE ALTERNATIVE

Under this alternative, the Building D Site would be developed as described in Subsection 3.3.1 "Building D Applications" of EIR Section 3.0, *Project Description*. Building D would contain 702,645 s.f. of building space, including 677,645 s.f. of warehouse floor space, 15,000 s.f. of ground floor office space, and 10,000 s.f. of mezzanine office space. There would be 54 loading docks on the west side of the building and 55 docks on the east side of the building (109 total docks). The Building E Site would be developed as a truck trailer parking yard to service the building constructed on the Building D Site. This alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would allow an intensification of surfacing parking to accommodate a building user that requires a substantial amount of on-site truck trailer storage space.

A. Aesthetics

The Project site does not contain any unique aesthetic resources, nor does it serve as a prominent scenic vista. Under the Reduced Project/Truck Trailer Storage Alternative, the visual character and quality of the Building E Site would be changed from undeveloped land to a truck trailer parking lot and storage area. The Building D Site would be developed as described in EIR Section 3.0, *Project Description*, and evaluated throughout this EIR. The selection of this alternative would result in similar aesthetic effects associated with changes to existing visual quality, character, and the introduction of light and glare sources, but slightly less than would occur under the proposed Project because only one building would be erected as compared to two buildings as proposed by the Project. Under both this alternative and the proposed Project, aesthetic impacts would be less-than-significant. Buildout of the Building D Site would develop one building in a contemporary architectural design that would be landscaped and served by improved roadways along the property's street frontages. The Building E Site would be fenced, and truck trailers would be visible on the site as compared to a building that would be visible under the proposed Project.

In conclusion, the proposed Project would result in less-than-significant aesthetic impacts. This alternative would result similar aesthetic impacts; thus, the Project's less-than-significant aesthetic impacts would not be reduced or avoided.



B. Agriculture and Forest Resources

No forestry resources are located on the Project site or in the immediate vicinity of the Project site. Therefore, neither the proposed Project nor this alternative would impact forest resources. Because no evidence exists that the Project site was ever used for agricultural use, the site is not surrounded by lands under active agricultural production, and the majority of the Project site is not suitable for productive farmland according to the land capability classification of the USDA Storie Index, it is highly unlikely that the Project site would ever be used for agricultural purposes under the Reduced Project/Truck Trailer Storage Alternative. For these reasons, impacts to agricultural resources would be the same under this alternative as they would be for the proposed Project. With mandatory compliance to Ordinance No. 625, as would be required by the County, impacts would be less than significant.

In conclusion, the proposed Project would result in less-than-significant agriculture impacts and no impacts to forest resources. This alternative would result in the same agriculture impacts and no forest resource impacts; thus, the Project's less-than-significant agriculture impacts would not be reduced or avoided.

C. Air Quality

Under this alternative, the construction schedule would be reduced as compared to the proposed Project because only one building and a large truck trailer storage lot would be constructed instead of two buildings. The construction of parking lot involves less intense construction activity than does the construction of a building. As such, construction-related air quality emissions would occur over a slightly shorter period of time. Total daily emissions during construction activities on the Project site would be the same as the proposed Project's daily emissions reported in Subsection 4.3 of this EIR. Therefore, air quality pollutant emissions associated with short-term construction would be identical between the proposed Project and the Reduced Project/Truck Trailer Storage Alternative. With mitigation, these impacts would be reduced to below a level of significance.

Because the Reduced Project/Truck Trailer Storage Alternative would construct 410,982 s.f. less building space than proposed by the Project, the Alternative would produce a concomitant reduction in traffic compared to the proposed Project and require a concomitant reduction of energy use. The truck trailer storage yard would be used by the building on the Building D Site and would not independently attract traffic. Under the Reduced Project/Truck Trailer Storage Alternative, 1,181 daily vehicle trips would be generated, including 731 passenger cars and 450 trucks. As such, mobile source and energy source air emissions would be reduced by approximately 44% compared to the Project. None of the Project's significant air quality impacts would be avoided and the Project's significant and unavoidable impacts associated with VOC and NO_x emissions also would not be eliminated. After the application of design features, mandatory regulatory requirements, and feasible mitigation measures, the Reduced Project/Truck Trailer Storage Alternative's long-term operational-related VOC and NO_x emissions would still exceed the SCAQMD numerical thresholds for daily emissions. In



addition, the VOC and NO_x emissions would cumulatively contribute to an existing air quality violation in the SCAB (i.e., NO_x and O₃ concentrations, which do not meet regional attainment status).

The Project would result in DPM exposure to the maximally exposed residential receiver, worker, and school child below the SCAQMD's significance threshold of 10 in one million. Thus, the Project's impacts associated with the exposure of sensitive receptors to substantial pollutant concentrations would be less than significant. Because the Reduced Project/Truck Trailer Storage Alternative would generate less traffic than the proposed Project, there would be a concomitant reduction in DPM emissions at the Project site, which would further reduce the Project's less-than-significant impact.

In conclusion, the proposed Project would result in significant and unavoidable air quality impacts with mitigation. This alternative would result in fewer air quality impacts; thus, the Project's significant and unavoidable air quality impacts would be reduced, but not avoided.

D. Biological Resources

Because the Reduced Project/Truck Trailer Storage Alternative would have the same ground-disturbing physical impacts as the proposed Project, impacts to biological resources would be identical as described in EIR Subsection 4.4, *Biological Resources*.

E. Cultural Resources

Because the Reduced Project/Truck Trailer Storage Alternative would have the same ground-disturbing physical impacts and depth of grading as the proposed Project, impacts to cultural resources would be identical as described in EIR Subsection 4.5, *Cultural Resources*.

F. Geology and Soils

Because the Reduced Project/Truck Trailer Storage Alternative would have the same ground-disturbing physical impacts and depth of grading as the proposed Project, impacts to geology and soils would be nearly identical to those described in EIR Subsection 4.6, *Geology and Soils*. However, because only one structure would be built instead of two structures, there would be fewer increased risks to new construction associated with seismic ground shaking or geologic hazards. Less-than-significant impacts would occur under this alternative and under the proposed Project.

In conclusion, the proposed Project would result in less-than-significant geology and soils impacts. This alternative would result in the same geology and soils impacts; thus, the Project's geology and soils impacts would be reduced.

G. Greenhouse Gas Emissions

The Reduced Project/Truck Trailer Storage Alternative would involve the construction and operation of 702,645 s.f. of building space, which would generate approximately 1,181 actual daily vehicle trips (not adjusted for PCE). Mobile-source (i.e., vehicle-related) emissions account for



approximately 84.5 percent of the Project's greenhouse gas (GHG) emissions (refer to Table 4.7-5, *Project Greenhouse Gas Emissions*, in EIR Subsection 4.7). Therefore, due to the reduction in the amount of actual daily vehicle trips associated with this alternative (approximately 934 fewer actual daily vehicle trips than the Project), the Reduced Project/Truck Trailer Storage Alternative would substantially reduce the Project's mobile source GHG emissions. Additionally, because this alternative would involve less building area, non-mobile source operational GHG emissions (fossil fuel use for building operation) also would be reduced under this alternative. The truck trailer parking yard on the Building E Site would serve the building on the Building D Site and would not independently generate vehicle trips. Both the proposed Project and this alternative would result in less-than-significant GHG emission impacts, because development under either scenario would achieve at least 100 points (equivalent to an approximate 15% reduction in GHG emissions) on the Riverside County Climate Action Plan's (CAP's) Screening Tables; therefore, with mitigation that requires CAP compliance, neither the proposed Project or this alternative would conflict with the County of Riverside's CAP or with the State's ability to achieve the reduction targets defined in Assembly Bill 32 (AB 32). Although fewer GHG emissions would be generated by selection of the Reduced Project/Truck Trailer Storage Alternative, both the proposed Project and this alternative would result in less-than-significant impacts.

In conclusion, the proposed Project would result in less-than-significant greenhouse gas emissions impacts with mitigation. This alternative would result in fewer greenhouse gas emissions impacts; thus, the Project's greenhouse gas emissions impacts would be reduced.

H. Hazards and Hazardous Materials

The Reduced Project/Truck Trailer Storage Alternative would attract the same types of building occupants as the Project on the Building D Site; therefore, the potential for hazards and hazardous materials associated would be similar to the Project. Although the potential for the use and storage of hazardous materials common in business park development would mostly occur on the Building D Site, truck trailer fuel has the potential to be stored on the Building E Site in association with the truck trailer parking yard. Potential construction-related hazards and hazardous materials impacts would be slightly reduced under this alternative due to a less intense construction process required for a trailer yard on the Building E Site as compared to what is required to construct a building. As with the proposed Project, mandatory compliance to federal, state, and local regulations during construction and long-term operation would ensure that the proposed development would not create a significant hazard to the environment due to routine transport, use, disposal, or upset of hazardous materials. Assuming mandatory compliance with standard ALUC conditions of approval, the building constructed under the Reduced Project/Truck Trailer Storage Alternative on the Building D Site would have the same building height as proposed by the Project, which was determined by the Riverside County Airport Land Use Commission (ALUC) to be consistent with the restrictions and requirements of the March ARB/IPA Compatibility Plan. Impacts would be less than significant under both the proposed Project and the Reduced Project/Truck Trailer Storage Alternative.



In conclusion, the proposed Project would result in less-than-significant hazards and hazardous materials impacts. This alternative would result in fewer hazards and hazardous materials impacts; thus, the Project's hazards and hazardous materials impacts would be reduced.

I. Hydrology and Water Quality

The Reduced Project/Truck Trailer Storage Alternative would have the same ground-disturbing physical impacts as the proposed Project, attract the same types of building occupants, and have a near-identical drainage system design. Impervious surface coverage also would be approximately the same because the reduction in building coverage on the Building E Site would be offset by increased impervious vehicle parking areas. Neither the proposed Project nor the Reduced Project/Truck Trailer Storage Alternative would result in substantial alterations to the drainage pattern of the site or would result in substantial erosion effects (with mandatory compliance with a Storm Water Pollution Prevention Plan (SWPPP)). Accordingly, implementation of either the proposed Project or this alternative would result in less-than-significant impacts to existing drainage patterns. Similar to the proposed Project, this alternative would require compliance with a site-specific Water Quality Management Plan (WQMP) and its associated Best Management Practices (BMPs.) Therefore, implementation of this alternative would result in less-than-significant water quality impacts with compliance to a SWPPP and a site-specific WQMP and its associated BMPs and result in similar impacts as would the proposed Project.

In conclusion, the proposed Project would result in less-than-significant hydrology and water quality impacts. This alternative would result in the same hydrology and water quality impacts; thus, the Project's hydrology and water quality impacts would not be reduced or avoided.

J. Land Use and Planning

The Reduced Project/Truck Trailer Storage Alternative would require the same General Plan Amendment and Change of Zone application requests that are under consideration for the proposed Project. The construction of a building on the Building D Site and a truck trailer parking yard on the Building E Site would result in a substantial alteration to the existing land uses on the Project site; but, considering the design features proposed by the Project and the design features that would be expected of a truck trailer parking yard (fencing with perimeter landscaping), would not result in a substantial change to the planned land use of the area, would be compatible with surrounding zoning and land uses, and would not result in significant environmental effects associated with the land use and zoning designation changes. However, the establishment of a large truck trailer parking yard on the Building E Site is not necessarily consistent with the Riverside County General Plan and Mead Valley Area Plan's vision for developing a majority of the site with employment-generating uses. Under both the proposed Project and this alternative, land use and planning impacts would be significant and unavoidable.



In conclusion, the proposed Project would result in significant and unavoidable land use and planning impacts. This alternative would result in the same land use and planning impacts; thus, the Project's land use and planning impacts would not be reduced or avoided.

K. Noise

As with the proposed Project, noise associated with this alternative would occur during near-term construction activities and under long-term operation. The Reduced Project/Truck Trailer Storage Alternative would have the same ground-disturbing physical impacts as the proposed Project; therefore, noise associated with short-term construction activities would be similar between the proposed Project and this alternative, although the duration of construction activities would be shorter on the Building E Site because a building would not be erected on that portion of the property.

Similar to the proposed Project, under long-term operations, noise generated by this alternative would be associated with vehicles traveling to and from the Building D Site and on-site vehicle idling, maneuvering and parking on the Building D Site and the Building E Site. This alternative would generate fewer vehicle trips than would be generated by the proposed Project and therefore would generate less vehicle-related noise than the Project. Although contribution to traffic noise levels along Oleander Avenue would be less under this alternative, they would not be reduced to below a level of significance. Significant and unavoidable noise impacts would occur under the proposed Project and under this alternative in the near-term because substantial transportation-related noise would be contributed compared to existing conditions along Oleander Avenue between Ellsworth Street Project Driveway #6. Due to the reduced amount of vehicle traffic, the Reduced Project/Truck Trailer Storage Alternative would reduce but not avoid the Project's significant and unavoidable short-term transportation-related noise impact.

In conclusion, the proposed Project would result in significant and unavoidable noise impacts after mitigation. This alternative would result in fewer noise impacts; thus, the Project's noise impacts would be reduced.

L. Population and Housing

To implement either the proposed Project or this alternative, one mobile home would be removed from the Building D Site. Neither this alternative nor the proposed Project would displace substantial numbers of existing housing units, people, or create a demand for additional housing. Because this alternative would develop only the Building D Site portion of the property with an employment-generating use (a business park building), fewer employment opportunities would be created as compared to the Project, reducing the potential for indirect population growth. Less-than-significant impacts would occur under both the proposed Project or the Reduced Project/Truck Trailer Storage Alternative.



In conclusion, the proposed Project would result in less-than-significant population and housing impacts. This alternative would result in fewer population and housing impacts; thus, the Project's population and housing impacts would be reduced.

M. Public Services

The Reduced Project/Truck Trailer Storage Alternative would result in less building space on the Project site as compared to the proposed Project, which would result in less of a demand on fire protection services, sheriff's protection services, and less indirect demand for other services such as public schools, libraries, and health services. Compared to the proposed Project, demand would be lessened, although the Project would not result in any significant public service impacts that would be eliminated by the selection of this alternative. The Riverside County Fire Department (RCFD) does not have plans to construct a new fire station or physically expand fire protection facilities in the Project site's vicinity. Similarly, the Riverside County Sheriff's Department (RCSD) does not have plans to construct or expand sheriff facilities. Therefore, neither the Reduced Project/Truck Trailer Storage Alternative nor the proposed Project would have physical environmental effects on public service facilities. Increased demand is not an environmental effect under CEQA. Because no building construction would occur on the Building E Site, this alternative would contribute a lesser payment amount toward public services that are funded by the County's Development Impact Fee (DIF) Ordinance (Riverside County Ordinance No. 659). In addition, a lower fee payment would be made under the provisions of California Government Code §§ 65995.5-65998 to the Val Verde Unified School District (VVUSD).

In conclusion, the proposed Project would result in less-than-significant public services impacts. This alternative would result in fewer public services impacts; thus, the Project's public services impacts would be reduced.

N. Recreation

Neither the proposed Project nor the Reduced Project/Truck Trailer Storage Alternative would physically impact recreational facilities. Also, neither the proposed Project nor the Reduced Project/Truck Trailer Storage Alternative would preclude the County's ability to implement a community trail segment along Oleander Avenue, as called for by the MVAP. Less-than-significant impacts would occur under the proposed Project and this alternative.

In conclusion, the proposed Project would result in less-than-significant recreation impacts. This alternative would result in the same impacts; thus, the Project's less-than-significant recreation impacts would not be reduced or avoided.

O. Transportation

The Reduced Project/Truck Trailer Storage Alternative is estimated to generate approximately 1,181 actual vehicle trips on a daily basis (utilizing the ITE trips generation rates for high-cube warehouse uses, not adjusted for PCE). For comparison purposes, the proposed Project would generate



approximately 2,115 actual vehicle trips on a daily basis (not adjusted for PCE). Although less traffic would be generated, the significant and unavoidable traffic impacts of the proposed Project would not be avoided through selection of the Reduced Project/Truck Trailer Storage Alternative. Also, because less building square footage would be developed, a lower monetary contribution would be made by the Project Applicant to the Riverside County DIF program and the Transportation Uniform Mitigation Fee (TUMF) program to assist in the funding of needed local and regional circulation network improvements. Other fair share fee payments toward needed transportation improvements also would be less. Under both the proposed Project and this alternative, there would be significant and unavoidable cumulatively considerable effects to four (4) local roadway intersections and to state highway facilities under the jurisdiction of Caltrans.

In conclusion, the proposed Project would result in significant and unavoidable transportation and traffic impacts after mitigation. This alternative would result in fewer transportation and traffic impacts; thus, the Project's transportation and traffic impacts would be reduced.

P. Utilities and Service Systems

This alternative represents a 410,982 s.f. reduction in building space as compared to the proposed Project. Only nominal water demand for landscaping and electricity use for exterior lighting would be demanded by the truck trailer parking lot use on the Building E Site. As such, water demand, wastewater generation, electricity, natural gas, fuel use (energy) demand, and solid waste generation would be reduced overall, compared to the proposed Project. Nonetheless, the same types of connections to existing water, sewer and storm drainage systems would be required. Neither the proposed Project or the Reduced Project/Truck Trailer Storage Alternative would result in significant or cumulatively considerable impacts to utilities and service systems.

In conclusion, the proposed Project would result in less-than-significant utilities and service system impacts. This alternative would result in fewer utilities and service system impacts; thus, the Project's utilities and service system impacts would not be reduced.

Q. Paleontological Resources

Because the Reduced Project/Truck Trailer Storage Alternative would have the same ground-disturbing physical impacts and depth of grading as the proposed Project, impacts to paleontological resources would be identical as described in EIR Subsection 4.17, *Paleontological Resources*.

In conclusion, the proposed Project would result in less-than-significant paleontological resources impacts after mitigation. This alternative would result in the same paleontological resources impacts; thus, the Project's paleontological resources impacts would not be reduced or avoided.

R. Tribal Cultural Resources

Five archaeological sites are recorded on the Project site, of which three sites would be fully impacted and two sites would be partially impacted as a result of either the proposed Project or this alternative.



None of the sites meet the definition of a tribal cultural resource under Public Resources Code § 21074(b) and the Project site also does not qualify as a cultural landscape under Public Resources Code § 21074(b). Thus, the proposed Project and this alternative would have a less-than-significant impact to tribal cultural resources. Because this alternative would disturb the same amount of land as the proposed Project, the impact conclusion would remain the same.

S. Conclusion

Selection of the Reduced Project/Truck Trailer Storage Alternative would reduce, but not avoid the Project's significant unavoidable impacts to air quality, land use and planning, noise, and transportation. The Reduced Project/Truck Trailer Storage Alternative would result in similar but reduced impacts to aesthetics, ~~agricultural and forestry resources~~, ~~biological resources~~, ~~cultural resources~~, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, ~~population and housing~~, public services, ~~recreation~~, and utilities and service systems as compared to the proposed Project. Impacts to agricultural and forestry resources, biological resources, cultural resources, population and housing, recreation, and tribal cultural resources would be the same either under the proposed Project or this alternative.

The Reduced Project/Truck Trailer Storage Alternative would meet most of the Project's objectives but to a lesser degree. Most particularly, the Reduced Project/Truck Trailer Storage Alternative would provide fewer economic opportunities, job growth, and generate less tax revenue for the County of Riverside. The selection of this alternative, while maximizing use of the site, would not maximize its development potential for business park space, filling the demand for logistics business park development in the SCAG region to a lesser extent than would the Project meet this demand. Thus, the regional demand for logistics buildings and the environmental effects associated with the development of these uses would very likely be displaced to other properties. Because this alternative would attain the basic objectives of the Project with reduced environmental impacts, it is considered to be environmentally superior to the proposed Project.

6.3.5 LARGER BUILDING ALTERNATIVE

Under this alternative, a 1,250,000 s.f. high cube warehouse building would be constructed on the Building D Site and the Building E Site, spanning the two areas. The segment of Ellsworth Street that segregates the two Sites would be vacated as a public right-of-way to allow for construction of the building. There would be 125 loading docks on the north side of the building and 125 loading docks on the south side of the building (150 total docks). This alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would allow for the construction of a larger building, with approximately the same amount of building space that would be provided by proposed Building D and Building E combined.

A. Aesthetics

The Project site does not contain any unique aesthetic resources, nor does it serve as a prominent scenic vista. Under the Larger Building Alternative, the visual character and quality of the site would be very



similar to what would occur under the proposed Project, although loading docks would face the north property line and the south property line instead of the east and west property. In addition, the building that would be constructed under the Larger Building Alternative would have more mass and bulk and would have a greater potential to obstruct distant views. Because the segment of Ellsworth Street through the site would be eliminated under this alternative and covered with the center of a large building, there would be no public views from that area. The selection of this alternative would result in similar aesthetic effects associated with changes to existing visual quality, character, and the introduction of light and glare sources, but slightly more than would occur under the proposed Project because one large, more bulky-appearing building would be erected as compared to two smaller buildings as proposed by the Project. Under either this alternative or the proposed Project, aesthetic impacts would be less-than-significant.

In conclusion, the proposed Project would result in less-than-significant aesthetic impacts. This alternative would result in the similar aesthetic impacts; thus, the Project's less-than-significant aesthetic impacts would not be reduced or avoided.

B. Agriculture and Forest Resources

No forestry resources are located on the Project site or in the immediate vicinity of the Project site. Therefore, neither the proposed Project nor this alternative would impact forest resources.

Because no evidence exists that the Project site was ever used for agricultural use, the site is not surrounded by lands under active agricultural production, and the majority of the Project site is not suitable for productive farmland according to the land capability classification of the USDA Storie Index, it is highly unlikely that the Project site would ever be used for agricultural purposes under the Larger Building Alternative. For these reasons, impacts to agricultural resources would be the same under this alternative as they would be for the proposed Project. With mandatory compliance to Ordinance No. 625, as would be required by the County, impacts would be less than significant.

In conclusion, the proposed Project would result in less-than-significant agriculture impacts and no impacts to forest resources. This alternative would result in the same agriculture impacts and no forest resource impacts; thus, the Project's less-than-significant agriculture impacts would not be reduced or avoided.

C. Air Quality

Under this alternative, the construction schedule would be more intense than would occur under the proposed Project because the one larger building would result in the entire site being under simultaneous construction whereas the proposed Project would construct Building D and Building E serially. As such, total daily emissions during construction activities on the Project site would be increased as compared to the proposed Project's daily emissions reported in Subsection 4.3 of this EIR. It is likely that emissions of VOC, NO_x, and particulate matter could not be feasibly mitigated under this alternative to a less-than-significant level. Therefore, construction-related air quality impacts



would be increased under this alternative as compared to the proposed Project and would likely be significant and unavoidable.

Because the Larger Building Alternative would construct approximately the same amount of building space as proposed by the Project, operational-related air quality impacts would be nearly identical. The Project's significant air quality impacts would not be reduced or avoided and the Project's significant and unavoidable impacts associated with VOC and NO_x emissions would remain at similar levels.

The Project would result in DPM exposure to the maximally exposed residential receiver, worker, and school child below the SCAQMD's significance threshold of 10 in one million. Thus, the Project's impacts associated with the exposure of sensitive receptors to substantial pollutant concentrations would be less than significant. Because the Larger Building Alternative would position loading docks and truck yards on the north and south sides of the building instead of on the east and west sides of the buildings as proposed by the Project, it is likely that DPM impacts would be increased under this alternative. With feasible restrictions placed on on-site operating equipment, it is unlikely that the more severe impacts would exceed the SCAQMD's significance threshold of 10 in one million. Therefore, although impacts would be more severe under this alternative, both this alternative and the proposed Project would have less-than-significant impacts.

In conclusion, the proposed Project would result in significant and unavoidable air quality impacts with mitigation. This alternative would result in greater air quality impacts; thus, the Project's significant and unavoidable air quality impacts would be increased.

D. Biological Resources

Because the Larger Building Alternative would have the same ground-disturbing physical impacts as the proposed Project, impacts to biological resources would be identical as described in EIR Subsection 4.4, *Biological Resources*.

E. Cultural Resources

Because the Larger Building Alternative would have the same ground-disturbing physical impacts and depth of grading as the proposed Project, impacts to cultural resources would be identical as described in EIR Subsection 4.5, *Cultural Resources*.

F. Geology and Soils

Because the Larger Building Alternative would have the same ground-disturbing physical impacts and depth of grading as the proposed Project, impacts to geology and soils would be nearly identical to those described in EIR Subsection 4.6, *Geology and Soils*. However, more grading would likely be required under this alternative because the larger building would require a larger, flat development pad and grade could not be taken up inside the Project site along Ellsworth Street as is proposed by the



Project's grading design. Less-than-significant impacts would occur under this alternative and under the proposed Project.

In conclusion, the proposed Project would result in less-than-significant geology and soils impacts. This alternative would result in the same geology and soils impacts; thus, the Project's geology and soils impacts would not be reduced or avoided.

G. Greenhouse Gas Emissions

Because the Larger Building Alternative would construct approximately the same amount of building space as proposed by the Project, operational-related GHG emissions would be nearly identical. Both the proposed Project and this alternative would result in less-than-significant GHG emission impacts, because development under either scenario would achieve at least 100 points (equivalent to an approximate 15% reduction in GHG emissions) on the Riverside County Climate Action Plan's (CAP's) Screening Tables; therefore, with mitigation that requires CAP compliance, neither the proposed Project or this alternative would conflict with the County of Riverside's CAP or with the State's ability to achieve the reduction targets defined in Assembly Bill 32 (AB 32). Both the Project and this alternative would result in less-than-significant impacts.

In conclusion, the proposed Project would result in less-than-significant greenhouse gas emissions impacts with mitigation. This alternative would result in the same greenhouse gas emissions impacts; thus, the Project's greenhouse gas emissions impacts would not be reduced or avoided.

H. Hazards and Hazardous Materials

Because the Larger Building Alternative would attract the same types of building occupants as the Project, the potential for hazards and hazardous materials would be similar to the Project. Potential construction-related hazards and hazardous materials impacts would also be very similar. As with the proposed Project, mandatory compliance to federal, state, and local regulations during construction and long-term operation would ensure that the proposed development would not create a significant hazard to the environment due to routine transport, use, disposal, or upset of hazardous materials. Assuming mandatory compliance with standard ALUC conditions of approval, the building constructed under the Larger Building Alternative would have the same building height range as proposed by the Project, which was determined by the Riverside County Airport Land Use Commission (ALUC) to be consistent with the restrictions and requirements of the March ARB/IPA Compatibility Plan. Impacts would be less than significant under both the proposed Project and the Larger Building Alternative.

In conclusion, the proposed Project would result in less-than-significant hazards and hazardous materials impacts. This alternative would result in the same hazards and hazardous materials impacts; thus, the Project's hazards and hazardous materials impacts would not be reduced or avoided.



I. Hydrology and Water Quality

The Larger Building Alternative would have the same ground-disturbing physical impacts as the proposed Project, attract the same types of building occupants, and have a near-identical drainage system design. Neither the proposed Project or the Larger Building Alternative would result in substantial alterations to the drainage pattern of the site or would result in substantial erosion effects (with mandatory compliance with a Storm Water Pollution Prevention Plan (SWPPP)). Accordingly, implementation of either the proposed Project or this alternative would result in less-than-significant impacts to existing drainage patterns. As with the proposed Project, this alternative would require compliance with a site-specific Water Quality Management Plan (WQMP) and its associated Best Management Practices (BMPs.) Therefore, implementation of this alternative would result in less-than-significant water quality impacts with compliance to a SWPPP and a site-specific WQMP and its associated BMPs and result in similar impacts as would the proposed Project.

In conclusion, the proposed Project would result in less-than-significant hydrology and water quality impacts. This alternative would result in the same hydrology and water quality impacts; thus, the Project's hydrology and water quality impacts would not be reduced or avoided.

J. Land Use and Planning

The Larger Building Alternative would require the same General Plan Amendment and Change of Zone application requests that are under consideration for the proposed Project and result in the development of the same business park use, although with a different building configuration. As such, the Larger Building Alternative would have the same significant and unavoidable land use and planning impacts as the proposed Project, as described in EIR Subsection 4.10, *Land Use and Planning*.

In conclusion, the proposed Project would result in significant and unavoidable land use and planning impacts. This alternative would result in the same land use and planning impacts; thus, the Project's land use and planning impacts would not be reduced or avoided.

K. Noise

As with the proposed Project, noise associated with this alternative would occur during near-term construction activities and under long-term operation. Because the Larger Building Alternative would construct approximately the same amount of building space as proposed by the Project and generate a similar amount of traffic, construction-related and operational-related noise impacts would be nearly identical to those described in EIR Subsection 4.11, *Noise*. Construction-related noise impacts would be less than significant with mitigation and operational-related transportation noise impacts would be significant and unavoidable along Oleander Avenue in the near term.

In conclusion, the proposed Project would result in significant and unavoidable noise impacts after mitigation. This alternative would result in the same noise impacts; thus, the Project's noise impacts would not be reduced or avoided.



L. Population and Housing

Because the Larger Building Alternative would construct approximately the same amount of building space as the proposed Project and generate the same amount of employment opportunity, less-than-significant population and housing impacts under this alternative would be similar to those described in EIR Subsection 4.12, *Population and Housing*.

In conclusion, the proposed Project would result in less-than-significant population and housing impacts. This alternative would result in the same population and housing impacts; thus, the Project's population and housing impacts would not be reduced or avoided.

M. Public Services

Because the Larger Building Alternative would construct approximately the same amount of building space as the proposed Project and thus place the same amount of demand on public service providers, under this alternative, impacts associated with public services would be the same as the proposed Project. As described in EIR Subsection 4.13, *Public Services*, increased demand is not an environmental effect under CEQA, and no physical impacts to public service facilities would occur. Impacts would be less than significant.

In conclusion, the proposed Project would result in less-than-significant public services impacts. This alternative would result in the same public services impacts; thus, the Project's public services impacts would not be reduced or avoided.

N. Recreation

Neither the proposed Project nor the Larger Building Alternative would physically impact recreational facilities. Also, neither the proposed Project nor the Larger Building Alternative would preclude the County's ability to implement a community trail segment along Oleander Avenue, as called for by the MVAP. Thus, less-than-significant impacts would occur under the proposed Project and this alternative.

In conclusion, the proposed Project would result in less-than-significant recreation impacts. This alternative would result in the same recreation impacts; thus, the Project's recreation impacts would not be reduced or avoided.

O. Transportation

Because the Larger Building Alternative would construct approximately the same amount of building space as proposed by the Project, the same amount of traffic would be generated, and the transportation and traffic impacts would be nearly identical as presented in EIR Subsection 4.15, *Transportation*. Because the segment of Ellsworth Street that passes through the Project site would be vacated under this alternative, however, it is likely that traffic impacts would be increased due to this loss of a local road connection. Under both the proposed Project and this alternative, there would be significant and



unavoidable cumulatively considerable effects to four (4) local roadway intersections and to state highway facilities under the jurisdiction of Caltrans.

In conclusion, the proposed Project would result in significant and unavoidable transportation and traffic impacts after mitigation. This alternative would result in the same transportation and traffic impacts; thus, the Project's noise impacts would not be reduced or avoided.

P. Utilities and Service Systems

Because the Larger Building Alternative would construct approximately the same amount of building space as proposed by the Project, the same amount of water demand, wastewater generation, electricity, natural gas, fuel use (energy) demand, and solid waste generation would occur as discussed in EIR Subsection 4.16, *Utilities and Service Systems*. Also, the same connections to existing water, sewer and storm drainage systems would be required. Neither the proposed Project nor the Larger Building Alternative would result in significant or cumulatively considerable impacts to utilities and service systems.

In conclusion, the proposed Project would result in less-than-significant utilities and service system impacts. This alternative would result in the same utilities and service system impacts; thus, the Project's utilities and service system impacts would not be reduced or avoided.

Q. Paleontological Resources

Because the Large Building Alternative would have the same ground-disturbing physical impacts and depth of grading as the proposed Project, impacts to paleontological resources would be identical as described in EIR Subsection 4.17, *Paleontological Resources*.

In conclusion, the proposed Project would result in less-than-significant paleontological resources impacts after mitigation. This alternative would result in the same paleontological resources impacts; thus, the Project's paleontological resources impacts would not be reduced or avoided.

R. Tribal Cultural Resources

Five archaeological sites are recorded on the Project site, of which three sites would be fully impacted and two sites would be partially impacted as a result of either the proposed Project or this alternative. None of the sites meet the definition of a tribal cultural resource under Public Resources Code § 21074(b) and the Project site also does not qualify as a cultural landscape under Public Resources Code § 21074(b). Thus, the proposed Project and this alternative would have a less-than-significant impact to tribal cultural resources. Because this alternative would disturb the same amount of land as the proposed Project, the impact conclusion would remain the same.



S. Conclusion

Selection of the Larger Building Alternative would result in similar if not identical impacts as would occur under the proposed Project under all environmental topics with the exception of air quality and operational traffic. Construction-related air quality impacts would increase because more construction activity would occur on a daily basis. Operational-related DPM exposure to off-site populations may increase because the building's loading docks and truck courts would be located closer to sensitive receivers. Also, the loss of the Ellsworth Street segment through the center of the property would cause other local roads to carry a greater volume of traffic.

The Larger Building Alternative would meet all of the Project's objectives, but would not have any environmental advantages. Because this alternative would result in greater impacts to air quality and transportation, it is not considered to be environmentally superior to the proposed Project.



| Table 6-4 Alternatives to the Proposed Project – Comparison of Environmental Impacts | | | | | | |
|---|--|---|---|---|--|--|
| ENVIRONMENTAL TOPIC | PROPOSED PROJECT SIGNIFICANCE OF IMPACTS AFTER MITIGATION | LEVEL OF IMPACT COMPARED TO THE PROPOSED PROJECT | | | | |
| | | NO PROJECT/ NO DEVELOPMENT ALTERNATIVE | NO PROJECT / EXISTING GENERAL PLAN DESIGNATION ALTERNATIVE | BUILDING D ONLY ALTERNATIVE – THE ENVIRON- MENTALLY SUPERIOR ALTERNATIVE | REDUCED PROJECT / TRUCK TRAILER STORAGE ALTERNATIVE | LARGER BUILDING ALTERNATIVE |
| Aesthetics | Less-than-Significant Impacts | Avoided | Same | Reduced | Same | Same |
| Agriculture and Forest Resources | Less-than-Significant Impacts | Avoided | Same | Reduced | Same | Same |
| Air Quality | Significant and Unavoidable Impacts after Mitigation | Avoided | Increased | Reduced | Reduced | Increased |
| Biological Resources | Less-than-Significant Impacts with Mitigation | Avoided | Same | Reduced | Same | Same |
| Cultural Resources | Less-than-Significant Impacts with Mitigation | Avoided | Same | Reduced | Same | Same |
| Geology and Soils | Less-than-Significant Impacts | Avoided | Same | Reduced | Same | Same |
| Greenhouse Gas Emissions | Less-than-Significant Impacts with Mitigation | Avoided | Increased | Reduced | Reduced | Same |
| Hazards and Hazardous Materials | Less-than-Significant Impacts | Avoided | Same | Reduced | Same | Same |
| Hydrology and Water Quality | Less-than-Significant Impacts | Avoided | Same | Reduced | Same | Same |



| | | | | | | |
|--|--|----------------|---------------|----------------|---------------|-------------|
| Land Use and Planning | Significant and Unavoidable Impacts after Mitigation | Avoided | Same | Same | Same | Same |
| Noise | Significant and Unavoidable Impacts after Mitigation | Avoided | Increased | Reduced | Reduced | Same |
| Population and Housing | Less-than-Significant Impacts | Same | Increased | Reduced | Reduced | Same |
| Public Services | Less-than-Significant Impacts | Avoided | Same | Reduced | Reduced | Same |
| Recreation | Less-than-Significant Impacts | Avoided | Same | Reduced | Reduced | Same |
| Transportation and Traffic | Significant and Unavoidable Impacts after Mitigation | Avoided | Increased | Reduced | Reduced | Same |
| Utilities and Service Systems | Less-than-Significant Impacts | Avoided | Increased | Reduced | Reduced | Same |
| Paleontological Resources | Less-than-Significant Impacts with Mitigation | Avoided | Same | Same | Same | Same |
| <u>Tribal Cultural Resources</u> | <u>Less-than-Significant Impacts</u> | <u>Avoided</u> | <u>Same</u> | <u>Reduced</u> | <u>Same</u> | <u>Same</u> |
| Objective A: To develop vacant or underutilized property in Mead Valley in close proximity to I-215 with business park warehouse buildings offering loading bays that can be used as part of the Southern California goods movement network | | Not Met | Partially Met | Partially Met | Partially Met | Met |
| Objective B: To make efficient use of a property in Mead Valley by maximizing its buildout potential for employment-generating uses. | | Not Met | Met | Not Met | Partially Met | Met |
| Objective C: To attract new employment-generating businesses along the I-215 corridor thereby growing the economy and providing a more equal jobs-housing balance in the Riverside County/Inland Empire area that will reduce the need for members of the local workforce to commute outside the area for employment. | | Not Met | Met | Partially Met | Partially Met | Met |



| | | | | | |
|---|---------|---------------|---------------|---------------|-----|
| Objective D: To develop Class A business park warehouse buildings in Mead Valley that meet industry standards for modern, operational design criteria and can accommodate a wide variety of users. | Not Met | Partially Met | Partially Met | Partially Met | Met |
| Objective E: To develop vacant or underutilized property in Mead Valley with structures that have architectural design and operational characteristics that complement other new developments in the immediate vicinity. | Not Met | Met | Partially Met | Partially Met | Met |
| Objective F: To develop business park warehouse buildings that are economically competitive with similar buildings in the local area and region. | Not Met | Partially Met | Partially Met | Partially Met | Met |



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7.1.1 COUNTY OF RIVERSIDE

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7.2 DOCUMENTS INCORPORATED BY REFERENCE IN THIS EIR

The following reports, studies, and supporting documentation were used in the preparation of this EIR and are incorporated by reference within this EIR. A copy of the following reports, studies, and supporting documentation is a matter of public record and is generally available to the public at the location listed.

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7.4 PERSONS CONSULTED DURING PREPARATION OF THIS EIR (WRITTEN AND VERBAL COMMUNICATION)

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7.5 DOCUMENTS APPENDED TO THIS EIR

The following reports, studies, and supporting documentation were used in preparing the Knox Business Park EIR and are bound separately as Technical Appendices. A copy of the Technical Appendices is available for review at the Riverside County Planning Department 4080 Lemon Street, Riverside, CA 92502.

Appendix A Initial Study for Knox Business Park, Notice of Preparation, and Written Comments on the NOP.

Appendix B1 Urban Crossroads, Inc. 2017a. *Knox Business Park Supplemental Air Quality Impact Analysis, Greenhouse Gas Analysis, & Mobile Source Health Risk Assessment*. February 9, 2017.

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Urban Crossroads, Inc. 2016a. *Knox Business Park Air Quality Impact Analysis, County of Riverside*. August 5, 2016.

Appendix B2 Urban Crossroads, Inc. 2016b. *Knox Business Park Mobile Health Risk Assessment, County of Riverside*. January 28, 2016.

Appendix C1 Cadre Environmental (Cadre). 2015a. *Final Draft General MSHCP Habitat Assessment, Regulatory Constraints Analysis, and Consistency Analysis for the 37.08 Acre Decker Parcels I Project Site, Unincorporated Western Riverside County, California*. April 28, 2015.

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Appendix C3 Hernandez Environmental Services (HES). 2015a. *Jurisdictional Delineation Parcel Map No. 36950 Planning Case No. 36950 (GPA 01151, EA 42802, CFG 06184, CZ 07872)*. August 2015.

Appendix C4 Hernandez Environmental (HES) 2017b. *Habitat Assessment Update for Parcel Map No. 36962*. February 10, 2017.



- Appendix C5 Hernandez Environmental Services (HES). 2015c. *Burrowing Owl Survey Report for the Decker Parcels II*. April 28, 2015.
- Appendix C6 Hernandez Environmental (HES) 2017c. *Jurisdictional Delineation Update for Parcel Map No. 36962*. February 10, 2017.
- Appendix C7 Hernandez Environmental Services (HES) 2016a. *Determination of Biologically Equivalent or Superior Preservation, Parcel Map No. 36950, Plot Plan No. 25838 (GPA 01151, EA 42802, CFG 06184, CZ 07872)*. December 2015 (Revised July 2016).
- Appendix C8 Hernandez Environmental Services (HES) 2017a. *Determination of Biologically Equivalent or Superior Preservation Parcel Map No. 36962, Plot Plan No. 25837 ((GPA 01151, EA 42802, CFG 06184, CZ 07872, LLA 05524)*. December 2015 (Revised February 2017).
- Appendix D1 Brian F. Smith and Associates, Inc. (BFSA). 2015a. *A Phase I and II Cultural Resources Assessment for the Decker Parcels I Project*. June 24, 2015.
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- Appendix D5 Brian F. Smith and Associated, Inc. (BFSA). 2017. Paleontological Resource Impact Mitigation Program (PRIMP) for the “Knox Business Park Buildings D and E” Project. November 1, 2017.
- Appendix E1 Matrix Geotechnical Consulting, Inc. (Matrix) 2014. *Geotechnical Investigation, Infiltration Study, and Rock Rippability Report*. September 30, 2014.
- Appendix E2 Southern California Geotechnical (SoCalGeo). 2016a. *Change of Engineer of Record, Response Report and Plan Review, Building D*. June 16, 2016.
- Appendix E3 Matrix Geotechnical Consulting, Inc. (Matrix). 2015. *Geotechnical Investigation and Rock Rippability Report*. February 19, 2015.



- Appendix E4 Southern California Geotechnical (SoCalGeo). 2017a. *Geotechnical Report Update and Plan Review* and Southern California Geotechnical (SoCalGeo). 2016b. *Change of Engineer of Record, Response Report and Plan Review, Building E*. August 2, 2016.
- Appendix F Urban Crossroads, Inc. 2016c. *Knox Business Park Greenhouse Gas Analysis*. County of Riverside. October 6, 2015 (Revised January 28, 2016).
- Appendix G1 Kennedy/Jenks Consultants (Kennedy/Jenks). 2014. *Decker Assemblage Phase I Environmental Site Assessment Unincorporated Riverside County, California*. August 18, 2014.
- Appendix G2 Kennedy/Jenks Consultants (Kennedy/Jenks). 2015. *Decker II Assemblage Phase I Environmental Site Assessment Unincorporated Riverside County, California*. January 29, 2015.
- Appendix H Hydrology and Water Quality Information (DEA, 2017).
- Appendix I Urban Crossroads, Inc. 2017b Knox Business Park Noise Impact Analysis County of Riverside. January 31, 2017.
- Appendix J1 Urban Crossroads, Inc. 2017c. *Knox Business Park Supplemental Analysis*. January 31, 2017.
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Urban Crossroads, Inc. 2015a. *Knox Business Park Traffic Impact Analysis County of Riverside*. June 8, 2015.
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- Appendix K Eastern Municipal Water District (EMWD). 2015. *Water Supply Assessment Report for the Knox Business Park*. October 21, 2015.
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- Appendix N Written Correspondence