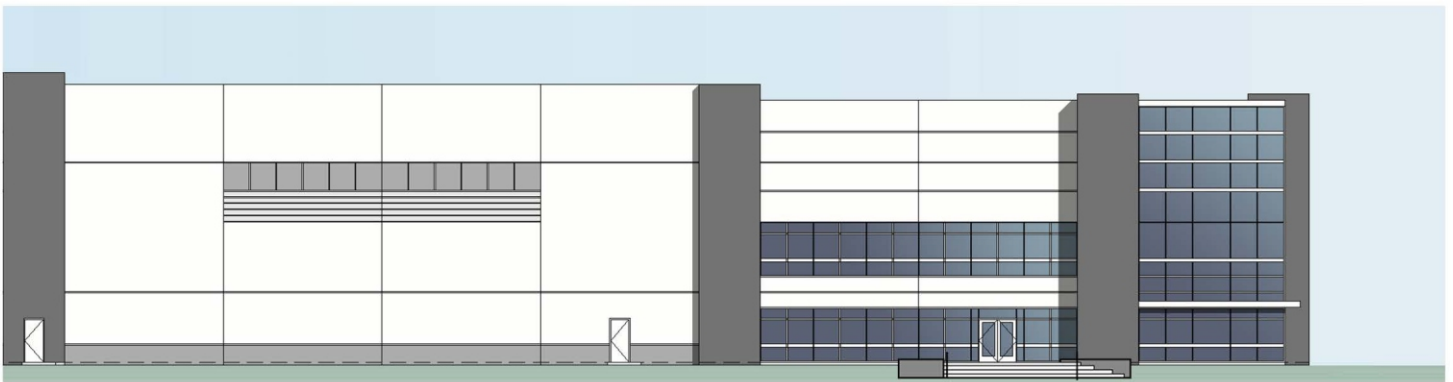

BARKER LOGISTICS, LLC INDUSTRIAL WAREHOUSE BUILDING DRAFT ENVIRONMENTAL IMPACT REPORT

RIVERSIDE COUNTY, CALIFORNIA
AT PLACENTIA AVENUE & PATTERSON AVENUE



Lead Agency:

***COUNTY OF RIVERSIDE
PLANNING DEPARTMENT***
4080 Lemon Street, 12th Floor
Riverside, CA 92501

June 2020

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**Environmental Assessment Number: CEQ 190017
Project Case Number: Plot Plan 190008**

June 8, 2020

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0.0 EXECUTIVE SUMMARY

The California Environmental Quality Act (CEQA), Public Resources Code Section 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 environment.

This Environmental Impact Report (EIR), State Clearinghouse (SCH) No. **2019090706**, was prepared in accordance with *CEQA Guidelines* Article 9, Sections 15120 to 15132 to evaluate potential environmental impacts associated with planning, constructing and operating the proposed Barker Logistics LLC warehouse/logistics building (Project). This EIR does not recommend approval, approval with modification, or denial of the Project. Rather, this EIR is a source of factual information pertaining to potential impacts 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.

This Executive Summary complies with *CEQA Guidelines* Section 15123 ("Summary"). This EIR document includes a description of the Project and evaluates physical environmental effects that could result from Project development and operation. The EIR scope was determined through completion of an Initial Study accepted by the County of Riverside's independent judgment pursuant to *CEQA Guidelines* Section 15063 and in consideration of public comment received by the County in response to this EIR's Notice of Preparation (NOP).

As an initial step in complying with procedural CEQA requirements for an EIR, an Initial Study was prepared by the County of Riverside to determine whether any aspect of the Project, either individually or cumulatively, would have the potential to cause a significant adverse effect on the physical environment. The EIR Initial Study is presented at *Appendix A* to this document. For this Project, the Initial Study indicated this EIR should focus on the environmental topical areas listed above. After completion of the Initial Study, the County filed a Notice of Preparation with the California Office of Planning and Research (State Clearinghouse) to indicate that an EIR would be prepared. The Initial Study and Notice of Preparation were distributed for a 30-day public review. The State Clearinghouse established the public comment period for the NOP/IS as September 30 through October 29, 2019.

The Initial Study, NOP, and written comments received by the County in response to the NOP are attached to this EIR as *Appendix A*. As determined through the Initial Study process, and in consideration of public comment on the NOP, the environmental subject areas that could be reasonably and significantly affected by the Project are analyzed herein, including:

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions

- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use
- Mineral Resources
- Noise
- Paleontological Resources
- Population and Housing
- Public Services and Utilities
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

Please refer to EIR Section 4 (*Environmental Analysis*) for a full analysis of subjects indicated above.

For each of the subject areas analyzed in detail in Section 4, this EIR describes the following:

- The physical conditions that existed at the approximate time this EIR's NOP was filed with the California State Clearinghouse;
- The type and magnitude of potential environmental impacts resulting from Project development construction and operations; and
- Mitigation Measures that would reduce or avoid potentially significant environmental impacts that the Project may cause.

A summary of the Project's significant environmental impacts and 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 ES-1 (*Mitigation Monitoring and Reporting Program*). The County of Riverside applies Mitigation Measures that it determines 1) are feasible and practical for project applicants to implement, 2) are feasible and practical for the County of Riverside to monitor and enforce, 3) are legal for the County to impose, 4) have an essential nexus to Project impacts, and 5) would result in a benefit to the physical environment. CEQA does not require the Lead Agency to apply Mitigation Measures that are duplicative of mandatory regulatory requirements.

0.1 PROJECT OVERVIEW

0.1.1 Location and Setting

The Project site consists of approximately 31.55 gross acres at the northeast corner of the Placentia Avenue/Patterson Avenue intersection in the Mead Valley Area Plan (MVAP) area, west of the City of Perris in unincorporated western Riverside County. The Project site is depicted on Exhibit 2-3 (*Existing Site – Aerial*).

The Project site is bordered by existing single-family residential and vacant land uses north of the Project site, single-family residential uses south and west of the Project site, and single-family residential and industrial/manufacturing uses east of the Project site.

The Project site General Plan Land Use designation is “Business Park” (BP). Zoning designations of the Project site are “Industrial Park” (IP) and “Manufacturing-Service Commercial” (M-SC). The Project does not propose or require amendment of site’s existing General Plan Land Use designation and/or Zoning Designations.

0.1.2 Project Objectives

The underlying purpose of the Project and its primary goal is to develop a vacant property with a warehouse/logistics building to provide an employment-generating use that helps to grow the economy and fulfill regional market demand for this land use type in Riverside County. The Project would achieve this goal through the following specific objectives.

- To build a land use in compliance with County of Riverside General Plan and Mead Valley Area Plan.
- To create a sustainable Project.
- To promote regional-oriented warehouse/logistics development near Interstate 215.
- To maintain the integrity of the surrounding single-family residential neighborhood through quality contemporary design, appropriate structural setbacks, architectural treatments and building color palette.
- To concentrate employment opportunities near regional transportation.
- To provide a sustainably designed building that is energy conscious and a healthy work environment.
- To make efficient use of undeveloped property in the Mead Valley area of unincorporated Riverside County by maximizing its buildout potential for employment-generating uses.
- To attract new businesses and jobs to unincorporated Riverside County and thereby provide economic growth.
- To create an employment-generating business in the Project vicinity and thereby reduce the need for members of the local workforce to commute outside the area for employment.
- To develop a vacant or underutilized property with a High-Cube warehouse/logistics building to help meet the substantial unmet regional demand for this type of building and use.
- To develop a warehouse/logistics building that can attract building occupants seeking modern warehouse building space in the Mead Valley area constructed to contemporary design standards.
- To develop a vacant property zoned for the proposed warehouse/logistics building use that has access to available infrastructure, including roads and utilities.
- To develop a vacant property with a warehouse/logistics building that has operational characteristics that complement other existing warehouse buildings in the immediate vicinity and minimize conflicts with other nearby land uses.
- To develop a project that is economically competitive with similarly-sized buildings in the local area and in the inland empire.
- To develop a light industrial use in close proximity to designated truck routes and Interstate 215 to avoid or shorten truck-trip lengths on other roadways.

0.1.3 Project Summary Description

The Project involves a Plot Plan to allow development of a 699,630 square foot warehouse/logistics building on a 31.55-acre property. The building dimensions are 42 to 49.5 feet (at its peak) in height, 1,098

feet long, and 720 feet at its widest. It is 600 feet from dock doors on the west to the dock doors on the east of the structure. The automobile parking spaces are to be located around the perimeter of the building; truck/truck trailer bays will be located on the east and west elevations of the building.

0.1.3.1 Roadway, Intersection, and Site Access Improvements

Roadway, intersection, and site access improvements to be constructed by the Project are listed below. Roadways adjacent to the Project, site access points and site-adjacent intersections will be constructed consistent with the identified roadway classifications and respective cross-sections in the County of Riverside General Plan Circulation Element or as otherwise specified by the County. Additional or alternative improvements may be specified by the County through the Project Conditions of Approval.¹

On-site traffic signing and striping should be implemented in conjunction with detailed construction plans for the Project site. Sight distance at each Project access point should be reviewed with respect to standard Caltrans and County of Riverside sight distance standards at the time of preparation of final grading, landscape and street improvement plans.

Roadways

Patterson Avenue (N – S)

Construct Patterson Avenue at its ultimate half-section width as a Secondary Highway (100-foot right-of-way) between the Project's northern boundary and Placentia Street, in compliance with applicable County of Riverside and Caltrans standards.

Placentia Street (E – W)

Construct Placentia Street at its ultimate half-section width as a Secondary Highway (100-foot right-of-way) between the Project's Patterson Avenue and the Project's eastern boundary, in compliance with applicable County of Riverside and Caltrans standards.

Intersections

Patterson Avenue & Driveway 1²

Install a stop control on the westbound approach and construct the intersection with the following geometrics:

- Northbound Approach: One shared left-through-right turn lane.
- Southbound Approach: One shared left-through-right turn lane.
- Eastbound Approach: One shared left-through-right turn lane.
- Westbound Approach: One shared left-through-right turn lane.

¹ This EIR evaluates potential impacts that would result from the maximum scope of recommended improvements as detailed in the Project TIA. The ultimate scope of required Project traffic improvements may be less than that evaluated here, and would be determined in consultation with the Lead Agency prior to the issuance of development permits.

² The Applicant is endeavoring to acquire right-of-way that would allow for alignment of Driveway 1 on Patterson Avenue with Walnut Street to the west. If the right-of-way cannot be acquired, the Project Applicant will work with County staff to develop an alternative design for Driveway 1.

Patterson Avenue & Placentia Street

Maintain the existing traffic control and construct the intersection with the following geometrics:

- Northbound Approach: Not Applicable (N/A)
- Southbound Approach: One shared left- right turn lane.
- Eastbound Approach: One shared left-through lane.
- Westbound Approach: One through lane and one right turn lane.

Driveway 2/Tobacco Road & Placentia Street

Install a stop control on the southbound approach and construct the intersection with the following geometrics:

- Northbound Approach: One shared left-through-right turn lane.
- Southbound Approach: One shared left-through-right turn lane.
- Eastbound Approach: One shared left-through-right turn lane.
- Westbound Approach: One shared left-through-right lane.

Placentia Street & Driveway 3

Install a stop control on the southbound approach and construct the intersection with the following geometrics:

- Northbound Approach: N/A
- Southbound Approach: One shared left- right turn lane.
- Eastbound Approach: One shared left-through lane.
- Westbound Approach: One shared through-right turn lane.

Project Site Access

Access to the Project site would be via Patterson Avenue and Placentia Avenue. These rights-of-way adjacent to the Project site would be constructed by the Project consistent with County requirements and pursuant to the Project Conditions of Approval. Vehicular and truck traffic access to the Project site would be provided via the following driveways:

- Patterson Avenue and Walnut Street via Driveway 1 – full access for passenger cars and trucks;
- Placentia Street via Driveway 2 – full access for passenger cars only; and
- Placentia Street via Driveway 3 – full access for passenger cars and trucks.

0.1.3.2 Utilities Undergrounding

As one component of the Project, existing Southern California Edison (SCE) overhead utilities on power poles along the Project site's southerly and westerly boundaries will be placed underground. Additionally, any Verizon or CATV communication lines currently overhead will be collocated underground in a common trench with the SCE lines pursuant to the purveyor's specifications/requirements.

0.1.3.3 Soil Import/Export

The Project grading concept provides for balanced cut/fill within the site. For the purposes of analysis, it is assumed however that limited import/export of soils of up to 15,000 cubic yards (cy) may be required.

0.2 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

CEQA Guidelines Section 15123(b)(2) requires that areas of controversy known to the Lead Agency (County of Riverside) be identified in the Executive Summary. The Lead Agency has not identified any issues of controversy associated with the Project after consideration of all comments received in response to the Notice of Preparation. Notwithstanding, the Lead Agency has identified several issues of local concern including, but not limited to, potential impacts to air quality, cultural resources, paleontological resources, transportation, and wildfire.

Regarding issues to be resolved, this EIR addresses environmental issues known by the County that are identified in the Initial Study prepared for the Project and that were identified in the comment letters that the County of Riverside received on this EIR's Notice of Preparation (reference *Appendix A*).

0.3 ALTERNATIVES TO THE PROJECT

In compliance with *CEQA Guidelines* Section 15126.6, an EIR must describe a range of reasonable alternatives to the Project or to the Project location. Each alternative must be able to feasibly attain most of the Project Objectives and avoid or substantially lessen the Project's significant impacts on the environment. A detailed description of each alternative evaluated in this EIR and an analysis of potential environmental impacts associated with each alternative is contained in EIR Section **6.0** (*Project Alternatives*). In addition, Section **6.0** identifies alternatives that were considered but rejected from further analysis.

No Development/No Project Alternative

The No Development/No Project Alternative considers no additional development on the Project site other than that which would occur under existing conditions. The entire 31.55-acre Project site would remain vacant and undeveloped. Under this alternative, no improvements would be made on the Project site. Implementation of the No Development/No Project Alternative would result in no physical environmental impacts beyond those that historically have occurred on the Project site; that is, agriculture. All significant effects of Project development and operation would be avoided or lessened by selection of this Alternative. The No Development/No Project Alternative would not meet Project Objectives.

Reduced Project Alternative

The Reduced Project Alternative comprises a smaller warehouse/logistics building of approximately 350,000 square feet in area; or approximately one-half the area size of the proposed Project building. The Reduced Project Alternative would not result in a reduction in building height (maximum 49.5 feet). Landscaping is included in the Reduced Project Alternative. Required automobile parking would be reduced by one-half. The number of truck bays would be decreased. The Reduced Project Alternative would meet the Project Objectives to a lesser degree than the Project.

Business Park/Office Alternative

The Business Park/Office Alternative would develop the Project site as a business park use in accordance with the site’s current General Plan/MVAP “Business Park” Land Use designation. Under the Business Park/Office Alternative, the Project site would be developed with an approximately **329,823** square foot business park/office building that would support administrative and professional offices. Site improvements would include parking areas, drive aisles and landscaping. As with the proposed Project, the Business Park/Office Alternative would construct necessary supporting infrastructure improvements. The Business Park/Office Alternative would represent a reduction of 369,807 square feet (53 percent) in the Project building area. This Alternative would not meet Project Objectives.

0.4 SUMMARY OF IMPACTS, MITIGATION AND LEVELS OF IMPACTS

Table ES-1 provides a summary of Project impacts, identifies proposed mitigation measures, and level of significance of each impact following application of mitigation. Plans, Policies or Programs and Project Design Features were assumed and accounted for in assessment of impacts for each issue area, and are listed at Table ES-2.

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
Aesthetics				
Scenic Corridor: Project site is not located on a State-designated scenic highway. Of the 8 eligible Scenic Highways in Riverside County, none are in view of Project site. Project will not be visible from any State routes or from I-15.	No Impact	No Mitigation Required	N/A	
Scenic Resources: Project site is vacant, with sparse grasses and vegetation. Project site has been graded periodically. Project vicinity has single-family residential and industrial uses. Project development will not have a significant impact on scenic resources because it will construct a new warehouse/logistics building on a site planned for such use.	Less-Than-Significant	No Mitigation Required	N/A	
Visual Character/Quality: The Project will not substantially change overall views and visual character of the vicinity due to the proposed structural setbacks and fencing.	Less-Than-Significant	No Mitigation Required	N/A	
Mt. Palomar Use: Project site is 55 miles northwest of Mt. Palomar Observatory and is within Mt. Palomar Nighttime Lighting Policy Area Zone B impact area and thereby will comply with Riverside County Ordinance No. 655 lighting requirements to reduce any impact.	Less-Than-Significant	No Mitigation Required	N/A	
Lighting/New Source: Project development and operation will introduce new sources of light and glare to Project vicinity for building, security and parking lot.	Less-Than-Significant	No Mitigation Required	N/A	

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
Unacceptable Light Levels: Project development and operation will include interior and exterior lighting that will be confined to the Project site and will comply with requirements of Riverside County Ordinances Nos. 655 and 915, and with County Standard Conditions. Project Design Features will lessen any impact level to less-than-significant.	Less-Than-Significant	No Mitigation Required	N/A	
Cumulative Impacts: Under all aesthetics topics, the Project would have no impact or impacts would be less-than-significant. Project impacts would not be cumulatively considerable.				
Agriculture and Forestry Resources				
Conversion of Farmland to Non-Agricultural Use: The Project site is not designated as Farmland on any database.	No Impact	No Mitigation Required	N/A	
Conflict with Agricultural zoning: The Project site is not designated with Agricultural Zoning.	No Impact	No Mitigation Required	N/A	
Development of Non-Agricultural Uses within 300 Feet of Agriculturally Zoned Property: Although several parcels adjacent to the Project site are designated as Light Agriculture, those parcels are developed with residential uses. The Project involves non-agricultural uses.	Less-Than-Significant	No Mitigation Required	N/A	
Other Changes Resulting in Conversion of Farmland to Non-Agricultural Use: The Project site is not designated as Farmland on any database.	No Impact	No Mitigation Required	N/A	
Conflict with Existing Zoning for Forest Land: The Project site is not designated as Forest Land on any database.	No Impact	No Mitigation Required	N/A	
Result in Loss of Forest Land: The Project site is not designated as Forest Land on any database.	No Impact	No Mitigation Required	N/A	
Other Changes Resulting in Conversion of Forest Land to Non-Forest Use: The Project site is not designated as Forest Land on any database.	No Impact	No Mitigation Required	N/A	
Cumulative Impacts: Under all Agriculture and Forestry Resources topics, the Project would have no impact or impacts would be less-than-significant. Project impacts would not be cumulatively considerable.				
Air Quality				
Conflict with Air Quality Plan: Project operational-source NOx emissions would exceed applicable SCAQMD regional thresholds. Project operational-source NOx emissions exceedances may delay or obstruct goals and strategies articulated in the AQMP for the South Coast Air Basin. Additionally, the Project would allow for development intensities not reflected in the current AQMP. On this basis, the Project would conflict with the governing AQMP. Per SCAQMD criteria, significant and unavoidable impacts at the Project-level are also cumulatively significant and unavoidable.	Potentially Significant	MM-AQ-2: Truck access gates and loading docks within the truck court on the Project site shall be posted with signs that state as follows: <ul style="list-style-type: none"> • Truck drivers shall turn off engines when not in use; • Diesel delivery trucks servicing the Project shall not idle for more than five (5) minutes; and, • Telephone numbers of 	Significant and Unavoidable	MM-AQ-2 through MM-AQ-6 would reduce Operational-source NOx emissions to the extent feasible. However, there are no feasible means to reduce Project operational-source NOx emissions to levels that would be less-than-significant, and thereby avoid potential conflicts with AQMP Consistency Criterion No. 1.

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
		<p>the building facilities manager and the California Air Resources Board to report violations.</p> <p>MM-AQ-3:</p> <ul style="list-style-type: none"> • Site design shall allow for trucks to check-in within the facility area to prevent queuing of trucks outside the facility. • Signs shall be posted in loading dock areas that instruct truck drivers to shut down the engine after 300 seconds of continuous idling operation once the vehicle is stopped, the transmission is set to “neutral” or “park,” and the parking brake is engaged. <p>MM-AQ-4: The Project shall be designed to incorporate electric vehicle charging stations and carpool parking spaces for employees.</p> <p>MM-AQ-5: The Project shall comply with provisions of the County of Riverside Good Neighbor Policy for Logistics and Warehouse/Distribution Centers as implemented through the Project Conditions of Approval.</p> <p>MM-AQ-6: The Project shall comply with CAP Update Measure R2-CE1. CAP Update Measure R2-CE1 requires that the Project provide onsite renewable energy production generation comprising at least 20 percent of the Project energy demand. The County shall verify implementation of CAP Update Measure R2-CE1 within the Project building plans and site designs prior</p>		<p>Nor is it feasible to substantially alter the Project land uses, and thereby avoid potential conflicts with AQMP Consistency Criterion No. 2. Project conflict with the AQMP is therefore considered to be significant and unavoidable impact. Per SCAQMD criteria, significant and unavoidable impacts at the Project-level are also cumulatively significant and unavoidable.</p>

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
		to the issuance of building permit(s) and/or site plans (as applicable). The County shall verify implementation of CAP Update Measure R2-CE1 prior to the issuance of Certificate(s) of Occupancy.		
<p>Cumulatively Considerable Increase in Non-Attainment Criteria Pollutant: Project operational-source NOx emissions exceedances would result in a cumulatively considerable net increase in criteria pollutants (ozone and PM₁₀/PM_{2.5}) for which the Project region is non-attainment. Per SCAQMD criteria, significant and unavoidable impacts at the Project-level are also cumulatively significant and unavoidable.</p>	Potentially Significant	Please refer to MM-AQ-2 through MM-AQ-6.	Significant and Unavoidable	There are no feasible means to reduce Project operational-source NOx emissions to levels that would be less-than-significant. Project operational-source NOx emissions exceedances would result in a cumulatively considerable net increase in criteria pollutants (ozone and PM ₁₀ /PM _{2.5}) for which the Project region is non-attainment. This is a significant and unavoidable impact. Per SCAQMD criteria, significant and unavoidable impacts at the Project-level are also cumulatively significant and unavoidable.
<p>Exposure of Sensitive Receptors to Substantial Pollutant Concentration: Project construction activities would generate PM₁₀/PM_{2.5} emissions concentrations exceeding applicable LSTs. This is a potentially significant impact.</p> <p>The Project does not propose or require uses or activities that would otherwise expose sensitive receptors to substantial pollutant concentrations.</p>	Potentially Significant	MM-AQ-1 During Project site preparation and grading activity, all actively graded areas within the Project site shall be watered at 2.1-hour watering intervals (e.g., 4 times per day) or a movable sprinkler system shall be in place to ensure minimum soil moisture of 12% is maintained for actively graded areas. Moisture content can be verified with use of a moisture probe by the grading contractor.	Less-Than-Significant	
Other Air Quality Impacts	Less-Than-Significant	No Mitigation Required	N/A	
<p>Cumulative Impacts: Even with application of mitigation, Project operational-source NOx emissions would exceed applicable SCAQMD thresholds. Project operational-source NOx emissions exceedances would contribute to Basin non-attainment conditions for ozone, and PM₁₀/PM_{2.5}. Per SCAQMD criteria, significant and unavoidable impacts at the Project-level are also cumulatively significant and unavoidable.</p>				
Biological Resources				
<p>Conflict with Habitat Conservation Plan, NCCP, or Other Conservation Plan: The Biological Resources Habitat Assessment and Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis conducted for the Project concludes that</p>	Potentially Significant	MM-BR-1: Prior to commencement of any development activity on the Project site, the Project Applicant/Developer shall remit required Multiple Species	Less-Than-Significant	

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
<p>“with completion of the recommendations in this document and payment of the MSHCP and SKR mitigation fees, development of the project site is fully consistent with the Western Riverside County MSHCP.</p>		<p>Conservation Plan fees to the County of Riverside.</p> <p>MM-BR-3: Prior to commencement of any development activity on the Project site, the Project Applicant/Developer shall remit required Stephens’ Kangaroo Rat HCP Mitigation Fee to the County of Riverside in compliance with County of Riverside Ordinance Nol. 663.10; SKR HCP.</p>		
<p>Substantial Effect on Endangered or Threatened Species: The Project site is located within Burrowing Owl and Stephens’s Kangaroo Rat protection areas. However, no burrowing owls or evidence of recent or historic use by burrowing owls were observed on the Project site during focused surveys.</p>	Potentially Significant	<p>MM-BR-2: Prior to commencement of any grading activities, the developer shall conduct a 30-day burrowing owl pre-construction clearance survey. If burrowing owls and/or birds displaying nesting behaviors are observed within the Project site during future Project development, further review may be necessary to ensure compliance with the Multiple Species Habitat Conservation Plan, Migratory Bird Treaty Act, and California Fish and Game Code.</p>	Less-Than-Significant	
<p>Substantial Effect on Candidate, Sensitive, Special Status Species: A majority of the Project site, due to grading and disking, is dominated by early successional and non-native vegetation that has reduced, if not eliminated, the ability of the Project site to provide suitable habitat for special-status plant species. The Project site has a moderate potential to support Cooper’s hawk, sharp-shinned hawk, burrowing owl and California horned lark and a low potential to provide suitable habitat for Golden eagle, great egret, egret blue heron, ferruginous hawk, white-tailed kite, merlin, prairie falcon, and San Diego black-tailed jackrabbit. The Project site does not provide suitable habitat for any of the other special-status wildlife species known to occur in the Project area.</p>	Potentially Significant	<p>MM-BR-4: The Project developer/Applicant shall conduct a pre-construction clearance survey prior to commencement of grading activities.</p>	Less-Than-Significant	
<p>Substantial Interference with Fish/Wildlife Species: The Project site has not been identified as occurring in a wildlife corridor or linkage. However, the Project site is located east of the MSHCP Proposed Noncontiguous Habitat Block 4,</p>	Less-Than-Significant	<p>MM-BR-5 identified below is recommended to ensure any Project-related impacts to nesting birds would be reduced to and maintained at a less</p>	Less-Than-Significant	

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
<p>which is comprised of the Motte Rimrock reserve and provides habitat for MSHCP listed species Quino checkerspot butterfly, coastal California gnatcatcher, and Stephens' Kangaroo Rat. Removal of any trees, shrubs or other potential nesting habitat on the Project site should be conducted outside the avian nesting season.</p>		<p>than significant level.</p> <p>MM-BR-5: In coordination with the RCA, if ground disturbance and vegetation removal cannot occur outside of the nesting season, a pre-construction clearance survey for nesting birds should be conducted within three (3) days of the commencement of any ground disturbing activity to ensure no nesting birds will be disturbed during Project development. Furthermore, the biologist who conducts the clearance survey should document a negative survey with a brief letter report indicating no impacts to active avian nests will occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities should stay outside a 300-foot buffer around the active nest. For raptor species, the buffer is expanded to 500 feet. Furthermore, it is recommended a biological monitor be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure nesting behavior is not adversely affected by construction. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, normal construction activities can occur. The nesting bird clearance survey shall include a pre-construction burrowing owl clearance survey to ensure that burrowing owl remain absent from the Project site.</p>		
<p>Substantial Adverse Effect on Riparian Habitat: No riparian habitat is located on the Project site.</p>	<p>No Impact</p>	<p>No Mitigation Required</p>	<p>N/A</p>	

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
<p>Substantial Adverse Effect on State/Federally Protected Wetlands: The Project site does not support any discernible drainage courses, inundated areas, wetland vegetation, or hydric soils that would be considered jurisdictional by the United States Army Corps of Engineers, Regional Water Quality Board, and/or the California Department of Fish and Wildlife.</p>	Less-Than-Significant	No Mitigation Required.	N/A	
<p>Conflict with Local Policies/Ordinances Protecting Biological Resources:</p>	No Impact	No Mitigation Required	N/A	
<p>Cumulative Impacts: Under all biological resources topics, the Project would have no impact, impacts would be less-than-significant, or would be less-than-significant as mitigated. Project impacts would not be cumulatively considerable.</p>				
<p>Cultural Resources</p>				
<p>Alteration of Historical Site:</p>	No Impact	No Mitigation Required	N/A	
<p>Substantial Adverse Change in Historical Resource Significance: The Project site is vacant and the Riverside County General Plan does not identify any historical resources on the Project site.</p>	No Impact	No Mitigation Required	N/A	
<p>Substantial Adverse Change in Significance of Archaeological Resource: The Cultural Resources Assessment prepared for the Project states “the field survey and research have indicated that there are no cultural resources located within the project site boundaries.” However, the Assessment further concludes the Project site “is considered sensitive for buried cultural resources because numerous prehistoric archaeological sites have been identified in the Project site vicinity.</p>	Potentially Significant	<p>MM-CR-1 (Project Archaeologist): Prior to issuance of grading permits: The applicant/developer shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist (Project Archaeologist) has been contracted to implement a Cultural Resource Monitoring Program (CRMP). 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. A fully executed copy of the contract and a wet-signed copy of the Monitoring Plan shall be provided to the County Archaeologist to ensure compliance with this condition of approval.</p>	Less-Than-Significant	

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
		<p>Working directly under the Project Archaeologist, an adequate number of qualified Archaeological Monitors shall be present to ensure that all earth moving activities are observed and shall be on-site during all grading activities for areas to be monitored including 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.</p> <p>MM-CR-2 (Unanticipated Resources): If during ground disturbance activities, unanticipated unique cultural resources* are discovered, the following procedures shall be followed:</p> <p>i. 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 archaeologist, the tribal representative, and the Planning Director to discuss the significance of the find.</p> <p>ii. At the meeting, the significance of the discoveries shall be discussed, and after consultation with the tribal representative(s) and the archaeologist, a decision shall be made, with the concurrence of the Planning Director, as to the appropriate mitigation</p>		

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
		<p>(documentation, recovery, avoidance, etc.) for the cultural resources.</p> <p>iii. Grading or further ground disturbance shall not resume within the area of the discovery until a decision has been made through consultation with all relevant parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will continue if needed.</p> <p>iv. Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the appropriate tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or reburial on the Project property so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Condition.</p> <p>v. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the project archeologist, in consultation with the Tribe, and shall be submitted to the County for their review and approval prior to implementation of the said plan.</p> <p>vi. Pursuant to Calif. Pub. Res. Code § 21083.2(b), if the project will cause damage to a unique archaeological resource, the County shall determine if reasonable efforts can be formulated to permit any or all of these resources to be preserved in</p>		

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
		<p>place or left in an undisturbed state. If the landowner and the Tribe(s) cannot agree on the significance or the mitigation for the archaeological or cultural resources, these issues will be presented to the County Planning Director for decision. The County Planning Director shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the project archeologist and shall take into account the cultural and religious principles and practices of the Tribe(s).</p> <p>* Unique cultural resources are defined, for this condition only, as being multiple 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 as determined in consultation with the Native American Tribe(s).</p> <p>MM-CR-3 (Phase IV Monitoring Report): Prior to Grading Permit Final Inspection, 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 this grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on</p>		

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
		<p>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 and evidence that any artifacts have been treated in accordance to procedures stipulated in the Cultural Resources Management Plan.</p>		
<p>Disturbance of Human Remains: The Cultural Resources Assessment indicates that if human remains are encountered during Project development, the California State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 509798. BCR Consulting has initiated a Sacred Lands File search with the Native American Heritage Commission, followed by scoping with tribes. The Sacred Lands file search revealed no traditional cultural places within the boundaries of the Project site.</p>	<p>Potentially Significant</p>	<p>Compliance with County of Riverside General Plan Policies and with County of Riverside Standard Conditions; MM-TCR-3, which states as follows: MM-TCR-3 (Human Remains): If human remains are found on this site, the developer/permit holder or any successor in interest shall comply with State Health and Safety Code Section 7050.5.</p> <p>If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code Section 50.97.98(b), remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted 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</p>	<p>Less-Than-Significant</p>	

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
		make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. Evidence of compliance with this condition, if human remains are found, shall be provided to the County of Riverside upon the completion of a treatment plan and final report detailing the significance and treatment of the finding.		
Cumulative Impacts: Under all cultural resources topics, the Project would have no impact, impacts would be less-than-significant, or would be less-than-significant as mitigated. Project impacts would not be cumulatively considerable.				
Energy				
Potentially Significant Impact Due to Wasteful, Inefficient, Unnecessary Consumption of Energy Resources: Indirectly, Project development energy efficiencies and energy conservation would be achieved through use of bulk purchase, transport and use of construction materials, improving fuel efficiencies.	Less-Than-Significant	No Mitigation Required	N/A	
Conflict/Obstruction of State/Local Plan for Renewable Energy/Energy Efficiency: Project would implement energy-saving features and operational programs, consistent with reduction measures contained in the County of Riverside Climate Action Plan and would comply with California Building Standards Title 24 mandates.	Less-Than-Significant	No Mitigation Required	N/A	
Cumulative Impacts: Under all energy resources topics impacts would be less-than-significant. Project impacts would not be cumulatively considerable.				
Geology/Soils				
Project Site Subject to Rupture of Known Earthquake Fault: Project site is not located within a currently established State of California Alquist-Priolo Earthquake Fault Zone or a Riverside County Fault Hazard Zone for surface fault rupture hazards. The Geotechnical investigation for the Project indicates “the potential for ground rupture is considered to be very low due to the absence of active or potentially active faults” at the Project site.	Less-Than-Significant	No Mitigation Required	N/A	
Subject to Seismic-Related Ground Failure: Project site is located in an area of “Low” liquefaction susceptibility. The Geologic Investigation for the Project site states that “due to the lack of a permanent, near-surface groundwater table and the	Less-Than-Significant	No Mitigation Required	N/A	

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
dense to very dense nature of the old alluvial fan deposits, liquefaction potential for the site is negligible and not a design consideration.”				
Subject to Strong Ground Shaking: Nearest known active fault is the Glen Ivy segment of the Elsinore fault, approximately 11 miles west of the Project site. However, the Project site could experience ground shaking from a major earthquake in the Project vicinity.	Less-Than-Significant	No Mitigation Required	N/A	
Located on Unstable Geologic Unit or Soil, Project Resulting in Landslide, Lateral Spreading, Collapse, Rockfalls: No landslides have been mapped on, or near, the Project site.	Less-Than-Significant	No Mitigation Required	N/A	
Located on Unstable Geologic Unit or Soil, Project Resulting in Ground Subsidence: There is only a slight degree of potential soil collapse on the Project site.	Less-Than-Significant	No Mitigation Required	N/A	
Subject to Seiche, Mudflow, Volcanic Hazards:	No Impact	No Mitigation Required	N/A	
Change in Topography: Project site ground surface relief features will be altered somewhat during Project development. Cuts of approximately 16 feet and fills of approximately 15 feet will be used to achieve finished grades. However, the Geological Investigation for the Project indicates surficial stability will be maintained at a safe level.	Less-Than-Significant	No Mitigation Required	N/A	
Create Cut/Fill Slopes Greater than 2:1/Higher than 10 Feet: See above.	Less-Than-Significant	No Mitigation Required	N/A	
Result in Effects to Subsurface Sewage Disposal Systems: No grading associated with Project development will affect subsurface sewage disposal systems.	No Impact	No Mitigation Required	N/A	
Result in Substantial Soil Erosion/Loss of Topsoil: Much of the Project site is covered with grassland. Topsoil is underlain by very old alluvium and granitic bedrock. Project development will result in short-term erosion impacts due to increasing the rate of water runoff and concomitant susceptibility to erosion. Standard County of Riverside requirements, Riverside County National Pollutant Discharge Elimination System Municipal Stormwater Permit, and Best Management Practices will minimize soil erosion and loss of topsoil resulting from Project development.	Less-Than-Significant	No Mitigation Required	N/A	
Location on Expansive Soil, Creating Substantial Risks to Life or Property: Soils on the Project site have a very low expansion potential, according to the Geological Investigation conducted for the Project.	Less-Than-Significant	No Mitigation Required	N/A	

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
Have Soils Incapable of Supporting Septic Tanks Where Sewers Not Available: Project development and operation will connect to the existing Eastern Municipal Water District sewer system.	No Impact	No Mitigation Required	N/A	
Impacted by or Result in Wind Erosion and Blowsand: As with much of Riverside County, the Project site may experience wind erosion susceptibility. However, this impact would be a short-term impact. Project design and County of Riverside regulations would reduce this impact to a less-than-significant level.	Less-Than-Significant	No Mitigation Required	N/A	
Cumulative Impacts: Under all geology/soils topics, the Project would have no impact or impacts would be less-than-significant. Project impacts would not be cumulatively considerable.				
Greenhouse Gas Emissions				
Generation of GHG, Significantly Impacting Environment: The Project will result in approximately 8,095.32 MTCO ₂ e per year. The Project would therefore exceed the County’s screening threshold of 3,000 MTCO ₂ e per year. Absent Project demonstrated attainment of at least 100 points through the implementation of CAP Update Screening Table features, the Project could generate direct or indirect GHG emissions that would result in a significant impact on the environment.	Potentially Significant	MM-GHG-1 The Project shall implement Screening Table Measures providing for a minimum 100 points per the County Screening Tables. The Project would be consistent with the CAP Update’s requirement to achieve at least 100 points and thus the Project is considered to have a less-than-significant individual and cumulatively considerable impact on GHG emissions. The County shall verify incorporation of the identified Screening Table Measures within the Project building plans and site designs prior to the issuance of building permit(s) and/or site plans (as applicable). The County shall verify implementation of the identified Screening Table Measures prior to the issuance of Certificate(s) of Occupancy. MM-GHG-2 The Project shall comply with CAP Update Measure R2-CE1. CAP Update Measure R2-CE1 requires that the Project provide onsite renewable energy production generation comprising at least 20 percent of the Project energy demand. The	Less-Than-Significant	

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
		<p>County shall verify implementation of CAP Update Measure R2-CE1 within the Project building plans and site designs prior to the issuance of building permit(s) and/or site plans (as applicable). The County shall verify implementation of CAP Update Measure R2-CE1 prior to the issuance of Certificate(s) of Occupancy.</p> <p>MM-GHG-3 The Project shall comply with applicable provisions of the County of Riverside Good Neighbor Policy for Logistics and Warehouse/Distribution Centers as implemented through the Project Conditions of Approval.</p>		
<p>Conflict with Applicable Plan/Policy/Regulation for Reduction of GHG: GHG emissions reduction plans, policies and regulations applicable to the Project include: AB 32, SB 32, (including related 2008/2017 ARB Scoping Plan Elements), and the CAP Update. The Project could potentially conflict with these plans, policies, and regulations.</p>	Potentially Significant	Please refer to MM-GHG-1, MM-GHG-2, MM-GHG-3	Less-Than-Significant	
<p>Cumulative Impacts: Under all GHG topics, impacts would be less-than-significant as mitigated. Project impacts would not be cumulatively considerable.</p>				
<p>Hazards/Hazardous Materials</p>				
<p>Creation of Significant Hazard Through Transport, Use, Disposal of Hazardous Materials: Small amounts of hazardous materials may be used during Project development. Construction activities may involve transport, storage and use of chemical agents, solvents, paints and other hazardous materials. All construction-related materials will be required to be used, handled and transported in compliance with Federal, State and County requirements.</p>	Potentially Significant	<p>MM-HA-1: Prior to issuance of a grading permit for site preparation for the proposed warehouse/logistics building, the Applicant shall complete and submit an asbestos and hazardous materials survey of all irrigation pipes and building materials for review and approval of the County of Riverside Environmental Health Department. Should asbestos materials be identified on-site, such materials shall be handled and disposed of by licensed contractors in accordance with all appropriate regulatory agency guidelines.</p>	Less-Than-Significant	
<p>Creation of Significant Hazard Through Upset/Accident Releasing Hazardous Materials Into Environment: The Project site was farmed for many years. Therefore, there is a potential that irrigation lines on the Project site may be wrapped with, or contain, asbestos. Therefore, Mitigation is required.</p>	Potentially Significant		Less-Than-Significant	

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
Impairment with Adopted Emergency Response/Evacuation Plan:	No Impact	No Mitigation Required	No	
Emission of Hazardous Emissions or Handling of Hazardous Materials, Substances, Waste Within One-Quarter Mile of Existing/Proposed School:	Less-Than-Significant	No Mitigation Required	No	
Location on Hazardous Materials Site:	No Impact	No Mitigation Required	No	
Inconsistency with Airport Master Plan:	Less-Than-Significant	No Mitigation Required	N/A	The Project Applicant has submitted the Project plans to the Riverside County Airport Land Use Commission (ALUC) for that agency’s independent review. The ALUC determined that the Project is consistent with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan. Review and conditional approval of the Project is documented in <i>Airport Land Use Commission (ALUC) Development Review</i> (Riverside County Airport Land Use Commission) February 20, 2020 (EIR Appendix T). Conditions, revisions or limitations required by the ALUC would be incorporated in the Project prior to approval by the County.
Require Review by Airport Land Use Commission:	Less-Than-Significant	No Mitigation Required	N/A	Please refer to Remarks above.
Result in Safety Hazard for Residents/Employees for Project Within Airport Land Use Plan or Within 2 Miles of Public Airport/Public Use Airport:	Less-Than-Significant	No Mitigation Required	N/A	
Result in Safety Hazard for Residents/Employees for Project Within Vicinity of Private Airstrip or Heliport:	No Impact	No Mitigation Required	N/A	
Cumulative Impacts: Under all hazards/hazardous materials topics, the Project would have no impact, impacts would be less-than-significant, or would be less-than-significant as mitigated. Project impacts would not be cumulatively considerable.				
Hydrology/Water Quality				
Violation of Water Quality Standards/Waste Discharge Requirements or Otherwise Degrade Surface or Groundwater Quality: Project development will convert natural drainage surfaces on the Project site to impervious surfaces and will alter existing drainage patterns. Project development	Less-Than-Significant	No Mitigation Required	N/A	

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
and operation will be required to comply with the Regional Water Quality Control Plan. The Water Quality Management Plan prepared for the Project indicates water quality for the post-development condition will be maintained.				
Substantially Decrease Groundwater Supplies or Substantial Interference with Groundwater Recharge: Increase in impervious surfaces could reduce amount of water reaching underground aquifers.	Less-Than-Significant	No Mitigation Required	N/A	
Substantial Alteration of Existing Drainage Pattern: The Project has been designed to maintain the same drainage discharge locations and tributary areas, to the maximum extent practicable, as in the existing condition.	Less-Than-Significant	No Mitigation Required	N/A	
Result in Substantial Erosion or Siltation: The Project will maintain the soils natural infiltration capacity for each post-construction Best Management Practice.	Less-Than-Significant	No Mitigation Required	N/A	
Substantial Increase in Rate or Amount of Surface Runoff that Would Result in Flooding: Project development will convert natural drainage surfaces on the Project site to impervious surfaces and will alter existing drainage patterns. However, post-Project development peak flows will be less than pre-development flows in the 2-year, 5-year, and 10-year return periods.	Less-Than-Significant	No Mitigation Required	N/A	
Creation or Contribution of Runoff Water that Exceeds Capacity of Existing/Planned Stormwater Drainage Systems or Provides Substantial Additional Sources of Polluted Runoff: Project development will contribute runoff water into stormwater drainage systems. However, proposed off-site storm drain conveyance system improvements that are part of Project development will be located and sized in compliance with the Master Drainage Plan for the Perris Valley Area provided by Riverside County Flood Control and Water Conservation District.	Less-Than-Significant	No Mitigation Required	N/A	
Impede/Redirect Flood Flows: Although Project site topography will be altered to accommodate the proposed building pad and parking lot, the drainage pattern generally will be maintained by Project development. Runoff will be directed to on-site underground infiltration/detention basins designed to address post-development water quality by hydromodification and flood control. The Project includes outlet structures designed so that post-development peak flows will not exceed pre-development peak flow	Less-Than-Significant	No Mitigation Required	N/A	

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
rates.				
Risk Release of Pollutants Due to Project Inundation in Flood Hazard, Tsunami, or Seiche Zones: The Project site is not located within a flood hazard, tsunami, or seiche zone.	No Impact	No Mitigation Required	N/A	
Riske Release of Pollutants Due to Project Inundation in Hazard Area or Dam Failure Inundation Zone: The Project site is not located within a hazard area of dam failure inundation zone.	No Impact	No Mitigation Required	N/A	
Conflict with/Obstruct Water Quality Control Plan or Sustainable Groundwater Management Plan Implementation: The Project will be required to prepare Storm Water Pollution Prevention Plans for Project operational activities and to implement a long-term water quality sampling and monitoring program or receive an exemption.	No Impact	No Mitigation Required	N/A	
Cumulative Impacts: Under all hydrology/water quality topics, the Project would have no impact or impacts would be less-than-significant. Project impacts would not be cumulatively considerable.				
Land Use and Planning				
Cause Significant Environmental Impact Due to Conflict with Land Use Plan, Policy, Regulation: Project development is consistent with the land use designations assigned the Project site in the County of Riverside General Plan, Land Use Ordinance, and the Mead Valley Area Plan.	No Impact	No Mitigation Required	N/A	
Disrupt/Divide Physical Arrangement of Established Community: The Project site is zoned for, and contemplated for, industrial/business park uses. The property bordering the Project site to the east is zoned M-SC and contains a Light Industrial use. Surrounding properties to the north, west and south are residentially zoned, but the majority of that land is vacant with only 12 single-family residences on large lots bordering the Project site.	Less-Than-Significant	No Mitigation Required	N/A	
Cumulative Impacts: Under all land use and planning topics, the Project would have no impact or impacts would be less-than-significant. Project impacts would not be cumulatively considerable.				
Mineral Resources				
Result in Loss of Availability of Known Mineral Resource of Value to Region or Residents of State:	No Impact	No Mitigation Required	N/A	
Result in Loss of Availability of Locally-Important Mineral Resource Recovery Site Delineated on Local General Plan, Specific Plan or Other Land Use Plan:	No Impact	No Mitigation Required	N/A	
Potentially Expose People or Property to Hazards from Quarries/Mines:	No Impact	No Mitigation Required	N/A	
Cumulative Impacts: Under all mineral resources topics, the Project would have no impact. Project impacts would not be cumulatively considerable.				

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
Noise				
<p>Exposure of People Residing/Working in Project Area to Excessive Noise Levels for Project Located Within Airport Land Use Plan or Within 2 Miles of Public Airport/Public Use Airport: The Project site is approximately 2.5 miles southwest of March Air Reserve Base and thereby would not be exposed to excessive aircraft noise levels.</p>	Less-Than-Significant	No Mitigation Required	N/A	
<p>Exposure of People Residing/Working in Project Area to Excessive Noise Levels for Project Located Within Vicinity of Private Airstrip: The Project site is not located within the vicinity of a private airstrip and would not expose people working on the Project site or in the Project area to excessive noise levels.</p>	No Impact	No Mitigation Required	N/A	
<p>Generation of Substantial Temporary/Permanent Increase in Ambient Noise Levels in Project Vicinity in Excess of Local General Plan/Noise Ordinance/Applicable Standards: Noise generated by Project construction equipment (trucks; power tools; concrete mixers; portable generators) can reach high levels. The number and mix of construction equipment are expected to occur in the following stages: site preparation; grading; building construction; architectural coating; and, paving.</p>	Potentially Significant	<p>MM-N-1 – The following noise barrier is required to reduce the operational noise level impacts to owned and/or occupied noise-sensitive uses at the time of Project operation.</p> <ul style="list-style-type: none"> • A minimum 17-foot tall noise barrier at the eastern truck court boundary is required. The barrier shall provide a weight of at least four (4) pounds per square foot of face area with no decorative cutouts or line-of-sight openings between shielded areas and the roadways, or a minimum transmission loss of 20dBA. The barriers shall consist of a solid face from top to bottom. Unnecessary openings or decorative cutouts shall not be made. All gaps (except for weep holes) should be filled with grout or caulking. The noise barriers shall be constructed using the following materials: <ul style="list-style-type: none"> o Masonry block; o Earthen berm; o Or any combination of construction materials capable of the minimum weight of 4 pounds per square foot or a minimum 	Less-Than-Significant	

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
<p>Generation of Excessive Ground-borne Vibration or Ground-borne Noise Levels: Noise generated by Project construction equipment (trucks; power tools; concrete mixers; portable generators) can reach high levels. The number and mix of construction equipment are expected to occur in the following stages: site preparation; grading; building construction; architectural coating; and, paving. Project-related vibration impacts will be potentially significant during Project development (construction).</p>	Potentially Significant	<p>transmission loss of 20 dBA.</p> <p>MM-N-2 – For Project-related construction activities, large loaded trucks and dozers (greater than 80,000 pounds) shall not be used within 90 feet of owned and occupied noise-sensitive residential homes east of the Project site as identified in the Noise Impact Analysis prepared for the Project during construction activities. Instead, small rubber-tired or alternative equipment shall be used within this area during Project construction to reduce vibration effects.</p>	Less-Than-Significant	
<p>Cumulative Impacts: Under all noise topics, the Project would have no impact, impacts would be less-than-significant, or would be less-than-significant as mitigated. Project impacts would not be cumulatively considerable.</p>				
<p>Paleontological Resources</p>				
<p>Direct/Indirect Destruction of Unique Paleontological Resource/Site or Unique Geological Feature: Although a record search from the Western Science Center revealed no previously recorded fossil localities within one mile of the Project site, the Western Science Center recommended a Mitigation Program be in place for the Project because of the presence of other Quaternary fossil localities in southern California and sediments present beneath the Project site.</p>	Potentially Significant	<p>MM-PR-1: Project development shall adhere to all guidelines and recommendations of the <i>Paleontological Monitoring Plan as presented within Paleontological Resource Assessment and Impact Mitigation Program, for the Barker Logistics (APN 317-240-001-8) Project in Perris, Riverside County, California</i> (Environmental Planning Group, LLC) March 28, 2019.</p>	Less-Than-Significant	
<p>Cumulative Impacts: Paleontological resources impacts would be less-than-significant as mitigated. Project impacts would not be cumulatively considerable.</p>				
<p>Population/Housing</p>				
<p>Displace Substantial Numbers of People/Housing, Necessitating Construction of Replacement Housing Elsewhere: The Project site is vacant and therefore no people or housing would be displaced as a result of Project development.</p>	No Impact	No Mitigation Required	N/A	
<p>Creation of Demand for Additional Housing, Particularly for Households Earning 80% or Less of County Median Income: Project development will provide temporary employment for workers. Project operation will provide employment opportunities for</p>	Less-Than-Significant	No Mitigation Required	N/A	

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
approximately 700 persons. Additional adjunct jobs for truck drivers, mechanics and maintenance personnel will be created as well. A portion of the new jobs will be filled by residents of nearby areas and cities. Therefore, the impact on housing demand in the area will not be substantial.				
Inducement of Substantial Unplanned Population Growth: Project development is consistent with the County of Riverside General Plan and Zoning designations for the Project site. Thereby, the Project land use has been assumed in population and employment projections for Riverside County.	Less-Than-Significant	No Mitigation Required	N/A	
Cumulative Impacts: Cumulative projects similarly are industrial warehouses in nature with the exception of one small residential project. Any generation of demand for additional housing will be less-than-significant.	Less-Than-Significant	No Mitigation Required	N/A	
Public Services				
Result in Substantial Adverse Physical Impacts to/Cause Need for New Governmental Facilities for Fire Services, Sheriff Services, Schools, Libraries, Health Services: Any additional calls for Fire Protection/Emergency or Police services resulting from Project development and/or Project operation will be offset by payment of required fees. Payment of fees for Library, Schools and other public services will be required.	Less-Than-Significant	No Mitigation Required other than compliance with County of Riverside Standard Conditions	N/A	
Cumulative Impacts: Cumulative impacts to fire protection/emergency services, police service, libraries, schools and other governmental facilities would be evaluated as those facilities are cleared according to CEQA and Mitigation will be provided as appropriate or necessary.	Less-Than-Significant	No Mitigation Required other than compliance with County of Riverside Standard Conditions	N/A	
Recreation				
Inclusion of Recreational Facilities or Requirement of Construction/Expansion of Recreation Facilities that Adversely Affect Environment: Project development and operation will not include recreational facilities, will not result in a significant increase in population, and will not require construction or expansion of recreational facilities.	No Impact	No Mitigation Required	N/A	
Increase Use of Existing Neighborhood/Regional Parks/Recreational Facilities that Result in Substantial Physical Deterioration of Facility: No residential uses are part of the Project. Project	No Impact	No Mitigation Required	N/A	

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
development and operation will not include recreational facilities, will not result in a significant increase in population, and will not require construction or expansion of recreational facilities.				
<p>Location Within Community Service Area or Recreation District with Community Parks and Recreation Plan: The Project site is not located within a Community Service Area. The County of Riverside currently does not have a requirement for industrial projects to pay Quimby Act fees. However, the Project will have a Condition of Approval that would require any such future fees be paid according to any future County of Riverside requirements.</p>	Less-Than-Significant	No Mitigation Required	N/A	
<p>Cumulative Impacts: Project development and operation will not increase use of neighborhood or regional parks because the entire Project involves development and operation of a warehouse/logistics facility. All but one project in the vicinity of the Project site is industrial in nature and thereby would not impact parks or contain recreational facilities.</p>	Less-Than-Significant	No Mitigation Required	N/A	
Transportation				
<p>Conflict with Program/Plan/Ordinance/Policy Addressing Circulation System: The EIR discussions address the potential for the Project to conflict with applicable plans, policies and ordinances establishing a measure of effectiveness for the performance of the circulation system. In this case, the measure of performance is the applicable jurisdictional Level of Service (LOS) standard. The EIR LOS discussions take into account “all modes of transportation, including mass transit and nonmotorized 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 Project could result in or cause LOS deficiencies within the TIA Study Area.</p>	Potentially Significant	<p>MM-TR-1: MVAP DIF shall be paid pursuant to County Ordinance 659. TUMF shall be paid pursuant to County Ordinance 824. Applicant responsibility for improvements not covered by the MVAP DIF or TUMF Programs, and/or not constructed the Project shall be fulfilled by payment of Fair Share fees.</p> <p>MVAP DIF, TUMF and/or fair share fees paid pursuant to Mitigation Measure TR-1 would be assigned to construction of improvements recommended to ensure adequate LOS conditions are maintained in the Study Area. Improvements recommended to achieve acceptable LOS under EAP (2021) Conditions, and that would be funded through MVAP DIF,</p>	Less-Than-Significant.	

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
		TUMF and/or fair share fee payments are listed below. Harvill Avenue & N. A Street (Intersection No. 10) <ul style="list-style-type: none"> • Install a Traffic Signal. • Add a northbound right turn lane with overlap phasing. Harvill Avenue & Placentia Street (Intersection No. 8) <ul style="list-style-type: none"> • Install a Traffic Signal • Add a westbound left turn lane • Add a westbound right turn lane with overlap phasing. 		
<p>Conflict with Applicable Congestion Management Program: Within the Study Area, I-215 is a CMP freeway. Under all analysis scenarios, the Project would contribute fewer than 50 peak hour trips at all CMP facilities within the Study Area. Per the deficiency/impact significance criteria identified at Section 4.18.1.9, Project impacts at Study Area CMP facilities would therefore be less-than-significant.</p>	Less-Than-Significant	No Mitigation Required	N/A	
<p>Substantial Increase in Hazards Due to Geometric Design Feature/ Cause an effect upon circulation during the project’s construction; Result in Inadequate Emergency Access: The final design of the Project site plan and all Project traffic improvements would be subject to review and approval by the County, thereby ensuring conformance of the Project improvements with County design and safety standards. In addition, representatives of the County Sheriff Department and County Fire Department would review the Project’s plans to ensure that emergency access is provided consistent with Department(s) requirements. Efficient and safe access within, and access to, the Project is provided by the site plan design concept, site access improvements, and site adjacent roadway improvements included as components of the Project. On-site traffic signing and striping would be implemented in conjunction with detailed construction plans for the Project site. Sight distance at each Project access point</p>	Less-Than-Significant	No Mitigation Required	N/A	

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
<p>would be reviewed to ensure conformance with County sight distance standards at the time of preparation of final grading, landscape and street improvement plans.</p> <p>Short-term traffic detours and traffic disruption could result during Project construction activities are addressed under the Project Construction Traffic Management Plan (Plan), summarized within the EIR Project Description.</p>				
<p>Effect to/Need for New/Altered Maintenance of Roads: Roadways in the Study Area generally would require routine, intermittent maintenance. Periodic maintenance of the Study Area roadway system is a function of the County (and Caltrans for Caltrans facilities). Such maintenance activities would not result in any new or substantially different impacts beyond those identified and addressed in this EIR.</p> <p>Maintenance and repair of Study Area roads is funded by federal, state, and local tax revenues. The Project will also contribute fees and tax revenues to the County that may be directed to the repair and maintenance of Study Area roads.</p>	Less-Than-Significant		N/A	
<p>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.</p>	Less Than Significant Impact	No Mitigation Required	No	
<p>Alter waterborne, rail, or air traffic</p>	Less Than Significant Impact	No Mitigation Required	No	
<p>Cumulative Impacts: Under all transportation topics, impacts would be less-than-significant, or would be less-than-significant as mitigated. Project impacts would not be cumulatively considerable.</p>				
<p>Tribal Cultural Resources</p>				
<p>Cause Substantial Adverse Change in Significance of Tribal Cultural Resource Listed/Eligible for Listing in California Register of Historical Resources); or *a resource determined by the lead agency, in the discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (in applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.,1, the lead agency shall consider the significance of the resource to a California Native American tribe.): Consultation with the Native American community is required, per stipulations in California Assembly Bill 52 (AB 52). The</p>	Potentially Significant	<p>MM-TCR-1 (Native American Monitor): Prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement with the consulting tribe(s) for a Native American Monitor. The Agreement shall be consistent with the CRMP and address the treatment of known cultural resources; the treatment and final disposition of any tribal cultural resources, sacred sites, human remains or archaeological and cultural resources</p>	Less-Than-Significant	

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
<p>County has contacted those tribes on its most current AB 52 Consultation list. To date, the County has received tribal consultation requests from the Rincon Band of Luiseño Indians, the Soboba Band of Luiseño Indians, and the Pechanga Band of Luiseño Mission Indians.</p>		<p>inadvertently discovered on the Project site.</p> <p>The Native American Monitor(s) 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(s), the Native American Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources.</p> <p>The developer/permit applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this condition of approval. Upon verification, the County Archaeologist shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure.</p>		
		<p>MM-TCR-2 (Artifact Disposition): Prior to Grading Permit Final Inspection, the landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the Project property during any ground-disturbing activities, including previous investigations and/or Phase III data recovery.</p> <p>Historic Resources- All historic archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project, such as testing of</p>		

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
		<p>archaeological sites that took place years ago), shall be curated at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines.</p> <p>Prehistoric Resources- One of the following treatments shall be applied.</p> <p>a. Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources.</p> <p>b. Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures to protect the reburial area from any future impacts. Reburial shall not occur until all required cataloguing, analysis and studies have been completed on the cultural resources, with an exception that sacred items, burial goods and Native American human remains are excluded. Any reburial processes shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to a Public Records Request.</p> <p>c. If reburial is not agreed upon by the Consulting</p>		

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
		<p>Tribes then the resources shall be curated at a culturally appropriate manner at a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. 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 of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to the County. There shall be no destructive or invasive testing on sacred items, burial goods and Native American human remains.</p> <p>MM-TCR-3 (Human Remains): If human remains are found on this site, the developer/permit holder or any successor in interest shall comply with State Health and Safety Code Section 7050.5.</p> <p>If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code Section 50.97.98(b), remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Riverside</p>		

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
		<p>County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted 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 concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. Evidence of compliance with this condition, if human remains are found, shall be provided to the County of Riverside upon the completion of a treatment plan and final report detailing the significance and treatment of the finding.</p> <p>MM-TCR-4 (Tribal Cultural Sensitivity Training): Prior to ground disturbance, the Project Archaeologist and, if required, 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 and the surrounding area; what resources could potentially be identified during earthmoving activities; the protocols that apply in the event unanticipated 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</p>		

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
		mandatory training and all construction personnel must attend prior to beginning work on the project site. A copy of the agreement and a copy of the sign-in sheet shall be submitted to the County Archaeologist to ensure compliance with this condition of approval.		
Cumulative Impacts: Under all Tribal Cultural Resources topics, impacts would be less-than-significant as mitigated. Project impacts would not be cumulatively considerable.				
Utilities/Service Systems				
Require/Result in Relocation/Construction of New/Expanded Water/Wastewater Treatment/Storm Water Drainage Systems that Would Cause Significant Environmental Effects: Project development will contribute runoff water into stormwater drainage systems. However, proposed off-site storm drain conveyance system improvement that are part of Project development will be located and sized in compliance with the Master Drainage Plan for the Perris Valley Area provided by Riverside County Flood Control and Water Conservation District. The Final Drainage Study for the Project will incorporate final design and analysis of the off-site public storm drain system. Installation of water and sewer line connections that are part of Project development would result in physical environmental impacts. However, construction of water and sewer lines necessary to serve the Project would not result in any significant physical impacts on the environment that are identified, disclosed and analyzed as part of this EIR.	Less-Than-Significant	No Mitigation Required	N/A	
Have Sufficient Water Supplies Available to Serve Project and Foreseeable Future Development During Normal, Dry, Multiple Dry Years: The Eastern Municipal Water District has indicated it has sufficient water capacity to serve existing and new development within its service area to at least 2040.	Less-Than-Significant	No Mitigation Required	N/A	
Require/Result in Construction of New Wastewater Treatment Facilities Whereby Construction or Relocation Would Cause Significant Environmental Effects: Project development would include construction of an on-site network of water and sewer pipes that would connect to existing water and sewer lines beneath surrounding	Less-Than-Significant	No Mitigation Required	N/A	

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
roadways. Installation of water and sewer lines connections would result in physical environmental impacts potentially to air quality, paleontological resources, hydrology, and greenhouse gas emissions. However, Project development impacts are considered short-term and less-than-significant with implementation of Mitigation Measures contained in related sections of this EIR.				
Result in Determination by Wastewater Treatment Provider that It has adequate Capacity to serve Project Demand: The Eastern Municipal Water District “Sewer System Management Plan-2016” states that the goal of the Sewer System Management Plan is to provide a plan and schedule to properly manage, operate, and maintain all parts of the Sanitary Sewer System.	Less-Than-Significant	No Mitigation Required	N/A	
Generation of Solid Waste in Excess of State/Local Standards or in Excess of Capacity of Local Infrastructure or Otherwise Impair Attainment of Solid Waste Reduction Goals: Project development and operation would generate an incremental increase in solid waste requiring off-site disposal. Solid waste from the Project would be disposed of at the Badlands Landfill and the El Sobrante Landfill.	Less-Than-Significant	No Mitigation Required	N/A	
Compliance with Federal, State, Local Management/Reduction Statutes/Regulations Related to Solid Wastes: Project development and operation will be required to comply with Federal, State and Local regulations pertaining to solid waste reduction.	Less-Than-Significant	No Mitigation Required	N/A	
Construction of New Facilities or Expansion of Existing Facilities that Would Cause Significant Environmental Effects –	Less-Than-Significant	No Mitigation Required	N/A	
Cumulative Impacts: Under all utilities/service systems topics impacts would be less-than-significant. Project impacts would not be cumulatively considerable.				
Wildfire				
Substantial Impairment of Adopted Emergency Response Plan/Emergency Evacuation Plan: Project development will include construction of off-site improvements that, together with facets of the Project and compliance with County of Riverside regulations, will ensure Project development and operation will not result in a requirement for installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.	Less-Than-Significant	No Mitigation Required	N/A	

Table ES-1 – Environmental Impacts and Mitigation Summary

Issues/Impacts	Impact Significance Before Mitigation	Mitigation Measures	Impact Significance After Mitigation	Remarks
<p>Exacerbate Wildfire Risks Due to Slope, Prevailing Winds and Other Factors, Thereby Exposing Project Occupants to Pollutant Concentrations from Wildfire or Uncontrolled Spread of Wildfire: Fire potential for Riverside County typically is greatest in dry months. The Project site is located in a designated Very High Fire Hazard Danger Zone. The post-development danger from wildland fire will be lessened through development of the property in that the Project will replace grassland with a structure built in compliance with State and County Fire Code requirements.</p>	Less-Than-Significant	No Mitigation Required	N/A	
<p>Require Installation/Maintenance of Associated Infrastructure that May Exacerbate Fire Risk or Result in Temporary/Ongoing Impacts to Environment:</p>	Less-Than-Significant	Reference above.	N/A	
<p>Exposure of People/Structures to Significant Risks, Including Downslope/Downstream Flooding/Landslides as Result of Runoff, Post-Fire Slope Instability, Drainage Changes: The Project site is not sufficiently sloped to affect downstream flooding or landslides. Project development would create a largely flat building pad. Drainage is addressed in the “Hydrology/Water Quality” sub-section of this Executive Summary of the EIR.</p>	No Impact	No Mitigation Required	N/A	
<p>Exposure of People/Structures to Significant Risk of Loss, Injury, Death Involving Wildland Fires: The Project site is located in a Very High Fire Hazard Zone. However, the post-development danger from wildland fire will be lessened through development of the Project site. This will occur because the Project site will replace grassland with a structure built to compliance with State and County Fire Code requirements.</p>	Potentially Significant	<p>MM-WI-1: The Project Applicant/Developer shall demonstrate compliance with County of Riverside General Plan policies, with the Riverside County Fire Department Fire Protection and Emergency Medical Services Strategic Master Plan requirements, with the Riverside County Emergency Operations Plan requirements, and with County of Riverside Standard Conditions at required stages of Project development as determined by the County of Riverside staff.</p>	Less-Than-Significant	
<p>Cumulative Impacts: Under all wildfire topics, the Project would have no impact or impacts would be less-than-significant. Project impacts would not be cumulatively considerable.</p>				

Table ES-2- – Plans, Policies or Programs/Project Design Features

AESTHETICS	
Policy LU 14.1	Preserve and protect outstanding scenic vistas and visual features for the enjoyment of the traveling public.
Policy LU 14.8	Avoid the blocking of public views by solid walls.
MVAP 8.1	Adhere to the lighting requirements specified in Riverside County Ordinance No. 655 for standards that are intended to limit light leakage and spillage that may interfere with the operations of the Mount Palomar Observatory.
PD-AE-1	The Project building will utilize Low Pressure Sodium security, parking lot and parkway lighting in compliance with Riverside County Ordinance No. 655.
PDF-AE-2	Loading/unloading docks and parking lot will incorporate energy-efficient LED shielded fixtures with energy savings control options and occupancy sensing units.
AGRICULTURE AND FORESTRY RESOURCES	
Policy OS 7.3	Encourage conservation of productive agricultural lands and preservation of prime agricultural lands.
Policy OS 7.5	Encourage the combination of agriculture with other compatible open space uses in order to provide an economic advantage to agriculture. Allow by right, in areas designated Agriculture, activities related to the production of food and fiber, and support uses incidental and secondary to the on-site agricultural operation.
AIR QUALITY	
Policy LU 11.1	Provide sufficient commercial and industrial development opportunities in order to increase local employment levels and thereby minimize long-distance commuting.
Policy LU 11.2	Ensure adequate separation between pollution producing activities and sensitive emission receptors, such as hospitals, residences, child care centers and schools.
Policy LU 11.4	Provide options to the automobile in communities, such as transit, bicycle and pedestrian trails, to help improve air quality.
Policy LU 11.5	Ensure that all new developments reduce Greenhouse Gas emissions as prescribed in the Air Quality Element and Climate Action Plan.
Policy HC 14.2	When feasible, avoid locating new sources of air pollution near homes and other sensitive receptors.
Policy AQ 3.3	Encourage large employers and commercial/industrial complexes to create Transportation Management Associations
Policy AQ 3.4	Encourage employee rideshares and transit incentives for employers with more than 25 employees at a single location.
Policy AQ 4.1	Require the use of all feasible building materials/methods which reduce emissions.
Policy AQ 4.7	To the greatest extent possible, require every project to mitigate any of its anticipated emissions which exceed allowable emissions as established by the SCAQMD, MDAQMD, SCAB, the Environmental Protection Agency and the California Air Resources Board.
Policy AQ 4.9	Require compliance with SCAQMD Rules 403 and 403.1, and support appropriate future measures to reduce fugitive dust emanating from construction sites.
Policy AQ 15.1	Identify and monitor sources, enforce existing regulations, and promote stronger controls to reduce particulate matter.
Policy AQ 17.1	Reduce particulate matter from agriculture, debris hauling, street cleaning, utility maintenance, railroad rights-of-way, and off-road vehicles to the extent possible.

Table ES-2- – Plans, Policies or Programs/Project Design Features	
Policy AQ 17.4	Adopt incentives, regulations and/or procedures to manage paved and unpaved roads and parking lots so they product the minimum practicable level of particulates.
Policy AQ 17.7	Separate trucks from other vehicles in industrial areas of the County with the creation of truck-only access lanes to promote the free flow of traffic.
Policy AQ 17.9	Encourage the installation and use of electric service units at truck stops and distribution centers for heating and cooling truck cabs, and particularly for powering refrigeration trucks in lieu of idling of engines for power.
Policy AQ 17.10	Promote and encourage the use of natural gas and electric vehicles in distribution centers.
BIOLOGICAL RESOURCES	
Policy OS 5.5	Preserve and enhance existing native riparian habitat and prevent obstruction of natural water resources. Prohibit fencing that constricts flow across watercourses and their banks. Incentives shall be utilized to the maximum extent possible.
Policy OS 17.1	Every stand-alone application shall require an initial Habitat Evaluation and Acquisition Negotiation Process (HANS) assessment and such assessment shall be made by the Planning Department’s Environmental Programs Division. Habitat assessment and species-specific focused surveys shall not be required as part of this initial HANS assessment for stand-alone applications but will be required when a development proposal or land use application to subsequently subdivide, grade or build on the property is submitted to the County.
Policy OS 17.2	Enforce the provisions of applicable MSHCP’s and implement related Riverside County policies when conducting review of development applications.
MVAP 17.6	Protect sensitive biological resources in Mead Valley Area Plan through adherence to policies found in the multiple Species Habitat Conservation Plans, Environmentally Sensitive Lands, Wetlands, and Floodplain and Riparian Area Management sections of the General Plan Multipurpose Open Space Element.
CULTURAL RESOURCES	
Policy OS 19.2	The County of Riverside shall establish a cultural resources program in consultation with Tribes and the professional cultural resources consulting community. Such a program shall, at a minimum, address each of the following: application processing requirements; information database(s); confidentiality of site locations; content and review of technical studies; professional consultant qualifications and requirements; site monitoring; examples of preservation and mitigation techniques and methods; and the descendant community consultation requirements of local, state and federal law.
Policy OS 19.3	Review proposed development for the possibility of cultural resources and for compliance with the cultural resources program.
Policy OS 19.4	To the extent feasible, designate as open space and allocate resources and/or tax credits to prioritize the protection of cultural resources preserved in place or left in an undisturbed state.
Policy OS 19.5	Exercise sensitivity and respect for human remains from both prehistoric and historic time periods and comply with all applicable laws concerning such remains.
ENERGY	
PDF-EE10.A1 (Insulation)	Modestly Enhanced Insulation (walls R-13; roof/attic R-38)

Table ES-2- – Plans, Policies or Programs/Project Design Features	
PDF-EE10.A.2 (Windows)	Enhanced Window Insulation (0.32 U-factor, 0.25 SHGC)
PDF-EE10.A.3 (Cool Roofs)	Modest Duct Insulation (R-6)
PDF-EE10.B.2 (Space Heating/Cooling Equipment)	Improved Efficiency HVAC (EER 14/65% AFUE or 8 HSPF)
PDF-EE10.B.4 (Water Heaters)	High Efficiency Water Heater (0.72 Energy Factor)
PDF-EE10.B.5 (Daylighting)	All rooms within building have daylight (through use of windows, solar tubes, skylights)
PDF-EE10.B.6 (Artificial Lighting)	High Efficiency Lights (50% of in-unit fixtures are high efficacy)
PDF-CEL.B.1 (Photovoltaic)	20 percent of the power needs of the Project
PDF-W2.D.1 (Water Efficient Landscaping)	Eliminate turf and only provide drought tolerant plants
PDF-W2.D.2 (Water Efficient Irrigation Systems)	Weather based irrigation control systems combined with drip irrigation (demonstrate 20% reduced water use)
PDF-W2.E.2 (Toilets)	Water Efficient Toilets/Urinals (1.5 gpm)
PDF-W2.E.3 (Faucets)	Water Efficient Faucets (1.28 gpm)
T4.B.1 (Electric Vehicle Recharging)	Install electric vehicle charging stations in garages/parking areas
GEOLOGY AND SOILS	
Policy S 2.2	Require geological and geotechnical investigations in areas with potential for earthquake-induced liquefaction, landsliding or settlement, for any building proposed for human occupancy and any structure whose damage would cause harm, except for accessory buildings.
Policy S 3.1	Require the following in landslide potential hazard management zones, or when deemed necessary by the California Environmental Quality Act. <ul style="list-style-type: none"> a) Preliminary geotechnical and geologic investigations. b) Evaluations of site stability, including any possible impact on adjacent properties, before final project design is approved. c) Consultant reports, investigations, and design recommendations required for grading permits, building permits, and subdivision applications be prepared by state-licensed professionals.
Policy S 3.3	Before issuance of building permits, require certification regarding the stability of

Table ES-2- – Plans, Policies or Programs/Project Design Features	
	the site against adverse effects of rain, earthquakes, and subsidence.
Policy S 3.11	Require studies that address the potential of this hazard on proposed development within “High” and “Very High” wind erosion hazard zones as shown on Figure S-8, Wind Erosion Susceptibility Map.
Policy S 3.12	Include a disclosure about wind erosion susceptibility on property title for those properties located within “High” and “Very High” wind erosion hazard zones as shown on Figure S-8, Wind Erosion Susceptibility Map. (AI 92)
Policy S 3.13	Require buildings to be designed to resist wind loads.
PDF-GEO-1	Recommendations pertaining to Project site preparation and maintenance and Project development (construction) contained in the Geotechnical Investigation (Section 8 – Conclusions and Recommendations) will be implemented.
GREENHOUSE GAS EMISSIONS	
Policy LU 11.1	Provide sufficient commercial and industrial development opportunities in order to increase local employment levels and thereby minimize long-distance commuting.
Policy LU 11.2	Ensure adequate separation between pollution producing activities and sensitive emission receptors, such as hospitals, residences, child care centers and schools.
Policy LU 11.4	Provide options to the automobile in communities, such as transit, bicycle and pedestrian trails, to help improve air quality.
Policy LU 11.5	Ensure that all new developments reduce Greenhouse Gas emissions as prescribed in the Air Quality Element and Climate Action Plan.
Policy LU 17.1	Permit and encourage solar energy systems as an accessory use to any residential, commercial, industrial, mining, agricultural or public use.
Policy LU 18.1	Ensure compliance with Riverside County’s water-efficient landscape policies. Ensure that projects seeking discretionary permits and/or approvals develop and implement landscaping plans prepared in accordance with the Water-Efficient Landscape Ordinance (Ordinance No. 859), the County of Riverside Guide to California Friendly Landscaping and Riverside County’s California Friendly Plant List. Ensure that irrigation plans for all new development incorporate weather-based controllers and utilize state-of-the-art water-efficient irrigation components.
Policy LU 18.2	Minimize use of turf. Minimize the use of natural turf in landscape medians, front-yard typical designs, parkways, other common areas, etc. and use drought tolerant planting options, mulch, or a combination thereof as a substitute. Limit the use of natural turf to those areas that serve a functional recreational element. Incorporate other aesthetic design elements such as boulders, stamped concrete, pavers, flagstone, decomposed granite, manufactured rock products to enhance visual interest and impact.
Policy LU 18.3	Design and field check irrigation plans to reduce run-off. Emphasize the use of subsurface irrigation techniques for landscape areas adjoining non-permeable hardscape. Utilize subsurface irrigation or other low volume irrigation technology in association with long, narrow, or irregularly shaped turf areas. Minimize use of irregularly shaped turf areas.
Policy OS 1.4	Promote the use of recycled water for landscape irrigation.
Policy OS 1.5	Encourage the installation of water-conserving systems such as dry wells and graywater systems, where feasible, especially in new developments. The Installation of cisterns or infiltrators shall also be encouraged to capture rainwater

Table ES-2- – Plans, Policies or Programs/Project Design Features	
	from roofs for irrigation in the dry season and flood control during heavy storms.
Policy OS 2.1	Implement a water-efficient landscape ordinance and corresponding policies that promote the use of water-efficient plants and irrigation technologies, minimizes the use of turf, and reduces water-waste without sacrificing landscape quality.
Policy OS 11.2	Support and encourage voluntary efforts to provide active and passive solar access opportunities in new developments.
Policy OS 11.4	Encourage site planning and building design that maximizes solar energy use/potential in future development applications.
Policy OS 16.1	Continue to implement Title 24 of the California Code of Regulations (the “California Building Standards Code” particularly Part 6 (the California Energy Code) and Part 11 (the California Green Building Standards Code), as amended and adopted pursuant to County ordinance. Establish mechanisms and incentives to encourage architects and builders to exceed the energy efficiency standards within CCR Title 24.
Policy 16.10	Encourage installation and use of cogenerating systems where they are cost-effective and appropriate.
Policy OS 16.14	Coordinate energy conservation activities with the County Climate Action Plan (CAP) as decreasing energy usage also helps reduce carbon emissions.
Policy HC 14.2	When feasible, avoid locating new sources of air pollution near homes and other sensitive receptors.
Policy AQ 5.1	Utilize source reduction, recycling and other appropriate measures to reduce the amount of solid waste disposed of in landfills.
Policy AQ 5.2	Adopt incentives and/or regulations to enact energy conservation requirements for private and public developments.
Policy AQ 5.4	Encourage the incorporation of energy-efficient design elements, including appropriate site orientation and the use of shade and windbreak trees to reduce fuel consumption for heating and cooling.
Policy AQ 18.2	Adopt GHG emissions reduction targets. Pursuant to the results of the Carbon Inventory and Greenhouse Gas Analysis for Riverside County, future development proposed as a discretionary project pursuant to the General Plan shall achieve sufficient reductions in greenhouse gas emissions in order to be found consistent with the County’s Climate Action Plan.
Policy AQ 20.6	Reduce emissions from commercial vehicles, through VMT, by requiring all new commercial buildings, in excess of 162,000 square feet, to install circuits and provide capacity for electric vehicle charging stations.
Policy AQ 20.10	Reduce energy consumption of the new developments (residential, commercial and industrial) through efficient site design that takes into consideration solar orientation and shading, as well as passive solar design.
Policy AQ 20.11	Increase energy efficiency of the new developments through efficient use of utilities (water, electricity, natural gas) and infrastructure design. Also, increase energy efficiency through use of energy efficient mechanical systems and equipment.
Policy AQ 20.13	Reduce water use and wastewater generation in both new and existing housing, commercial and industrial uses. Encourage increased efficiency of water use for agricultural activities.
Policy AQ 20.14	Reduce the amount of water used for landscaping irrigation through implementation

Table ES-2- – Plans, Policies or Programs/Project Design Features	
	of County Ordinance 859 and increase use of non-potable water.
Policy AQ 21.1	<p>The County shall require new development projects subject to County discretionary approval to incorporate measures to achieve 100 points through incorporation of the Implementation Measures (IMs) found in the Screening Tables within the Riverside County Climate Action Plan. One hundred points represent a project’s fair-share of reduction in operation emissions associated with the developed use needed to reduce emissions down to the CAP Reduction Target.</p> <ul style="list-style-type: none"> a) For the purposes of this policy, the “operational life” of a new development shall be defined as a 30-year span with construction emissions amortized over the 30 years. b) For the purposes of this policy, ‘new development’ refers to private development occurring pursuant to a discretionary land use approval issued by the County of Riverside and subject to binding Conditions of Approval. This definition generally corresponds to projects found non-exempt pursuant to the California Environmental Quality Act (CEQA), but is nevertheless subject to the sole discretion of the County of Riverside as lead agency. c) Other methods for showing GHG emissions reductions may be used provided such methods are both scientifically defensible and show actual emission reduction measures incorporated into project design, mitigation or alternative selection. That is, reductions must not be illusory “paper” reductions achieved merely through baseline manipulation. d) Nothing in this policy shall be construed as accepting any proposed discretionary project from any legally applicable CEQA requirements or explicitly limiting the scope of any analyses required to show CEQA compliance.
Policy AQ 21.2	<p>Implementation Measures found necessary for a given project pursuant to the CAP Screening Tables shall be incorporated into a project’s Mitigation and Monitoring Programs as required mitigation measures under CEQA to ensure the measures are implemented appropriately. Such Implementation Measures may also be separately incorporated into the Conditions of Approval issued by the County. In the event no Mitigation and Monitoring Program is required for a project, the Implementation Measures shall be incorporated into a project’s Conditions of Approval issued by the County.</p>
Policy AQ 21.3	<p>Discretionary Measures – Because of the varied nature of the private development proposals reviewed by the County, in some cases, the Implementing Measures in the CAP may not provide the most appropriate means for achieving the required Interim GHG reductions. In such cases, the following alternate measures may be utilized, at the County’s discretion:</p> <ul style="list-style-type: none"> a) For large-scale developments, such as specific plans, business parks, industrial centers, and those triggering a full Environmental Impact Report, a custom GHG analysis may be warranted to both assure compliance with the applicable targets herein and to provide a customized array of appropriate reduction measures.

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	<p>b) In such cases, the resultant GHG analysis may be used to develop customized GHG reduction measures in place of the CAP’s Implementing Measures, provided they achieve the stated targets or implement all feasible mitigation short of achieving the applicable targets.</p> <p>c) Project-specific analysis may be particularly valuable when assessing large-scale mixed use developments. In such developments, significant energy efficiencies and VMT reductions can result from smart growth design features, such as provision of housing, jobs, services and recreation within a 5- to 10-minute walking radius. Project-specific analysis in these cases may result in the need for fewer add-on Implementing Measures and potentially yield substantial savings on construction costs.</p>
Policy AQ 24.2	Fore discretionary actions, energy efficiency and conservation objectives shall be achieved through development and implementation of the appropriate Implementation Measures of the Climate Action Plan for all new development approvals. County programs shall also be developed and implemented to address energy efficiency and conservation efforts for County operations and the community.
Policy AQ 26.2	For discretionary actions, the objectives for greenhouse gas reduction through increased use of alternative energy sources shall be achieved through development and implementation of the applicable Implementation Measures of the Climate Action Plan. County programs shall also be developed and implemented to address use of alternative energy for County operations and within the community.
Policy AQ 27.2	Greenhouse gas reduction through the above waste reduction. Objectives shall be achieved through development and implementation of the applicable Implementation Measures of the Climate Action Plan for new development. County programs shall also be developed and implemented to address waste reductions for County operations and voluntary community efforts.
HAZARDS AND HAZARDOUS MATERIALS	
Policy S 6.1	<p>Enforce the land use policies and siting criteria related to hazardous materials and wastes through continued implementation of the programs identified in the County of Riverside Hazardous Waste Management Plan including the following:</p> <ol style="list-style-type: none"> Ensure county businesses comply with federal, State and local laws pertaining to the management of hazardous wastes and materials including all Certified Unified Program Agency (CUPA) programs. Ensure active public participation in hazardous waste and hazardous materials management decisions in Riverside County through the County’s land use and planning processes. Encourage and promote the programs, practices, and recommendations contained in the Riverside County Hazardous Waste Management Plan, giving the highest waste management priority to the reduction of hazardous waste at its source.
Policy S 7.3	Require commercial businesses, utilities, and industrial facilities that handle hazardous materials to: Install automatic fire and hazardous materials detection, reporting and shut-off devices; and install an alternative communication system in the event power is out or telephone service is saturated following an earthquake.

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HYDROLOGY	
Policy OS 1.4	Promote the use of recycled water for landscape irrigation. [to address Riverside County’s water supply issues]
Policy OS 2.1	Implement a water-efficient landscape ordinance and corresponding policies that promote the use of water-efficient plants and irrigation technologies, minimizes the use of turf, and reduces water-waste without sacrificing landscape quality.
Policy OS 2.2	Encourage the installation of water-conserving systems such as dry wells and graywater systems, where feasible, especially in new developments. The installation of cisterns or infiltrators shall also be encouraged to capture rainwater from roofs for irrigation in the dry season and flood control during heavy storms.
Policy OS 3.2	Encourage wastewater treatment innovations, sanitary sewer systems, and groundwater management strategies that protect groundwater quality in rural areas.
Policy OS 3.3	Minimize pollutant discharge into storm drainage systems, natural drainages, and aquifers.
Policy OS 3.6	Design the necessary stormwater detention basins, recharge basins, water quality basins, or similar water capture facilities to protect water-quality. Such facilities should capture and/or treat water before it enters a watercourse. In general, these facilities should not be placed in watercourses, unless no other feasible options are available.
Policy OS 3.7	Where feasible, decrease stormwater runoff by reducing pavement in development areas, reducing dry weather urban runoff, and by incorporating “Low Impact Development,” green infrastructure and other Best Management Practice design measures such as permeable parking bays and lots, use of less pavement, bio-filtration, and use of multi-functional open drainage systems, etc.
Policy OS 4.6	Retain storm water at or near the site of generation for percolation into the groundwater to conserve it for future uses and to mitigate adjacent flooding. Such retention may occur through “Low Impact Development” or other Best Management Practice measures.
MVAP 15.1	Protect the Santa Ana River watershed, its tributaries, and surrounding habitats, and provide flood protection through adherence to the Floodplain and Riparian Area Management, Wetlands, Multiple Species Habitat Conservation Plans, and Environmentally Sensitive Lands sections of the Multipurpose Open Space Element [of the County of Riverside General Plan].
LAND USE AND PLANNING	
Policy LU 4.1	Require that new developments be located and designed to visually enhance, not degrade the character of the surrounding area through consideration of the following concepts: <ul style="list-style-type: none"> a. Compliance with the design standards of the appropriate area plan land use category. b. Require that structures be constructed in accordance with the requirements of Riverside County’s zoning, building, and other pertinent codes and regulations. c. Require that an appropriate landscape plan be submitted and implemented for development projects subject to discretionary review.

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	<ul style="list-style-type: none"> d. Require that new development utilize drought tolerant landscaping and incorporate adequate drought-conscious irrigation systems. e. Pursue energy efficiency through street configuration, building orientation, and landscaping to capitalize on shading and facilitate solar energy, as provided for in Title 24 Part 6 and/or Part 11 of the California Code of Regulations. f. Incorporate water conservation techniques, such as groundwater recharge basins, use of porous pavement, drought tolerant landscaping, and water recycling, as appropriate. g. Encourage innovative and creative design concepts. h. Encourage the provision of public art that enhances the community’s identity, which may include elements of historical significance and creative use of children’s art. i. Include consistent and well-designed signage that is integrated with the building’s architectural character. j. Provide safe and convenient vehicular access and reciprocal access between adjacent commercial uses. k. Locate site entries and storage bays to minimize conflicts with adjacent residential neighborhoods. l. Mitigate noise, odor, lighting, and other impacts on surrounding properties. m. Provide and maintain landscaping in open spaces and parking lots. n. Include extensive landscaping. o. Preserve natural features, such as unique natural terrain, arroyos, canyons, and other drainage ways, and native vegetation, wherever possible, particularly where they provide continuity with more extensive regional systems. p. Require that new development be designed to provide adequate space for pedestrian connectivity and access, recreational trails, vehicular access and parking, supporting functions, open space, and other pertinent elements. q. Design parking lots and structures to be functionally and visually integrated and connected. r. Site buildings access points along sidewalks, pedestrian areas, and bicycle routes, and include amenities that encourage pedestrian activity s. Establish safe and frequent pedestrian crossings. t. Create a human-scale ground floor environment that includes public open areas that separate pedestrian space from auto traffic or where mixed, it does so with special regard to pedestrian safety. u. Recognize open space, including hillsides, arroyos, riparian areas, and other natural features as amenities that add community identity, beauty, recreational opportunities, and monetary value to adjacent developed areas. v. Manage wild land fire hazards in the design of development proposals located adjacent to natural open space.
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Policy LU 5.2	Monitor the capacities of infrastructure and services in coordination with service providers, utilities, and outside agencies and jurisdictions to ensure that growth does not exceed acceptable levels of service.
Policy LU 5.3	Review all projects for consistency with individual urban water management plans.
Policy LU 7.1	Require land uses to develop in accordance with the General Plan and area plans to ensure compatibility and minimize impacts.
Policy LU 7.3	Consider the positive characteristics and unique features of the project site and surrounding community during the design and development process.
Policy LU 7.4	Retain and enhance the integrity of existing residential, employment, agricultural, and open space areas by protecting them from encroachment of land uses that would result in impacts from noise, noxious fumes, glare, shadowing, and traffic.
Policy LU 8.1	Accommodate the development of a balance of land uses that maintain and enhance Riverside County’s fiscal viability, economic diversity, and environmental integrity.
Policy LU 8.2	Promote and market the development of a variety of stable employment and business uses that provide a diversity of employment opportunities.
Policy LU 8.8	Stimulate industrial/business-type clusters that facilitate competitive advantage in the marketplace, provide attractive and well landscaped work environments, and fit with the character of our varied communities.
Policy LU 10.1	Require that new development contribute their fair share to fund infrastructure and public facilities such as police and fire facilities.
Policy LU 11.1	Provide sufficient commercial and industrial development opportunities in order to increase local employment levels and thereby minimize long-distance commuting.
Policy LU 11.2	Ensure adequate separation between pollution producing activities and sensitive emission receptors, such as hospitals, residences, child care centers and schools.
Policy LU 11.4	Provide options to the automobile in communities, such as transit, bicycle and pedestrian trails, to help improve air quality.
Policy LU 11.5	Ensure that all new developments reduce Greenhouse Gas emissions as prescribed in the Air Quality Element and Climate Action Plan.
Policy LU 14.1	Preserve and protect outstanding scenic vistas and visual features for the enjoyment of the traveling public.
Policy LU 14.8	Avoid the blocking of public views by solid walls.
Policy LU 15.2	Review all proposed projects and require consistency with any applicable airport land use compatibility plan as set forth in Appendix I-1 and as summarized in the Area Plan’s Airport Influence Area section for the airport in question.
Policy LU 17.1	Permit and encourage solar energy systems as an accessory use to any residential, commercial, industrial, mining, agricultural or public use.
Policy LU 18.1	Ensure compliance with Riverside County’s water-efficient landscape policies. Ensure that projects seeking discretionary permits and/or approvals develop and implement landscaping plans prepared in accordance with the Water-Efficient Landscape Ordinance (Ordinance No. 859), the County of Riverside Guide to California Friendly Landscaping and Riverside County’s California Friendly Plant List. Ensure that irrigation plans for all new development incorporate weather-based controllers and utilize state-of-the-art water-efficient irrigation components.
Policy LU 18.3	Design and field check irrigation plans to reduce run-off. Emphasize the use of subsurface irrigation techniques for landscape areas adjoining non-permeable

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	hardscape. Utilize subsurface irrigation or other low volume irrigation technology in association with long, narrow, or irregularly shaped turf areas. Minimize use of irregularly shaped turf areas.
Policy LU 30.2	Control heavy truck and vehicular access to minimize potential impacts on adjacent properties.
Policy LU 30.3	Protect industrial lands from encroachment of incompatible or sensitive uses, such as residential or schools that could be impacted by industrial activity.
Policy LU 30.4	Concentrate industrial and business park uses in proximity to transportation facilities and utilities, and along transit corridors.
Policy LU 30.6	Control the development of industrial uses that use, store, produce, or transport toxins, generate unacceptable levels of noise or air pollution, or result in other impacts.
Policy LU 30.7	Require that adequate and available circulation facilities, water resources, and sewer facilities exist to meet the demands of the proposed land use.
Policy LU 30.8	Require that industrial development be designed to consider their surroundings and visually enhance, not degrade, the character of the surrounding area.
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.
MVAP 6.2	A minimum 50-foot setback shall be required for any new industrial project on properties zoned I-P, if that property abuts a property that is zoned for residential, agricultural, or commercial uses. A minimum of 20 feet of the setback shall be landscaped, unless a tree screen 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.
MINERAL RESOURCES	
None	
NOISE	
Policy N 1.1	Protect noise sensitive land uses from high levels of noise by restricting noise-producing land uses from these areas. If the noise-producing land use cannot be relocated, then noise buffers such as setbacks, landscaping, or block walls should be used.
Policy N 1.3	Consider the following uses noise-sensitive and discourage these uses in areas in excess of 65 CNEL: <ul style="list-style-type: none"> • Schools • Hospitals • Rest Homes • Long Term Care Facilities

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	<ul style="list-style-type: none"> • Mental Care Facilities • Residential Uses • Libraries • Passive Recreation Uses • Places of Worship
Policy N 1.5	Prevent and mitigate the adverse impacts of excessive noise exposure on the residents, employees, visitors, and noise-sensitive uses of Riverside County.
Policy N 4.1	Prohibit facility-related noise, received by any sensitive use, from exceeding the following worst-case noise levels: <ol style="list-style-type: none"> a) 45 dBA 10-minute L_{eq} between 10:00 p.m. and 7:00 a.m. b) 65 dBA 10-minute L_{eq} between 7:00 a.m. and 10:00 p.m.
Policy N 13.1	Minimize the impacts of construction noise on adjacent uses within acceptable standards.
Policy N 13.2	Ensure that construction activities are regulated to establish hours of operation in order to prevent and/or mitigate the generation of excessive or adverse impacts on surrounding areas.
Policy N 13.3	Condition subdivision approval adjacent to developed/occupied noise-sensitive land uses (see policy N 1.3) by requiring the developer to submit a construction-related noise mitigation plan to the [County] for review and approval prior to issuance of a grading permit. The plan must depict the location of construction equipment and how the noise from this equipment will be mitigated during construction of the project, through the use of such methods as: <ol style="list-style-type: none"> i. Temporary noise attenuation fences; ii. Preferential location and equipment; and iii. Use of current noise suppression technology and equipment.
Policy N 16.3	Prohibit exposure of residential dwellings to perceptible ground vibration from passing trains as perceived at the ground or second floor. Perceptible motion shall be presumed to be a motion velocity of 0.01 inches/second over a range of 1 to 100 Hz.
PALEONTOLOGICAL RESOURCES	
SC	<p>Following is a relevant General Condition for “Projects Located Completely within the Low Potential Zone” contained in the Riverside County General Plan. The Low Potential Zone encompasses lands for which previous field surveys and documentation demonstrated a low potential for containing significant paleontological resources subject to adverse impacts. As such, the project would not be anticipated to require any direct mitigation for paleontological resources. However, should fossil remains be encountered during site development the following conditions must be met - -</p> <ul style="list-style-type: none"> • All site earthmoving shall be ceased in the area of where the fossil remains are encountered. Earthmoving activities may be diverted to other areas of the site. • The owner of the property shall be immediately notified of the fossil discovery and shall in turn immediately notify the Riverside County Geologist of the discovery.

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	<ul style="list-style-type: none"> • The applicant shall retain a qualified paleontologist approved by the County of Riverside. • The paleontologist shall determine the significance of the encountered fossil remains. • Paleontological monitoring of earthmoving activities will continue thereafter on an as-needed basis by the paleontologist during all earthmoving activities that may expose sensitive strata. Earthmoving activities in areas of the project area where previously undisturbed strata will be buried, but not otherwise disturbed, need not be monitored. The supervising paleontologist will have the authority to reduce monitoring once he/she determines the probability of encountering any additional fossils has dropped below an acceptable level.] • If fossil remains are encountered by earthmoving activities when the paleontologist is not on site, these activities will be diverted around the fossil site and the paleontologist called to the site immediately to recover the remains. • Any recovered fossil remains will be prepared to the point of identification and identified to the lowest taxonomic level possible by knowledgeable paleontologists. The remains then will be curated (assigned and labeled with museum [or] repository fossil specimen numbers and corresponding fossil site numbers, as appropriate; placed in specimen trays or vials [along] with completed specimen data cards) and catalogued. Associated specimen data and corresponding geologic and geographic site data will be archived (specimen and site numbers, and corresponding data, entered into appropriate museum repository catalogs and computerized databases) at the museum [or] repository fossil collection, where they will be permanently stored, maintained and, along with associated specimen and site data, made available for future study by qualified scientific investigators. The County of Riverside must be consulted on the repository [or] museum to receive the fossil material prior to [its] being curated.
Policy 19.2	The County of Riverside shall establish a cultural resources program in consultation with Tribes and the professional cultural resources consulting community. Such a program shall, at a minimum, address each of the following: application processing requirements; information database(s); confidentiality of site locations; content and review of technical studies; professional consultant qualifications and requirements; site monitoring; examples of preservation and mitigation techniques and methods; and the descendant community consultation requirements of local, state and federal law.
Policy 19.3	Review proposed development for the possibility of cultural resources and for compliance with the cultural resources program.
Policy 194	To the extent feasible, designate as open space and allocate resources and/or tax credits to prioritize the protection of cultural resources preserved in place or left in an undisturbed state.
Policy 19.5	Exercise sensitivity and respect for human remains from both prehistoric and historic time periods and comply with all applicable laws concerning such remains.

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Policy 19.6	Whenever existing information indicates that a site proposed for development has high paleontological sensitivity as shown on Figure OS-8, a paleontological resource impact mitigation program (PRIMP) shall be filed with the County Geologist prior to site grading. The PRIMP shall specify the steps to be taken to mitigate impacts to paleontological resources.
Policy 19.7	Whenever existing information indicates that a site proposed for development has low paleontological sensitivity as shown on Figure OS-8, no direct mitigation is required unless a fossil is encountered during site development. Should a fossil be encountered, the County Geologist shall be notified and a paleontologist shall be retained by the project proponent. The paleontologist shall document the extent and potential significance of the paleontological resources on the site and establish appropriate mitigation measures for further site development.
POPULATION AND HOUSING	
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.
MVAP 6.2	A minimum 50-foot setback shall be required for any new industrial project on properties zoned I-P, if that property abuts a property that is zoned for residential, agricultural, or commercial uses. A minimum of 20 feet of the setback shall be landscaped, unless a tree screen 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.
PUBLIC SERVICES	
County Ordinance No. 659	Ordinance No. 659 requires new development to pay Development Impact Fees to ensure certain facility obligations are met to reasonably serve the subject development. The obligations include construction of new facilities. The Ordinance ensures there is a reasonable relationship between use of the fees and type of development projects on which the fees are imposed.
County Ordinance No. 695	Each spring, CalFire and the Riverside County Fire Department distribute hazard abatement notices. The notices require property owners to reduce fuels around their properties. Requirements for hazard reduction around improved parcels (those with structures) are contained in Riverside County Ordinance No. 787 (and Public Resources Code Section 4291). A minimum 30-foot clearance is required around all structures and can be extended to 100-feet in areas where severe fire hazards exist. On unimproved properties, as indicated in Riverside County Ordinance No. 695, the property owner is required to disc or mow 100 feet along the perimeter of the property. The County of Riverside also requires a development within a high fire hazard area to design and implement and fuel modification programs for the interface between developed and natural areas within and adjacent to the proposed

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	project area.
County Ordinance No. 787	Ordinance No. 787 adopts a variety of State codes, such as the Uniform Fire Code, established by the International Fire Code Institute, for implementation and enforcement at the county level. The Ordinance also addresses implementation of the California Building Code, based on the International Conference of Building Officials. Both major Codes prescribe performance characteristics and materials to be used to achieve acceptable levels of fire protection.
Policy S 5.1	<p>Develop and enforce construction and design standards that ensure that proposed development incorporates fire prevention features through the following:</p> <ol style="list-style-type: none"> a. All proposed development and construction within Fire Hazard Severity Zones shall be reviewed by the Riverside County Fire and Building and Safety departments. b. All proposed development and construction shall meet minimum standards for fire safety as defined in the Riverside County Building or County Fire Codes, or by County zoning, or as dictated by the Building Official or the Transportation Land Management Agency based on building type, design, occupancy, and use. c. In addition to the standards and guidelines of the California Building Code and California Fire Code fire safety provisions, continue to implement additional standards for high-risk, high occupancy, dependent, and essential facilities where appropriate under the Riverside County Fire Code (Ordinance No. 787) Protection Ordinance. These shall include assurance that structural and nonstructural architectural elements of the building will not impede emergency egress for fire safety staffing/personnel, equipment, and apparatus; nor hinder evacuation from fire, including potential blockage of stairways or fire doors. d. Proposed development and construction in Fire Hazard Severity Zones shall provide secondary public access, in accordance with Riverside County Ordinances. e. Proposed development and construction in Fire Hazard Severity Zones shall use single loaded roads to enhance fuel modification areas, unless otherwise determined by the Riverside County Fire Chief. f. Proposed development and construction in Fire Hazard Severity Zones shall provide a defensible space or fuel modification zones to be located, designed, and constructed that provide adequate defensibility from wildfires.
Policy S 5.3	Monitor fire-prevention (such as fuel reduction) through a site specific fire-prevention plan to reduce long-term fire risks in the Very High Fire Hazard Severity Zones.
Policy S 5.5	Encourage proposed development in Fire Hazard Severity Zones to develop where fire and emergency services are available or planned.
Policy S 5.6	Demonstrate that the proposed development can provide fire services that meet the minimum travel times identified in Riverside County Fire Department Fire Protection and EMS Strategic Master Plan.
Policy S 5.7	Minimize pockets of flammable vegetation that increase likelihood of fire spread

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	through conceptual landscaping plans to be reviewed by Planning and Fire Departments in the Fire Hazard Severity Zones. The conceptual landscaping plan of the proposed development shall at a minimum include: <ol style="list-style-type: none"> a. Plant palette suitable for high fire hazard areas to reduce the risk of fire hazards. b. Retention of existing natural vegetation to the maximum extent feasible. c. Removal of onsite combustible plants.
Policy S 5.9	Reduce fire threat and strengthen fire-fighting capability so that the County could successfully respond to multiple fires.
Policy S 5.10	Require automatic natural gas shutoff earthquake sensors in high-occupancy industrial and commercial facilities, and encourage them for all residences.
Policy S 7.3	Require commercial businesses, utilities, and industrial facilities that handle hazardous materials to: install automatic fire and hazardous materials detection, reporting and shut-off devices, and install an alternative communication system in the event power is out or telephone service is saturated following an earthquake.
Policy S 7.4	Use incentives and disincentives to persuade private businesses, consortiums, and neighborhoods to be self-sufficient in an emergency by maintaining a fire control plan, including an onsite fire fighting capability and volunteer fire response teams to respond to and extinguish small fires, and identifying medical personnel or local residents who are capable and certified in first aid and CPR.
Policy LU 5.1	Ensure that development does not exceed the ability to adequately provide supporting infrastructure and services, such as libraries, recreational facilities, education and day care centers transportation systems, and fire/police/medical services.
Policy LU 5.2	Monitor the capacities of infrastructure and services in coordination with service providers, utilities, and outside agencies and jurisdictions to ensure that growth does not exceed acceptable levels of service.
Policy LU 10.1	Require that new development contribute their fair share to fund infrastructure and public facilities such as police and fire facilities.
RECREATION	
County Ordinance No. 460	Riverside County Ordinance No. 460 – Regulating the Division of Land (Section 10.35) details methods by which Quimby Act compliance is achieved (i.e., land dedication, in-lieu fee payment or combination of both) for <u>residential</u> projects.
County Ordinance No. 659	Riverside County Ordinance No. 659, as amended, provides that industrial developments within the Mead Valley area pay Development Impact Fees of \$6,743 per acre. Although these fees are focused to public improvements or public facilities, no industrial development in the Mead Valley Plan Development Impact Fees is assigned to Regional Parks or Regional Trails.
Standard Condition	The County of Riverside will place a Standard Condition on the Project discretionary permit (Plot Plan) that requires the Project developer to pay Development Impact Fees enumerated in Riverside County Ordinance No. 659 (as amended, March 14, 2015).
TRANSPORTATION	
SCAG RTP/SCS	The Southern California Association of Governments (SCAG) is a regional agency established pursuant to California Government Code Section 6500 – the Joint

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	<p>Powers Authority law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project site is located within SCAG’s regional planning authority. SCAG adopted the “2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) in April, 2016, with the following goals:</p> <ul style="list-style-type: none"> • To preserve the existing transportation system; • To expand the regional transit system; • To expand passenger rail; • To improve highway and arterial capacity; • To manage demands on the transportation system; • To optimize performance of the transportation system; • To promote forms of active transportation; • To strengthen the regional transportation network for goods movement; • To leverage technology; • To improve airport access; and, • To focus new growth around transit.
County CMP	<p>The Riverside County Transportation Commission (RCTC) prepared the “Riverside County Congestion Management Program (CMP) with the intent 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 CMP was initially adopted in December, 1992, and has been updated 11 times since. The CMP states that deficiencies along the CMP system must be identified when they occur so that improvement measures can be identified. This is intended to conserve scarce funding resources and assist to target those resources appropriately.</p>
TUMF Program	<p>The Western Riverside Council of Governments (WRCOG) established the Transportation Uniform Mitigation Fee (TUMF) Program in 2000 to mitigate 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 that includes every jurisdiction in Western Riverside County. Collected funds are combined and used by WRCOG to fund transportation network improvements including roads, bridges, interchanges, and railroad grad separations identified by the public works departments of WRCOG member agencies and listed in the “Regional System of Highways and Arterials.”</p> <p>TUMF guidelines empower a local zone committee to prioritize and arbitrate certain projects. The Project is located in the Central Zone, which has developed a 5-year capital improvement program to prioritize public construction of certain roads.</p>
County Ordinance No. 659	<p>Ordinance No. 659 (as amended through 659.12 is entitled “An Ordinance of the County of Riverside Amending Ordinance No. 659 Establishing a Development Impact Fee Program” and is dated November 20, 2013. The Ordinance “. . . establishes and sets forth policies, regulations, and Fees relating to the funding and</p>

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	installation of the Facilities and the acquisition of open space and habitat necessary to address the direct and cumulative environmental effects generated by new development projects described and defined in this ordinance . . . [and] establishes the authorized uses of the Fees collected.” Collected Fees would be applied to the following public improvements: public facilities; fire facilities; transportation (roads, bridges, major improvements); transportation (signals); conservation and land bank; regional parks; community centers/parks; regional multipurpose trails; flood control; library books; and Fee Program administration. The established Development Impact Fees for industrial projects within the Mead Valley Area Plan study area is \$15,078/acre.
Policy C 1.1	Design the transportation system to respond to concentrations of population and employment activities, as designated by the Land Use Element and in accordance with the Circulation Plan.
Policy C 1.2	Support development of a variety of transportation options for major employment and activity centers including direct access to transit routes, primary arterial highways, bikeways, park-n-ride facilities, and pedestrian facilities.
Policy C 1.4	Utilize existing infrastructure and utilities to the maximum extent practicable and provide for the logical, timely, and economically efficient extension of infrastructure and services
Policy C 1.7	Encourage and support the development of projects that facilitate and enhance the use of alternative modes of transportation, including pedestrian-oriented retail and activity centers, dedicated bicycle lanes and paths, and mixed-use community centers.
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 . . . which are currently County maintained, or are intended to be accepted into the County maintained roadway system. LOS D shall apply to all development proposals located within any of the following Area Plans: . . . Mead Valley Area Plan. Notwithstanding the forgoing minimum LOS targets, the Board of Supervisors may, on occasion by virtue of their discretionary powers, approve a project that fails to meet these LOS targets in order to balance congestion management considerations in relation to benefits, environmental impacts and costs, provided an Environmental Impact Report, or equivalent, has been completed to fully evaluate the impacts of such approval. Any such approval must incorporate all feasible mitigation measures, make specific findings to support the decision, and adopt a statement of overriding considerations.
Policy C 2.2	Require that new development prepare a traffic impact analysis as warranted by the Riverside County Traffic Impact Analysis Preparation Guidelines or as approved by the Director of Transportation. Apply level of service targets to new development per the Riverside County Traffic Impact Analysis Preparation Guidelines to evaluate traffic impacts and identify appropriate mitigation measures for new development.
Policy C 2.3	Traffic studies prepared for development entitlements . . . shall identify project related traffic impacts and determine the significance of such impacts in compliance with CEQA and the Riverside County Congestion Management Program

Table ES-2- – Plans, Policies or Programs/Project Design Features	
	Requirements.
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.
Policy C 3.6	Require private developers to be primarily responsible for the improvement of streets and highways that serve as access to developing commercial, industrial, and residential areas. These may include road construction or widening, installation of turning lanes and traffic signals, and the improvement of any drainage facility or other auxiliary facility necessary for the safe and efficient movement of traffic or the protection of road facilities.
Policy C 3.9	Design off-street loading facilities for all new commercial and industrial developments so that they do not face surrounding roadways or residential neighborhoods. Truck backing and maneuvering to access loading areas shall not be permitted on the public road system, except when specifically permitted by the Transportation Department.
Policy C 3.10	Require private and public land developments to provide all onsite auxiliary facility improvements necessary to mitigate any development-generated circulation impacts. A review of each proposed land development project shall be undertaken to identify project impacts to the circulation system and its auxiliary facilities. The Transportation Department may require developers and/or subdividers to provide traffic impact studies prepared by qualified professionals to identify the impacts of a development.
Policy C 3.11	Generally locate commercial and industrial land uses so that they take driveway access from General Plan roadways with a classification of Secondary Highway or greater, consistent with design criteria limiting the number of such commercial access points and encouraging shared access. Exceptions to the requirement for access to a Secondary Highway or greater would be considered for isolated convenience commercial uses, such as standalone convenience stores or gas stations at an isolated off ramp in a remote area. Industrial park type developments may be provided individual parcel access via an internal network of Industrial Collector streets.
Policy C 3.28	Reduce transportation noise through proper roadway design and coordination of truck and vehicle routing.
Policy C 3.31	Through the development review process, identify existing dirt roads serving residential areas which may be impacted by traffic from new developments, and design new developments such that new traffic is discouraged from using existing dirt roads. When this is unavoidable, require that new developments participate in the improvement of the affected dirt roads
Policy C 3.33	Assure all-weather, paved access to all developing areas.
Policy C 4.7	Make reasonable accommodation for safe pedestrian walkways that comply with the Americans with Disabilities Act (ADA) requirements within commercial, office, industrial, mixed use, residential, and recreational developments.
Policy C 5.3	Require parking areas of all commercial and industrial land uses that abut residential areas to be buffered and shielded by adequate landscaping.
Policy C 6.7	Require that the automobile and truck access of commercial and industrial land uses

Table ES-2- – Plans, Policies or Programs/Project Design Features	
	abutting residential parcels be located at the maximum practical distanced from the nearest residential parcels to minimize noise impacts.
Policy C 16.1	Implement the Riverside County trail system as depicted in the Bikeways and Trails Plan.
Policy C 16.4	Require that all development proposals located along a planned trail or trails provide access to, dedicate trail easements or right-of-way, and construct their fair share portion of the trails system. Evaluate the locations of existing and proposed trails within and adjacent to each development proposal and ensure that the appropriate easements are established to preserve planned trail alignments and trail heads.
Policy C 17.1	Develop Class I Bike Paths, Class II Bike Lanes and Class I Bike Paths/Regional Trails (Combination Trails) as shown in the Trails Plan . . . to the design standards as outlined in the California Department of Transportation Highway Design Manual, adopted Riverside County Design Guidelines (for communities that have them), the Riverside County Regional Park and Open Space Trails Standards Manual, and other Riverside County Guidelines.
Policy C 20.6	Control dust and mitigate other environmental impacts during all stages of roadway construction.
Policy C 20.8	Protect Riverside County residents from transportation generated noise hazards. Increased setbacks, walls, landscaped berms, other sound absorbing barriers, or a combination thereof shall be provided along freeways, expressways, and four-lane highways in order to protect adjacent noise-sensitive land uses from traffic-generated noise impacts. Additionally, noise generators such as commercial, manufacturing, and/or industrial activities shall use these techniques to mitigate exterior noise levels to no more than 60 decibels.
Policy C 20.9	Incorporate specific requirements of the Western Riverside County Multiple Species Habitat Conservation Plan and the Coachella Valley Multiple Species Habitat Conservation Plan into transportation plans and development proposals.
Policy C 20.13	Incorporate specific requirements of the General Plank Air Quality Element into transportation plans and development proposals where applicable.
Policy C 20.15	Implement National Pollutant Discharge Elimination System Best Management Practices relating to construction of roadways to control runoff contamination from affecting the groundwater supply.
MVAP 9.1	Design and develop the vehicular roadway system per Figure 8, Circulation, and in accordance with the Functional Classifications section in the General Plan Circulation Element.
MVAP 9.2	Maintain Riverside County’s roadway Level of Service standards as described in the Level of Service section of the General Plan Circulation Element.
MVAP 11.1	Maintain and improve the trails and bikeways system to reflect Figure 9, Trails and Bikeway System, and as discussed in the Non-motorized Transportation section of the General Plan Circulation Element.
TRIBAL CULTURAL RESOURCES	
Policy OS 19.2	The County of Riverside shall establish a cultural resources program in consultation with Tribes and the professional cultural resources consulting community. Such a program shall, at a minimum, address each of the following: application processing requirements; information database(s); confidentiality of site locations; content and

Table ES-2- – Plans, Policies or Programs/Project Design Features	
	review of technical studies; professional consultant qualifications and requirements; site monitoring; examples of preservation and mitigation techniques and methods; and the descendant community consultation requirements of local, state and federal law.
Policy OS 19.3	Review proposed development for the possibility of cultural resources and for compliance with the cultural resources program.
Policy OS 19.4	To the extent feasible, designate as open space and allocate resources and/or tax credits to prioritize the protection of cultural resources preserved in place or left in an undisturbed state.
Policy OS 19.5	Exercise sensitivity and respect for human remains from both prehistoric and historic time periods and comply with all applicable laws concerning such remains.
UTILITIES AND SERVICE SYSTEMS	
Federal Clean Water Act	The basis of the Clean Water Act was enacted in 1948 (the Federal Water Pollution Control Act) and was significantly reorganized and expanded in 1972, when the Act became known as the Clean Water Act. The Clean Water Act establishes the basic structure for regulating discharges of pollutants into waters of the United States and regulating quality standards for surface waters. Under the Clean Water Act, the Environmental Protection Agency has implemented pollution control programs such as establishing wastewater standards for industry and has established water quality standards for all contaminants in surface waters. The Clean Water Act made it unlawful to discharge any pollutant from a point source into navigable waters without a permit. The Environmental Protection Agency National Pollutant Discharge Elimination System permit program controls discharges. Point sources are discrete conveyances such as pipes or man-made ditches. Industrial facilities must obtain permits if their discharges proceed directly to surface waters.
Federal Safe Drinking Water Act	The Safe Drinking Water Act was enacted to protect the quality of drinking water in the United States. This law focuses on all waters (above ground or underground) actually or potentially designed for drinking. This Act authorizes the Environmental Protection Agency to establish minimum standards to protect tap water and requires all owners or operators of public water systems to comply with these primary (health-related) standards. The Act was amended in 1996 to require that the Environmental Protection Agency consider a detailed risk and cost assessment and use best available peer-reviewed science when developing these standards. (State governments, which can be approved to implement these rules for the Environmental Protection Agency, also encourage attainment of secondary standards (nuisance-related). Under the Safe Drinking Water Act, the Environmental Protection Agency further establishes minimum standards for state programs to protect underground sources of drinking water from endangerment by underground injection of fluids.
California Porter-Cologne Water Control Act	The Porter-Cologne Water Control Act is the main law governing water quality regulation in California. The Act establishes a comprehensive program to protect water quality and beneficial uses of water. The Porter-Cologne Water Control Act applies to surface waters, wetlands, ground water, and to both point and non-point sources of pollution. Pursuant to this Act, the policy of the State of California is - - <ul style="list-style-type: none"> • That the quality of all the waters of the State shall be protected;

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	<ul style="list-style-type: none"> • That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and, • That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation. <p>The Porter-Cologne Water Control Act established nine Regional Water Quality Control Boards (RWQCB) and the State Water Resources Control Board (SWRCB), which are charged with implementing the Act’s provisions and have primary responsibility for protecting water quality in California. The SWRCB provides program guidance and oversight, allocates funds, and reviews RWQCB decisions. Also, the SWRCB allocates rights to the use of surface water. The RWQCB have primary responsibility for individual permitting, inspection and enforcement actions within each of nine hydrologic regions. The SWRCB and RWQCB have numerous non-point source related responsibilities including monitoring and assessment planning, financial assistance, and management.</p> <p>The RWQCB regulate discharges under the Porter-Cologne Act primarily through issuance of National Pollutant Discharge Elimination Service (NPDES) permits for point source discharges and waste discharge requirements. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The SWRCB and the RWQCB can make their own investigations or may require dischargers to implement water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing waste discharge requirements and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions.</p> <p>The Porter-Cologne Act also implements many provisions of the Clean Water Act and requires adoption of water quality control plans that contain guiding policies of water pollution management in California. In addition, regional water quality control plans (basin plans) have been adopted by each RWQCB and get updated as necessary and practical. These plans identify existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans further contain implementation, surveillance and monitoring plans. The Project site is located within the Santa Ana River Watershed and thereby is under purview of the Santa Ana RWQCB. The Santa Ana River Basin Water Quality Control Plan is the governing water quality plan for the region.</p>
<p>California Water Code</p>	<p>The California Water Code is the principal State law that regulates water quality in California. Among the water quality provisions in the Code that must be complied with that is relevant to the Project/Project site is the Health and Safety Code for protection of ground and surface waters from hazardous waste and other toxic substances. Surface water quality is the responsibility of the applicable RWQCB, water supply and wastewater treatment agencies, and city and county governments. The primary means of enforcement by the RWQCB is through development,</p>

Table ES-2- – Plans, Policies or Programs/Project Design Features	
	<p>adoption and issuance of water discharge permits. RWQCB basin plans establish water quality objectives that are defined as the limits or levels of water quality constituents or characteristics for reasonable protection of beneficial uses of water.</p>
California Toxics Rule	<p>The California Toxics Rule assists in California’s water quality standards that are necessary for protecting human health and aquatic life. The California Toxics Rule supplements and does not change or supersede criteria that the Environmental Protection Agency promulgated for California waters in the National Toxics Rule. The Rule’s criteria are similar to those published in the National Recommended Water Quality Criteria. The California Toxics Rule and the National Toxics Rule criteria, together with beneficial use designations in the Basin Plans and the related implementation policies, are the directly applicable water quality standards for toxic priority pollutants in California waters.</p>
Urban Water Management Planning Act	<p>The Urban Water Management Planning Act requires water agencies to develop Urban Water Management Plans (UWMP) over a 20-year planning horizon and requires UWMP to be updated every five years. UWMP are exempt from CEQA. The Urban Water Management Planning Act was proposed and adopted to ensure water planning is conducted at the local level since the State of California recognized that two water agencies in the same region could have very different impacts from a drought.</p> <p>UWMPs provide a framework for long-term water planning and inform the public about a supplier’s plans for long-term resource planning that ensures adequate water supplies for existing and future water demands. Water suppliers are required to report, describe and evaluate the following: water deliveries and uses; water supply sources; efficient water uses; demand management measures; and, water shortage contingency planning.</p> <p>The Urban Water Management Planning Act has been modified over time. In 2009, an amendment - - the Water Conservation Act of 2009 - - required agencies to establish water use targets for 2015 and 2020 that would result in Statewide savings of 20 percent by 2020.</p>
California Senate Bill 610	<p>California Senate Bill 610 amends the California Water Code to require an assessment of whether available water supplies are sufficient to serve the demand generated by a proposed project, as well as the reasonably foreseeable cumulative demand in the region over the ensuing 20 years under average normal year, single dry year, and multiple dry year conditions. Water assessments must be furnished to local governments for inclusion in any environmental documentation for certain projects subject to CEQA. Senate Bill 610 defines a “project” as any of the following that relate to the Project:</p> <ul style="list-style-type: none"> • A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area. • A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit project.

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	The Project will require a Water Supply Assessment in that the Project proposes more than 650,000 square feet of floor area.
Water Conservation in Landscaping Act	The Water Conservation in Landscaping Act is designed to ensure adequate water supplies are available for future uses. The Act requires local agencies to adopt a water efficient landscape ordinance. The County of Riverside water efficient landscape ordinance is contained in the Municipal Code.
Executive Order B-37-16	This Executive Order established a new water use efficiency framework for California. The Order strengthened the State drought resilience and preparedness by establishing longer-term water conservation measures that include permanent monthly water use reporting, new urban water use targets, reducing system leaks and eliminating clearly wasteful practices, strengthening urban drought contingency plans, and improving agricultural water management and drought plans.
Executive Order B-40-17	This Executive Order ended the drought state of emergency in all but four California counties. The Order maintains water reporting requirements and prohibitions on wasteful practices.
California Solid Waste Integrated Waste Management Act (Assembly Bill 939)	<p>The California Solid Waste Integrated Waste Management Act was established in 1989. The Act established an integrated waste management hierarchy to guide the California Integrated Waste Management Board and local agencies in implementation of source reduction, recycling and composting, and environmentally safe transformation and land disposal. The Management Board has been disbanded and CalRecycle has assumed its duties. The Act gave the Management Board the power to mandate reduction of disposed waste and required the following.</p> <ul style="list-style-type: none"> • Establishment of a task force to coordinate development of city Source Reduction and Recycling Elements (SRRE) and a county-wide siting element. • Each city (by July 1, 1991) to prepare, adopt and submit a SRRE to the county which includes the following components: waste characterization, source reduction; recycling; composting; solid waste facility capacity; education and public information; funding; special waste (e.g., asbestos; sewage sludge); and, household hazardous waste. • Each county (by January 1, 1991) to prepare a SRRE for its unincorporated area, with the components noted above and a countywide siting element that specifies areas for transformation or disposal sites to provide capacity for solid waste generated in the jurisdiction that cannot be reduced or recycled for a 15-year period. • Each county to prepare, adopt and submit to the Board an Integrated Waste Management Plan that includes all the elements described above. • Each city or county plan to include an implementation schedule that shows diversion of 25 percent of all solid waste from landfill or transformation facilities by January 1, 1995 through source reduction, recycling and composting activities, and diversion of 50 percent of all solid waste by January 1, 2000 through source reduction, recycling and composting activities. • The Board to review implementation of each SRRE at least once every two years.

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	<ul style="list-style-type: none"> The Act required the Board, in conjunction with an inspection conducted by a Lead Enforcement Agency to conduct at least one inspection per year of each solid waste facility in the State.
Waste Reuse and Recycling Act (Assembly Bill 1327)	The Waste Reuse and Recycling Act required the California Integrated Waste Management Board to approve a model ordinance for adoption by a local government for transfer, receipt, storage and loading of recyclable materials in development projects by March 1, 1993. The Act also required local agencies to adopt a local ordinance by September 1, 1993 or allow the model ordinance to take effect. The Act requires all development projects that are commercial, industrial or marina in nature and where solid waste is collected and loaded to provide an adequate area for collecting and loading recyclable materials over the lifetime of the project. The area is required to be provided before building permits are issued.
Mandatory Commercial Recycling Program (Assembly Bill 341)	Assembly Bill 341 directed CALRecycle to develop and adopt regulations for mandatory commercial recycling. Final regulation was approved by the Office of Administrative Law on May 7, 2012. This Assembly Bill was designed to assist meeting California’s recycling goal of 75% by the year 2020. The Assembly Bill requires all commercial businesses and public entities that generate 4 cubic yards or more of waste per week to have a recycling program in place. All multi-family apartment developments with 5 or more units also are required to form a recycling program.
2016 California Green Building Standards	The most recent edition of CALGreen became effective on January 1, 2017. This edition is applicable to planning, design, operation, construction, use and occupancy of every newly constructed building or structure throughout the State of California. CALGreen requires that 100 percent of trees, stumps, rocks and associated vegetation and soils resulting from land clearing shall be reused or recycled. For a phased project, this material may be stockpiled on-site until the storage site is developed.
Sustainable Groundwater Management Act (2014)	<p>The objective is the Sustainable Groundwater Management Act is sustainable groundwater management in a manner that prevents significant and unreasonable impacts to groundwater basins in California. Each high and medium priority basin (as identified by the California Department of Water Resources) - - such as the San Jacinto Groundwater Basin - - is required to have a Groundwater Sustainability Agency (GSA) that will be responsible for groundwater management and development of a Groundwater Sustainability Plan (GSP). The Eastern Municipal Water District Board of Directors is the GSA for the West San Jacinto Groundwater Management Area and is responsible for development and implementation of a GSP.</p> <p>Although the San Jacinto Groundwater Basin is a “high priority” basin, it is not critically over-drafted. The GSA is required to develop by 2022 and to be implemented by 2042 a Groundwater Sustainability Plan that will document Basin conditions and Basin management based on measurable objectives and minimum thresholds defined to prevent significant and unreasonable impacts to sustainability indicators defined in the GSP.</p>
EMWD Urban Water	The 2015 UWMP acts as the urban water management plan for the Eastern Municipal Water District. This UWMP herein is incorporated by reference and is

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Management Plan	available for public review 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 presents estimated costs and phasing of recommended improvements. The UWMP includes a Water Shortage Contingency Plan that the Water District is to implement in cases of future water deficiencies caused by limited supplies or the Water District’s delivery system. At time of long-term or short-term drought conditions or other emergencies, the Water District would inform its customers of the need to conserve water and impose penalties for non-compliance with mandatory water use reductions. Compliance with mandatory water use reductions would ensure the Eastern Municipal Water District can meet present and projected demand within its service area during dry years.
Riverside County Integrated Waste Management Plan	The Countywide Integrated Waste Management Plan was prepared in accordance with the California Integrated Waste Management Act of 1989, Chapter 1095 (Assembly Bill 939). This Waste Management Plan establishes a County-wide plan to reduce volume and toxicity of solid waste that is sent to landfills and incinerated in the County, and to meet minimum diversion goals of Assembly Bill 939 (a 25% diversion of solid waste by 1995 and a 50% diversion of solid waste by 2000).
Water Master Plan, EMWD (2016)	This Plan analyzes EMWD facilities needs to meet current and future customer demand.
Recycled Water Strategic and Master Plan (2016)	This Plan analyzes EMWD recycled water opportunities and contains recycled water projections through year 2045, including descriptions of planned recycled water projects and facilities.
Wastewater Collection Master Plan, EMWD 2016	This Plan analyzes EMWD facilities needs to collect existing and future wastewater.
Regional Water Reclamation Facilities Master Plan	This Plan analyzes EMWD reclamation facility needs for treating existing and future wastewater.
Integrated Resources Plan, MWD (2015)	This Plan describes the Metropolitan Water District plan for providing adequate and reliable supplies to member agencies and is used as the basis for the Metropolitan Water District 2015 Urban Water Management Plan.
2015 Urban Water Management Plan, MWD	This Plan describes Metropolitan Water District demand and supply reliability and is used as the basis for the Eastern Municipal Water District imported water supply reliability.
Policy LU 5.2	Monitor the capacities of infrastructure and services in coordination with service providers, utilities, and outside agencies and jurisdictions to ensure that growth does not exceed acceptable levels of service.
Policy LU 5.3	Review all projects for consistency with individual urban water management plans.

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WILDFIRE	
Policy S 5.1	<p>Develop and enforce construction and design standards that ensure that proposed development incorporates fire prevention features through the following:</p> <ul style="list-style-type: none"> a) All proposed development and construction within Fire Hazard Severity Zones shall be reviewed by the Riverside County Fire and Building and Safety departments. b) All proposed development and construction shall meet minimum standards for fire safety as defined in the Riverside County Building or County Fire Codes, or by County zoning, or as dictated by the Building Official or the Transportation Land Management Agency based on building type, design, occupancy and use. c) In addition to the standards and guidelines of the California Building Code and the California Fire Code fire safety provisions, continue to implement additional standards for high-risk, high occupancy, dependent, and essential facilities where appropriate under the Riverside County Fire Code (Ordinance No. 787) Protection Ordinance. These shall include assurance that structural and nonstructural architectural elements of the building will not impede emergency egress for fire safety staffing/personnel, equipment, and apparatus; nor hinder evacuation from fire, including potential blockage of stairways or fire doors. d) Proposed development and construction in Fire Hazard Severity Zones shall provide secondary public access, in accordance with Riverside County Ordinances. e) Proposed development and construction in Fire Hazard Severity Zones shall use single loaded roads to enhance fuel modification areas, unless otherwise determined by the Riverside County Fire Chief. f) Proposed development and construction in Fire Hazard Severity Zones shall provide a defensible space or fuel modification zones to be located, designed, and constructed that provide adequate defensibility from wildfires.
Policy S 5.6	Demonstrate that the proposed development can provide fire services that meet the minimum travel times identified in Riverside County Fire Department Fire Protection and EMS Strategic Master Plan.
Policy S 5.7	<p>conceptual landscaping plans to be reviewed by Planning and Fire Departments in the Fire Hazard Severity Zones. The conceptual landscaping plan of the proposed development shall at a minimum include:</p> <ul style="list-style-type: none"> a. Plant palette suitable for high fire hazard areas to reduce the risk of fire hazards. b. Retention of existing natural vegetation to the maximum extent feasible. c. Removal of onsite combustible plants.
Policy S 5.9	Reduce fire threat and strengthen fire-fighting capability so that the County could successfully respond to multiple fires.
County Fire Department Fire Protection	The Riverside County Fire Department Fire Protection and Emergency Medical Services Strategic Master Plan discusses descriptions of emergency services including available equipment, personnel, appropriate facilities, and capacity to

Table ES-2- – Plans, Policies or Programs/Project Design Features	
and Emergency Medical Services Strategic Master Plan	assist and support wildfire suppression emergency service needs.
County Emergency Operations Plan	The Riverside County Emergency Operations Plan outlines functions, responsibilities and regional risk assessments for emergencies such as wildland fires, hazardous materials incidents, flooding, dam failure, and light airplane crashes, and establishes the planned response for managing those incidents.
County Ordinance No. 695	<p>Riverside County Ordinance No. 695 commits the County to establish a hazardous vegetation abatement program that protects the lives and property of the citizens of Riverside County while at the same time protecting rare and sensitive plant and animal species and the environment.</p> <p>The Board of Supervisors found that hazardous vegetation or combustible material poses a danger to the health, safety and welfare of the residents in the vicinity of any real property located throughout the territory of the County of Riverside. Therefore, all hazardous vegetation or combustible material located on real property within the territory of the County of Riverside is deemed a public nuisance and poses a hazard to the safety of the landowners, residents in the vicinity, users of public highways and to the public generally.</p>
MVAP 19.1	Protect life and property from wildfire hazards through adherence to the Fire Hazards section of the General Plan Safety Element.

1.0 ***INTRODUCTION***

1.1 PURPOSE OF AN ENVIRONMENTAL IMPACT REPORT

The County of Riverside is the Lead Agency under the California Environmental Quality Act (CEQA) and has determined that an Environmental Impact Report (EIR) is required for the Barker Logistics LLC warehouse/logistics building project (Project). This EIR has been prepared in conformance with CEQA (California Public Resources [PRC] §§ 21000 et seq.); *CEQA Guidelines* (California Code of Regulations [CCR], Title 14, §§ 15000 et seq.); and, rules, regulations and procedures for implementation of CEQA, as adopted by the County of Riverside. The principal *CEQA Guidelines* sections that govern content of this EIR include Article 9 (*Contents of Environmental Impact Reports*) (Sections 15120 through 15132), and Section 15161 (*Project EIR*).

The purpose of this EIR is to review the existing conditions, analyze potential environmental impacts, and identify feasible Mitigation Measures to reduce potentially significant effects of the Project. More detailed information pertaining to the Project is contained in Section 2.0 – *Project Description*.

This EIR addresses environmental effects of the Project, in accordance with Section 15161 of the *CEQA Guidelines*. Section 15121(a) of *CEQA Guidelines* states the primary purposes of an EIR are as follows:

- To inform decision makers and the public generally of significant effects of a project;
- To identify possible ways to minimize significant effects of a project; and,
- To describe reasonable alternatives to a project.

Mitigation Measures are provided that can be adopted as Conditions of Approval to avoid or minimize significant impacts that would result from the Project. This EIR also is the primary reference document used in formulation and implementation of a Mitigation Monitoring Program for the Project.

The County of Riverside (which has the principal responsibility of processing and approving the Project) and other public (responsible and trustee) agencies that may use this EIR in the decision making or permitting process will consider information in this EIR, along with other information that may be presented during the CEQA process. Environmental impacts are not always mitigatable to a level considered less than significant. In those cases, impacts are considered Significant Unavoidable Impacts. In accordance with Section 15093(b) of the *CEQA Guidelines*, if a public agency approves a project that has significant impacts that are not substantially mitigated (i.e., significant unavoidable impacts), the Lead Agency shall state in writing the specific reasons for approving the Project, based upon the Final EIR and any other information in the public record for the Project. Per *CEQA Guidelines* Section 15093, this is termed a “Statement of Overriding Considerations.”

This EIR analyzes the Project’s environmental effects to the degree of specificity appropriate to the proposed actions (required by *CEQA Guidelines*, Section 15146). The analysis considers activities associated with the Project to determine short-term and long-term effects associated with Project implementation. This EIR discusses both direct and indirect impacts of the Project and the cumulative impacts associated with other past, present, and reasonably foreseeable future projects.

Compliance with CEQA

The County of Riverside is the Lead Agency with authority to prepare this Draft EIR and, after the public review/comment/response process, is the Certifying Agency for the Final EIR. This EIR is an informational document, made available for public review and consideration by the County of Riverside and the Responsible Agencies during deliberations about the Project. Discretionary actions associated with the Project are described in Section 2.0 – *Project Description* of this EIR.

Questions and comments pertaining to preparation of this document and the County of Riverside’s review of the Project should be directed to the following.

County of Riverside
Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92501
Attn.: Russell Brady
951.955.3025

1.2 ENVIRONMENTAL IMPACT REPORT PROCESS

Initial Study/Notice of Preparation/Early Consultation (Scoping)

In compliance with *CEQA Guidelines*, the County of Riverside has provided opportunities for various agencies and the public to participate in the environmental review process for the Project. Pursuant to *CEQA Guidelines* Section 15082, the County of Riverside circulated the Initial Study/Environmental Checklist and Notice of Preparation directly to responsible and trustee agencies (including the State Clearinghouse Office of Planning and Research), special districts, and members of the public who had requested such notice. The Notice of Preparation was distributed on **September 30, 2019** with a 30-day public review period that concluded on **October 29, 2019**. The purpose of the Initial Study/Environmental Checklist and Notice of Preparation was to formally announce the preparation of a Draft EIR for the Project and to indicate that, as Lead Agency, the County of Riverside was soliciting input related to the scope and content of environmental information to be included in the EIR. The Initial Study/Environmental Checklist and Notice of Preparation provided preliminary information about the anticipated range of impacts to be analyzed in the EIR. The Appendices to this EIR contain the Initial Study/Environmental Checklist, Notice of Preparation and comment letters pertaining to the Notice of Preparation. These documents are presented as Appendices A and B.

The Notice of Preparation commenters were the following:

- **California Air Resources Board**
- **Native American Heritage Commission**
- **Southern California Association of Governments**
- **South Coast Air Quality Management District**

Format of the Draft EIR

The Draft EIR is organized into the following Sections.

- **Section 0 – Executive Summary.** The Executive Summary provides a brief description of the Barker Logistics Project and a summary of related environmental impacts and Mitigation Measures.
- **Section 1.0 – Introduction.** The Introduction provides information about CEQA compliance.
- **Section 2.0 – Project Description.** This Section provides a detailed description of the Project, indicating the following: Project setting and location, background and history; Project characteristic, goals and objectives; construction information; and, associated discretionary actions required to realize the Project.
- **Section 3.0 – Environmental Setting.** This Section discusses the impacts of project development and operation. This Section also describes the approach and methodology for the cumulative analysis.
- **Section 4.0 – Environmental Analysis.** This Section contains a detailed environmental analysis of existing conditions, potential Project impacts, recommended Mitigation Measures, and potential significant and unavoidable impacts for environmental topic areas.
- **Section 5.0 – Other CEQA Considerations.** This Section provides a discussion of long-term implications of the Project. Irreversible environmental changes that would be involved with Project development and/or operation are identified. The Project’s growth-inducing impacts are discussed.
- **Section 6.0 – Project Alternatives.** This Section describes a reasonable range of alternatives to the Project that could avoid or substantially lessen the Project’s significant impacts and still feasibly attain the basic Project Objectives.
- **Section 7.0 – Effects Found Not To Be Significant.** This Section provides an explanation of potential impacts that have been determined not to be significant.
- **Section 8.0 – References.** This Section identifies reference sources for the Draft EIR.
- **Section 9.0 – Appendices.** The Appendices are comprised of technical studies and information related to the Project.

This Draft 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 public review period, public notices announcing availability of the Draft EIR will be mailed to interested parties, an advertisement will be published in the local general circulation newspaper, and copies of the Draft EIR and its accompanying Technical Appendices will be available for review at locations indicated in the public notices. After close of the 45-day review public comment review period, the County of Riverside will prepare and publish responses to written comments received on the environmental effects of Project development and/or operation. The Final EIR then will be considered for certification by the Riverside County Planning Commission and/or Riverside County Board of Supervisors. Certification of the Final EIR would be accompanied by 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 that describes the process to ensure implementation of Mitigation Measures identified in the Final EIR. The Mitigation Monitoring and Reporting Program will ensure CEQA compliance during Project development (construction) and operation.

1.3 RESPONSIBLE AND TRUSTEE AGENCIES

Various projects or actions that are undertaken by a Lead Agency require subsequent oversight, approvals, or permits from other public agencies to be implemented. The other agencies are referred to as Responsible Agencies and Trustee Agencies. *CEQA Guidelines* Sections 15381 and 15386 define Responsible Agencies and Trustee Agencies as follows - -

A “‘Responsible Agency’ means a public agency, which proposes to carry out or approve a project, for which a Lead Agency is preparing or has prepared an EIR or Negative Declaration. For the purposes of CEQA, the term ‘responsible agency’ includes all public agencies other than the Lead Agency, which have discretionary approval power of the project.” (Section 15381)

A “‘Trustee Agency’ means 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. Trustee Agencies include: (a) The California Department of Fish and Wildlife . . . ; (b) The State Lands Commission . . . ; (c) The State Department of Parks and Recreation . . . and (d) The University of California with regard to sites within the Natural Land Water Reserves System.” (Section 15386)

Responsible and Trustee Agencies and other agencies/entities that may use this Draft EIR in their decision-making process or for informational purposes include, but may not be limited to, the following:

- CalTrans (California State Department of Transportation)
- March Reserve Air Base Airport Land Use Commission
- Santa Ana Regional Water Quality Control Board
- South Coast Air Quality Management District

1.4 INCORPORATION BY REFERENCE

Pertinent documents relating to the Draft EIR have been used in accordance with *CEQA Guidelines* Section 15150. This Section encourages incorporation by reference as a means of reducing redundancy and the length of environmental reports. The following documents hereby are incorporated by reference into this Draft EIR. Information within these documents has been utilized for each section of this Draft EIR.

- **County of Riverside General Plan (adopted December 8, 2015)** – The County of Riverside General Plan (General Plan) provides a general, comprehensive and long-range guide for community decision making. The General Plan was used throughout this EIR as the fundamental planning document governing development at the Project site. The General Plan is organized into the following nine elements: Land Use; Circulation; Multipurpose Open Space; Safety; Noise; Housing; Air Quality; Healthy Communities; and, Administration. The Elements present a background discussion of each topic, a description of the setting, issues and policies.
- **Mead Valley Area Plan (June 26, 2018)** – The Mead Valley Area Plan guides the evolving physical development and land uses in the unincorporated area west of the City of Perris. The Mead Valley Area Plan is not a stand-alone document. Rather, it is an extension of the County of Riverside General Plan and Vision Statement. The Vision Statement details physical, environmental, and economic characteristics that the County of Riverside aspires to achieve by

year 2020. The Vision Statement is the primary foundation of the County of Riverside General Plan, which establishes standards and policies for development within the entire unincorporated portion of Riverside County. The Mead Valley Area Plan provides a description of the location, physical characteristics and special features of the planning area and contains a Land Use Plan, statistical summaries, policies and accompanying exhibits that allow interested parties to understand the physical, environmental and regulatory characteristics of Mead Valley. Background information in the Mead Valley Area Plan provides insights that help in understanding issues that require special focus and reasons for more localized policy direction in the Area Plan.

- **Western Riverside County Multiple Species Habitat Conservation Plan** – The Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) is a comprehensive, multi-jurisdictional Habitat Conservation Plan that focuses on conservation of species and their associated habitats in Western Riverside County. The MSHCP is one of several large, multi-jurisdictional habitat-planning efforts in Southern California with the overall goal of maintaining biological and ecological diversity within a rapidly urbanizing region. The MSHCP, by being a comprehensive open space plan, will allow Riverside County and its cities to better control local land use decisions and maintain a strong economic climate in the region while at the same time addressing requirements of the State and Federal Endangered Species Acts. The MSHCP area encompasses approximately 1.26 million acres that includes all unincorporated Riverside County land west of the crest of the San Jacinto Mountains to the Orange County line and the jurisdictional areas of 13 cities. The MSHCP will serve as a Habitat Conservation Plan pursuant to Section 10(a)(1)(B) of the federal Endangered Species Act of 1973, as well as a Natural Communities Conservation Plan under the Natural Communities Conservation Plan Act of 2001. The MSHCP is used to allow participating jurisdictions to authorize “Take” of plant and wildlife species identified with the Plan Area. Under the MSHCP, the United States Fish and Wildlife Service and the California State Department of Fish and Wildlife will grant “Take Authorization” for otherwise lawful actions (e.g., public and private development that may incidentally Take or harm individual species or their habitat outside the MSHCP Conservation Area) in exchange for assembly and management of a coordinated MSHCP Conservation Area.
- **March Air Reserve Base/Inland Port Authority Airport Land Use Compatibility Plan (adopted October 2004)** – The basic function of airport compatibility plans is to promote compatibility between airports and the uses that surround them. Compatibility plans serve as a tool for use by airport land use commissions in fulfilling their duty to review proposed development plans for airports and surrounding land uses, serve as compatibility criteria applicable to local agencies in their preparation or amendment of land use plans and ordinances, and serve landowners in their design of new development. The *Riverside County Airport Land Use Compatibility Plan Policy Document* establishes policies applicable to land use compatibility planning in the vicinity of airports throughout Riverside County. Compatibility criteria and maps are included for the influence areas of individual airports. In addition, the Plan delineates procedural requirements for compatibility review of development proposals. Requirements for creation of airport land use commissions (ALUC) initially were established under the California State Aeronautics Act (Public Utility Code §§ 21670 et seq.) in 1967. The law has been amended many times since its inception but the fundamental purpose of ALUC remains to promote land use compatibility around airports. ALUC protection of public health, safety and welfare is to be achieved by ensuring the orderly expansion of airports “. . . and the adoption of land use measures that minimize the public’s exposure to excessive noise and safety hazards within areas around public airports to the extent that

these areas are not already devoted to incompatible uses.” The statutes give ALUC two primary powers by which to accomplish this objective. The ALUC must prepare and adopt an airport land use compatibility plan and it must review the plans, regulations and other actions of local agencies and airport operators for consistency with those plans. The State Aeronautics Act establishes the fundamental relationship between the Riverside County Airport Land Use Commission and the governments of Riverside County and affected cities in the County. The ALUC is not simply an advisory body for the Riverside County Board of Supervisors or city councils. Within bounds of State law, ALUC decisions are final and independent of the Board or City Councils. The *Riverside County Airport Compatibility Plan Policy Document* contains maps of noise contours and airspace protection (structural height limit) surfaces associated with supporting policies. The Project site is located within Zone C (Extended Approach/Departure Zone), which indicates a moderate noise impact level and a moderate risk level, based on compatibility zone factors.

Riverside County Climate Action Plan (November 2019) – The Riverside County Climate Action Plan (CAP) reflects the County’s commitment to reducing Greenhouse Gas Emissions in an effort to provide a more livable, equitable and economically vibrant community. The (CAP) was prepared, implemented, and updated in 2019 to help ensure 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 Update integrates the County’s past and current efforts with future efforts to grow and thrive sustainably. The 2019 CAP has three main purposes:

- To present the County’s Updated GHG inventory, forecasts, and target setting for achieving sustainability by utilizing resources effectively, reducing GHG emissions, and preparing for potential climate-related impacts
- To identify how the County will effectively implement this CAP Update to comply with the State and local GHG reduction policies by promoting economic competitiveness, obtaining funding for program implementation, and tracking and monitoring the progress of Plan implementation over time
- To allow streamline California Environmental Quality Act (CEQA) compliance for new development by completing CEQA compliance for the CAP Update and developing screening tools that provide clear guidance to developers and other project proponents

The CAP is a separately bound document from the County of Riverside General Plan that provides an implementation tool of the General Plan to guide development in Riverside County. The 2019 CAP Update presents the following:

- A summary of methodologies used to calculate the County’s GHG emissions and forecasts
- A summary of the County’s historic and future GHG emissions and the reduction targets the County has established
- A detail of reduction strategies that will be implemented to meet the identified reduction targets, including potential energy savings and local co-benefits of the measures
- An explanation of implementation of the measures, potential funding sources, and how the CAP Update will be monitored and updated over time together with a summary of the outreach and CEQA process conducted as part of the CAP Update

1.5 INTENDED USE OF THIS EIR

The County of Riverside (County) is the Lead Agency for the purposes of CEQA because it has the principal responsibility and authority for consideration of discretionary actions and permitting for the Project. As the Lead Agency, the County is also responsible for analyzing the Project's potential environmental impacts.

The Lead Agency will employ this EIR in its evaluation of potential environmental impacts resulting from, or associated with, approval and implementation of the Project. This EIR may also be used by various Responsible Agencies, e.g., Air Quality Management District(s), Regional Water Quality Control Board(s), *et al.* For example, if the Project would require discretionary permits from the South Coast Air Quality Management District (SCAQMD), this EIR would serve as the environmental assessment for such permits (please refer to California Code of Regulations, Section 15050). Other agencies, e.g. utilities and service providers, may also employ this EIR in their evaluation of environmental impacts associated with provision of or modification of utilities and services to Project.

In employing this EIR, the County and other agencies need to recognize that the Project plans and development concepts identified herein are just that – plans and concepts that are subject to refinement as the Project is further defined. Acknowledging the potential for these future minor alterations to the Project, this EIR in all instances evaluates likely maximum impact scenarios that would account for these potential minor alterations

2.0 *PROJECT DESCRIPTION*

2.1 PROJECT LOCATION

The 31.55-acre Project site is located at the northeast corner of the Placentia Avenue/Patterson Street intersection. The Project site is depicted on the Steele Peak and Perris quadrangles of the United States Geological Survey's 7.5-minute topographic map series in Section 13 of Township 4 South, Range 4 West. Reference Exhibit 2-1: *Regional Location Map* and Exhibit 2-2: *Local Vicinity Map*.

2.2 PROJECT DESCRIPTION

The Project involves a Plot Plan to allow development of a 699,630 square foot warehouse/logistics building on a 31.55-acre property. The building dimensions are 42 to 49.5 feet (at its peak) in height, 1,098 feet long, and 720 feet at its widest. It is 600 feet from dock doors on the west to the dock doors on the east of the structure. The automobile parking spaces are to be located around the perimeter of the building; truck/truck trailer bays will be located on the east and west elevations of the building. Reference Exhibit 2-6: *Proposed Site Plan* and Exhibit 2-7: *Proposed Building Elevations*.

2.2.1 Roadway/Access Improvements

Roadway, intersection, and site access improvements to be constructed by the Project are listed below. Roadways adjacent to the Project, site access points and site-adjacent intersections will be constructed consistent with the identified roadway classifications and respective cross-sections in the County of Riverside General Plan Circulation Element or as otherwise specified by the County. Additional or alternative improvements may be specified by the County through the Project Conditions of Approval.¹

On-site traffic signing and striping should be implemented in conjunction with detailed construction plans for the Project site. Sight distance at each Project access point should be reviewed with respect to standard Caltrans and County of Riverside sight distance standards at the time of preparation of final grading, landscape and street improvement plans.

Roadways

Patterson Avenue (N – S)

Construct Patterson Avenue at its ultimate half-section width as a Secondary Highway (100-foot right-of-way) between the Project's northern boundary and Placentia Street, in compliance with applicable County of Riverside and Caltrans standards.

Placentia Street (E – W)

Construct Placentia Street at its ultimate half-section width as a Secondary Highway (100-foot right-of-way) between the Project's Patterson Avenue and the Project's eastern boundary, in compliance with applicable County of Riverside and Caltrans standards.

¹ This EIR evaluates potential impacts that would result from the maximum scope of recommended improvements as detailed in the Project TIA. The ultimate scope of required Project traffic improvements may be less than that evaluated here, and would be determined in consultation with the Lead Agency prior to the issuance of development permits.

Intersections

Patterson Avenue & Driveway 1²

Install a stop control on the westbound approach and construct the intersection with the following geometrics:

- Northbound Approach: One shared left-through-right turn lane.
- Southbound Approach: One shared left-through-right turn lane.
- Eastbound Approach: One shared left-through-right turn lane.
- Westbound Approach: One shared left-through-right turn lane.

Patterson Avenue & Placentia Street

Maintain the existing traffic control and construct the intersection with the following geometrics:

- Northbound Approach: Not Applicable (N/A)
- Southbound Approach: One shared left- right turn lane.
- Eastbound Approach: One shared left-through lane.
- Westbound Approach: One through lane and one right turn lane.

Driveway 2/Tobacco Road & Placentia Street

Install a stop control on the southbound approach and construct the intersection with the following geometrics:

- Northbound Approach: One shared left-through-right turn lane.
- Southbound Approach: One shared left-through-right turn lane.
- Eastbound Approach: One shared left-through-right turn lane.
- Westbound Approach: One shared left-through-right lane.

Placentia Street & Driveway 3

Install a stop control on the southbound approach and construct the intersection with the following geometrics:

- Northbound Approach: N/A
- Southbound Approach: One shared left- right turn lane.
- Eastbound Approach: One shared left-through lane.
- Westbound Approach: One shared through-right turn lane.

Project Site Access

Access to the Project site would be via Patterson Avenue and Placentia Avenue. These rights-of-way adjacent to the Project site would be constructed by the Project consistent with County requirements and pursuant to the Project Conditions of Approval. Vehicular and truck traffic access to the Project site would be provided via the following driveways:

² The Applicant is endeavoring to acquire right-of-way that would allow for alignment of Driveway 1 on Patterson Avenue with Walnut Street to the west. If the right-of-way cannot be acquired, the Project Applicant will work with County staff to develop an alternative design for Driveway 1.

- Patterson Avenue and Walnut Street via Driveway 1 – full access for passenger cars and trucks;
- Placentia Street via Driveway 2 – full access for passenger cars only; and
- Placentia Street via Driveway 3 – full access for passenger cars and trucks.

2.2.2 Construction Traffic Management Plan

Temporary and short - term traffic detours and traffic disruptions could result during Project construction activities including implementation of access and circulation improvements noted above. Accordingly, the Project Applicant would be responsible for the preparation and submittal of a construction area traffic management plan (Plan) to be reviewed and approved by the County. Typical elements and information incorporated in the Plan would include but would not be limited to:

- **Name of on-site construction superintendent and contact phone number.**
- **Identification of Construction Contract Responsibilities** - For example, for excavation and grading activities, describe the approximate depth of excavation, and quantity of soil import/export (if any).
- **Identification and Description of Truck Routes** - to include the number of trucks and their staging location(s) (if any).
- **Location and Description of Construction Trailer** (if any).
- **Identification and Description of Traffic Controls** - Traffic controls shall be provided per the Manual of Uniform Traffic Control Devices (MUTCD) if the occupation or closure of any traffic lanes, parking lanes, parkways or any other public right-of-way is required. If the right-of-way occupation requires configurations or controls not identified in the MUTCD, a separate traffic control plan must be submitted to the County for review and approval. All right-of-way encroachments would require permitting through the County.
- **Identification and Description of Parking** - Estimate the number of workers and identify parking areas for their vehicles.
- **Identification and Description of equipment staging areas, material stockpiles, proposed road closures, and hours of construction operations.**
- **Identification and Description of Maintenance Measures** - Identify and describe measures taken to ensure that the work site and public right-of-way would be maintained (including dust control).

The Plan must be reviewed and approved by the County prior to the issuance of the building permit. The Plan and its requirements would also be required to be provided to all contractors as one component of building plan/contract document packages.

2.2.3 Other Attributes and Design Features

It is estimated that Project operation will result in 679 jobs.

Project development will include landscaping comprising a plant palette that features drought tolerant plants in conformance with County of Riverside requirements. Airport Land Use Commission requirements

include providing areas within a Project site of a minimum dimension of 75 feet by 300 feet with plant material and other obstructions of not taller than four (4) feet.

Signage will be proposed at a later date and will be based on requirements of the Riverside County Code or a separate County-approved Master Signage Program.

Consistent with County requirements, the Project will provide onsite renewable energy production generation comprising at least 20 percent of the Project energy demand. To this end, the Project includes photovoltaic cells on the building roof that will provide a minimum of 20 percent of the Project annual usage.

Project development, which will occur over an approximate 24-month period, will include construction of perimeter walls ranging from eight feet in height to 17 feet.

2.3 PROJECT SETTING: EXISTING CONDITIONS

Elevation of the Project site ranges from 1,520 to 1,580 feet above sea level. The Project site is vacant, has sparse grasses and several trees in its southerly area, slopes approximately 50 feet down from north to south, and has been graded in the past. The Project site is bordered by existing single-family residential and vacant land uses north of the Project site, single-family residential uses south and west of the Project site, and single-family residential and industrial/manufacturing uses east of the Project site. Reference Exhibit 2-3: *Existing Site Aerial*, Exhibit 2-4: *Site Photographs Existing Viewshed*, and Exhibit 2-5: *Site Photographs Existing Viewshed (cont.)*.

Soils on the Project site have been disturbed over time by agricultural, grading and disking activities. Grading and disking have eliminated the natural plant communities that historically occurred within the Project site and in the Project site vicinity and have resulted in a majority of the Project site being dominated by early successional and non-native vegetation, which has reduced, if not eliminated, the ability of the Project site to provide suitable habitat for special-status plant species.

2.4 PROJECT GOALS AND OBJECTIVES

The following are the primary Project Objectives:

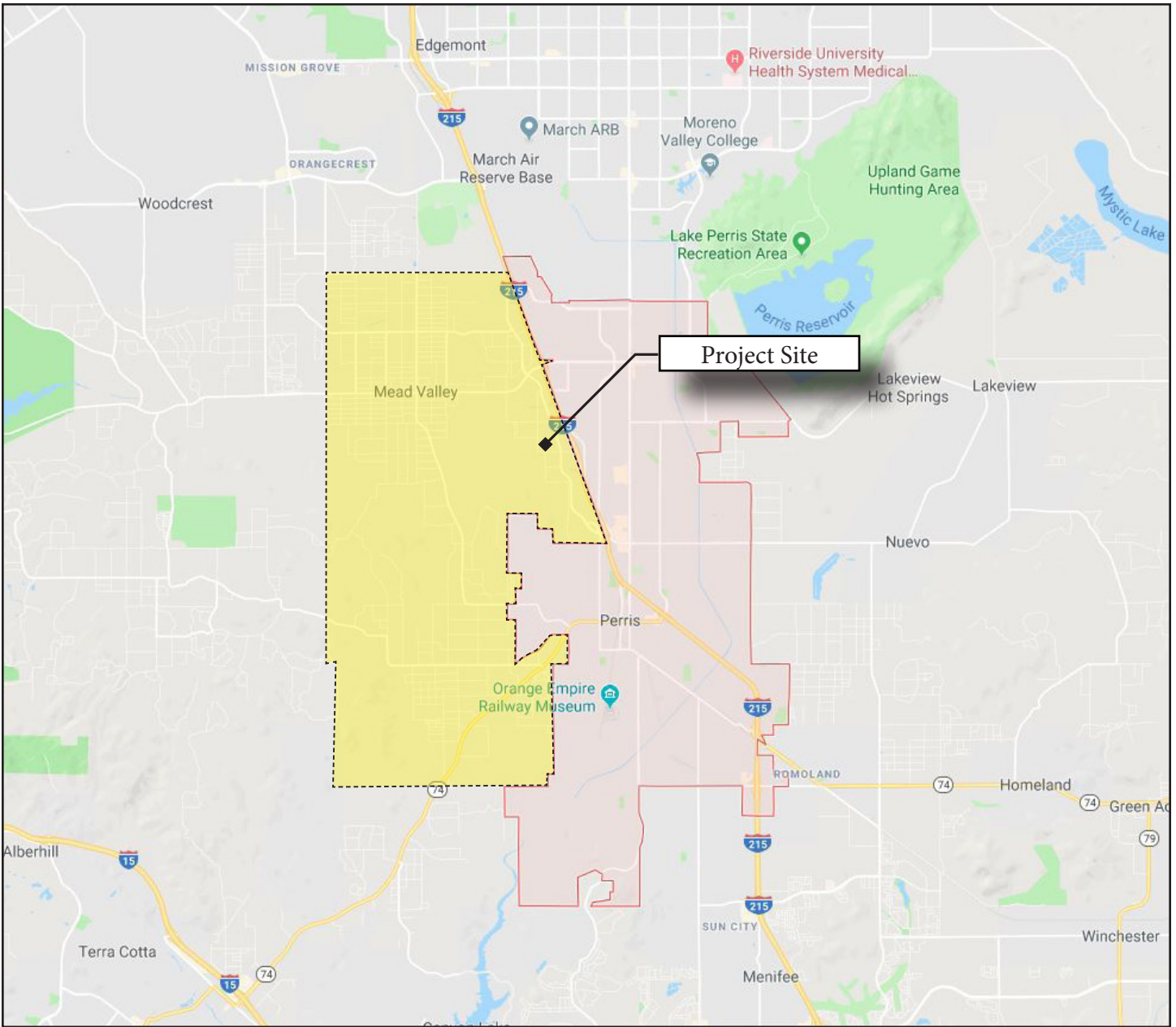
- To build a land use in compliance with County of Riverside General Plan and Mead Valley Area Plan.
- To create a sustainable Project.
- To promote regional-oriented warehouse/logistics development near Interstate 215.
- To maintain the integrity of the surrounding single-family residential neighborhood through quality contemporary design, appropriate structural setbacks, architectural treatments and building color palette.
- To concentrate employment opportunities near regional transportation.
- To provide a sustainably designed building that is energy conscious and a healthy work environment.
- To make efficient use of undeveloped property in the Mead Valley area of unincorporated Riverside County by maximizing its buildout potential for employment-generating uses.

- To attract new businesses and jobs to unincorporated Riverside County and thereby provide economic growth.
- To create an employment-generating business in the Project vicinity and thereby reduce the need for members of the local workforce to commute outside the area for employment.
- To develop a vacant or underutilized property with a High-Cube warehouse/logistics building to help meet the substantial unmet regional demand for this type of building and use.
- To develop a warehouse/logistics building that can attract building occupants seeking modern warehouse building space in the Mead Valley area constructed to contemporary design standards.
- To develop a vacant property zoned for the proposed warehouse/logistics building use that has access to available infrastructure, including roads and utilities.
- To develop a vacant property with a warehouse/logistics building that has operational characteristics that complement other existing warehouse buildings in the immediate vicinity and minimize conflicts with other nearby land uses.
- To develop a project that is economically competitive with similarly-sized buildings in the local area and in the inland empire.
- To develop a light industrial use in close proximity to designated truck routes and Interstate 215 to avoid or shorten truck-trip lengths on other roadways.

2.5 PROJECT APPROVALS

The sole discretionary permit required to allow Project development is a Plot Plan approved by the County of Riverside. Although it is not anticipated that any discretionary approvals or permits are required from other Responsible or Trustee Agencies, such as the California State Department of Fish and Wildlife, United States Army Corps of Engineers, or other State or Federal agencies, if necessary, this DEIR can be used by any agency to comply with CEQA for all approvals, discretionary or ministerial.

Exh 2-1
Regional
Location Map



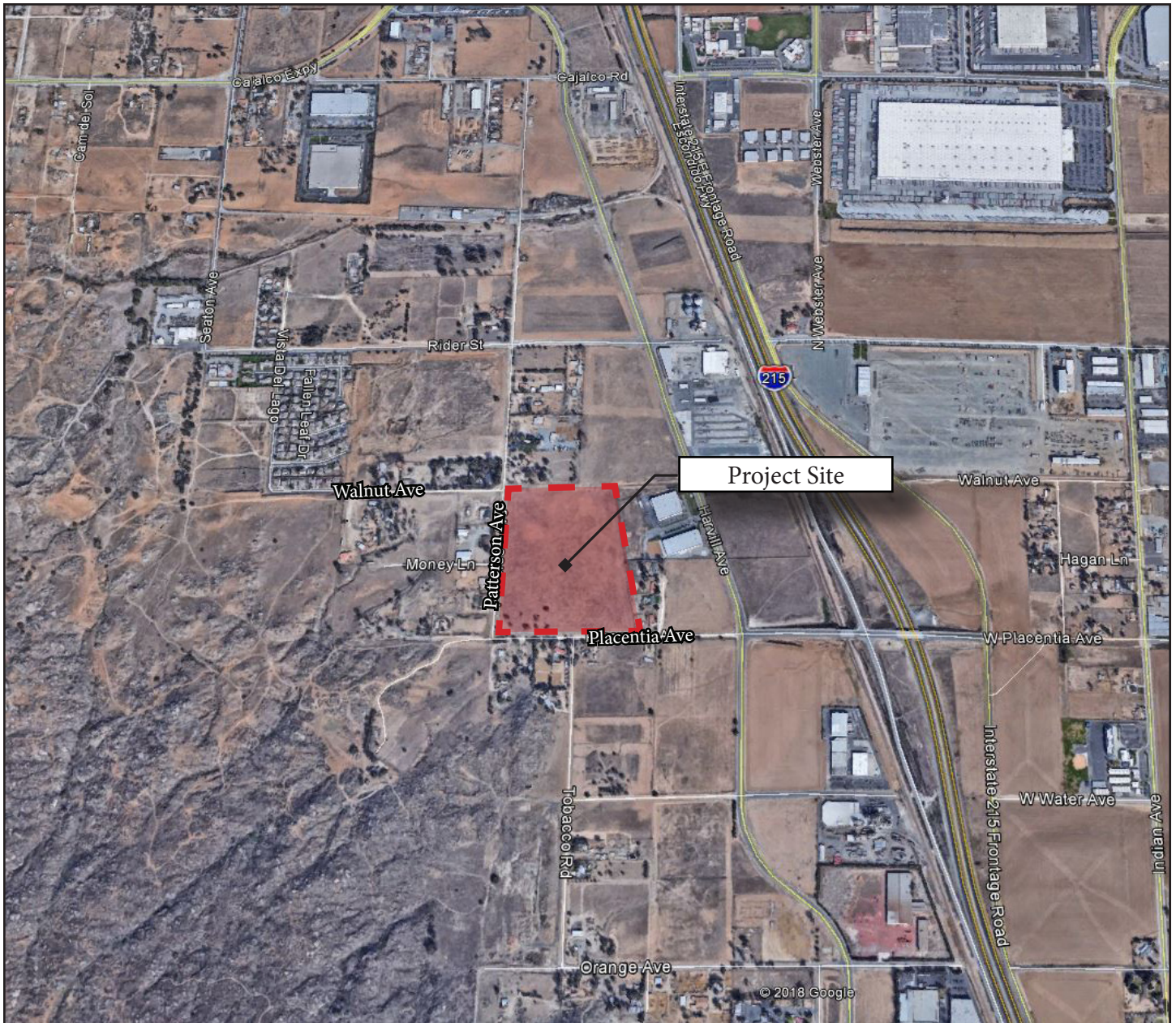
Legend

- Perris, CA City Boundary
- City of Perris Sphere of Influence*

*A “sphere of influence” is the area outside of and adjacent to a city’s border that has been identified by the County Local Agency Formation Commission as a future logical extension of the city’s jurisdiction. While the County of Riverside has land use authority over city sphere areas, development in these areas directly affects circulation, service provision, and community character within the cities.

Source: Google Maps

Exh 2-2
Local
Vicinity Map



Source: Google Maps





Source: Google Maps

Exh 2-4
Site Photographs
Existing Viewshed



1 Looking north from Placentia Ave. and Tobacco Rd.



2 Looking north easterly from Placentia Ave. and Patterson Ave.

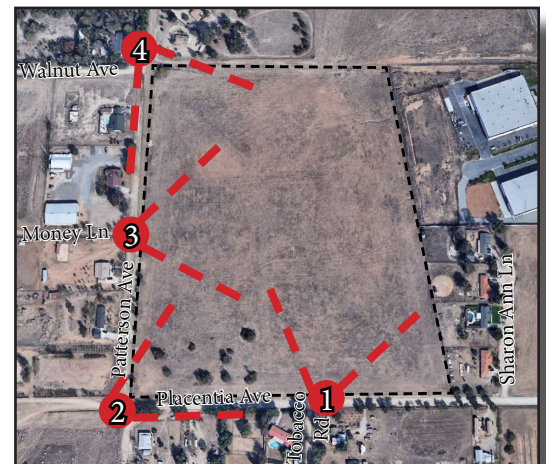


3 Looking east from Patterson Ave.



4 Looking south easterly from Patterson Ave. and Walnut Ave.

KEY MAP



Site Photographs
Existing Viewshed (cont.)



5 From the northeast corner of the project site looking south along the eastern boundary.

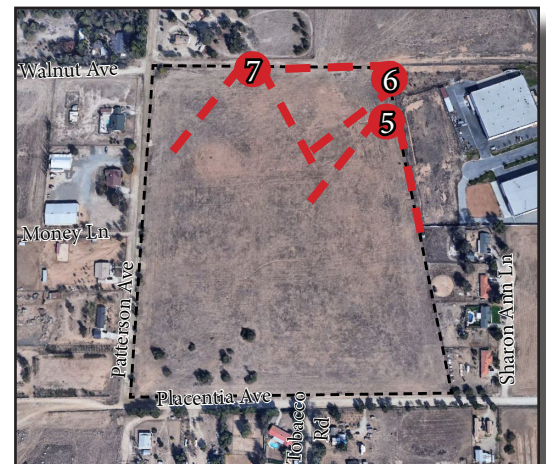


6 From the northeast corner of the project site looking west along the northern boundary.

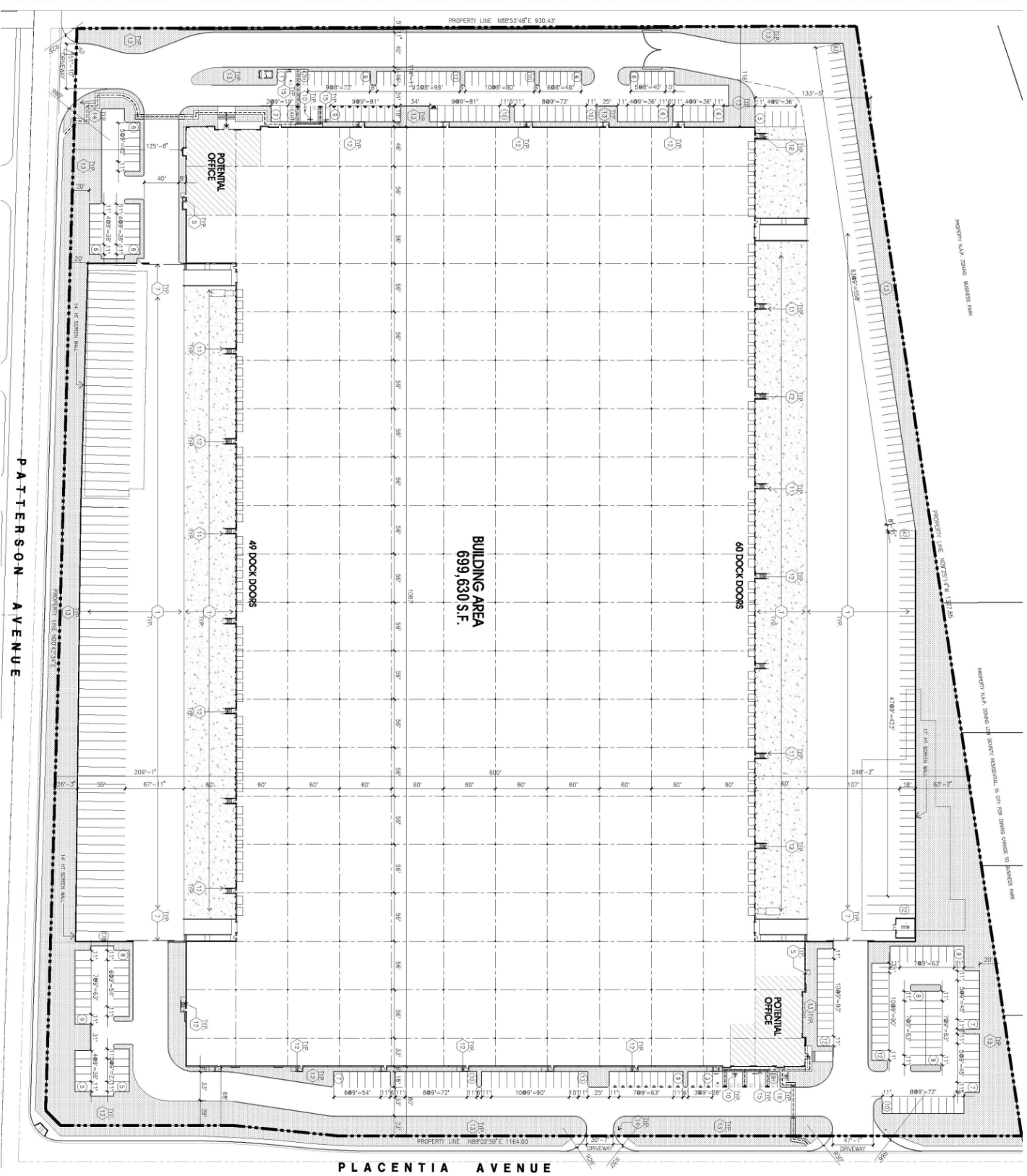


7 From the middle of the northern boundary looking south across the project site.

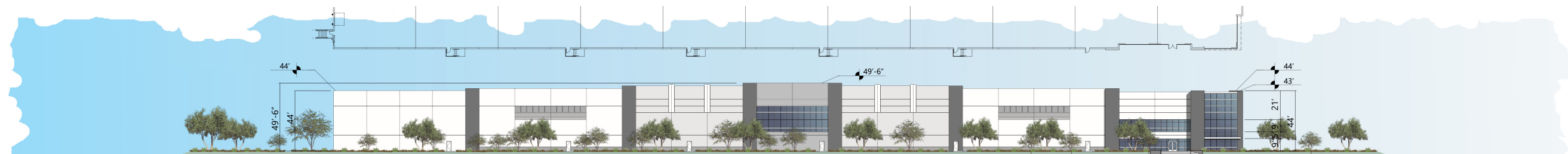
KEY MAP



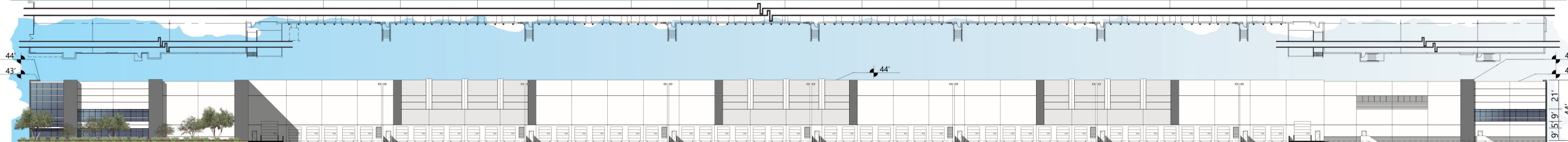
Exh 2-6
Proposed Site Plan



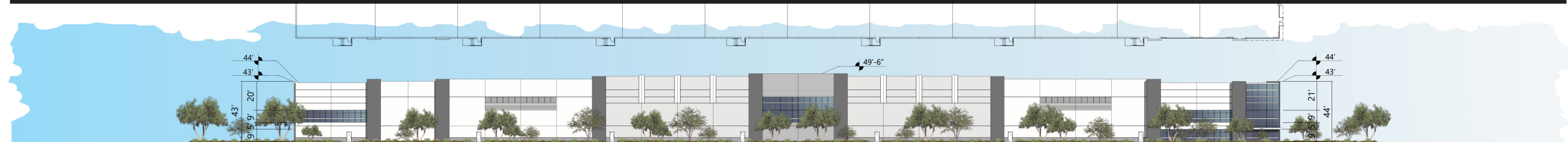
Proposed Building Elevations



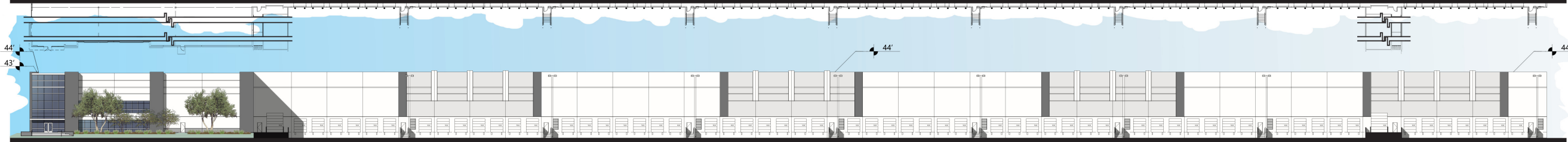
North Elevation



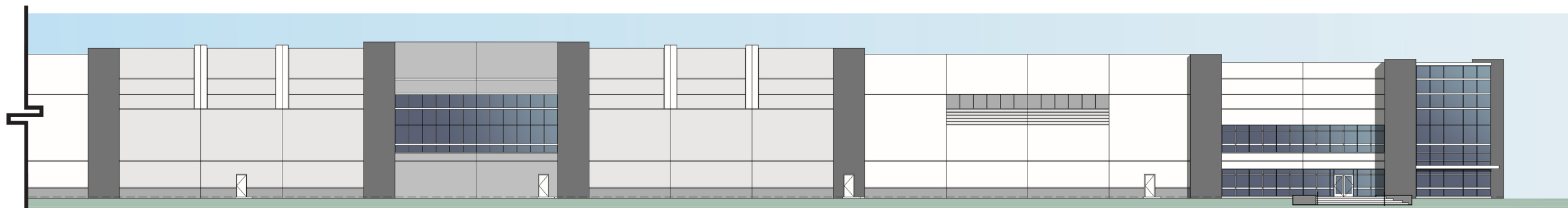
West Elevation



South Elevation



East Elevation



Enlarged View of North Elevation

3.0 ENVIRONMENTAL SETTING

3.1 INTRODUCTION

In accordance with *CEQA Guidelines* Section 15125, this section of the EIR provides a description of overall existing physical environmental conditions on the Project site and in the Project vicinity from a local and regional perspective at the time the Notice of Preparation was published. Specific existing conditions also are discussed within each individual section.

Each sub-section in Section 4.0 of the EIR includes a discussion of existing conditions and an assessment of potential impacts of the proposed Project. In addition, each sub-section includes a discussion of cumulative impacts associated with the proposed Project. The cumulative impacts discussion in each sub-section is based on the environmental impacts of the proposed Project combined with the related environmental impacts of projects planned in the Project vicinity.

3.2 ENVIRONMENTAL SETTING

3.2.1 REGIONAL SETTING AND LOCATION

The Project site is located within unincorporated western Riverside County. The Project site is west of Interstate 215, east of Interstate 15, south of State Route 60, and north of State Route 74 and is within the sphere of influence of the City of Perris. Reference Figure 2-1: *Regional Location Map*.

3.2.2 PROJECT LOCATION AND SURROUNDING LAND USES/DEVELOPMENT

The 31.55-acre Project site is located on the northeast corner of the Placentia Avenue/Patterson Avenue intersection in the Mead Valley Area Plan of unincorporated western Riverside County. Reference Figure 2-1: *Regional Location Map* and Figure 2-2: *Local Vicinity Map*.

The Project site is bordered by existing single-family residential and vacant land uses north of the Project site, single-family residential uses south and west of the Project site, and single-family residential and industrial/manufacturing uses east of the Project site. Adjacent properties are zoned as indicated in the following Table 3.1: *Adjacent Property Zoning*.

Table 3.1: Adjacent Property Zoning

Direction	Zoning	Existing Land Use
North	Light Agriculture (A-1-1) Industrial Park (I-P)	Single Family Residential
South	Rural Residential (R-R-1)	Single Family Residential
East	Manufacturing-Service Commercial (M-SC) Light Agriculture (A-1-1) Rural Residential (R-R-1)	Single Family Residential Industrial/Manufacturing
West	Rural Residential (R-R-1) Light Agriculture (A-1-1)	Single Family Residential

3.3 PLANNING CONTEXT

3.3.1 COUNTY OF RIVERSIDE GENERAL PLAN AND MEAD VALLEY AREA PLAN

The Riverside County General Plan Land Use designation for the 31.55-acre Project site is Business Park. The General Plan recognizes that 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 floor area ratio intensities would range from 0.25 to 0.6.

The Project site is located within the Mead Valley Area Plan. 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. This area has access to Interstate 215 via two existing interchanges (Cajalco/Ramona Expressway and Nuevo) and one under construction interchange (Placentia Avenue) and includes areas that have the necessary infrastructure in place to support economic development. The County of Riverside policy is to stimulate economic development in this area of Mead Valley but also recognizes that given the proximity of the rural community and residential uses, impacts of industrial expansion on localized air quality, traffic, noise, light and glare need to be assessed to apply appropriate measures that would mitigate environmental impacts so the environmental quality of the community and residents' health and welfare are maintained. The Mead Valley Area Plan also designates the Project site as Business Park. Reference Exhibit 3-1: *Existing General Plan Land Use*.

Warehouse/logistics (with an internal adjunct office component) is an allowed use within the General Plan and Mead Valley Area Plan land use designations.

3.3.2 ZONING

The County of Riverside zoning for the Project site is Industrial Park (I-P) and Manufacturing-Service Commercial (M-SC). The Project involves development of a 699,630 square foot warehouse/logistics (distribution) building with an interior 9,000 square foot office component, which is a permitted use within the IP and M-SC zoning districts (Riverside County Ordinance No. 348.4896 – An Ordinance of the County of Riverside Providing for Land Use Planning and Zoning Regulations and Related Functions. Article X I-P Zone (Industrial Park) and Article XI M-SC (Manufacturing-Service Commercial)). Reference Exhibit 3-2: *Existing Zoning*.

3.3.3 RIVERSIDE COUNTY AIRPORT LAND USE COMPATIBILITY PLAN

The March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (ALUCP) identifies land use standards and design criteria for new development located in the proximity of the March Air Reserve Base 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 March Air Reserve Base and is subject to the ALUCP. The entire Project site is located within “Compatibility Zone C.”

3.3.4 SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY

The Southern California Association of Governments (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 (Los Angeles; Orange; Riverside; San Bernardino; Ventura; Imperial) and 191 cities in an area that covers more than 38,000 square miles. SCAG develops long-range regional transportation plans including the “Sustainable Communities Strategy” and growth forecast components, regional transportation improvement programs, regional housing needs allocations and other plans for the region.

The SCAG *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS) develops long-range regional transportation plans that include sustainable community strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations and other plans for the region. The RTP/SCS provides objectives for meeting emissions reduction targets set forth by the California Air Resources Board (CARB). These objectives were provided as a direct response to Senate Bill 375 (SB 375) which was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning. SCAG identifies the Project site as being located in the Western Regional Council of Governments (WRCOG) subregion planning area.

3.4 EXISTING PHYSICAL SITE CONDITIONS

The existing physical Project site conditions/environmental setting for each environmental topical area are discussed within each related section. Generally, the 31.55-acre Project site is vacant, has been graded

intermittently, and is home to grasses and to several trees in the southwesterly portion of the property. Reference Exhibit 2-3: *Existing Site Aerial*, Exhibit 2-4: *Site Photographs Existing Viewshed*, and Exhibit 2-5: *Site Photographs Existing Viewshed (cont.)*.

3.5 ASSUMPTIONS REGARDING CUMULATIVE IMPACTS

CEQA Guidelines Section 15120 states that “cumulatively considerable” impacts must be addressed in an EIR. Cumulatively considerable impacts are two or more individual impacts that, when considered together, compound individual project impacts. *CEQA Guidelines* further state that cumulatively considerable impacts need not be discussed in as great a level of detail as that necessary for a project alone. Cumulative impacts represent the change caused by the incremental impact of a project when added to other proposed or committed projects in the vicinity. *CEQA Guidelines* Section 15130(b)(1) states that the information used in an analysis of cumulative impacts should originate from one of the following two sources:

- A list of past, present and probable future projects producing related cumulative impacts, including, if necessary, those projects outside the control of the Lead Agency; or,
- A summary of projections contained in an adopted general plan or related planning document designed to evaluate regional or area-wide conditions

The cumulative impact analysis contained in this Draft Environmental Impact Report uses the former method.

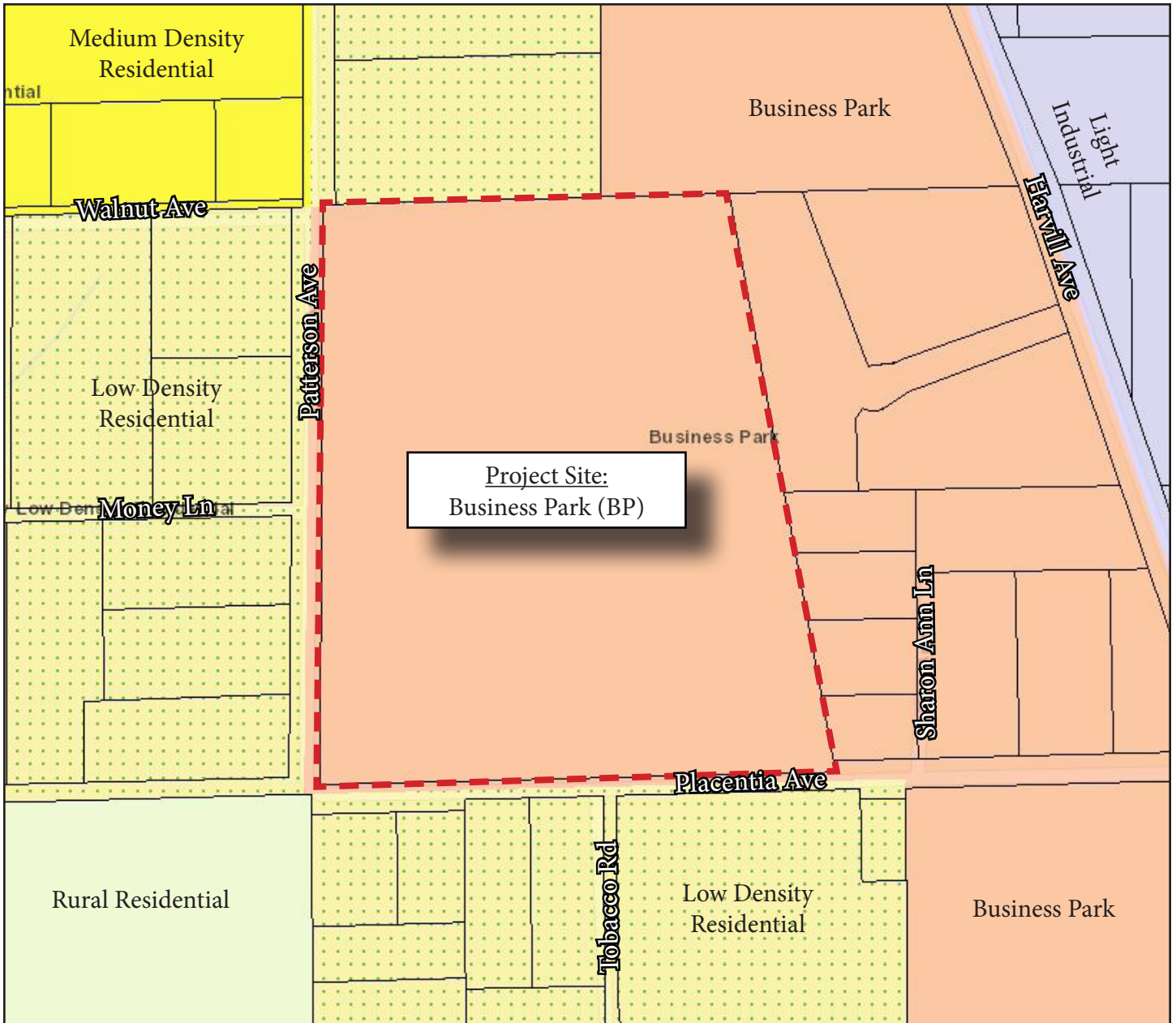
The following past, present, and probable future projects have been approved by the County of Riverside and are located generally within one mile of the Project site.

- Rados Distribution Center – a 1,200,000 square foot High-Cube warehouse located at the northwest corner of the Indian Avenue/Rider Street intersection east of Interstate 215 within the City of Perris.
- A 612,481 square foot High-Cube warehouse located at the southwest corner of the Patterson Avenue/Rider Street intersection in unincorporated Riverside County and within the City of Perris sphere of influence.
- Rider Commerce Center – a 204,330 square foot warehouse located at the northeast corner of the Patterson Avenue/Rider Street in unincorporated Riverside County and within the City of Perris sphere of influence.
- Majestic Freeway Business Center (Buildings 1, 3, & 4) – a 48,930 square foot warehouse and 1,195,740 square foot High-Cube warehouse located at the northwest corner of Harvill Avenue and Cajalco Road in unincorporated Riverside County and within the City of Perris sphere of influence.
- Farmer Boys/Retail Shop – a 3,252 square foot fast-food restaurant with a drive-thru window and a 16,306 square foot retail building located at the northeast corner of the Harvill Avenue/Cajalco Road intersection in unincorporated Riverside County and within the City of Perris sphere of influence.
- A 423,665 square foot High-Cube warehouse located at the southwest corner of the Harvill Avenue/Rider Street intersection in unincorporated Riverside County and within the City of Perris sphere of influence.

- Val Verde Logistics Center – a 280,308 square foot High-Cube warehouse located at the northwest corner of the Harvill Avenue/Old Cajalco Road in unincorporated Riverside County and within the City of Perris sphere of influence.
- Harvill Distribution Center – a 345,103 square foot High-Cube warehouse located east of Harvill Avenue and south of Orange Street in unincorporated Riverside County and within the City of Perris sphere of influence.
- A 23,600 square foot warehouse located at the southeast corner of the Harvill Avenue/Placentia Street intersection in unincorporated Riverside County and within the City of Perris sphere of influence.
- A 66,000 square foot warehouse located east of Harvill Avenue and north of Placentia Street in unincorporated Riverside County and within the City of Perris sphere of influence.

The locations of the above-noted projects are depicted in Exhibit 3-3: *Cumulative Projects Locations*.

Existing General Plan Land Use

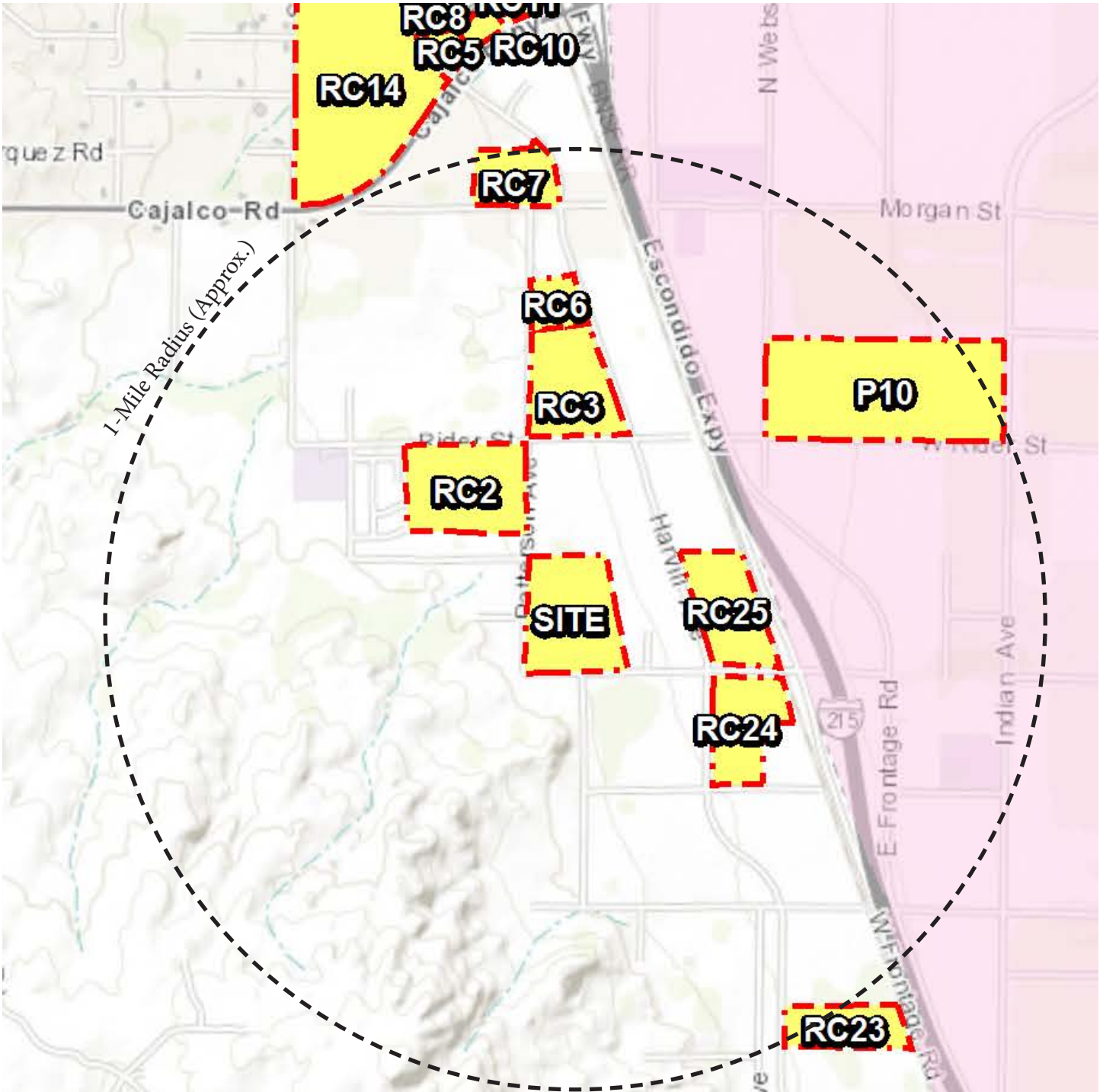


Source: County of Riverside [MapMyCounty](#), February 2019



Source: County of Riverside [MapMyCounty](#), February 2019

Exh 3-3
Cumulative Projects
Locations



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4.1 AESTHETICS

The purpose of this section is to describe the existing aesthetic environment at and near the proposed Project site and to analyze the potential effects of Project development and operation to the aesthetic character of the Project site and nearby properties.

4.1.1 ENVIRONMENTAL SETTING

The Project site is located on the northeast corner of the Patterson Avenue/Placentia Street intersection within unincorporated Riverside County. Elevation of the Project site ranges from 1,520 to 1,580 feet above sea level. The Project site is vacant, has sparse grasses and several trees in its southerly area, slopes approximately 50 feet down from north to south, and has been graded in the past. The Project site is bordered by existing single-family residential and vacant land uses north of the Project site, single-family residential uses south and west of the Project site, and single-family residential and industrial/manufacturing uses east of the Project site. Exhibit 2-3: *Existing Site-Aerial*, and Exhibits 2-4 and 2-5: *Site Photographs Existing Viewshed* depict views to the Project site from surrounding properties and depict uses surrounding the Project site.

The surrounding land uses have views to and across the Project site. None of the roadways bordering the Project site are designated Scenic Highways.

4.1.2 THRESHOLDS OF SIGNIFICANCE

The County of Riverside has adopted Thresholds of Significance that vary in some cases topically and in format from the Appendix G Thresholds, as reflected in the Initial Study prepared for the Project. This EIR uses the following County-adopted Thresholds of Significance to comprise the basis of impact analyses.

Scenic Resources - - Would the Project:

- a) **Have a substantial effect upon a scenic highway corridor within which it is located?**
- 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?**
- c) **In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

Mt. Palomar Observatory - - Would the Project:

- a) **Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?**

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Other Lighting Issues - - Would the Project:

- a) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?
- b) Expose residential property to unacceptable light levels?

4.1.3 ENVIRONMENTAL IMPACTS

Scenic Resources - - Would the Project:

- a) Have a substantial effect upon a scenic highway corridor within which it is located?

No Impact. The Project site is not located adjacent to a State-designated scenic highway. The only State-designated scenic highways within Riverside County are California State Route 62 (SR-62), California State Route 74 (SR-74), and California State Route 243 (SR-243). The Riverside County General Plan and Mead Valley Area Plan indicate the nearest County-designated scenic highway is Interstate 215, approximately one-half mile east of the Project site and separated from the Project site by industrial uses and vacant land. In addition, there are eight (8) eligible Scenic Highways in Riverside County. None are in view of the Project site. The closest eligible Scenic Highway is State Route 74, near Romoland and the City of Perris, which is approximately three miles southeast of the Project site. The Project will not be visible from any State Routes or from Interstate 215. Therefore, Project development will have no impact upon a scenic corridor.

- 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?

Less than Significant Impact. The Project site is vacant, has sparse grasses and several trees in its southerly area, slopes approximately 50 feet down from north to south, and has been graded in the past. The Project vicinity has a mix of uses, including single-family residences and industrial/manufacturing uses. Project buildout will change the visual character of the Project site from a vacant, undeveloped property to a developed property containing a 699,630 square foot warehouse/logistics building with paved surface auto/truck parking on a 31.55-acre property. The building dimensions are 42 to 49.5 feet (at its peak) in height, 1,098 feet long, and 720 feet at its widest. It is 600 feet from dock doors on the west to the dock doors on the east of the structure. The automobile parking spaces are to be located around the perimeter of the building; 98 truck/truck trailer bays will be located on the east and west elevations of the building.

Following is a description of the areas bordering the Project site.

Southern Street Scene along Placentia Avenue – Traveling westward along Placentia Avenue, the property edge has a 60-foot landscaped area before a parking lot starts 20 feet back from the property line. The industrial building is set back 70 feet from the right-of-way and is sited down from the street about 4 feet. The property has 1,130 feet of frontage along Placentia Avenue with 720 feet of industrial building frontage. The building sits below the intersection of Placentia Avenue and Patterson Avenue

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about 24 feet. There are four (4) large lot residential properties with 160 feet of frontage each on the south side of Placentia Avenue between Patterson Avenue and Tobacco Road. East of Tobacco Road on the south side of Placentia Avenue is vacant land. A single-load row of parking for automobiles is facing a slope bank between the building and Placentia Avenue.

Western Street Scene along Patterson Avenue – The property has 1,285 feet of frontage along Patterson Avenue. The building frontage is 1,100 feet long. The corner of the industrial pad is 30 feet below the intersection of Patterson Avenue and Placentia Avenue, and about 10 feet below on the north side of the building. The building setback from the property line varies between 170 feet on the south to 135 feet on the north. Truck access, loading/unloading bays are provided along this side of the building. The top of the trucks will be below the grade of Patterson Avenue, which varies between 15 and 25 feet. There are five (5) large residential lots with four (4) residential homes on the west side of Patterson Avenue. The residential lot widths vary from 185 feet to 330 feet.

Northern Property Line Visual Description – The northern property line is 900 feet long with 600-foot deep residential lots along the western portion. A dirt residential access road runs along this northern property line. A single home occupies the residential lot and is sited 200 feet away from the northern property line. The remainder of this property line to the east is industrial zoned land. The proposed industrial building is 115 feet south of the northern property line. There is road circulation and automobile parking in this setback area with some landscape screening. The property to the north is five (5) to 10 feet lower than the proposed industrial building.

Eastern Property Line Visual Description – The eastern property line is 1,300 feet long, 625 feet of which is four (4) residential large lot homes. The homes vary from 120 feet to 190 feet away from the property line. The building to building separation from the proposed industrial building to the single-family residential building varies between 365 feet to 420 feet. The eastern side of the industrial building is a loading/unloading area for trucks and employee parking. The elevation/grade change between the residential and the industrial varies from at-grade to an elevated grade of 10 feet for the industrial building. The remainder of the eastern property line is elevated 10 feet above the adjacent industrial properties.

The warehouse/logistics building and related facilities (parking bays, surface parking lot) will have a less than significant impact on scenic views from adjacent properties to the north, south and west. The Project Applicant/Developer has purchased the 4 residential large lot homes that border the Project site to the east.

In addition to perimeter landscaping and fencing that are part of Project development, the following indicate that the impact threshold will be less than significant.

Primary scenic views from the 4 residential dwellings on adjacent properties to the south and from the existing 4 single-family residences west of Patterson Avenue are toward the mountains to the northeast. In addition, the views of those residential properties also are toward the existing industrial building east of the Project site. The Project site is at an elevation lower than adjacent residential properties to the west and south. As stated above the corner of the warehouse/logistics building pad is 30 feet below the intersection of Patterson Avenue and Placentia Avenue, at the southwesterly corner of the Project site. The building sits approximately 24 feet below the intersection of Placentia Avenue and Patterson Avenue. Additionally, the 42-49.5-foot-tall building is set back 70 feet from the southerly property line and has a 60-foot landscaped area.

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The westerly building elevation sits on an industrial pad that is 30 feet below the Placentia Avenue/Patterson Avenue intersection at the southwesterly corner of the Project site. The building setback from the property line varies between 170 feet on the south to 135 feet on the north. Truck access, loading/unloading bays are provided along this side of the building. The top of the trucks will be between 15 and 25 feet below the grade of Patterson Avenue. Therefore, the residences to the west of the Project site (which also are in part set back significantly from Patterson Avenue) will view at most 34.5 feet of building at a distance of more than 135 feet from the property line in addition to the width of Patterson Avenue and from setback distance of those existing residential units.

One single-family residence is located on property bordering the Project site to the north and is sited 200 feet away from the northern property line. The proposed warehouse/logistics building is 115 feet south of the northern property line. Therefore, the existing residence is approximately 315 feet distant from the Project building. The distant view across the existing Project site from this residence is toward the 4 residences bordering the Project site to the south across Placentia Avenue rather than toward a scenic vista. Perimeter landscaping will soften the view of the Project building from this residence.

- c) **In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

Less than Significant Impact. Project site ground surface relief features will change somewhat during Project development in that Project development will necessitate grading that will involve cuts of approximately 16 feet and fills of approximately 15 feet to achieve proposed finished grades. Refer to a) above and Exhibits 2-4 and 2-5: *Site Photographs Existing Viewshed*.

CEQA Guidelines Section 15387 (Urbanized Area) defines “urbanized area” as “a central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile.” As such, the Project site is located within an urbanized area. Both the County of Riverside General Plan land use designation and the County of Riverside Zoning Code designations for the Project site allow the proposed warehouse/logistics building. In addition, the Mead Valley Area Plan provides for the proposed use.

Mt. Palomar Observatory - - Would the Project:

- a) **Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?**

Less than Significant Impact. The Project site is approximately 40 miles radius (62 miles highway driving) northwest of the Mount Palomar Observatory, within Zone B (defined as the circular ring area defined by two circles, one 45 miles in radius centered on Palomar observatory, the other the perimeter of Zone A, the circular area 15 miles centered on Palomar Observatory). All development projects within Zone B of the Mount Palomar Nighttime Lighting Policy Area are required to comply with Riverside County Ordinance No. 655 requirements (discussed below). Project operation will use low-pressure sodium lamps, security, parking lot, and parkway lighting in compliance with Riverside County Ordinance No. 655 requirements for Zone B structures.

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Other Lighting Issues - - Would the Project:

- a) **Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

Less than Significant Impact. The Project site currently is vacant and contains no sources of lighting. Project development and operation will create new sources of exterior light and glare that would be visible to adjacent residents. The new lighting will be security lighting, interior and exterior building lighting, and light emanating from truck traffic and employee vehicles. Project development and operation will be required to comply with Ordinance No. 655 (Regulating Light Pollution) provisions that require use of shielded light fixtures and timing restrictions so as not to conflict with Mount Palomar Observatory operations. In addition, Project development will be required to comply with Riverside County Ordinance No. 915 (Regulating Outdoor Lighting). This Ordinance requires (with certain exceptions) that outdoor lighting must be located, directed, and shielded from spilling onto adjacent properties, including roadways. Parking lot area lighting for the Project will utilize energy-efficient LED shielded fixtures with energy savings control options and occupancy sensing units. In addition, Project development and operation will comply with all County of Riverside requirements and County-imposed Standard Conditions.

Project lighting is characterized as Class II lighting; that is, “all outdoor lighting used for but not limited to illumination for walkways, private roadways and streets, equipment yards, parking lot and outdoor security.” Class II lighting may be left on all night.

Project development will include building materials and window treatments that will minimize daytime glare impacts to nearby residences and adjacent roadways. The Project structure will have room and exposure capability for installation of rooftop solar panels, which could result in glare experienced by nearby residences although the panels will not be oriented to spill glare onto adjacent properties.

- b) **Expose residential property to unacceptable light levels?**

Less than Significant Impact. Project development will include interior and exterior lighting. Exterior lighting for security and parking lot lighting will be ancillary to the proposed warehouse/logistics building. Project lighting (operational and security) will be confined to the Project site and will comply with requirements of Riverside County Ordinances Nos. 655 and 915. In addition to these required Project Design Features, Project development will set the proposed logistics/warehouse building back from adjacent residential properties and will include a 14-foot wall along its western boundary and a 17-foot wall along its eastern boundary to further shield adjacent residential properties. The County will impose Standard Conditions that will ensure any light impacts to adjacent residential properties will be maintained at a less than significant level.

4.1.4 CUMULATIVE IMPACTS

Scenic Resources Thresholds a), b), and c) – The Project site is relatively flat and varies in elevation by approximately 45 feet, as previously mentioned. As such, the Project site does not contribute to any prominent scenic vistas under existing conditions. Views of the Box Springs mountains are available from the Project vicinity and throughout the cumulative study area. Those views are not unique to the Project site vicinity. Development in the Project cumulative area would be required to comply with applicable

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General Plan County of Riverside and City of Perris policies, which in part regulate preservation of designated scenic resources. Therefore, Project buildout in combination with other developments completed and contemplated within the Project vicinity would not result in cumulatively significant impacts to scenic vistas. The resultant level of cumulative impacts would be less than significant.

As noted above, the Project site is not located within close proximity to any designated Scenic Highways and does not contain any scenic resources. Therefore, Project development has no potential contribution to a cumulatively significant impact to scenic resources.

Project development and new development in the surrounding area would be subject to applicable County of Riverside development regulations and design standards, including the County General Plan, Mead Valley Area Plan, and County Municipal Code. Mandatory compliance with development regulations and design standards would ensure development would incorporate high quality building and landscaping design and appearance. Project development would include a warehouse/logistics building that would be similar in design to nearby noted warehouse developments and thereby be aesthetically compatible with existing quality and character of that nearby warehouse development. Although residential development exists to the north, south and west of the Project site, the residential uses are separated from the Project site by roadways, as well as perimeter screen walls and landscaping proposed as part of Project development. Therefore, Project impacts will be less than cumulatively considerable to the existing visual character or quality of the Project site and vicinity.

Mount Palomar Observatory Threshold a) – As indicated above, the Project site is located within Zone B. Mandatory compliance with Riverside County Ordinance No. 655, including use of low-pressure sodium lamps, security, parking lot and parkway lighting. No interference with Mount Palomar Observatory operations would result. The cumulative level of impact will be less than significant due to required compliance with County requirements.

Other Lighting Issues Thresholds a) and b) – The County of Riverside Municipal Code requires shielding of outdoor light fixtures for new projects to limit “spillover” of light and glare onto adjacent properties. This would minimize light and glare and maintain acceptable levels of light emanating from new projects. Therefore, the cumulative effect from development on vacant land to the surrounding area as well as to the Mount Palomar Observatory would be less than significant.

4.1.5 APPLICABLE REGULATIONS AND STANDARD CONDITIONS

County of Riverside Ordinance No. 655

The Riverside County Board of Supervisors adopted Ordinance No. 655 (Regulating Light Pollution) on June 7, 1988. The intent of the Ordinance “is to restrict the permitted use of certain light fixtures emitting into the night sky undesirable light rays which have a detrimental effect on astronomical observation and research.” Ordinance No. 655 requires use of low-pressure sodium lamps that are shielded and identifies timing restrictions based on the type of lighting source. In addition, Ordinance No. 655 provides standards for preferred sources of illumination (low-pressure sodium lamps), shielding (“fully shielded if feasible and partially shielded in all other cases, and must be focused to minimize spill light into the night sky and onto adjacent properties”), hours of operation, and outdoor advertising display.

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County of Riverside Ordinance No. 915

Ordinance No. 915, adopted on December 20, 2011, requires (with certain exceptions) that outdoor lighting must be located, directed, and shielded from spilling onto adjacent properties, including roadways.

County of Riverside General Plan

Scenic Corridors

Policy LU 14.1 – Preserve and protect outstanding scenic vistas and visual features for the enjoyment of the traveling public.

Policy LU 14.8 – Avoid the blocking of public views by solid walls.

Mead Valley Area Plan

MVAP 8.1 – Adhere to the lighting requirements specified in Riverside County Ordinance No. 655 for standards that are intended to limit light leakage and spillage that may interfere with the operations of the Mount Palomar Observatory.

4.1.6 PROJECT DESIGN FEATURES

PDF-AE-1: The Project building will utilize low-pressure sodium lamps, security, parking lot and parkway lighting in compliance with Riverside County Ordinance No. 655.

PDF-AE-2: Loading/unloading docks and parking lot will incorporate energy-efficient LED shielded fixtures with energy savings control options and occupancy sensing units.

4.1.7 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

The Project site does not comprise all or part of a scenic vista and does not contain any visually prominent scenic features. No unique views to scenic vistas are visible from the Project site. The Project would not substantially change a scenic view or substantially block or obscure a scenic vista. Therefore, Project impacts to scenic vistas would be less than significant.

The Project site is not located within the viewshed of a scenic highway and does not contain any scenic resources that would be visible from a scenic highway.

Although Project development would change the visual character of the Project site from a vacant property to a development containing a 699,630 square foot, 42 to 49.5 foot tall warehouse/logistics building, the Project includes site design, architectural elements, landscaping and wall treatments that would ensure the surrounding visual character and quality is not substantially impacted.

Project development and operation would create light and glare not present on the existing property. However, the Project Design Features and compliance with County of Riverside requirements pertaining to artificial lighting would ensure light and glare impacts would remain at a less than significant level.

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4.1.8 MITIGATION MEASURES

No Mitigation Measures are required.

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4.2 AGRICULTURAL RESOURCES

4.2.1 ENVIRONMENTAL SETTING

The Project site is located within an area the Riverside County General Plan (and Farmland Mapping and Monitoring Program of the California Resources Agency) designates as “Farmland of Local Importance.” Agricultural activities occurred on the Project site in the distant past. However, the existing Project site is vacant, unused, has grade differentials of approximately 45 feet, and is surrounded by non-agricultural uses. The Project site is not utilized for farmland purposes and is not zoned for agricultural uses. In addition, the Project site is not subject to a Williamson Act contract and is not located within a Riverside County Agricultural Preserve.

The Project site is not zoned for forest land, timberland or timberland production. The Project site also does not contain forest land. No agricultural forest uses occur on the Project site.

4.2.2 THRESHOLDS OF SIGNIFICANCE

The County of Riverside has adopted Thresholds of Significance that vary in some cases topically and in format from the Appendix G Thresholds, as reflected in the Initial Study prepared for the Project. This EIR uses the following County-adopted Thresholds of Significance to comprise the basis of impact analyses related to Agriculture and Forestry Resources.

Agriculture

Would the Project - -

- 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?**
- 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?**
- c) Cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 “Right-to-Farm)?**
- d) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland of non-agricultural use?**

Forest

Would the Project - -

- 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 Government Code Section 51104(g))?**

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- b) **Result in the loss of forest land or conversion of forest land to non-forest use?**
- 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?**

4.2.3 ENVIRONMENTAL IMPACTS

Agriculture

Would the Project - -

- 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?**

No Impact. This threshold of significance was addressed in the Initial Study prepared for the Project (reference Appendix A, NOP/IS), which indicated no impact would occur. Therefore, no additional analysis is warranted or provided.

- 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?**

No Impact. This threshold of significance was addressed in the Initial Study prepared for the Project, which indicated no impact would occur. Therefore, no additional analysis is warranted or provided.

- c) **Cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 “Right-to-Farm)?**

Less than Significant Impact. The Project would be developed as a warehouse/logistics building with attendant parking; that is, with non-agricultural uses within 300 feet of agriculturally zoned property. Three parcels bordering the Project site to the west, one parcel bordering the Project site to the north, and one parcel bordering the Project site to the east all are designated “Light Agriculture (A-1-1). However, all these parcels are developed with single-family residences. No agricultural activities occur on those properties. According to County of Riverside Ordinance No. 625, “agricultural activity, operation, or facility, or appurtenances thereof” includes (but is not limited to) cultivation and tillage of the soil, dairying, production, cultivation, growing and harvesting of any agricultural commodity, including timber, viticulture, apiculture or horticulture, raising of livestock, furbearing animals, fish or poultry, practices performed by a farmer or on a farm as incident to or in conjunction with such farming operations, including preparation for market, delivery to storage or to market, or to carriers for transportation to market. This Ordinance is focused to ensure agricultural activities are not considered to be a “nuisance” to nearby non-agricultural uses. Since all the agriculturally-zoned properties have residential uses, the resultant Project impact would be less than significant.

- d) **Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland of non-agricultural use?**

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No Impact. This threshold of significance was addressed in the Initial Study prepared for the Project, which indicated no impact would occur. Therefore, no additional analysis is warranted or provided.

Forest

Would the Project - -

- 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 Government Code Section 51104(g))?**

No Impact. This threshold of significance was addressed in the Initial Study prepared for the Project, which indicated no impact would occur. Therefore, no additional analysis is warranted or provided.

- b) **Result in the loss of forest land or conversion of forest land to non-forest use?**

No Impact. This threshold of significance was addressed in the Initial Study prepared for the Project, which indicated no impact would occur. Therefore, no additional analysis is warranted or provided.

- 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?**

No Impact. This threshold of significance was addressed in the Initial Study prepared for the Project, which indicated no impact would occur. Therefore, no additional analysis is warranted or provided.

4.2.4 CUMULATIVE IMPACTS

Agriculture Thresholds a), b), c), and d) – The Project site is within an area the Riverside County General Plan (and Farmland Mapping and Monitoring program of the California Resources Agency) designates as “Farmland of Local Importance.” Agricultural activities took place on the Project site in the distant past.

However, the Project site is vacant, unused, has grade differentials of approximately 45 feet. In addition, although several properties adjacent to the Project site are agriculturally zoned (A-1-1 – Light Agriculture), those properties are developed with single-family residences and not used for agricultural purposes.

Forest Thresholds a), b), and c) – The Project site does not contain forest land and therefore Project development and operation will not result in loss of such land or conversion of forest land to non-forest use. No forest uses occur on the Project site and therefore Project development and operation will not involve conversion of forest land to non-forest use. Therefore, Project development in combination with other properties developed as warehouse uses in the cumulative analysis area will not result in a cumulative impact to Agriculture and Forestry Resources.

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4.2.5 EXISTING REGULATIONS AND STANDARD CONDITIONS

Riverside County General Plan

Multipurpose Open Space Element

The County of Riverside General Plan Multipurpose Open Space Element addresses protection and preservation of natural resources, agriculture and open space areas, management of mineral resources, preservation and enhancement of cultural resources, and provision of recreational opportunities for citizens of Riverside County. This Element has policies that pertain to Agriculture and Forestry Resources, as follows.

Policy OS 7.3 – Encourage conservation of productive agricultural lands and preservation of prime agricultural lands.

Policy OS 7.5 – Encourage the combination of agriculture with other compatible open space uses in order to provide an economic advantage to agriculture. Allow by right, in areas designated Agriculture, activities related to the production of food and fiber, and support uses incidental and secondary to the on-site agricultural operation.

County of Riverside Ordinance No. 625

When the County of Riverside Board of Supervisors passed Ordinance No. 625, they made the following findings where non-agricultural land uses extend into agricultural areas or exist side-by-side, and thereby often became the subjects of nuisance complaints:

“It is the declared policy of the County of Riverside that no agricultural activity, operation, or facility, or appurtenances thereof, conducted or maintained for commercial purposes in the unincorporated area of the County, 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.”

Mead Valley Area Plan

The Mead Valley Area Plan “Land Use Assumptions and Calculations” indicate no acreage designated as Agriculture (AG).

Standard Conditions/Project Design Features

No impacts related to Agriculture and Forest Resources have been identified. Therefore, no County of Riverside Standard Conditions apply to the Project. In addition, the Project will not include Design Features that pertain to Agriculture and Forest Resources.

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4.2.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Project development and operation will not impact Agriculture and Forest Resources, as indicated by the above analysis.

4.2.7 MITIGATION MEASURES

No Mitigation Measures are required.

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4.3 AIR QUALITY

The analysis in this Section is based on information presented in the following documents:

- County of Riverside General Plan;
- Riverside County General Plan EIR No. 521 for GPA No. 960;
- Mead Valley Area Plan; and
- *Barker Logistics Air Quality Impact Analysis, County of Riverside* (Urban Crossroads, Inc.) May 1, 2020 (AQIA); and
- *Barker Logistics Mobile Source Health Risk Assessment, County of Riverside* (Urban Crossroads, Inc.) December 17, 2018 (HRA).

Please also refer to Appendices D and O of this EIR.

4.3.1 ENVIRONMENTAL SETTING

The Project site is located on the northeast corner of Patterson Avenue and Placentia Street. The Project site is bordered by existing single-family residential and vacant land uses north of the Project site, single-family residential uses south and west of the Project site, and single-family residential and industrial/manufacturing uses east of the Project site. The 31.55-acre Project site is vacant, has been graded intermittently, and is home to grasses and to several trees in the southwesterly portion of the property.

South Coast Air Basin

The Project site is located within the South Coast Air Basin (SCAB) under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAB is a 6,745 square mile sub-region of the SCAQMD and includes portions of Los Angeles, Riverside and San Bernardino Counties, and all of Orange County. The larger SCAQMD district boundary includes 10,743 square miles. The SCAB is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino and San Jacinto Mountains to the north and east. The Los Angeles County portion of the Mojave Desert Air Basin is bounded by the San Gabriel Mountains to the south and west, the Los Angeles/Kern County border to the north, and the Los Angeles/San Bernardino County border to the east. The Riverside County portion of the Salton Sea Air Basin is bounded by the San Jacinto mountains in the west and spans eastward up to the Palo Verde Valley.

The SCAQMD was created by the 1977 Lewis-Presley Air Quality Management Act, which merged four county air pollution control bodies into one regional district. Under the Act, the SCAQMD is responsible for bringing air quality in areas under its jurisdiction into conformity with Federal and State air quality standards.

Regional Climate

Regional climate has a substantial influence on air quality in the SCAB. The temperature, wind, humidity, precipitation and amount of sunshine influence air quality. Average annual temperatures throughout the SCAB vary from the low-to-mid 60s (degrees Fahrenheit). Although the climate of the SCAB can be characterized as semi-arid, the air near the land surface is quite moist on most days due to the presence of a marine layer. Humidity restricts visibility in the SCAB, and the conversion of sulfur dioxide to sulfates is heightened in air with high relative humidity. The marine layer provides an environment for that conversion process, especially during the spring and summer months. Annual average relative humidity within the SCAB is 71 percent along the coast and 59 percent inland. More than 90 percent of the SCAB's

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rainfall occurs from November through April. Annual average rainfall varies from approximately nine inches in Riverside to fourteen inches in downtown Los Angeles.

The importance of wind to air pollution is considerable. Direction and speed of wind determines the horizontal dispersion and transport of air pollutants. During late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with 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 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.

In the SCAB, there are two distinct temperature inversion structures that control vertical mixing of air pollution. During 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 that effectively acts as an impervious lid to pollutants over the entire SCAB.

A second inversion-type forms in conjunction with the drainage of cool air off 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 winter and typically are only a few hundred feet above mean sea level. These inversions effectively trap pollutants such as NO_x and CO from vehicles, as the pool of cool air drafts seaward. Winter therefore is a period of high levels of primary pollutants along the coastline.

Criteria Pollutants/Health Effects of Air Pollutants

Criteria pollutants are pollutants regulated through development of human health based and/or environmentally based criteria for setting permissible levels. Criteria pollutants, their typical sources, and health effects are identified as follows.

Carbon Monoxide (CO)

Carbon Monoxide is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels such as gasoline or wood. CO concentrations tend to be highest during winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Motor vehicles operating at slow speeds are the primary source of CO in the SCAB. Thereby, the highest ambient CO concentrations generally are found near congested transportation corridors and intersections.

Individuals with a deficient blood supply to the heart are the most susceptible to adverse effects of CO exposure. Observed effects include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of decreased oxygen supply to the heart. 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. Hence, conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. Individuals most at risk include fetuses, patients with diseases involving heart and blood vessels, and patients with chronic hypoxemia (oxygen deficiency) as seen at high altitudes. Recent studies have found increased risks for adverse birth outcomes with exposure to elevated CO levels, including pre-term births and heart abnormalities.

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Sulfur Dioxide (SO₂)

Sulfur Dioxide (SO₂) is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant primarily 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).

A few minutes of exposure to low levels of SO₂ can result in airway constriction in some asthmatics, all of whom are sensitive to its effects. In asthmatics, increase in resistance to air flow, as well as reduction in breathing capacity leading to severe breathing difficulties, are observed after acute exposure to SO₂. In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of SO₂. Some population-based studies indicate mortality and morbidity effects associated with fine particles show a similar association with ambient SO₂ levels. In these studies, efforts to separate effects of SO₂ from those of fine particles have not been successful. It is not clear whether the two pollutants act synergistically or one pollutant alone is the predominant factor.

Nitrogen Oxides (Oxides of Nitrogen, or NO_x)

Nitrogen oxides (NO_x) comprise 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. NO_x is 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. 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 an increase in acute respiratory illness including infections and respiratory symptoms in children (not infants) is associated with long-term exposure to NO₂ at levels found in homes with gas stoves (which are higher than ambient levels found in Southern California). Increase in resistance to air flow and airway contraction is observed after short-term exposure to NO₂ in healthy subjects. Larger decreases in lung functions are observed in individuals with asthma or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups.

Ozone (O₃)

Ozone (O₃) is a highly reactive and unstable gas formed when volatile organic compounds (VOC) and NO_x (which are both byproducts of internal combustion engine exhaust) undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations generally are highest during summer months when direct sunlight, light wind and warm temperature conditions are favorable to formation of this pollutant.

Individuals exercising outdoors, children, and people with preexisting lung disease are considered to be the most susceptible sub-groups for ozone effects. 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. Elevated ozone levels are associated with increased school absences, with

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increases in daily hospital admission rates, and mortality. An increased risk for asthma has been found in children who participate in multiple outdoor sports and live in communities with high ozone levels. Animal studies suggest exposure to a combination of pollutants that includes ozone may be more toxic than exposure to ozone alone. Although lung volume and resistance changes observed after a single exposure diminish with repeated exposures, biochemical and cellular changes appear to persist, which can lead to subsequent lung structural changes.

Particulate Matter less than 10 microns (PM₁₀)

This pollutant is a major air pollutant consisting of tiny solid or liquid particles of soot, dust, smoke, fumes and aerosols. Particulate matter pollution is a major cause of reduced visibility caused by the scattering of light and consequently a significant reduction in air clarity. The size of the particles of this criteria pollutant allows the particles to easily enter the lungs where they may be deposited, resulting in adverse health effects.

Particulate Matter less than 2.5 microns (PM_{2.5})

These particles comprising this criteria pollutant 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 releases from power plants, automobiles and other types of combustion sources. The chemical composition of fine particles highly depends on location, time of year, and weather conditions.

A consistent correlation between elevated ambient fine Particulate Matter (PM₁₀ and PM_{2.5}) levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. In recent years, 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 also have been related to hospital admissions for acute respiratory conditions in children, to school and kindergarten absences, 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 with pre-existing respiratory or cardiovascular disease, and children appear to be more susceptible to effects of high levels of PM₁₀ and PM_{2.5}.

Volatile Organic Compounds (VOC)

Volatile organic compounds (VOC) 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. These compounds often have an odor. Some examples include gasoline, alcohol, and solvents used in paints. Exceptions to the VOC designation include the following: carbon monoxide; carbon dioxide; carbonic acid; metallic carbides or carbonates; and, ammonium carbonate. VOCs are a criteria pollutant because they are a precursor to Ozone. The SCAQMD uses the terms VOC and ROG interchangeably.

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Reactive Organic Gases (ROG)

Reactive Organic Gases (ROG) are precursors in forming Ozone and consist of compounds containing methane, ethane, propane, butane, and longer chain hydrocarbons that typically are the result of some type of combustion or decomposition process. Smog is formed when ROG and NO_x react in the presence of sunlight. ROG are a precursor to Ozone.

Lead (Pb)

Lead is a heavy metal that is highly persistent in the environment. In the past, the primary source of lead in the air was emissions from vehicles burning leaded gasoline. As a result of removal of lead from gasoline, there have been no violations at any of the SCAQMD regular air monitoring stations since 1982. Major sources of lead emissions are ore and metals processing, particularly lead smelters, and piston-engine aircraft operating on leaded aviation gasoline. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers.

Fetuses, infants and children are more sensitive than others to adverse effects of Lead exposure. Exposure to low levels of Lead can adversely affect 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 although it appears there are no direct effects of Lead on the respiratory system. Lead can be stored in the bone from early age environmental exposure and elevated blood Lead levels can occur due to breakdown of bone tissue during pregnancy, hyperthyroidism (increased secretion of hormones from the thyroid gland) and osteoporosis (breakdown of bony tissue). Fetuses and breast-fed babies can be exposed to higher levels of Lead because of previous environmental Lead exposure of their mothers.

Odors

The science of odor as a health concern is still new. Offensive odors can potentially affect human health in several ways. Odorant compounds can irritate the eye, nose and throat, which can reduce respiratory volume. Also, studies have shown the VOCs that cause odors can stimulate sensory nerves to cause neurochemical changes that might influence health by compromising the immune system. Furthermore, unpleasant odors can trigger memories or attitudes linked to unpleasant odors, causing cognitive and emotional effects such as stress.

Existing Air Quality

Existing air quality is measured at established SCAQMD air quality monitoring stations. Monitored air quality is evaluated in the context of ambient air quality standards, which are the levels of air quality considered safe, with an adequate margin of safety, to protect the public health and welfare. Determination of whether a region's air quality is healthful or unhealthful is determined by comparing contaminant levels in ambient air samples to State and Federal standards.

Air quality in a region is considered to be in attainment by the State if the measured ambient air pollutant levels for Ozone, Carbon Monoxide (except 8-hour Lake Tahoe), Sulfur Dioxide (1 and 24 hour), Nitrogen Dioxide, PM₁₀ and PM_{2.5} are not to be exceeded. All others are not to be equaled or exceeded.

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Regional Air Quality

The United States Environmental Protection Agency has established national ambient air quality standards for six of the most common air pollutants: Carbon Monoxide; Lead; Ozone; Particulate Matter – 10 Microns or less; Particulate Matter – 2.5 Microns or less; Nitrogen Dioxide; and, Sulfur Dioxide, all of which are criteria pollutants. The SCAQMD monitors levels of various criteria pollutants at 37 permanent monitoring stations and 5 single-pollutant source Lead air monitoring sites throughout the air district. In 2017, Federal and State ambient air quality standards were exceeded on one or more days for Ozone, PM₁₀ and PM_{2.5} at most monitoring locations. No areas of the SCAB exceeded Federal or State standards for Nitrogen Dioxide, Sulfur Dioxide, Carbon Monoxide, Sulfates or Lead. The following **Table 4.3.1** indicates the attainment status of criteria pollutants in the South Coast Air Basin.

Table 4.3.1 – Attainment Status of Criteria Pollutants in the South Coast Air Basin

Criteria Pollutant	State Designation	Federal Designation
Ozone – 1-hour standard	Nonattainment	--
Ozone – 8-hour standard	Nonattainment	Nonattainment (“Extreme”)
PM₁₀	Nonattainment	Attainment (Maintenance)
PM_{2.5}	Nonattainment	Nonattainment (“Serious”)
Carbon Monoxide	Attainment	Unclassifiable/Attainment
Nitrogen Dioxide	Attainment	Unclassifiable/Attainment
Sulfur Dioxide	Unclassifiable/Attainment	Unclassifiable/Attainment
Lead	Attainment	Unclassifiable/Attainment

According to the “Ambient and Emission Trends of Toxic Air Contaminants in California” journal article prepared for the California Air Resources Board, between 1990 and 2012 ambient concentration and emission trends for the seven toxic air contaminants responsible for most of known cancer risk associated with airborne exposure in California have declined significantly. The toxic air contaminants include those derived from mobile sources (diesel particulate matter, benzene and 1,3-butadiene), from stationary sources (perchloroethylene and hexavalent chromium), and from photochemical reactions of emitted volatile organic compounds (formaldehyde and acetaldehyde). The decline in ambient concentration and emission trends of these toxic air contaminants are a result of various regulations the California Air Resources Board has implemented to address cancer risk.

Local Air Quality

The Project site is located within the Source Receptor Area (SRA) 24. Within SRA 24, the SCAQMD Perris Valley monitoring station is located 2.58 miles southeast of the Project site and is the nearest long-term air quality monitoring site for Ozone and PM₁₀. The SCAQMD Elsinore Valley (SRA 25) monitoring station is located 10.19 miles southwest of the Project site and is the next nearest monitoring site and provides data for Carbon Monoxide and Nitrogen Dioxide. The nearest site that monitors PM_{2.5} is the SCAQMD Metropolitan Riverside County 1 (SRA 23) station located 15.78 miles northwest of the Project site. The following Table indicates the number of days ambient air quality standards were exceeded for the study area. Data for Sulfur Dioxide has been omitted because attainment is regularly met in the SCAB and few monitoring stations measure Sulfur Dioxide concentrations. The following **Table 4.3.2** contains a summary of Project area air quality monitoring between 2016 and 2018.

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Table 4.3.2 – Project Area Air Quality Monitoring Summary, 2016-2018

POLLUTANT	STANDARD	YEAR		
		2016	2017	2018
O₃				
Maximum Federal 1-Hour Concentration (ppm)		0.131	0.120	0.117
Maximum Federal 8-Hour Concentration (ppm)		0.098	0.105	0.103
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	23	33	31
Number of Days Exceeding State/Federal 8-Hour Standard	> 0.070 ppm	56	80	67
CO				
Maximum Federal 1-Hour Concentration	> 35 ppm	1.2	1.2	1.1
Maximum Federal 8-Hour Concentration	> 20 ppm	0.6	0.8	0.8
NO₂				
Maximum Federal 1-Hour Concentration	> 0.100 ppm	0.051	0.049	0.041
Annual Federal Standard Design Value		0.008	0.008	0.009
PM₁₀				
Maximum Federal 24-Hour Concentration (ug/m ³)	> 150 ug/m ³	76	75	104
Annual Federal Arithmetic Mean (ug/m ³)		32.2	32.2	22.4
Number of Days Exceeding Federal 24-Hour Standard	> 150 ug/m ³	0	0	0
Number of Days Exceeding State 24-Hour Standard	> 50 ug/m ³	5	11	9
PM_{2.5}				
Maximum Federal 24-Hour Concentration (ug/m ³)	> 35 ug/m ³	39.12	50.3	50.7
Annual Federal Arithmetic Mean (ug/m ³)	> 12 ug/m ³	12.54	12.18	12.41
Number of Days Exceeding Federal 24-Hour Standard	> 35 ug/m ³	4	6	2

The Project site is vacant. Therefore, existing air quality conditions at the Project site generally would reflect ambient monitored conditions as presented above.

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4.3.2 THRESHOLDS OF SIGNIFICANCE

The County of Riverside has adopted Thresholds of Significance that vary in some cases topically and in format from the Appendix G Thresholds, as reflected in the Initial Study prepared for the Project. This EIR uses the following County-adopted Thresholds of Significance to comprise the basis of impact analyses.

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the Project - -

- a) **Conflict with or obstruct implementation of the applicable air quality plan?**
- b) **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?**
- c) **Expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations?**
- d) **Result in other emissions (such as those leading to odors) affecting a substantial number of people?**

4.3.3 ENVIRONMENTAL IMPACTS

- a) **Conflict with or obstruct implementation of the applicable air quality plan?**

Significant and Unavoidable Impact. The SCAQMD has developed regional significance thresholds for regulated pollutants – as presented in **Table 4.3.3** below. SCAQMD CEQA Air Quality Significance Thresholds (March 2015) indicate any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

Table 4.3.3 – SCAQMD CEQA Air Quality Significance Thresholds

POLLUTANT	CONSTRUCTION	OPERATIONS
Regional Thresholds		
Nitrous Oxides	100 pounds per day	55 pounds per day
Volatile Organic Compounds	75 pounds per day	55 pounds per day
Particulate Matter ₁₀	150 pounds per day	150 pounds per day
Particulate Matter _{2.5}	55 pounds per day	55 pounds per day
Oxides of Sulfur	150 pounds per day	150 pounds per day
Carbon Monoxide	550 pounds per day	550 pounds per day
Lead	3 pounds per day	3 pounds per day

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The Project AQIA employs the current (October 17, 2017) California Emissions Estimator Model (CalEEMod) to calculate construction-source and operational-source criteria pollutant and greenhouse gas emissions; and to quantify applicable air quality and greenhouse gas reductions achieved from Mitigation Measures. Please refer to detailed discussions and air quality modeling presented in the Project AQIA (EIR Appendix D).

The Project site is located within the SCAB, which is characterized by relatively poor air quality. Currently, State and Federal air quality standards are exceeded in most parts of the SCAB. As a result, the SCAQMD has adopted a series of Air Quality Management Plans (AQMP) to meet State and Federal ambient air quality standards. AQMP are updated regularly to more effectively reduce emissions, accommodate growth, and minimize any negative fiscal impacts of air pollution control on the economy.

In March 2017, the AQMD released the Final 2016 AQMP, which continued to evaluate current integrated strategies and control measures to meet the National Ambient Air Quality Standards (NAAQS) as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the Federal, State and local levels. The 2016 AQMP incorporates scientific and technological information and planning assumptions that include the 2016 Regional Transportation Plan/Sustainable Communities Strategy and updated emission inventory methodologies for various source categories.

Project consistency with the AQMP is determined using the 2016 AQMP. Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD CEQA Air Quality Handbook (1993). The indicators are as follows - -

- **Consistency Criterion Number 1:** The project under construction 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.

The violations that Consistency Criterion No. 1 refers to are the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if regional thresholds or localized significance thresholds (LSTs) were exceeded.

- **Consistency Criterion Number 2:** The project under consideration will not exceed the assumptions in the AQMP based on the years of Project build-out phase.

The 2016 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in County of Riverside General Plan is considered to be consistent with the AQMP.

Criterion Number 1

As substantiated in this Section, Project construction-source emissions (as mitigated), and operational-source emissions would not exceed applicable LSTs. However, even with application of mitigation, Project operational-source NO_x emissions would exceed the applicable SCAQMD threshold. On this basis, the Project is determined to be inconsistent with the first criterion.

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Criterion Number 2

Per the County General Plan, the Project is located within the Mead Valley Area Plan and is designated as a Business Park (BP) Land Use. The BP Land Use designation, which is reflected in the 2016 AQMP, would allow for development of “employee-intensive uses, including research and development, technology centers, corporate and support office uses, clean industry and supporting retail uses.” The Project proposes 699,630 square feet of high-cube fulfillment center use. The uses proposed by the Project are not specifically envisioned under the County’s land use designation. On this basis, the Project is determined to be inconsistent with the second criterion.

No feasible mitigation exists that would reduce Project operational-source NOx emissions to levels that would be less-than-significant. Further, the Project uses are those reflected in the EIR Project Description and are the uses evaluated throughout this EIR. Substantial modification of the Project uses would comprise a development proposal other than that proposed by the Applicant and evaluated in this EIR. On this basis, there are no feasible measures that would resolve potential AQMP inconsistencies identified here. On this basis, the Project AQMP inconsistency impacts are considered significant and unavoidable.

- b) 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?**

Significant and Unavoidable Impact. The following **Table 4.3.4** depicts National Ambient Air Quality Standards and California Ambient Air Quality Standards currently in effect.

Table 4.3.4 – Ambient Air Quality Standards

AMBIENT AIR QUALITY STANDARDS						
Pollutant	Averaging Time	California Standards		National Standards		
		Concentration	Method	Primary	Secondary	Method
Ozone	1 Hour	0.09 ppm	Ultraviolet Photometry	--	--	Ultraviolet Photometry
	8 Hour	0.070 ppm		0.70 ppm	0.070 ppm	
Respirable Particulate Matter	24 Hour	50ug/m	Gravimetric or Beta Attenuation	150 ug/m	150 ug/m	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 ug/m		--	--	
Fine Particulate Matter	24 Hour	--	--	35 ug/m	35 ug/m	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 ug/m	Gravimetric or Beta Attenuation	12.0 ug/m	12.0 ug/m	
Carbon Monoxide	1 Hour	20 ppm	Non-Dispersive Infrared Photometry	35 ppm	--	Non-Dispersive Infrared Photometry
	8 Hour	9.0 ppm		9 ppm	--	
	8 Hour (Lake Tahoe)	6 ppm		--	--	
Nitrogen Dioxide	1 Hour	0.18 ppm	Gas Phase Chemiluminescence	100 ppb	--	Gas Phase Chemiluminescence
	Annual Arithmetic	0.030ppm		0.053 ppm	0.053 ppm	

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	Mean					
Sulfur Dioxide	1 Hour	0.25 ppm	Ultraviolet Fluorescence	75 ppb	--	Ultraviolet Fluorescence Spectrometry (Para-Rosaline Method)
	3 Hour	--		--	0.5 ppm	
	24 Hour	0.04 ppm		0.14 ppm (for certain areas)	--	
	Annual Arithmetic Mean	--		0.030 (for certain areas)	--	
Lead	30 Day Average	1.5 ug/m	Atomic Absorption	--	--	High Volume Sampler and Atomic Absorption
	Calendar Quarter Rolling 3-Month Average	--		1.5 ug/m (for Certain Areas)	1.5 ug/m (for Certain Areas)	
		--		0.15 ug/m	0.15 ug/m	
Visibility Reducing Particles	8 Hour	Extinction of 0.23 per kilometer Extinction of 0.07 per kilometer (Lake Tahoe only)	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24 Hour	25 ug/m	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm	Ultraviolet Fluorescence			
Vinyl Chloride	24 Hour	0.01 ppm	Gas Chromatography			

Construction-Source Emissions

Project development (construction activities) will result in emissions of VOC, NO_x, Sulfur Oxides (SO_x), Carbon Monoxide (CO), and Particulate Matter 10 and 2.5 (PM₁₀, PM_{2.5}). The following construction activities will result in emissions: site preparation; grading; building construction; paving; and, architectural coating.

The anticipated Project construction schedule is presented at **Table 4.3.5**. The sequencing and duration of construction activities was based on the Project 2021 Opening Year. Should construction occur subsequent to the time frames outlined at Table 4.3.5, the resulting construction-source emissions would likely be diminished when compared to the emissions evaluated in this Section. This is because emission factors for construction activities decrease as time passes and the analysis year increases due to increasingly stringent emission regulations.

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Table 4.3.5 – Construction Duration

Phase Name	Start Date	End Date	Days
Site Preparation	4/1/2020	4/14/2020	10
Grading	4/15/2020	6/16/2020	45
Building Construction	6/17/2020	6/29/2021	270
Paving	6/30/2020	8/10/2021	30
Architectural Coating	5/5/2021	8/10/2021	70

Table 4.3.6 includes a detailed summary of construction equipment. The duration of construction activity and associated equipment represent a reasonable approximation of the expected construction fleet as required per *CEQA Guidelines*.

Table 4.3.6 – Construction Equipment Assumptions

Activity	Equipment	Amount	Hours Per Day
Site Preparation	Rubber Tired Dozers	3	8
	Tractors/Loaders/Backhoes	4	8
Grading	Excavators	2	8
	Graders	1	8
	Rubber Tired Dozers	1	8
	Scrapers	2	8
	Tractors/Loaders/Backhoes	2	8
Building Construction	Cranes	1	8
	Forklifts	3	8
	Generator Sets	1	8
	Tractors/Loaders/Backhoes	3	8
	Welders	1	8
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	8

The Project is expected to generate 15,000 cubic yards of import soil. Dust typically is a major concern during rough grading activities. These emissions are called “fugitive emissions” because they are not amenable to collection and discharge through a controlled source. Fugitive dust emissions rates vary as a function of parameters such as soil silt, soil moisture, wind speed, area disturbed, number of vehicles, and depth of disturbance or excavation. CalEEMod was used to calculate fugitive dust emissions resulting from this phase of activity. Construction emissions for construction worker vehicles traveling to/from the Project site and vendor trips were estimated based on information CalEEMod model defaults.

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SCAQMD Rules currently applicable during Project construction activities include but are not limited to Rule 1113 (Architectural Coatings) and Rule 403 (Fugitive Dust).

Estimated maximum daily construction emissions without mitigation are summarized in **Table 4.3.7** below and show that under the assumed scenarios, Project construction-source emissions would not exceed applicable SCAQMD regional thresholds, and would therefore be less-than-significant.

Table 4.3.7
Overall Construction Emissions Summary (without mitigation)

Year	Emissions (lbs./day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summer Scenario						
2020	5.67	60.12	44.29	0.15	10.89	6.11
2021	5.14	40.23	41.65	.014	8.65	3.07
Winter Scenario						
2020	5.64	60.21	40.73	0.14	10.89	6.11
2021	5.13	40.11	38.36	0.14	8.65	3.07
Maximum Daily Emissions	5.67	60.21	44.29	0.15	10.89	6.11
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Mitigation is not necessary to reduce the above-noted estimated maximum daily construction-source regional emissions. Mitigation Measures applied to decrease localized emissions (see below) would further reduce already less than significant construction-source emissions (please refer to **Table 4.3.8**).

Table 4.3.8
Overall Construction Emissions Summary (with mitigation)

Year	Emissions (lbs./day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summer Scenario						
2020	5.67	60.12	44.29	.015	8.91	4.76
2021	5.14	10.23	41.65	0.14	8.65	3.07
Winter Scenario						
2020	5.64	60.21	40.73	0.14	8.91	4.76
2021	5.13	40.11	38.36	0.14	8.65	3.07
Maximum Daily Emissions	5.67	30.21	44.29	.015	8.91	4.76
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

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Operational-Source Emissions

Project operations will result in emissions of VOC, NO_x, SO_x, CO, and PM₁₀/PM_{2.5}. Operational emissions would be expected from the following primary sources: area source emissions; energy source emissions; and, mobile source emissions.

Area Source Emissions

- **Architectural Coatings** – Over time, the proposed warehouse/logistics building will be subject to emissions resulting from evaporation of solvents contained in paints, varnishes, primers and other surface coatings as part of Project maintenance. Emissions associated with architectural coatings were calculated using the CalEEMod model.
- **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 that when released in the atmosphere can react to form ozone and other photochemically reactive pollutants. Emissions associated with use of consumer products were calculated based on defaults provided within the CalEEMod model.
- **Landscape Maintenance Equipment** – Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Such equipment would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws and hedge trimmers used to maintain Project landscaping. Emissions associated with landscape maintenance equipment were calculated based on assumptions provided in the CalEEMod model.

Energy Source Emissions

- **Combustion Emissions Associated with Natural Gas and Electricity** – Criteria pollutants are emitted through generation of electricity and consumption of natural gas. Only natural gas use is considered in the impact analysis because electrical generating facilities for the Project area are located either outside the region or offset through use of pollution credits. Emissions associated with natural gas use were calculated using the CalEEMod model.

Mobile Source Emissions

- **Vehicles** – Project related operational air quality impacts derive primarily from vehicle trips generated by the Project. Mobile source air quality impacts are dependent on both overall daily vehicle trip generation and the effect of the Project on peak hour traffic volumes and Project vicinity Project operations. Trip characteristics in the “Traffic Impact Analysis” prepared for the Project were utilized in the mobile source air quality analysis. The Project is expected to generate a total of approximately 1,548 trip-ends per day and includes 276 truck trip-ends per day. The total truck percentage is comprised of two different truck types: 2 – 4 axle and 5+ axle trucks. The analysis assumed 50 percent of the 2-4 axle trucks are light heavy duty and the remainder are medium heavy duty. The following truck fleet mix was utilized to estimate the truck trip fleet mix to estimate the truck trip generation for the Project: 21.5% as 2-axle trucks; 21.5% as 3-4 axle trucks; and, 57% as 5+ axle trucks.

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Fugitive Dust Related to Vehicular Travel

Vehicles traveling on paved roads would be a source of fugitive emissions due to generation of road dust inclusive of brake and tire wear particulates. Emissions estimates for travel on paved roads were calculated using the CalEEMod model.

Trip Length

- **SCAQMD Recommendation** – The SCAQMD asserts that for warehouse, distribution center, and industrial land use projects, most heavy-duty trucks would be hauling consumer goods (often from the Ports of Long Beach and Los Angeles) to destinations outside California. The SCAQMD for this reason states the CalEEMod and the URBan EMISsions model default trip length (approximately 12.6 miles) would not be representative of activities at like facilities. As a result, the SCAQMD generally recommends use of a 40-mile one-way trip length.
- **Southern California Association of Government (SCAG) Heavy Duty Truck Model** – SCAG is comprised of six counties (Los Angeles, Orange, Riverside, San Bernardino, Ventura and Imperial) and 190 cities in Southern California and is the organization charged with addressing and resolving short-term and long-term regional policy issues. The SCAG region also consists of 14 sub-regional entities recognized by the Regional Council as partners in the regional planning process. There are more than 19 million residents within the 38,000 square mile SCAG region. SCAG maintains a regional transportation model and 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. Therefore, the AQIA input a weighted average trip length of 18.52 miles in CalEEMod.

Project Analysis Approach

Although the SCAQMD approach of 40 miles for one-way truck trips “is deemed to be the most applicable for the Project,” the analysis conservatively uses a truck trip length of 60 miles because that trip length was consistent for similar land use projects within the region. This methodology is employed in analyses for similar projects in Riverside County and is considered by the County of Riverside to be appropriate and accurate. For passenger car trips, the analysis assumed a one-way trip length of 16.6 miles.

Based on SCAQMD information and on the maximum square footage of the proposed warehouse/logistics building on-site modeled operational equipment includes three 200 horsepower, compressed natural gas-powered yard tractors operating at 4 hours a day for 365 days of the year.

Operational-Source Emissions Summary

Impacts without Mitigation

Table 4.3.9 summarizes Project maximum daily operational-source emissions. As indicated, Project operational-source NO_x emissions would exceed the applicable SCAQMD threshold. Approximately 93 percent of Project NO_x emissions are derived from vehicle usage. No feasible mitigation measures exist that would reduce emissions to levels that are less than significant because neither the Project Applicant nor the County of Riverside have regulatory authority to control tailpipe emissions. Mitigation Measures MM-AQ-2 – MM AQ-6 would reduce impacts to the maximum extent feasible. However, as a conservative

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measure, no “credit” has been taken for implementation of those mitigation measures. Therefore, the Project’s cumulative impact on the net increase of NO_x, a criteria pollutant for which the Project region is non-attainment under an applicable federal or State ambient air quality standard, is considered significant and unavoidable.

Table 4.3.9
Operational-Source Emissions Summary

Operational Activities – Summer Scenario	Emissions (lbs./day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Source	15.91	1.40e-03	0.15	1.00e-05	5.50e-04	5.50e-04
Energy Source	0.04	0.38	0.32	2.29e-03	0.03	0.03
Mobile Source (Passenger Cars)	3.52	2.47	42.03	0.12	12.15	3.26
Mobile Source (Trucks)	1.85	68.77	12.38	0.25	9.35	3.34
On-Site Equipment Source	0.41	4.64	2.32	9.52e-03	0.16	0.14
Total Maximum Daily Emissions	21.72	76.27	57.21	0.37	21.69	6.77
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	YES	NO	NO	NO	NO
Operational Activities – Winter Scenario	Emissions (lbs./day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Source	15.91	1.40e-03	0.15	1.00e-05	5.50e-04	5.50e-04
Energy Source	0.04	0.38	0.32	2.29e-03	0.03	0.03
Mobile Source (Passenger Cars)	3.12	2.56	34.55	0.11	12.15	3.26
Mobile Source (Trucks)	1.81	71.76	11.87	0.25	9.35	3.34
On-Site Equipment Source	0.41	4.64	2.32	9.52e-03	0.16	0.14
Total Maximum Daily Emissions	21.29	79.34	49.22	0.36	21.68	6.77
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	YES	NO	NO	NO	NO

Given that the Project AQIA identifies a significant and unavoidable project level and cumulative impact pertaining to NO_x emissions, the following assessment serves to provide an analysis in conformance with the *Sierra Club v. County of Fresno (Friant Ranch)* decision, which further clarifies, amplifies, and augments the Project Air Quality Analysis.

As summarized in the AQIA, the Project’s operational-source NO_x emissions will exceed applicable SCAQMD regional thresholds. Per the SCAQMD significance guidance, these impacts at the Project level also are considered cumulatively significant and would persist over the life of the Project. NO_x is an ozone precursor. The Project NO_x emissions therefore have the potential to contribute considerably to existing ozone non-attainment conditions within the South Coast Air Basin. This is a cumulatively significant impact persisting over the life of the Project.

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As noted in the Brief of Amicus Curiae by the SCAQMD in the Friant Ranch case (April 6, 2015, Appendix 3.5) (*Brief*), SCAQMD has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State, and thus it is uniquely situated to express an opinion on how lead agencies should correlate air quality impacts with specific health outcomes.

The SCAQMD discusses that it may be infeasible to quantify health risks caused by projects similar to the proposed Project, due to many factors. It is necessary to have data regarding the sources and types of air toxic contaminants, location of emission points, velocity of emissions, the meteorology and topography of the area, and the location of receptors (worker and residence). The *Brief* states that it may not be feasible to perform a health risk assessment for airborne toxics that will be emitted by a generic industrial building that was built on “speculation” (i.e., without knowing the future tenant(s)). Even where a health risk assessment can be prepared, however, the resulting maximum health risk value is only a calculation of risk—it does not necessarily mean anyone will contract cancer as a result of the Project. The *Brief* also cites the author of CARB methodology, which reported that a PM_{2.5} methodology is not suited for small projects and may yield unreliable results. Similarly, SCAQMD staff does not currently know of a way to accurately quantify O₃-related health impacts caused by NO_x or VOC emissions from relatively small projects. The *Brief* concludes, with respect to the Friant Ranch Environmental Impact Report (EIR), that although it may have been technically possible to plug the data into a methodology, the results would not have been reliable or meaningful.

On the other hand, for extremely large regional projects (unlike the proposed Project), the SCAQMD states that it has been able to correlate potential health outcomes for very large emissions sources – as part of their rulemaking activity, specifically 6,620 lbs./day of NO_x and 89,180 lbs./day of VOC were expected to result in approximately 20 premature deaths per year and 89,947 school absences due to O₃.

The proposed Project does not generate anywhere near 6,620 lbs./day of NO_x or 89,190 lbs./day of VOC emissions. The Project would generate 60.21 lbs./day of NO_x during construction and 79.34 lbs./day of NO_x during operations (0.58% and 1.20% of 6,620 lbs./day, respectively). The Project would also generate 5.67 lbs./day of VOC emissions during construction and 21.72 lbs./day of VOC emissions during operations (0.01% and 0.02% of 89,190 lbs./day, respectively). Therefore, the Project’s emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level.

Notwithstanding, the Project AQIA does evaluate the proposed Project’s localized impact to air quality for emissions of CO, NO_x, PM₁₀, and PM_{2.5} by comparing the proposed Project’s on-site emissions to the SCAQMD’s applicable LST thresholds. As evaluated in the Project AQIA, the Project would not result in emissions that exceeded the SCAQMD’s LSTs. Therefore, the Project would not be expected to exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NO_x, PM₁₀, and PM_{2.5}.

Localized Significance – Construction Activity

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. Collectively, these are referred to as Localized Significance Thresholds (LST). The LST represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable Federal or State ambient air quality standard at the nearest residence or sensitive receptor. The SCAQMD states lead agencies can use LST as another indicator of significance in its air quality impact analyses. LST were developed in response to environmental justice and health concerns raised by the public regarding exposure

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of individuals to criteria pollutants in local communities. To address the issue of localized significance, the SCAQMD adopted LST that demonstrate whether a project would cause or contribute to localized air quality impacts and thereby cause or contribute to potential localized adverse health effects. The Project AQIA uses the methodology included in the SCAQMD “Final Localized Significance Threshold Methodology.”

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 Carbon Monoxide and Nitrogen Dioxide, 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 the standards. If ambient levels already exceed a State or Federal standard, project emissions are considered significant if they increase ambient concentrations by a measurable amount. This would apply to Particulate Matter 10 and 2.5, both of which are non-attainment pollutants.

Applicability of LST for the Project

For the Project, the appropriate SRA for the LST analysis is the SCAQMD Perris Valley monitoring station (SRA 24). LST apply to Carbon Monoxide, Nitrogen Dioxide, Particulate Matter 10, and Particulate Matter 2.5.

The SCAQMD methodology states “off-site mobile emissions from the Project should not be included in the emissions compared to LSTs.” Therefore, for purposes of construction LST analysis only emissions included in the CalEEMod “on-site” emissions outputs were considered.

Maximum Daily Disturbed Area

Acres disturbed is based on the equipment list and days in site preparation or grading phase according to the anticipated maximum number of acres a given piece of equipment can pass over in an 8-hour workday. Disturbance of approximately 3.5 acres per 8-hour day was assumed for site preparation activities and 4 acres per day for grading activities, as indicated in the following **Table 4.3.10**.

Table 4.3.10 – Maximum Daily Disturbed Acreage

Construction Phase	Equipment Type	Equipment Quantity	Acres Graded Per Day	Operating Hours Per Day	Acres Graded Per Day
Site Preparation	Rubber Tired Dozers	3	0.5	8	1.5
	Tractors/Loaders/Backhoes	4	0.5	8	2
Total Acres Disturbed Per Day During Site Preparation					3.5
Grading	Graders	1	0.5	8	0.5
	Rubber Tired Dozers	1	0.5	8	0.5
	Scrapers	2	1	8	2
	Tractors/Loaders/Backhoes	2	0.5	8	1
Total Acres Disturbed Per Day During Grading					4

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- c) Expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations?

Less Than Significant Impact. Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, individuals with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that house these persons or places where they gather to exercise are defined as “sensitive receptors” and also are known to be locations where an individual can remain for 24 hours.

Sensitive receptors in the Project study area include residential uses. The nearest sensitive receptor is an existing residential outdoor living area located approximately 10 feet/3 meters east of the Project site. The sensitive receptors, as identified in the Project AQIA (which are depicted as the same locations in the Noise Analysis prepared for the Project), are the following:

- Approximately 66 feet north of the Project site – represented by residential homes on the north side of Walnut Avenue;
- Approximately 10 feet east of the Project site – represented by two residential outdoor living areas (backyards) on the east side of Project site;
- Approximately 10 feet east of the Project site – represented by a residential outdoor living area on the east side of the Project site, north of Placentia Avenue;
- Approximately 112 feet south of the Project site – represented by residences south of Placentia Avenue; and,
- Approximately 102 feet west of the Project site – represented by residences on the west side of Patterson Avenue.

SCAQMD methodology states “it is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.” The AQIA thereby uses a 25-meter receptor distance to determine LST for emissions of Nitrogen Dioxide, Carbon Monoxide, Particulate Matter 10 and Particulate Matter 2.5.

Localized Thresholds for Construction Activity

Consistent with SCAQMD guidance, the thresholds presented in **Table 4.3.11** below were calculated by interpolating the threshold values for the Project’s disturbed acreage. A 25-meter receptor distance was utilized to determine the LST for Carbon Monoxide, Nitrogen Dioxide, Particulate Matter 10 and Particulate Matter 2.5 emissions pertaining to construction and operational LST analyses.

Table 4.3.11 – Maximum Daily Localized Emissions Thresholds

Pollutant	Construction	Operations
Localized Thresholds		
NO _x	220 pounds/day (Site Preparation)	270 pounds/day
	237 pounds/day (Grading)	
CO	1,230 pounds/day (Site Preparation)	1,577 pounds/day
	1,346 pounds/day (Grading)	
PM ₁₀	10 pounds/day (Site Preparation)	4 pounds/day
	11 pounds/day (Grading)	
PM _{2.5}	6 pounds/day (Site Preparation)	2 pounds/day
	7 pounds/day (Grading)	

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Construction-Source Emissions LST Analysis

The following **Table 4.3.12** identifies localized impacts at the nearest receptor location in the Project vicinity. Without mitigation, localized construction emissions would exceed applicable SCAQMD LST for emissions of PM₁₀ and PM_{2.5} during site preparation.

Table 4.3.12 – Localized Significance Summary Construction (without Mitigation)

On-Site Site Preparation Emissions	Emissions (pounds per day)			
	NOx	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	42.42	21.51	10.69	6.05
SCAQMD Localized Threshold	220	1,230	10	6
Threshold Exceeded?	No	No	Yes	Yes
On-Site Grading Emissions	Emissions (pounds per day)			
	NOx	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	50.20	31.96	6.19	3.47
SCAQMD Localized Threshold	237	1,346	11	7
Threshold Exceeded?	No	No	No	No

Impacts with Mitigation

The following **Table 4.3.13** identifies localized impacts at the nearest receptor location in the Project vicinity. **Mitigation Measure AQ-1** identified below is recommended to reduce impacts to less than significant levels. After implementation of **Mitigation Measure AQ-1**, a less than significant impact would occur for localized construction activity.

Table 4.3.13 – Localized Significance Summary Construction (with Mitigation)

On-Site Site Preparation Emissions	Emissions (pounds per day)			
	NOx	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	42.42	21.51	7.86	4.71
SCAQMD Localized Threshold	220	1,230	10	6
Threshold Exceeded?	No	No	No	No
On-Site Grading Emissions	Emissions (pounds per day)			
	NOx	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	50.20	31.96	4.85	2.98
SCAQMD Localized Threshold	237	1,346	11	7
Threshold Exceeded?	No	No	No	No

Localized Significance – Long-Term Operational Activity

The following **Table 4.3.14** presents calculated emissions for the Project's operational activities compared with applicable LST. The LST analysis includes on-site sources only. However, the CalEEMod model outputs do not separate on-site and off-site emissions from mobile sources. Emissions shown on the following Table represent all on-site Project-related stationary (area) sources and Project-related mobile

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sources. It is assumed the maximum distance a passenger car or truck would make through the Project site is approximately 1.2 miles. An on-site travel distance of approximately 1.2 miles/6,336 feet for each passenger car and truck trip has been used as a conservative measure. Modeling based on these assumptions demonstrates that even within broad encompassing parameters, Project operation-source emissions would not exceed applicable LST.

Impacts without Mitigation

The following **Table 4.3.14** shows operational emissions will not exceed LST thresholds for the nearest sensitive receptor. Therefore, Project operation will result in a less than significant level of localized impact.

Table 4.3.14 – Localized Significance Summary of Operations

Operational Activity	Emissions (pounds per day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	8.74	5.52	1.26	0.50
SCAQMD Localized Significance Threshold	270	1,577	4	2
Threshold Exceeded?	No	No	No	No

CO “Hot Spot” Analysis

The SCAB was designated nonattainment under the CAAQS and NAAQS for Carbon Monoxide at the time of the publication of the 1993 Handbook. An adverse Carbon Monoxide concentration (a “hot spot”) would occur if an exceedance of the State one-hour standard of 20 parts per million or the eight-hour standard of 9 parts per million were to occur. Carbon Monoxide hotspots are caused by vehicular emissions, primarily when idling at congested intersections. As a response, vehicle emissions standards have become increasingly stringent in the last 20 years. Carbon Monoxide concentration in the SCAB is now designated as attainment as a result of turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies. The Traffic Impact Analysis prepared for the Project states that the Project would not produce sufficient traffic volume to result in a Carbon Monoxide hot spot and that hot spots “are not an environmental impact of concern for the proposed Project.” Therefore, localized air quality impacts related to mobile source emissions would be less than significant.

Health Risk Assessment (HRA)

Barker Logistics Mobile Source Health Risk Assessment, County of Riverside (Urban Crossroads, Inc.) December 17, 2018 (HRA) prepared for the Project evaluates potential mobile source health risk impacts to sensitive receptors (residents) and adjacent workers associated with the development of the proposed Project. More specifically, health risk impacts as a result of exposure to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks accessing the site. The HRA satisfies SCAQMD recommendation that such an assessment be prepared because Project development and operation is expected to generate/attract heavy-duty diesel trucks that emit diesel particulate matter.

Proximity to sources of toxics is critical to determining Project impact. In traffic-related studies, the additional non-cancer health risk attributable to proximity was seen within 1,000 feet of the Project site and was strongest within 300 feet of the Project site. California freeway studies demonstrate approximately a 70 percent drop-off in particulate pollution levels at 500 feet. Based on California Air Resources Board

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and SCAQMD emissions and modeling analyses, an 80 percent drop-off in pollutant concentrations is expected at approximately 1,000 feet from a distribution center. The 1,000-foot evaluation distance is supported by research-based findings concerning Toxic Air Contaminant emission dispersion rates from roadways and large sources showing that emissions diminish substantially between 500 and 1,000 feet from emission sources. The Project HRA utilized a one-quarter mile (1,320 feet) radius for determining potential impacts to nearby schools. This radius provides a more health protective scenario of evaluation that does the 1,000-foot impact radius.

Per the Traffic Impact Analysis, Project operation is expected to generate approximately 1,548 two-way vehicle trips per day, including 276 two-way truck trips.

Residential Exposure Scenario

The residential land use with the greatest potential exposure to Project DPM source emissions is approximately 120 feet southeast of the Project site, south of Placentia Avenue. On Exhibit 2-B of the HRA, adjacent receptors at 10 feet, 112 feet and so forth were modeled. The maximally impacted receptor happens to be the location 120 feet southeast of the Project site. The reason this receptor location experiences a greater impact than the receptors 10 feet east of the Project site is due to its proximity to the loading dock locations, on-site travel, and off-site travel, relative to the activity that occurs near the receptor located 10 feet to the east. At the maximally exposed individual receptor, the maximum incremental cancer risk attributable to Project DPM source emissions is estimated at 5.02 in one million, which is less than the threshold of 10 in one million. At the location with greatest potential exposure, non-cancer risks were estimated to be 0.002, which would not exceed the applicable threshold of 1.0. Therefore, Project development and operation will not cause a significant human health or cancer risk to adjacent residences (HRA, p. 1).

Worker Exposure Scenario

The worker receptor land use with the greatest potential exposure to Project DPM source emissions is located immediately adjacent to the north of the Project site, but currently is vacant and has a land use designation of Business Park (BP). At the maximally exposed individual worker (MEIW), the maximum incremental cancer risk impact at this location is 0.51 in one million, which is less than the threshold of 10 in one million. Maximum non-cancer risks were estimated to be 0.002, less than the applicable threshold of 1.0. Therefore, Project development and operation will not cause a significant human health or cancer risk to adjacent workers. All other modeled worker locations in the Project vicinity would be exposed to less emissions and therefore would experience less risk than the MEIW identified herein (HRA, p. 1).

School Child Exposure Scenario

There are no schools located within one-fourth mile of the Project site. Therefore, there would be no significant impacts that would occur to any schools in the Project vicinity (HRA, p. 1).

The following **Table 4.3.15** presents a summary of cancer and non-cancer risks related to Project development and operation discussed above.

Table 4.3.15 – Summary of Cancer and Non-Cancer Risks

Time Period	Location	Maximum Lifetime Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds Significance Threshold
30-Year Exposure	Maximum Exposed Sensitive Receptor	5.02	10	NO
25-Year Exposure	Maximum Exposed Worker Receptor	0.51	10	NO
Time Period	Location	Maximum Hazard Index	Significance Threshold	Exceeds Significance Threshold
Annual Average	Maximum Exposed Sensitive Receptor	0.002	1.0	NO
Annual Average	Maximum Exposed Worker Receptor	0.002	1.0	NO

As substantiated in the preceding discussions:

- Project construction-source emissions (as mitigated), and operational-source emissions would not exceed applicable LSTs.
 - Project-source DPM emissions would not result in adverse health impacts.
 - Project operations would not result in or create CO Hotspots.
- The Project does not propose or require uses or activities that would otherwise expose sensitive receptors to substantial pollutant concentrations.

Based on the preceding, with implementation of Mitigation Measure AQ-1, the potential for the Project to expose sensitive receptors to substantial pollutant concentrations is less-than-significant.

d) Result in other emissions (such as those leading to odors) affecting a substantial number of people?

Less Than Significant Impact. Project development will not include land uses typically associated with emitting objectionable odors. Potential odor sources associated with the Project may result from construction equipment exhaust and application of asphalt and architectural coatings during construction activities and temporary storage of typical solid waste associated with long-term Project operation. Standard requirements would minimize odor impacts from construction. Construction-related odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with County of Riverside solid waste regulations. The Project also would be required to comply with SCAQMD Rule 402 to prevent public nuisances. Therefore, odors associated with Project development (construction) and operation would be a less than significant impact and no mitigation is required.

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4.3.4 CUMULATIVE IMPACTS

Air Quality Thresholds a), b), c) and d) –

The cumulative impact area for air quality considerations is generally defined by the encompassing Air Basin and boundaries of the jurisdictional air quality management agency. In this case, the South Coast Air Basin (Basin) and the South Coast Air Quality Management District (SCAQMD), respectively. Project air pollutant emissions within the context of SCAQMD's regional emissions thresholds provide an indicator of potential cumulative impacts in the Basin. Due to the defining geographic and meteorological characteristics of the Basin, criteria pollutant emissions that could cumulatively impact air quality would be, for practical purposes, restricted to the Basin. Accordingly, the geographic area encompassed by the Basin is the appropriate limit for the cumulative air quality analysis.

The AQMD has published a report entitled "White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution." This report (Page D-3) states as follows - -

"... 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 $HI > 1.0$ while the cumulative (facility-wide) is $HI > 3.0$. 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."

Therefore, the Project AQIA assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which the South Coast Air Basin is in non-attainment and therefore would not be considered to have a significant adverse air quality impact. Individual project-related construction and operational emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable.

Construction Impacts

The Project AQIA states that "...after implementation of MM AQ-1 [**MM-AQ-1: (Construction-Source Mitigation Measure)**] which requires the Project site be watered at 2.1-hour watering intervals (e.g., 4 times per day) or a movable sprinkler system shall be in place to ensure minimum soil moisture of 12% in [sic] [is] maintained for actively graded areas, Project construction-source air pollutant emissions would not result in exceedances of regional thresholds...[and] Therefore, Project construction-source emissions would be considered less than significant on a project-specific and cumulative basis."

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Operational Impacts

Project operational-source NO_x emissions have the potential to result in exceedances of SCAQMD regional thresholds for NO_x. Approximately 94 percent of the Project operational-source NO_x emissions (by weight) are derived from vehicle usage. Since neither the Project Applicant nor the Lead Agency have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce Project operational-source NO_x emissions to levels that are less-than-significant. Mitigation measures presented in this Section would diminish Project operational-source NO_x emissions, but would not reduce operational-source NO_x emissions to levels that would be less-than-significant.

The South Coast Air Basin encompassing the Project site is designated as non-attainment for ozone, PM₁₀, and PM_{2.5} (NO_x is an ozone precursor; NO_x is also a precursor to PM₁₀, and PM_{2.5}) Project operational-source NO_x emissions regional threshold exceedances would result in a cumulatively considerable net increase in criteria pollutants (ozone and PM₁₀/PM_{2.5}) for which the Project region is non-attainment. These are cumulatively significant and unavoidable air quality impacts.

4.3.5 EXISTING REGULATIONS & STANDARD CONDITIONS

Federal Regulations

The United States Environmental Protection Agency is responsible for setting and enforcing the NAAQS for Ozone, Carbon Monoxide, Nitrogen Oxides, Sulfur Dioxide, Particulate Matter 10, and Lead. The United States Environmental Protection Agency (EPA) has jurisdiction over emissions sources that are under the authority of the Federal government including aircraft, locomotives, and emissions sources outside state waters. The 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 California Air Resources Board.

The Federal Clean Air Act (CAA) was first enacted in 1955 and subsequently has been amended numerous times. 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 for local areas not meeting these standards. The Plans must include pollution control measures that demonstrate how the standards will be met.

Sections of the CAA most directly applicable to Project development and operation 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: Ozone; Nitrogen Dioxide; Sulfur Dioxide; Particulate Matter 10; Particulate Matter 2.5; Carbon Monoxide; and, Lead. The NAAQS were amended in July, 1997 to include an additional standard for Ozone and to adopt a NAAQS for Particulate Matter 2.5. Mobile source emission as are regulated in accordance with Title II provisions, which require use of cleaner burning gasoline and other cleaner burning fuels such as methanol and natural gas. Automobile manufacturers also are required to reduce tailpipe emissions of Hydrocarbons and Nitrogen Oxides.

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California Regulations

The California Air Resources Board (CARB) became part of the California Environmental Protection Agency in 1991 and is responsible for ensuring implementation of the California Clean Air Act (Assembly Bill 2595), responding to the Federal CAA, and 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 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 establishes standards for sulfates, visibility, hydrogen sulfide, and vinyl chloride. 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. In general, the CAAQS are more stringent than the NAAQS.

South Coast Air Quality Management District (SCAQMD)

Local air quality management districts, such as the SCAQMD, regulate air emissions from stationary sources such as commercial and industrial facilities. All air pollution control districts have been formally designated as attainment or non-attainment for each CAAQS. Serious 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. The plans are required to include the following:

- Application of Best Available Retrofit Control Technology to existing sources;
- Developing control programs for area sources (e.g., architectural coatings and solvents) and indirect sources (e.g., motor vehicle uses generated by residential and commercial development);
- A District permitting system designed to allow no net increase in emissions from any new or modified permitted sources of emissions;
- Implementing reasonably available transportation control measures and assuring a substantial reduction in growth rate of vehicle trips and miles traveled;
- Significant use of low emissions vehicles by fleet operators; and,
- Sufficient control strategies to achieve a five percent or more annual reduction in emissions or 15 percent or more in a period of three years for Reactive Organic Gases, Nitrogen Oxides, Carbon Monoxide, and Particulate Matter₁₀. However, air basins may use alternative emission reduction strategies that achieve a reduction of less than five percent per year under certain circumstances.

Title 24 Energy Efficiency Standards and California Green Building Standards

California Code of Regulations Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings was first adopted in 1978 to reduce California's energy consumption and is updated periodically to allow consideration and potential incorporation of new energy technologies and methods with the final goal of decreasing greenhouse gas emissions. The 2019 Title 24 standards require upgrades to interior and exterior lighting for nonresidential buildings that are estimated to result in use of approximately 30 percent less energy.

California Code of Regulations, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code administered by the California Building Standards Commission for all residential, commercial and school buildings that became effective on January 1, 2011. The most recent CALGreen update occurred in 2016, with an effective date of January 1, 2017. Local jurisdictions are permitted to adopt more stringent requirements. CALGreen requirements applicable to the

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Project would include the following:

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- Designated parking for clean air vehicles. In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 (5.106.5.2).
- Electric vehicle charging stations. New construction shall facilitate the future installation of electric vehicle supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106.5.3.3 (5.106.5.3).
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, upright and glare ratings per Table 5.106.8 (5.106.8)
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1, 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- Excavated soil and land clearing debris. 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
 - Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
 - Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
 - Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
 - Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash

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fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).

- Outdoor portable water use in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient (MWELo), whichever is more stringent (5.304.1).
- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 sf or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (5.303.1.1 and 5.303.1.2).
- Outdoor water use in rehabilitated landscape projects equal or greater than 2,500 sf. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 sf requiring a building or landscape permit (5.304.3).
- Commissioning. For new buildings 10,000 sf and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

Air Quality Management Planning

The Project site is within the jurisdiction of the SCAQMD, which was created by the Lewis Air Quality Management Act in 1976 from a voluntary association of air pollution control districts in Los Angeles, Orange, Riverside and San Bernardino counties. The geographic area encompassing the SCAQMD is called the South Coast Air Basin (SCAB). SCAQMD develops comprehensive plans and regulatory programs for the region to attain Federal standards by dates specified in Federal law. In addition, SCAQMD is responsible for meeting standards by the earliest date achievable, using reasonably available control measures. SCAQMD created Air Quality Management Plans that represent a regional blueprint for achieving healthful air on behalf of the 16,000,000 residents of the SCAB. As a result, there occurred a "dramatic improvement" (according to the Project AQIA) in Basin air quality. The Project AQIA further states that "nearly all control programs developed through the early 1990s relied on (i) the development and application of cleaner technology; (ii) add-on emission controls, and (iii) uniform CEQA review throughout the Basin." This approach has significantly reduced emissions from industrial sources. In addition, vehicular emissions have been reduced by technologies implemented at the State level by the California Air Resources Board.

Ozone, Nitrogen Oxides, Volatile Organic Compounds and Carbon Monoxide have been decreasing in the SCAB since 1975 "and are projected to decrease through 2020." The decreases result largely from motor vehicle controls and reductions in evaporative emissions. Vehicle miles traveled in the SCAB continue to increase but Nitrogen Oxides and Volatile Organic Compound levels are decreasing due to mandated controls on motor vehicles and replacement of older polluting vehicles with lower-emitting vehicles. In addition, Nitrogen Oxide emissions from electric utilities also have decreased due to use of cleaner fuels and renewable energy. Ozone contour maps demonstrate the number of days exceeding the national 8-hour standard has decreased between 1997 and 2007. In 2007, there was an overall decrease in exceedance days compared with 1997 data. Ozone levels in the South Coast Air Basin have decreased substantially over the last 30 years; maximum concentrations today are approximately one-third of Ozone concentrations in the late 1970s.

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Overall trends of PM₁₀ and PM_{2.5} levels in the air (not emissions) demonstrate an overall improvement since 1975. Direct emissions of PM₁₀ have remained generally constant in the SCAB and direct emissions of PM_{2.5} have decreased slightly since 1975. The most recent PM₁₀ statistics demonstrate an overall improvement. However, there are days when concentrations will exceed the threshold although the values are below the Federal standard. The 24-hour State annual average for PM₁₀ emissions have decreased by approximately 56 percent since 1988. Overall, the national and State annual average concentrations of PM_{2.5} have decreased by almost 52 percent and 30 percent, respectively. The SCAB currently is designated as “nonattainment” for State and Federal PM_{2.5} standards, in large part because of the post-2012 drought.

The most recent Carbon Monoxide concentrations in the SCAB have decreased “markedly” - - approximately 80 percent in the peak 8-hour concentration since 1986. Year 2012 is the most recent year where 8-hour Carbon Monoxide averages and related statistics for the SCAB are available. The number of exceedance days also has decreased. The entire SCAB “is now designated as attainment for both the state and national CO standards.” Reductions from motor vehicles are anticipated to continue due to motor vehicle control programs.

The most recent data for Nitrogen Dioxide in the SCAB indicates that over the last 50 years Nitrogen Dioxide values have decreased significantly. Peak 1-hour national and State averages for 2017 is approximately 77 percent lower than the corresponding averages during 1963. The SCAB attained the State 1-hour Nitrogen Dioxide standard in 1994, thereby bringing the entire State into attainment. The new State annual average standard of 0.030 parts per million “is just barely exceeded” in the SCAB. Future emission control measures that will be implemented as part of the overall Ozone control strategy are expected to bring the SCAB into attainment of the State annual average standard.

SCAQMD Rules currently applicable during Project development (construction) include, but are not limited to, Rule 1113 (Architectural Coatings) and Rule 403 (Fugitive Dust).

American Lung Association data collected from State air quality monitors are used to compile an annual State of the Air report. This report indicates air quality in the SCAB has significantly improved in terms of both pollution levels and high pollution days over the past three decades.

Riverside County General Plan

Land Use Element

Policy LU 11.1 – Provide sufficient commercial and industrial development opportunities in order to increase local employment levels and thereby minimize long-distance commuting.

Policy LU 11.2 – Ensure adequate separation between pollution producing activities and sensitive emission receptors, such as hospitals, residences, child care centers and schools.

Policy LU 11.4 – Provide options to the automobile in communities, such as transit, bicycle and pedestrian trails, to help improve air quality.

Policy LU 11.5 – Ensure that all new developments reduce Greenhouse Gas emissions as prescribed in the Air Quality Element and Climate Action Plan.

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Healthy Communities Element

Policy HC 14.2 – When feasible, avoid locating new sources of air pollution near homes and other sensitive receptors.

Air Quality Element

Mobile Pollution Sources

Policy AQ 3.3 – Encourage large employers and commercial/industrial complexes to create Transportation Management Associations.

Policy AQ 3.4 – Encourage employee rideshares and transit incentives for employers with more than 25 employees at a single location.

Stationary Pollution Sources

Policy AQ 4.1 – Require the use of all feasible building materials/methods which reduce emissions.

Policy AQ 4.7 – To the greatest extent possible, require every project to mitigate any of its anticipated emissions which exceed allowable emissions as established by the SCAQMD, MDAQMD, SCAB, the Environmental Protection Agency and the California Air Resources Board.

Policy AQ 4.9 – Require compliance with SCAQMD Rules 403 and 403.1, and support appropriate future measures to reduce fugitive dust emanating from construction sites.

Monitoring

Policy AQ 15.1 – Identify and monitor sources, enforce existing regulations, and promote stronger controls to reduce particulate matter.

Control Measures

Policy AQ 17.1 – Reduce particulate matter from agriculture, debris hauling, street cleaning, utility maintenance, railroad rights-of-way, and off-road vehicles to the extent possible.

Policy AQ 17.4 – Adopt incentives, regulations and/or procedures to manage paved and unpaved roads and parking lots so they product the minimum practicable level of particulates.

Policy AQ 17.7 – Separate trucks from other vehicles in industrial areas of the County with the creation of truck-only access lanes to promote the free flow of traffic.

Policy AQ 17.9 – Encourage the installation and use of electric service units at truck stops and distribution centers for heating and cooling truck cabs, and particularly for powering refrigeration trucks in lieu of idling of engines for power.

Policy AQ 17.10 – Promote and encourage the use of natural gas and electric vehicles in distribution centers.

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Good Neighbor Policy for Logistics and Warehouse/Distribution Uses

The Project would be subject to provisions of the County of Riverside “*Good Neighbor*” Policy for Logistics and Warehouse Distribution Centers, Board of Supervisors Policy F-3 (Policy), <https://www.rivcocob.org/wp-content/uploads/2020/01/Good-Neighbor-Policy-F-3-Final-Adopted.pdf>.

The purpose of this Policy is to provide framework for the development and operations of logistics and warehouse projects larger than 250,000 sf in size in a way that would lessen their impact on the surrounding communities. This Policy provides development and operational criteria that can be implemented to supplement project-level mitigation measures. The Project would be required to comply with applicable provisions of the Good Neighbor as implemented through the MM AQ-6 and the Project Conditions of Approval. The analysis provided here does not take credit for any pollutant emissions reductions that may be achieved under the Good Neighbor Policy, thereby establishing a likely maximum impact scenario.

County of Riverside Climate Action Plan

The County of Riverside adopted its Climate Action Plan (CAP) on December 8, 2015. The CAP was designed under the premise that the County, and the community it represents, is uniquely capable of addressing emissions associated with sources under the County’s jurisdiction, and that the County’s emission reduction efforts should coordinate with the state strategies of reducing emissions in order to accomplish these reductions in an efficient and cost-effective manner. The CAP was updated on November 17, 2019. Per the Updated CAP, Measure R2-CE1 requires one or more new buildings totaling more than 100,000 gross sf of commercial, office, industrial, or manufacturing development to offset its energy demand by 20%. The 20% on-site renewable energy requirement is reflected in the Project emissions modeling as “mitigation” accounting for compliance with R2-CE1. Timely and monitored implementation of CAP Measure R2-CE1 is provided for as Mitigation Measure AQ-6.

4.3.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Potentially Significant Impacts:

- a) Conflict with applicable air quality plan** – Project operational-source NO_x emissions exceedances would delay or obstruct goals and strategies articulated in the AQMP for the South Coast Air Basin. Additionally, the Project would implement uses other than those reflected in the AQMP, and could therefore result in emissions not considered and addressed in the AQMP emissions inventories and emissions control/reduction strategies. On this basis, the Project would conflict with the governing AQMP. This is a potentially significant impact.

- b) Cumulatively considerable net increase of non-attainment criteria pollutant** – Project operational-source NO_x emissions would exceed applicable SCAQMD regional thresholds. The Project is located within ozone and PM₁₀/PM_{2.5} non-attainment areas (NO_x is a precursor to ozone, PM₁₀, and PM_{2.5}). Project operational-source NO_x emissions exceedances would therefore result in a cumulatively considerable net increase in criteria pollutants (ozone, PM₁₀, and PM_{2.5}) for which the Project region is non-attainment. This is a potentially significant impact.

- c) Exposure of sensitive receptors within one mile of the Project site to substantial pollutant concentrations** – Project construction activities would generate PM₁₀/PM_{2.5} emissions concentrations exceeding applicable LSTs. This is a potentially significant impact.

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The Project does not propose or require uses or activities that would otherwise expose sensitive receptors to substantial pollutant concentrations.

Less-Than-Significant Impacts:

As substantiated in this Section, all other Project air quality impacts would be less-than-significant.

4.3.7 PROJECT DESIGN FEATURES/BEST AVAILABLE CONTROL MEASURES

The following Best Available Control Measures (BACM) are relevant to the Project and shall appear on all Project grading plans, construction specifications and bid documents. The County of Riverside shall ensure such language is incorporated prior to issuance of any development permits for the Project.

BACM-AQ-1: The contractor shall adhere to applicable measures contained in Table 1 of Rule 403 including, but not limited to the following:

- All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 miles per hour per SCAQMD guidelines to limit fugitive dust emissions.
- The contractor shall ensure all disturbed unpaved roads and disturbed areas within the Project 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 completed for the day.
- The contractor shall ensure traffic speeds on unpaved roads and Project site areas are limited to 15 miles per hour or less.

BACM-AQ-2: The following measure shall be incorporated into Project plans and specifications as implementation of SCAQMD Rule 1113: Only “Low-Volatile Organic Compounds” paints (no more than 50 gram/liter of Volatile Organic Compound) consistent with SCAQMD Rule 1113 shall be used.

4.3.8 MITIGATION MEASURES

MM-AQ-1: During Project site preparation and grading activity, all actively graded areas within the Project site shall be watered at 2.1-hour watering intervals (e.g., 4 times per day) or a movable sprinkler system shall be in place to ensure minimum soil moisture of 12% is maintained for actively graded areas. Moisture content can be verified with use of a moisture probe by the grading contractor.

MM-AQ-2: Truck access gates and loading docks within the truck court on the Project site shall be posted with signs that state as follows:

- Truck drivers shall turn off engines when not in use;
- Diesel delivery trucks servicing the Project shall not idle for more than five (5) minutes; and,
- Telephone numbers of the building facilities manager and the California Air Resources Board to report violations.

MM-AQ-3:

- Site design shall allow for trucks to check-in within the facility area to prevent queuing of trucks outside the facility.
- Signs shall be posted in loading dock areas that instruct truck drivers to shut down the engine after 300 seconds of continuous idling operation once the vehicle is stopped, the transmission is set to “neutral” or “park,” and the parking brake is engaged.

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MM-AQ-4: The Project shall be designed to incorporate electric vehicle charging stations and carpool parking spaces for employees.

MM-AQ-5: The Project shall comply with provisions of the County of Riverside *Good Neighbor Policy for Logistics and Warehouse/Distribution Centers* as implemented through the Project Conditions of Approval.

MM-AQ-6: The Project shall comply with CAP Update Measure R2-CE1. CAP Update Measure R2-CE1 requires that the Project provide onsite renewable energy production generation comprising at least 20 percent of the Project energy demand. The County shall verify implementation of CAP Update Measure R2-CE1 within the Project building plans and site designs prior to the issuance of building permit(s) and/or site plans (as applicable). The County shall verify implementation of CAP Update Measure R2-CE1 prior to the issuance of Certificate(s) of Occupancy.

4.3.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Significant and Unavoidable Impacts

- **Conflict with an applicable air quality plan** – Mitigation measures presented in this Section would act to generally reduce operational-source emissions, including NOx emissions. However, there are no feasible means to reduce Project operational-source NOx emissions to levels that would be less-than-significant, and thereby avoid potential conflicts with AQMP Consistency Criterion No. 1. Nor is it feasible to substantially alter the Project land uses, and thereby avoid potential conflicts with AQMP Consistency Criterion No. 2. Project conflict with the AQMP is therefore considered to be a significant and unavoidable impact. Per SCAQMD criteria, significant and unavoidable impacts at the Project-level are also cumulatively significant and unavoidable.
- **Result in a cumulatively considerable net increase of non-attainment criteria pollutant concentrations** – Mitigation measures presented in this Section would act to generally reduce operational-source emissions, including NOx emissions. However, there are no feasible means to reduce Project operational-source NOx emissions to levels that would be less-than-significant. Project operational-source NOx emissions exceedances would result in a cumulatively considerable net increase in criteria pollutants (ozone and PM₁₀/PM_{2.5}) for which the Project region is non-attainment. This is a significant and unavoidable impact. Per SCAQMD criteria, significant and unavoidable impacts at the Project-level are also cumulatively significant and unavoidable.

Less-Than-Significant Impacts after Mitigation

Exposure of sensitive receptors within one mile of Project site to substantial pollutant concentrations
MM AQ-1 would reduce localized construction-source PM₁₀/PM_{2.5} concentrations to levels that would be less-than-significant. The Project does not propose or require uses or activities that would otherwise expose sensitive receptors to substantial pollutant concentrations.

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4.4 BIOLOGICAL RESOURCES

The following discussions are based on information presented within the following reports:

- *Barker Logistics Riverside County, California, Habitat Assessment and Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis* (ELMT Consulting, Inc.) February 2019; and
- *Barker Logistics Riverside County, California, Burrowing Owl Focused Survey Report* (ELMT Consulting, Inc.) May 2019, Update January 2020.

These documents are presented as Appendices P and L, respectively to this EIR.

4.4.1 ENVIRONMENTAL SETTING

The relatively flat Project site occupies 31.5 acres that generally slopes from north to south. Elevation of the Project site ranges from 1,520 to 1,580 feet above sea level. The following soils underlay the Project site: Fallbrook sandy loam; Greenfield sandy loam; Hanford coarse sandy loam; Monserate sandy loam; Ramona sandy loam; and, Ramona sandy loam. Soils on the Project site have been disturbed over time by agricultural, grading and disking activities. Grading and disking have eliminated the natural plant communities that historically occurred within the Project site and in the Project site vicinity.

The Project site is depicted on the Steele Peak and Perris quadrangles of the United States Geological Survey's 7.5-minute topographic map series in Section 13 of Township 4 South, Range 4 West.

4.4.2 THRESHOLD OF SIGNIFICANCE

The County of Riverside has adopted Thresholds of Significance that vary in some cases topically and in format from the Appendix G Thresholds, as reflected in the Initial Study prepared for the Project. This EIR uses the following County-adopted Thresholds of Significance to comprise the basis of impact analyses.

- a) Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state conservation plan?**
- 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)?**
- 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 Wildlife or U. S. Fish and Wildlife Service?**

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- 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?**
- 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, and regulations or by the California Department of Fish and Wildlife or U. S. Fish and Wildlife Service?**
- f) **Would the Project have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**
- g) **Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinances?**

4.4.3 ENVIRONMENTAL IMPACTS

- a) **Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State conservation plan?**

Potentially Significant. The Project site is located in the Mead Valley Area Plan of the Multiple Species Habitat Conservation Plan (MSHCP). The Project site is not specifically identified as a Covered Activity in the MSHCP. However, under MSHCP Section 7.1 (Covered Activities Outside Criteria Area and PQP Lands), public and private developments that are outside of Criteria Areas and Public/Quasi-Public (PQP) Lands are permitted under the MSHCP subject to consistency with MSHCP policies that apply to areas outside Criteria Areas. Therefore, to achieve coverage the Project must be consistent with the following MSHCP policies:

- The policies for the protection of species associated with Riparian/Riverine areas and vernal pools as set forth in Section 6.1.2 of the MSHCP;
- The policies for the protection of Narrow Endemic Plant Species as set for in Section 6.1.3 of the MSHCP;
- The Urban/Wildlands Interface Guidelines as set forth in Section 6.1.4 of the MSHCP;
- The requirements for conducting additional surveys as set forth in Section 6.3.2 of the MSHCP; and,
- Fuels management guidelines as set forth in Section 6.4 of the MSHCP.

The Project biologists conducted a review of literature and records for special-status biological resources potentially occurring on or within the Project site and Project site vicinity. The following literature were reviewed:

- California Department of Fish and Wildlife QuickView Tool in the Biogeographic Information and Observation System (BIOS), California Natural Diversity Database (CNDDB) Rarefind 5;
- California Native Plant Society (CNPS) Electronic Inventory of Rare and Endangered Vascular Plants of California;

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- Calflora Database;
- Compendia of special-status species published by the California Department of Fish and Wildlife;
- United States Fish and Wildlife Service (USFWS) species listings;
- Species covered within the MSHCP and associated technical documents;
- Standard field guides and texts on special-status and non-special-status biological resources;
- Google Earth Pro historic aerial imagery (1994-2018);
- 2006 Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area;
- United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) Soil Survey;
- USFWS Critical Habitat designations for Threatened and Endangered Species;
- Stephens' Kangaroo Rat Habitat Conservation Plan; and,
- RCA MSHCP Information Map.

In addition, the Project biologists used the CNDDDB database, in conjunction with ArcGIS software to locate the nearest recorded occurrences of special-status species and determine the distance from the Project site.

Project biologists evaluated the extent and conditions of plant communities within the boundaries of the Project site on January 15, 2019 and verified the presence of plant communities identified on aerial photographs during the review of literature. In addition, Project biologists evaluated plant communities for their potential to support special-status plant and wildlife species, examined whether riparian/riverine areas and vernal pool exist on the Project site, addressed Narrow Endemic Plant Species and Urban/Wildlands Interface Guidelines, conducted a focus survey of burrowing owls, addressed the potential for nesting birds on the Project site, and discussed how the Project must comply with Fuels Management Guidelines specified in the MSHCP.

The *Habitat Assessment and Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis* conducted for the Project and Project site concludes as follows - - 'With completion of the recommendations in this document and payment of the MSHCP and SKR mitigation fees, development of the project site is fully consistent with the Western Riverside County MSHCP.' Required payment of these fees is formulated into two Mitigation Measures (**MM-BR-1** and **MM-BR- 3**) below.

- 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)?**

Potentially Significant. Special-status plant and wildlife species associated with vernal pools are presumed absent from the Project site because none of the clay soils needed to support vernal pools were observed on the Project site.

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The burrowing owl currently is designated as a California Species of Special Concern. The burrowing owl is a grassland specialist distributed throughout western North America. It occupies open areas with short vegetation and bare ground within shrub, desert and grassland environments that allow line-of-sight observation of the surrounding habitat to forage and watch for predators. This species uses a wide variety of arid and semi-arid environments with level to gently-sloping areas characterized by open vegetation and bare ground and the majority of the time uses burrows made by burrowing mammals as its shelter. Burrowing owls also have been found occupying man-made cavities such as buried and non-functioning drain pipes, stand-pipes, and dry culverts. In California, the burrowing owl breeding season extends from the beginning of February through the end of August. The entire Project site is vegetated with a variety of relatively low-growing plant species that allow for the line-of-sight opportunities favored by the burrowing owl. In addition, Project biologists encountered several small mammal burrows that have the potential to provide suitable burrowing owl nesting habitat (diameter of more than 4 inches) throughout the Project site.

Under the Riverside County MSHCP, the burrowing owl is considered an adequately conserved covered species that may require focused surveys in certain areas as designated in Figure 6-4 of the MSHCP. To comply with MSHCP requirements, the Project biologists conducted an initial habitat suitability assessment on January 15, 2019 and four separate focused surveys during the breeding season (April 4, April 15, April 23, and May 3, 2019) for burrowing owls to document the presence/absence of burrowing owl on the Project site. The conclusion of the survey states as follows - -

“Based on the results of the burrowing owl focused survey, no burrowing owls or evidence of recent or historic use by burrowing owls was observed on the project site during the focused surveys. As a result, burrowing owl are presumed absent from the project site.” Although the Project site is absent of burrowing owl, the following recommendation of the Project biologists is made as a Mitigation Measure (**MM-BR-2**) identified below, out of an abundance of caution and to ensure burrowing owl remain absent from the Project site.

In addition, the Project site is located within the Mitigation Area of the Stephens’ Kangaroo Rat, which is protected under the Stephens’ Kangaroo Rat Habitat Conservation Plan (County Ordinance No. 663.10; SKR HCP). As noted below in Mitigation Measure **MM-BR-3**, the Project Applicant/Developer will be required to pay the Stephens’ Kangaroo Rat HCP Mitigation Fee prior to commencement of any development on the Project site.

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 Wildlife or U. S. Fish and Wildlife Service?

Potentially Significant. The biologists who conducted the habitat assessment of the Project site accessed the California Department of Fish and Wildlife Quick View Tool in BIOS, the CNDDDB Rarefind 5 and the California Native Plant Society Electronic Inventory of Rare and Endangered Vascular Plants of California for reported locations of special-status plant and wildlife species and accessed special-status natural plant communities in the Steele Peak and Perris USGS 7.5-minute quadrangles.

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The habitat assessment conducted for the Project and Project site evaluated conditions of habitat(s) within the boundaries of the Project site to determine if the plant communities existing at the time of the field survey had the potential to provide suitable habitat(s) for special-status plant and wildlife species. Plant communities identified on aerial photographs during the literature review were verified in the field by the biologist walking meandering transects through the on-site plant communities and along boundaries between plant communities. The biologist evaluated plant communities for their potential to support special-status plant and wildlife species and gave special attention to special-status habitats and/or undeveloped areas that have higher potentials to support special-status plant and wildlife species. Field staff closely surveyed areas providing suitable habitat for burrowing owl for signs of its presence. Methods to detect burrowing owl presence included direct observation, aural detection, and signs of presence such as pellets, white wash, feathers, or prey remains.

The habitat assessment found that grading and disking disturbances on the Project site “have resulted in a majority of the project site being dominated by early successional and non-native vegetation, which has reduced, if not eliminated, the ability of the project site to provide suitable habitat for special-status plant species.” Furthermore, the habitat assessment stated that “although the field investigation was not conducted during the blooming season for the majority of the special-status plant species known to occur in the general vicinity of the project site, based on habitat requirements for specific special-status plant species and the availability and quality of habitats needed by each species, it was determined that the project site has a low potential to provide suitable habitat for smooth tarplant . . . and particulate tarplant. All other special-status plant species are presumed absent from the project site.”

The California Natural Diversity Database (CNDDDB) lists three (3) special-status plant communities as being identified within the Steele Peak and Perris USGS 7.5-minute quadrangles - - Southern Coast Live Oak Riparian Forest, Southern Cottonwood Willow Riparian Forest, and Southern Sycamore Alder Riparian Woodland. None of these special-status plant communities were observed within the Project site boundaries during the habitat assessment filed survey.

According to the CNDDDB, seventy-four (74) special status wildlife species have been reported in the Steele Peak and Perris quadrangles. However, the habitat assessment and availability and quality of on-site habitats, the habitat assessment indicates the Project site “has a moderate potential” to support Cooper’s hawk, sharp-shinned hawk, burrowing owl, and California horned lark. The Project site was determined to have a low potential to provide suitable habitat for Golden eagle, great egret, egret blue heron, ferruginous hawk, white-tailed kite, merlin, prairie falcon, and San Diego black-tailed jackrabbit. The habitat assessment further determined that the Project site “does not provide suitable habitat for any of the other special-status wildlife species known to occur in the area since the project site has been heavily disturbed from on-site disturbances and surrounding development.” Due to the “moderate potential” of the Project site for the above-mentioned special-status wildlife species, Mitigation Measure (MM-BR-4) identified below is recommended to ensure impacts to these species do not occur from Project development and operation and to ensure any Project-related impacts to special-status species will be reduced to a less than significant level.

- 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?**

Less Than Significant Impact. Habitat linkages provide links between larger undeveloped habitat areas that are separated by development. Wildlife corridors are similar to linkages but provide specific opportunities for animals to disperse or migrate between areas. A corridor can be defined as a linear landscape feature of sufficient width to allow animal movement between two comparatively undisturbed habitat fragments. Biology field staff identified any natural corridors and linkages that may support movement of wildlife through the area. As the habitat assessment indicates - - “Adequate cover is essential for a corridor to function as a wildlife movement area.” Wildlife corridors are significant features for dispersal, seasonal migration, breeding and foraging.

The habitat assessment states “the project site has not been identified as occurring in a wildlife corridor or linkage.” However, the Project site is located east of the MSHCP Proposed Noncontiguous Habitat Block 4. This Block is comprised of the Motte Rimrock Reserve and provides habitat for MSHCP listed species Quino checkerspot butterfly, coastal California gnatcatcher, and Stephens’ kangaroo rat.

Keeping in mind that the Project will be confined to existing areas that have been heavily disturbed by agricultural, grading and disking activities, and is primarily bordered by existing development, the habitat assessment indicates “the project site will not directly impact, prevent or restrict the use of Motte Rimrock Reserve by MSHCP listed species associated with Proposed Noncontiguous Habitat Block 4.”

MSHCP Urban Wildlands Guidelines will be implemented for the Project to reduce potential indirect impacts to Proposed Noncontiguous Habitat Block 4 adjacent to the Project site. As a result, “potential impacts to wildlife corridors or linkages are expected to be less than significant.”

The Migratory Bird Treaty Act and the California Fish and Game Code state that removal of any trees, shrubs or other potential nesting habitat should be conducted outside the avian nesting season (generally from March through August, but can extend from as early as January 1 for raptor species). Mitigation Measure **MM-BR-5** identified below is recommended to ensure any Project-related impacts to nesting birds would be reduced to and maintained at a less than significant level.

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, and regulations or by the California Department of Fish and Wildlife or U. S. Fish and Wildlife Service?

No Impact. The federal Endangered Species Act designates “Critical Habitat” at the time of listing of a species or within one year of listing. Critical Habitat refers to specific areas within the geographical range of a species at the time it is listed that include the physical or biological features essential to the survival and eventual recovery of that species. All federal agencies are required to consult with the United States Fish and Wildlife Service about activities they authorize, fund, or permit that may affect a federally listed species or its designated Critical Habitat to ensure projects will not jeopardize the continued existence of the listed species or adversely modify or destroy its designated Critical Habitat.

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The habitat assessment of the Project site indicates “the project site is not located with federally designated Critical Habitat.” The Critical Habitat nearest the Project site is approximately 4.2 miles southeast and is designated for spreading navarretia and thread-leaved brodiaea along the San Jacinto River. Therefore, the loss or adverse modification of Critical Habitat will not occur as a result of Project development and consultation with the United States Fish and Wildlife Service will not be required.

Riparian /riverine areas are areas dominated by trees, shrubs, persistent emergent plants, or emergent mosses and lichens that occur close to or are dependent upon nearby freshwater, or areas with freshwater flowing during all or a portion of the year. Conservation of riparian/riverine areas is intended to protect habitat that is essential to a number of listed or special-status water-dependent fish, amphibian, avian and plant species. The habitat assessment for the Project site states “the project site does not support any discernible drainage courses, inundated areas, wetland vegetation, or hydric soils that would be considered jurisdictional or qualify as riparian/riverine habitat under the MSHCP.” Therefore Project development and operation “will not result in impacts to riparian/riverine habitats”

No impact from Project development or operation will result.

f) Would the Project have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less Than Significant Impact. Three key agencies regulate activities within inland streams, wetlands and riparian areas in California. The United States Army Corps of Engineers Regulatory Branch regulates discharge of dredge and/or fill materials into “waters of the United States” pursuant to Section 404 of the Federal Clean Water Act and Section 10 of the Rivers and Harbors Act. The California Regional Board regulates discharges into surface waters pursuant to Section 401 of the Clean Water Act and the California Porter-Cologne Water Quality Control Act. The California Department of Fish and Wildlife regulates alterations to streambed and associated plant communities pursuant to Section 1602 of the California Fish and Game Code.

The habitat assessment states “the project site does not support any discernible drainage courses, inundated areas, wetland vegetation, or hydric soils that would be considered jurisdictional by the Corps, Regional Board, and/or CDFW [California Department of Fish and Wildlife].” Therefore, no approvals from these agencies will be required for Project development to proceed.

Vernal pools are seasonally inundated, ponded areas that only form in regions where specialized soil and climatic conditions exist. During fall and winter rains water collects in shallow depressions where downward percolation of water is prevented by the presence of a hard pan or clay pan layer below the soil surface. When rains decrease later in the spring and the weather warms, the water evaporates and the pools generally disappear by May. The shallow depressions remain relatively dry until late fall and early winter with the advent of more precipitation and cooler temperatures. Vernal pools provide unusual “flood and drought” habitat conditions to which certain plant and wildlife species have specifically adapted as well as invertebrate species such as fairy shrimp. Vernal pools are seasonal wetlands that occur in depression areas without a continual source of water. Vernal pools have wetland indicators of all 3 parameters (soils,

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vegetation, and hydrology) during the wetter portion of the growing season but normally lack wetland indicators of hydrology and/or vegetation during the drier portion of the growing season. The seasonal hydrology of vernal pools provides for a unique environment that supports plants and invertebrates specifically adapted to a regime of winter inundation, followed by an extended period when the pool soils are dry. The determination that an area exhibits vernal pool characteristics and the definition of the watershed supporting vernal pool hydrology is made on a case-by-case basis.

The habitat assessment conducted for the Project site concluded as follows - -

“The project site does not support any discernible drainage courses, inundated areas, wetland vegetation, or hydric soils that would be considered jurisdictional by the Corps, Regional Board, or CDFW, or qualify as riparian/riverine habitat under the MSHCP. Therefore, regulatory approvals from the Corps, Regional Board, and/or the CDFW will not be required for implementation of the project. Further, site development will not result in impacts to riparian/riverine habitats and a DBESP will not be required for the loss of riparian/riverine habitat.” In addition, because none of the clay soils needed to support vernal pools were found on-site, special-status plant and wildlife species associated with vernal pools are presumed absent from the Project site.

The level of Project development and operation impact would be less than significant.

g) Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinances?

No Impact. There are no oak trees on the Project site. Therefore, the Project is not in conflict with the Riverside County Oak Tree Management Guidelines. In addition, the Project complies with Mead Valley Area Plan policies related to biological resources and no impact will result from Project development or Project operation.

4.4.4 CUMULATIVE IMPACTS

Biological Resources Thresholds a), f), and g) – The cumulative impact analysis for biological resources considers Project development in conjunction with other development projects in the Project site vicinity as well as based on the MSHCP. The Project site is compliant with all MSHCP provisions. Although the burrowing owl is not present on the Project site under existing conditions, the Project site contains habitat suitable for the burrowing owl. Should the species migrate onto the Project site and be present on the site at the time a grading permit issued, impacts would be significant.

Biological Resources Thresholds b) and c) – No sensitive plant communities are located within the Project site. Project development and operation could potentially result in an impact to nesting migratory birds if active nests are disturbed during the nesting season. No discernible drainage courses, inundated areas, wetland vegetation or hydric soils considered jurisdiction by the United States Corps of Engineers, Santa Ana Regional Water Quality Board, or the California State Department of Fish and Wildlife are present on the Project site.

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Although the Project site might not contain any potential nesting habitat, a wide range of habitat and vegetation types in the Project vicinity may have the potential to support nesting birds. Therefore, it is likely other development projects within the Project vicinity may impact nesting birds. Project development, individually and cumulatively, would be required to comply with California State laws to preclude impacts to nesting birds. Mandatory compliance with State law would ensure cumulative considerable impacts to nesting birds would be less than significant.

The Project site contains potentially suitable habitat for the burrowing owl. Although burrowing owls were not observed on the Project site during field surveys, as noted in this Section, there is the potential for this species to migrate onto the Project site and occupy the site prior to initiation of grading activities. The burrowing owl is commonly found within the Project vicinity. Therefore, it is feasible to conclude impacts to the burrowing owl habitat would occur in conjunction with development of other projects in the Project vicinity and Project development has the potential to contribute to a cumulatively considerable impact to the burrowing owl.

The narrative above describes potential impacts of Project development on Biological Resources. Five Mitigation Measures have been proposed in this Section that addresses potential impacts to listed, threatened or otherwise sensitive species. In addition, this Section concludes that potential impacts of the Project on Biological Resources would be reduced to less than significant levels with implementation of the recommended Mitigation Measures. Project and cumulative projects payment of regional MSHCP impact fees, together with implementation of the identified Mitigation Measures, will ensure any cumulative regional impacts to Biological Resources are reduced to less than significant levels.

Biological Resources Thresholds b) and d) – Project development and operation, in combination with other cumulative projects, would not substantially interfere with movement of any native resident or migratory fish or wildlife species, would not interfere with migratory wildlife corridors, and would not impede use of native wildlife nursery sites.

Presently, there are no projects that would, in combination with the proposed Project, produce a significant impact to listed or sensitive species, wildlife movement, sensitive habitat areas, jurisdictional waters or wetlands. Therefore, Project development is not expected to contribute to any significant cumulative impacts related to Biological Resources.

Biological Resources Thresholds e) and g) – Project development and operation would not conflict with any local policies or ordinances protecting biological resources. Other development projects noted in the Project vicinity would be and have been required as standard conditions of project review and approval to comply with applicable local policies and/or ordinances related to protection of biological resources. In that the Project, together with the cumulative projects, would be prohibited from violating applicable, local policies or ordinances pertaining to protection of biological resources, a cumulatively considerable impact would not occur.

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4.4.5 EXISTING REGULATIONS AND STANDARD CONDITIONS

Federal Regulations

Endangered Species Act of 1973

The Federal Endangered Species Act (“ESA”) was enacted to provide a means to conserve endangered species and threatened species. A species is endangered if it is “in danger of extinction throughout all or a significant portion of its range other than a species of the Class Insecta determined by the Secretary [of the Interior] to constitute a pest whose protection under the provision of this Act would present an overwhelming and overriding risk to man.” A threatened species is defined as one that is “likely to become endangered within the foreseeable future throughout all or a significant portion of its range.” It is Congress’s policy that all Federal departments utilize their authorities in furtherance of the conservation of endangered and threatened species and to “cooperate with State and local agencies to resolve water resource issues in concert with conservation of endangered species.”

The Secretary of the Interior (or the Secretary of Commerce) shall determine whether a species is an endangered species or a threatened species because of the following factors:

- The present or threatened destruction, modification, or curtailment of its habitat or range;
- Overutilization for commercial, recreational, scientific, or educational purposes;
- Disease or predation;
- The inadequacy of existing regulatory mechanisms; or,
- Other natural or manmade factors affecting its continued existence.

If the Secretary determines that a species is an endangered species or threatened species, he/she shall concurrently designate any habitat of such species to be a critical habitat, and may from time to time thereafter revise such designation.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act makes it unlawful to pursue, hunt, take, capture, kill, possess or attempt to do the same to any migratory bird or part, nest, or egg of any such bird listed in wildlife protection treaties between the United States, Great Britain, Mexico, Japan and the countries of the former Soviet Union, and authorizes the United States Secretary of the Interior to protect and regulate the taking of migratory birds. In addition, the Act makes it unlawful to offer for sale, sell, offer to barter, barter, offer to purchase, purchase, deliver for shipment, ship, export, import, cause to be shipped, exported, or imported, deliver for transportation, transport or cause to be transported, carry or cause to be carried, or receive for shipment, transportation, carriage, or export, and migratory bird, any part, nest, or egg of any such bird or any product, whether or not manufactured, which consists, or is composed in whole or part, nest, or egg thereof in the terms of the Treaty. The Act applies to migratory bird species that are native to the United States or its territories as a result of natural biological or ecological processes. The Act does not apply to “migratory bird species that occurs in the United States or its territories solely as a result of intentional or unintentional human assisted introduction . . . unless: (i) it was native to the United States or its territories and extant in 1918; (ii) after such extirpation, it was reintroduced in the United States or its territories as a part of a program carried out by a Federal Agency.” The Act establishes seasons and bag limits for hunted species and protects migratory birds, their occupied nests, and their eggs.

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Section 3 of the Act authorizes the Secretary of Agriculture (transferred to the Secretary of the Interior) to determine, occasionally, when, consistent with the Conventions, “hunting, taking, capture, killing, possession, sale, purchase, shipment, transportation, carriage, or export of any such bird, or any part, nest, or egg” could be carried out and to adopt regulations allowing for this. These determinations must be based on “due regard to the zones of temperature and to the distribution, abundance, economic value, breeding habits, and times and lines of migratory flight.”

Section 4 of the Act makes it unlawful to “ship, transport, or carry, by any means whatever . . . any bird, or any part, nest or egg thereof,” which is taken in violation of this law, whether by interstate or international transportation.

Section 7 of the Act allows states to enact regulations that allow for greater protection of migratory birds if (1) the regulations are not inconsistent with the provisions of the particular conventions, and (2) the “regulations do not extend the open seasons for such birds beyond the dates approved by the President in accordance with section three of this act.”

Section 12 of the Act states the Act does not apply to “the breeding of migratory game birds on farms and preserves and the sale of birds so bred under proper regulations for the purpose of increasing food supply.”

In 1972, the Migratory Bird Treaty Act was amended to include protection for migratory birds of prey (i.e., raptors). The Migratory Bird Treaty Act protects more than 800 species including geese, ducks, shorebirds, raptors, songbirds and many relatively common species.

Section 404 of the Clean Water Act

Section 404 of the Clean Water Act (CWA) establishes a program to control discharge of dredged or fill material into navigable waters of the United States, including wetlands. This Section establishes a system that requires a permit before dredged or fill material is allowed to be discharged into navigable waters of the United States unless the activity is exempt from regulation. Any general permit issued shall be (1) based on guidelines developed by the Administrator and (2) set forth requirements and standards that shall apply to any activity authorized by such general permit. Activities regulated under this Section include fill for development, water resource projects, infrastructure development and mining projects.

Activities that are exempt under Section 404(f)(1) of the CWA include: (1) normal farming, silviculture, and ranching; (2) maintenance of currently serviceable structures; (3) construction or maintenance of farm or stock ponds or irrigation ditches, or the maintenance of drainage ditches; and (4) construction or maintenance of farm roads or forest roads, or temporary roads for moving mining equipment, in accordance with best management practices. In general, a permit is not required if the activities are exempt under section 404. However, if activities listed under Section 404(f)(1) include “any discharge of dredged or fill material into the navigable waters incidental to any activity having as a purpose bringing an area of the navigable waters into a use to which it was not previously subject, where the flow or circulation of navigable waters may be impaired or the reach of such waters be reduced,” the activity is not exempt, and a permit is required. If a discharge will only have minimal impact to the nation’s waters, a general permit may be acceptable. An individual permit is required for potentially significant impacts. Section 404 permits and authorizations are subject to Section 401 of the Clean Water Act.

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Section 401 of the Clean Water Act

Section 401 of the Clean Water Act requires that any applicant for a Federal license or permit to conduct any activity that may result in any discharge into navigable waters provide a certification from the State, that any discharge will comply with the applicable provisions of the Act, including water quality requirements established by the State. Certification requirements in paragraph (1) of Section 401 are waived, with respect to a Federal application, if the State fails or refuses to act on a request for certification within a reasonable time after receipt of such request. This period of time shall not exceed one year. No license or permit may be issued by a Federal agency until the certification required by Section 401 has been granted. No license or permit shall be granted if certification has been denied by the State, interstate agency, or the Administrator.

When such discharge may affect the quality of waters of another state, the Administrator shall notify the other state within thirty (30) days of the date of notice of the application. If, within sixty (60) days of receipt of said notification, the other state determines the discharge will affect the quality of its waters, resulting in a violation of water quality requirements in such state, the affected state may object to an issuance of a license or permit and request a public hearing on the objection. If, within sixty (60) days of receipt of said notification, the other state notifies the Administrator of its objection and request for a public hearing on said objection, the licensing or permitting agency shall hold such a hearing.

Section 401 of the Clean Water Act allows a state to levy conditions on the issuance of Federal permits by placing limitations on certification. Any Federal license or permit obtained under paragraph (1) of Section 401 may be suspended or revoked by the issuing federal agency, upon the entry of a judgment that such activity has been operated in violation of the applicable provisions of this title.

Section 401 of the Clean Water Act does not limit the authority of any agency pursuant to other provisions of the law to require compliance with any applicable water quality requirements. Any certification provided under Section 401 shall set forth any limitations and necessary monitoring requirements.

California State Regulations

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) provides for protection of the environment within the State of California by establishing State policy to prevent significant, avoidable damage to the environment through use of alternatives or mitigation measures for projects. CEQA applies to actions directly undertaken, financed or permitted by State lead agencies. Section 15380 of CEQA Guidelines independently defines “endangered” and “rare” species separately from the definitions of the California Endangered Species Act (CESA). Under CEQA, “endangered” species of plants or animals are defined as those whose survival and reproduction in the wild are in immediate jeopardy, while “rare” species are defined as those who are in such low numbers that they could become endangered if their environment worsens.

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California Endangered Species Act (CESA) – (California Fish and Game Code, Sections 2050-2115.5)

The California Department of Fish and Wildlife enforces the California Endangered Species Act. State-listed threatened and endangered species are protected under CESA provisions. Activities that may result in “take” of individuals (defined as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”) are regulated by the California Department of Fish and Wildlife. Habitat degradation or modification is not included in the definition of “take” under CESA. However, the Department of Fish and Wildlife has interpreted “take” to include destruction of nesting, denning, or foraging habitat necessary to maintain a viable breeding population of protected species.

The State of California considers an endangered species as one whose prospects of survival and reproduction are in immediate jeopardy throughout all or a significant portion of its range. A threatened species is considered as one present in such small numbers throughout its range that it is likely to become an endangered species in the near future in the absence of special protection or management. A rare species is one that is considered present in such small numbers throughout its range that it may become endangered if its present environment worsens. State threatened and endangered species are fully protected against “take.”

The California Department of Fish and Wildlife has produced a species of special list to serve as a species watch list. Species on this list are either of limited distribution or their habitats have been reduced substantially, such that a threat to their populations may be imminent. In addition, the California State Legislature intends to acquire lands for preservation of endangered species and threatened species.

The California Fish and Game Code indicates that public agencies should not approve projects that would risk the continued existence of any endangered species or threatened species if there are reasonable and prudent alternatives that would prevent risk. Further, reasonable and prudent alternatives shall be developed, consistent with conserving the endangered species or threatened species, while also maintaining the purpose of the project. The Fish and Wildlife Commission is empowered to establish a list of endangered species and a list of threatened species. Any interested person may petition to add a species or remove a species from either list. If the Commission determines the petitioned action may be warranted, a public hearing shall be conducted for consideration of the petition.

California Fish and Game Code

Fish and Game Code Sections 3503, 3503.5, 3511 and 3513 are applicable to natural resources management. Section 3503 of the Code makes it unlawful to destroy any bird nest or bird eggs that are protected under the Migratory Bird Treaty Act. Section 3503.5 protects birds of prey and makes it unlawful to take, possess or destroy their nest or eggs. Section 3511 lists fully protected bird species, where the California Department of Fish and Wildlife is unable to authorize issuance of permits or licenses to take these species. Section 3513 makes it unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act.

Native Plant Protection Act

Sections 1900-1913 of the Fish and Game Code were developed to preserve, protect and enhance Rare and Endangered plants in California. The Act requires all State agencies to use their authority to carry out

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programs to conserve Endangered and Rare native plants. Provisions of the Native Plant Protection Act prohibit taking of listed plants from the wild and require notification of the California Department of Fish and Wildlife at least ten (10) days in advance of any change in land use that would adversely impact listed plants, which allows the Department of Fish and Wildlife to salvage listed plant species that otherwise would be destroyed.

California Native Plant Society Rare and Endangered Plant Species

The California Native Plant Society lists vascular plants as rare or endangered.

Porter Cologne Act

The California Porter-Cologne Water Quality Control Act gives the State very broad authority to regulate waters of the State – defined as any surface water or groundwater, including saline waters. This Act has become an important tool in the regulatory environment with respect to State authority over isolated and insignificant waters. Generally, any person proposing to discharge waste into a water body that could affect its water quality must file a Report of Waste Discharge in the event there is no Section 404-401 nexus. Although “waste” is partially defined as any waste substance associated with human habitation, the Regional Board also interprets this to include fill discharged into water bodies.

Riverside County General Plan Policies

The following County of Riverside General Plan Multipurpose Open Space Element policies are relevant to Project development.

OS 5.5 – Preserve and enhance existing native riparian habitat and prevent obstruction of natural water resources. Prohibit fencing that constricts flow across watercourses and their banks. Incentives shall be utilized to the maximum extent possible.

OS 17.1 – . . . Every stand-alone application shall require an initial Habitat Evaluation and Acquisition Negotiation Process (HANS) assessment and such assessment shall be made by the Planning Department’s Environmental Programs Division. Habitat assessment and species-specific focused surveys shall not be required as part of this initial HANS assessment for stand-alone applications but will be required when a development proposal or land use application to subsequently subdivide, grade or build on the property is submitted to the County.

OS 17.2 – Enforce the provisions of applicable MSHCP’s and implement related Riverside County policies when conducting review of development applications.

Mead Valley Area Plan

The following policy in the Mead Valley Area Plan is relevant to the Project or Project site.

MVAP 17.6 – Protect sensitive biological resources in Mead Valley Area Plan through adherence to policies found in the multiple Species Habitat Conservation Plans, Environmentally Sensitive Lands, Wetlands, and Floodplain and Riparian Area Management sections of the General Plan Multipurpose Open Space Element.

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Western Riverside County Multiple Species Habitat Conservation Plan (MHS CP)

The MSHCP is a comprehensive, multi-jurisdictional Habitat Conservation Plan that focuses on conservation of species and their associated habitats in western Riverside County. The goal of the MSHCP is to maintain biological and ecological diversity within a rapidly urbanizing region. Approval of the MSHCP and execution of the Implementing Agreement (IA) by the wildlife agencies allows signatories of the IA to issue “take” authorizations for all species covered by the MSHCP, including State- and federal-listed species as well as other identified sensitive species and/or their habitats. Each local jurisdiction will impose a Development Mitigation Fee for projects within their jurisdiction. With payment of the mitigation fee to the County of Riverside and compliance with the survey requirements of the MSHCP where required, full mitigation in compliance with CEQA, the National Environmental Policy Act, CESA, and FESA will be granted. Payment of the mitigation fee and compliance with requirements of Section 6.0 of the MSHCP are intended to provide full mitigation under CEQA, NEPA, CESA AND FESA for impacts to the species and habitats covered by the MSHCP pursuant to agreements with the United States Fish and Wildlife Service, the California Department of Fish and Wildlife, and/or any other appropriate participating regulatory agencies as set forth in the Implementing Agreement for the MSHCP.

Standard Conditions

The County of Riverside General Plan and Mead Valley Area Plan do not identify any Standard Conditions that are applicable to the Project or Project site. However, fee payments noted in the narrative above in this Section will be placed on the Plot Plan discretionary approval for the Project.

4.4.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Although the preceding analyses indicated no burrowing owls were presumed to inhabit the Project site, there was a moderate potential that noted special-status wildlife or avian species could inhabit or use the Project site for nesting. This is a potentially significant impact.

4.4.7 MITIGATION MEASURES

MM-BR-1: Prior to commencement of any development activity on the Project site, the Project Applicant/Developer shall remit required Multiple Habitat Species Conservation Plan fees to the County of Riverside.

MM-BR-2: Prior to commencement of any grading activities, the developer shall conduct a 30-day burrowing owl pre-construction clearance survey. If burrowing owls and/or birds displaying nesting behaviors are observed within the Project site during future Project development, further review may be necessary to ensure compliance with the Multiple Species Habitat Conservation Plan, Migratory Bird Treaty Act, and California Fish and Game Code.

MM-BR-3: Prior to commencement of any development activity on the Project site, the Project Applicant/Developer shall remit required Stephens’ Kangaroo Rat HCP Mitigation Fee to the County of Riverside in compliance with County of Riverside Ordinance Nol. 663.10; SKR HCP.

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MM-BR-4: The Project developer/Applicant shall conduct a pre-construction clearance survey prior to commencement of grading activities.

MM-BR-5: In coordination with the RCA, if ground disturbance and vegetation removal cannot occur outside of the nesting season, a pre-construction clearance survey for nesting birds should be conducted within three (3) days of the commencement of any ground disturbing activity to ensure no nesting birds will be disturbed during Project development. Furthermore, the biologist who conducts the clearance survey should document a negative survey with a brief letter report indicating no impacts to active avian nests will occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities should stay outside a 300-foot buffer around the active nest. For raptor species, the buffer is expanded to 500 feet. Furthermore, it is recommended a biological monitor be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure nesting behavior is not adversely affected by construction. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, normal construction activities can occur. The nesting bird clearance survey shall include a pre-construction burrowing owl clearance survey to ensure that burrowing owl remain absent from the Project site.

4.4.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of the above-noted five Mitigation Measures will ensure Project compliance with MSHCP and HCP required fees, will ensure accurate assessment of pre-construction use of the Project site by burrowing owls, and will ensure protection of any bird nesting areas on the Project site. The resultant level of impact to Biological Resources, after Mitigation, will be less than significant.

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4.5 CULTURAL RESOURCES

This Section provides an evaluation of the potential impacts to cultural resources that could result from development of the Project. Information for this section was derived from:

- County of Riverside General Plan, Cultural Resources Element;
- County of Riverside General Plan Environmental Impact Report No. 521 for General Plan Amendment No. 960; and
- *Phase I Cultural Resources Assessment, Barker Logistics Project, Unincorporated Riverside County, California* (BCR Consulting, LLC) March 22, 2019.

4.5.1 ENVIRONMENTAL SETTING

Cultural resources are comprised of places, objects, structures and settlements that reflect individual or group archaeological, paleontological, architectural or historic activities. The records search BCR Consulting LLC conducted during its research revealed that 33 cultural resource studies have taken place that resulted in the recording of 73 archaeological resources within one mile of the Project site. Two previous studies of a portion of the Project site did not identify any cultural resources within the boundary of the Project site. The Project site is vacant, has some vegetation and trees in portions, and shows evidence of periodic grading.

Two primary regional syntheses are commonly utilized in archaeological literature for southern California. The Wallace synthesis, advanced in 1955, defines the following four cultural horizons, each with characteristic local variations: Early Man Horizon; Milling Stone; Intermediate; and, Late Prehistoric. The 1986 Warren synthesis defines five periods in southern California prehistory: Lake Mojave; Pinto; Gypsum; Saratoga Springs; and, Protohistoric. Warren characterized the cultural ecological approach for archaeological research of the California deserts and coast. Many changes in settlement patterns and subsistence focus are viewed as cultural adaptations to a changing environment, beginning with the gradual environmental warming in the late Pleistocene, the desiccation of the desert lakes during the early Holocene, the short return to pluvial conditions during the middle Holocene, and the general warming and drying trend, with periodic reversals, that continue to the present.

Paleoindian (12,000 to 10,000 BP) and Lake Mojave (10,000 to 7,000 B) Periods

Climatic warming characterizes the transition from the Paleoindian Period to the Lake Mojave Period. This transition also marks the end of Pleistocene Epoch and ushers in the Holocene Period. Artifacts that characterize this Period throughout southern California deserts include stemmed points, flake and core scrapers, choppers, hammerstones, and crescentics. Projectile points associated with the Period include the Silver Lake and Lake Mojave styles. Lake Mojave sites commonly occur on shorelines of Pleistocene lakes and streams where geological surfaces of that epoch have been identified.

Pinto Period (7,000 to 4,000 BP)

The Pinto Period largely has been characterized by desiccation of the southern California. Pinto Period

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sites are rare, and are characterized by surface manifestations that usually lack significant in-situ remains. Artifacts from this era include Pinto projectile points and a flake industry similar to the Lake Mojave tool complex, though use of Pinto projectile points as an index artifact for the era has been disputed. Milling stones have also occasionally been associated with sites of this Period.

Gypsum Period (4,000 to 1,500 BP)

A temporary return to moister conditions during the Gypsum Period is postulated to have encouraged technological diversification afforded by the abundance of available resources. Concurrently, a more diverse artifact assemblage reflects intensified reliance on plan resources. The new artifacts include milling stones, mortars, pestles, and a proliferation of Humboldt Concave Base, Gypsum Base, Elko Eared, and Elko Corner-notched dart points. Other artifacts include leaf-shaped projectile points, rectangular-based knives, drills, large scraper planes, choppers, hammer stones, shaft straighteners, incised stone pendants, and drilled slate tubes. The bow and arrow appeared around 2,000 BP.

Saratoga springs Period (1,500 to 800 BP)

During the Saratoga Springs Period regional cultural diversifications of Gypsum Period developments are evident. Influences from Patayan/Yuman assemblages are apparent in southern inland areas, and include buff and brown wares often associated with Cottonwood and Desert Side-notched projectile points. Obsidian became more commonly used throughout southern California. Characteristic artifacts of the period include milling stones, mortars, pestles, ceramics, and ornamental and ritual objects. More structured settlement patterns are evidenced by large villages. Three types of identifiable archaeological sites (major habitation; temporary camps; processing stations) emerge. Diversity of resource exploitation continues to expand, which indicates a more generalized, less mobile subsistence strategy.

Shoshonean Period (800 BP to Contact)

The Shoshonean Period is the first to benefit from contact-era ethnography. Interviews of living informants allowed anthropologists to match artifact assemblages and particular traditions with linguistic groups and to plot them geographically. During this Period, diversification of site assemblages continued. In addition, reduced Anasazi influence both coincide with the expansion of Numic speakers across the Great Basin, Takic speakers into southern California, and the Hopi across the Southwest. Hunting and gathering continued to diversify and the diagnostic arrow points include desert side-notch and cottonwood triangular. Ceramics continue to proliferate but are more common in southeastern Riverside County during this Period. Trade routes became well-established between coastal and inland groups.

Ethnography

The Project site is situated within the traditional boundaries of the Cahuilla. The Cahuilla, like other Native American groups in southern California, practiced semi-nomadic hunter-gatherer subsistence strategies and commonly exploited seasonably available plant and animal resources. The Cahuilla generally are divided into three groups: Desert Cahuilla, Mountain Cahuilla, and Western (or Pass) Cahuilla.

History

The historic era of southern California generally is divided into three periods: the Spanish or Mission Period (1769-1821); the Mexican or Rancho Period (1821-1848); and, the American Period (1848-present).

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Spanish Period

The Spanish Period is represented by the following: exploration of the region; establishment of the San Diego Presidio and missions at San Gabriel and San Luis Rey; and, introduction of livestock, agricultural goods, and European architecture and construction techniques.

Mexican Period

The Mexican Period began with Mexican independence from Spain and continued until the end of the Mexican-American War. The Secularization Act of 1834 resulted in the transfer, through land grants (called ranchos) of large mission tracts to politically prominent individuals. Sixteen (16) ranchos were granted in Riverside County. Cattle ranching was a more substantial business than agriculture. Trade in hides and tallow increased during the early portion of this Period. Until the 1849 Gold Rush, livestock and horticulture dominated California's economy.

American Period

The American Period saw California's entry into the Union of the United States in 1850. The cattle industry reached its greatest prosperity during the first years of the American Period. Mexican Period land grants had created large pastoral estates in California, and the demand for beef during the Gold Rush led to a cattle boom that lasted from 1849-1855. However, the demand for beef began to decline due to imports of sheep from New Mexico and cattle from the Mississippi Valleys. Many California ranchers lost their ranchos through foreclosure when the beef market collapsed. A series of disastrous floods in 1861 and 1862, followed by two years of extreme drought that continued to some extent until 1876, altered ranching forever in southern California.

4.5.2 THRESHOLDS OF SIGNIFICANCE

Appendix G of the *CEQA Guidelines* contains the Initial Study Environmental Checklist form used during preparation of the Initial Study contained in Appendix A of this EIR. The County of Riverside has adopted Thresholds of Significance that vary from the Appendix G Thresholds, as reflected in the Initial Study prepared for the Project. This EIR uses the following County-adopted Thresholds of Significance to comprise the basis of impact analyses.

- a) **Would the Project alter or destroy a historical site?**
- b) **Would the Project cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5?**
- c) **Would the Project alter or destroy an archaeological site?**
- d) **Would the Project cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5?**
- e) **Would the Project disturb any human remains, including those interred outside of formal cemeteries?**

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4.5.3 ENVIRONMENTAL IMPACTS

a) **Would the Project alter or destroy a historical site?**

and

b) **Would the Project cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5?**

No Impact. As indicated in the Initial Study prepared for the Project, the Project site is vacant. California Code of Regulations Section 15064.5(a) defines “historical resource” as including the following:

- A resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources;
- A resource included in a local register of historical resources, as defined in California Public Resources Code Section 5020.1(k) or identified as significant in a historical resource survey meeting requirement of Public Resources Code Section 5024.1(g) shall be presumed to be historically or culturally significant. Public agencies are required to treat any such resource as significant unless the preponderance of evidence demonstrates it is not historically or culturally significant; or,
- Any object, building, structure, size, area, place, record or manuscript that 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 a historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the entire record. In general, 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 Historic Places, including the following:
 - Is associated with events that have made a significant contribution to broad patterns of California history and cultural heritage;
 - Is associated with lives of persons important to California’s past;
 - Embodies 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,
 - Has yielded, or may be likely to yield, information important in prehistory or history.

The Riverside County General Plan does not identify any historical resources on the Project site. Therefore, Project development and operation would not alter or destroy a historical resource as defined in Section 15064.5. Furthermore, the Cultural Resources Assessment conducted for the Project indicated Project development would not alter or destroy a historic site. As a result, no impact will result from Project development.

c) **Would the Project alter or destroy an archaeological site?**

and

d) **Would the Project cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5?**

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Potentially Significant. BCR Consulting LLC conducted research pursuant to the California Environmental Quality Act, Public Resources Code Chapter 2.6, Section 21083.2, California Code of Regulations Title 14, Chapter 3, Article 5, Section 15064.5, and *County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work*. The pedestrian cultural resources survey is intended to locate and document previously recorded or new cultural resources, including archaeological sites, features, isolates and historic-period buildings that exceed 45 years in age within the defined Project boundaries. Project site boundaries were examined using 10-15 meter transect intervals, where accessible. The Cultural Resources Assessment for the Project was intended to determine whether cultural resources are located within the Project boundaries, whether any cultural resources are significant pursuant to the above-referenced regulations and standards, and to develop specific Mitigation Measures that would address potential impacts to existing or potential resources.

A records search was conducted that included a review of all pre-recorded historic-period and prehistoric cultural resources and excavation reports generated from projects located within one mile of the Project site. Also, a review was conducted of the National Register of Historic Places (National Register), the California Register, and documents and inventories from the California Office of Historic Preservation, including the lists of California Historical Landmarks, California Points of Historical Interest, Listing of National Register Properties, and the Inventory of Historic Resources.

Fieldwork was conducted on March 5, 2019, after completion of the records search. The survey was conducted by walking parallel transects spaced approximately 10-15 meters apart across 100 percent of the Project site, where accessible. Digital photographs were taken at various points within the Project boundaries. In areas of dense vegetation, a random sampling of four cleared two-meter-by two-meter surface scrapes were performed. California Office of Historic Preservation *Instructions for Recording Historical Resources* were followed in the field.

The Cultural Resources Assessment prepared for the Project states “the field survey and research have indicated that there are no cultural resources located within the project site boundaries.” However, the Assessment further concludes the Project site “is considered sensitive for buried cultural resources” because numerous prehistoric archaeological sites have been identified in the vicinity of the Project site. Prehistoric or historic cultural materials that may be encountered during ground-disturbing activities include the following:

- Prehistoric flaked-stone artifacts and debitage (waste material), consisting of obsidian, basalt, and or cryptocrystalline silicates;
- Groundstone artifacts, including mortars, pestles, and grinding slabs;
- Dark, greasy soil that may be associated with charcoal, ash, bone, shell, flaked stone, groundstone, and fire affected rocks;
- Historic-period artifacts such as glass bottles and fragments, cans, nails, ceramic and pottery fragments, and other metal objects; and,
- Historic-period structural or building foundations, walkways, cisterns, pipes, privies, and other structural elements.

Mitigation Measures MM-CR-1 through MM-CR-3, presented subsequently, would ensure any impact to archaeological sites or resources would be lessened and remain less than significant.

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- e) **Would the Project disturb any human remains, including those interred outside of formal cemeteries?**

Potentially Significant. The Cultural Resources Assessment indicates that if human remains are encountered during Project development, the California State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 509798. BCR Consulting has initiated a Sacred Lands File search with the Native American Heritage Commission, followed by scoping with tribes. The Sacred Lands file search revealed no traditional cultural places within the boundaries of the Project site. However, Mitigation Measure MM-TCR-3 provided in the Tribal Cultural Resources Section of this EIR will ensure that any potential impacts related to the discovery of human remains during Project development will be reduced to a less than significant level.

4.5.4 CUMULATIVE IMPACTS

Cultural Resources Thresholds a) and b) – Record search and field surveys indicated no significant historical sites exist on the Project site or within properties in the Project vicinity subject to cumulative analysis. Therefore, Project development would not result in a cumulatively considerable impact to historical sites or resources.

Cultural Resources Thresholds c) and d) – Project development would not impact any known prehistoric archaeological resources and the likelihood of uncovering previously unknown prehistoric archaeological resources during Project grading and construction. In addition, the potential of Project development uncovering previously unknown prehistoric archaeological resources is low. Therefore, Project development and operation would not contribute to a significant cumulative impact to prehistoric archaeological sites and/or resources.

Cultural Resources Threshold e) – Required compliance with California Health and Safety Code Section 7050.5 as well as Public Resources Code Section 5097 *et. seq.* would assure all future development projects within the Project vicinity treat human remains that may be uncovered during Project grading or construction in accordance with prescribed, respectful and appropriate practices and thereby avoid cumulative impacts.

Potential cumulative impacts related to Tribal Cultural Resources are analyzed in the Tribal Cultural Resources Section of this EIR.

4.2.5 EXISTING REGULATIONS

Regulatory Background

National Historic Preservation Act (1966)

The goal of this Act is to ensure federal agencies act as responsible stewards of resources in the United States when actions affect historic properties. There are no historic resources on the Project site. Therefore, the provisions of this Act do not pertain to the Project.

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National Register of Historic Places (1981)

The National Register of Historic Places provides a guide for governmental entities, private groups and citizens to identify the nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment. Listing of a site on the National Register generally does not result in any specific physical protection, but does create an additional level of CEQA and National Environmental Protection Act review to be completed prior to approval of any discretionary action occurring that might adversely affect the listed resource. There are no historic places on the Project site. Therefore, the provisions of the National Register of Historic Places do not pertain to the Project.

National Historic Landmarks Program (1982)

This Program, as authorized by the Historic Site Act and as administered by the Department of the Interior, identifies and designates National Historic Landmarks to “encourage the long-range preservation of nationally-significant properties that illustrate or commemorate the history and prehistory of the U.S.” Sites listed on the National Historic Landmarks are explicitly preserved and protected from harm under federal law. There are no historic landmarks on the Project site. Therefore, the provisions of the National Register of Historic Places do not pertain to the Project.

American Indian Religious Freedom Act (1978)

The intent of this Act is to protect Native Americans’ First Amendment right to “free exercise” of religion. Under this Act, federal agencies and departments are charged with evaluating their policies and procedures in consultation with native traditional religious leaders to eliminate interference with the free exercise of native religion. Agencies must determine and make appropriate changes necessary to protect and preserve Native American religious cultural rights and practices and to accommodate access to and use of religious sites “to the extent that the use is practicable and not inconsistent with an agency’s essential functions.” No Native American religious sites have been identified on the Project site. Therefore, the provisions of the American Indian Religious Freedom Act do not pertain to the Project.

Native American Graves Protection and Repatriation Act (1990)

This Act describes the rights of Native American lineal descendants, Indian Tribes and Native Hawaiian organizations with respect to treatment, repatriation and disposition of Native American cultural items for which they can show a relationship of lineal descent or cultural affiliation. In addition, the Act requires federal agencies and museums receiving federal funds to inventory holdings of Native American human remains and funerary objects and provide written summaries of other cultural items. Furthermore, the Act provides for greater protection of Native American burial sites and more careful control over removal of Native American human remains, funerary objects, sacred objects and items of cultural patrimony on federal and tribal lands.

Federal Antiquities Act (1906)

To protect cultural resources in the United States, this Act explicitly prohibits appropriation, excavation, injury and destruction of “any historic or prehistoric ruin or monument, or any object of antiquity” located on lands owned or controlled by the federal government without permission of the Secretary of the federal department with jurisdiction and establishes criminal penalties for these acts. This Act and its implementing regulations do not specifically mention paleontological resources. However, several federal agencies,

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including the National Park Service, the Bureau of Land Management and the United States Forest Service, have interpreted objects of antiquity as including fossils.

Paleontological Resources Preservation Act (2002)

This Act intends to codify the generally-accepted practice of limiting collection on public (federal) land of vertebrate fossils and other rare and scientifically significant fossils to qualified researchers who obtain a permit from the appropriate state or federal agency and agree to donate any materials recovered to recognized public institutions where they will remain accessible to the public and to other researchers. The Project site is privately owned, not public property. Therefore, the provisions of this Act do not pertain to the Project.

Actions by the United States Army Corps of Engineers

The United States Army Corps of Engineers has established procedures to be followed to fulfill requirements of the National Historic Preservation Act and other applicable historic preservation laws. The United States Army Corps of Engineers has no jurisdiction over the environment on the Project site.

California State Public Resources Code

California State Public Resources Code policies and regulations protect archaeological, paleontological and historical sites. CEQA further protects cultural and paleontological resources because those resources are considered to be non-renewable. Public Resources Code protections are as follows.

- Sections 5020-5029.5 – provides for continuation of the former Historical Landmarks Advisory Committee as the State Historical Resources Commission, which is in charge of overseeing the administration of the California Register of Historical Resources and is responsible for designation of State Historical Landmarks and Historical Points of Interest
- Sections 5079-5079.65 – provides definitions of the functions and duties of the Office of Historic Preservation, which is responsible for administration of federally and state-mandated historic preservation programs in California and the California Heritage Fund
- Sections 5097.9-5097.998 – provides protection to Native American historical and cultural resources and sacred sites and identifies powers and duties of the Native American Heritage Commission; requires notification to descendants of discoveries of Native American human remains and provides for treatment and disposition of human remains and associated grave materials.

California Administrative Code, Title 14, Section 4308

This section of the California Administrative Code states “no person shall remove, injure, deface or destroy any object of paleontological, archeological or historical interest or value.”

California Code of Regulations, Title 14, Section 1427

Recognizing that California’s archaeological resources “are endangered by urban development and population growth and by natural forces,” these Regulations state “these resources need to be preserved in order to illuminate and increase public knowledge concerning the historic and prehistoric past of California” and that any person “not the owner thereof, who willfully injures, disfigures, defaces or destroys any object

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or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor.”

California Register of Historic Resources

This Register is overseen by the State Office of Historic Preservation. The Register is intended to serve as an authoritative guide to California’s significant historical and archaeological resources. Listed resources must meet one of four “significance criteria” related to events, people, construction/artistic value or information and also must retain sufficient integrity to convey their significance. California Historical Landmarks are intended to recognize resources of Statewide significance. Points of historical Interest recognize resources of local or countywide significance. All listings on the National Register of Historic Resources are automatically added to the California Register of Historic Resources. Listing on a California Register generally does not result in any specific physical protection of the resource but does create an additional level of CEQA review to be conducted prior to any discretionary action occurring that might adversely affect the resource.

Regulation of Cultural Resources Pursuant to the Public Resources Code, Section 5097

This Section (5097) of the California Public Resources Code provides for the following:

- Outlines requirements for cultural resource analysis prior to commencement of any construction on State lands;
- Specifies that unauthorized disturbance or removal of archaeological, historical or paleontological resources located on public lands is a misdemeanor;
- Prohibits the knowing destruction of objects of antiquity without a permit on public lands and provides for criminal sanctions for violators;
- Requires consultation with the California Native Heritage Commission when Native American graves are found; and,
- Establishes that violations for taking or possessing remains or artifacts are felonies.

Other Sections (5097.9 through 5097.91) establish that no public agency or private party using or occupying public property shall interfere with free expression or exercise of Native American religion as provided in the United States Constitution and the California State Constitution. In addition, these Sections prohibit public agencies and private parties using or occupying public property from causing severe or irreparable damage to any Native American sanctified cemetery, place or worship, religious or ceremonial site or sacred shrine located on public property, except on a clear and convincing demonstration that the public interest and necessity require such.

Section 5097 further establishes the Native American Heritage Commission, which is tasked with working to ensure preservation and protection of Native American human remains, associated grave goods and cultural resources. The Public Resources Code authorizes the Native American Heritage Commission to initiate legal action when necessary to prevent damage to Native American burial grounds or places of worship and establishes more specific procedures to be implemented in the event that Native American remains are discovered.

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California Public Resources Code Related to Paleontological Resources

Section 5097.5 of the California Public Resources Code prohibits “knowing and willful” excavation removal, destruction, injury and defacement of any paleontological feature on public lands except where the agency with jurisdiction has granted express permission.

Section 30244 requires reasonable mitigation for impacts on paleontological resources that occur as a result of development on public lands.

California Government Codes Addressing Native American Heritage

California Government Code Section 6254(r) exempts from disclosure public records of Native American graves, cemeteries and sacred places maintained by the Native American Heritage Commission. Furthermore, California Government Code Section 65351 specifies how local planning agencies should provide opportunities for involvement of California Native American tribes to consult on preparation or amendment of general plans. Section 65352 requires local planning agencies to refer proposed actions of general plan adoption or amendment to California Native American tribes on the Native American Heritage Commission contact list with a 45-day opportunity for comments. Other California Government Code Sections allow city and county legislative bodies to acquire property for preservation or development of a historical landmark and allow local legislative bodies to enact ordinances to provide special conditions or regulations for protection or enhancement of places or objects of special historical or aesthetic interest or values.

California State Health and Safety Code

The California State Health and Safety Code (Section 7050.5(b) requires that excavation on a project site cease “in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery” until the coroner can determine the circumstances, manner and cause of any death. The coroner then is required to make recommendations concerning treatment and disposition of the human remains. This Section also makes it a misdemeanor to intentionally disturb, mutilate or remove interred human remains. Section 7051 specifies removal of human remains from “internment or a place of storage while awaiting internment” with the intent to sell them or to dissect them with “malice or wantonness” is a public offense. Sections 8010-8011 establish the California Native American, Graves Protection and Repatriation Act consistent with the federal law addressing the same and, among other provisions, outlines the need for aiding California Indian tribes, including non-federally recognized tribes, in filing repatriation claims.

California Senate Bill 18 (Traditional Tribal Cultural Places Act – 2004)

California State law provides for limited protection of Native American prehistoric, archaeological, cultural, spiritual and ceremonial places, such as the following: sanctified cemeteries, religious, ceremonial sites, shrines, burial grounds, prehistoric ruins, archaeological sites; and, sacred sites.

California Senate Bill 18 (2005) placed new requirements on local governments for developments in or near a Traditional Tribal Cultural Place (TTCP). Local jurisdictions must provide opportunities for involvement of California Native American tribes in the land planning process to preserve traditional tribal cultural places. The Final Tribal Guidelines recommends the Native American Heritage Commission provide written information within 30 days to inform the Lead Agency if a proposed project is determined to be near a TTCP and another 90 days for tribes to respond to a local government if the tribes want to

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consult to determine whether the project would have an adverse impact on the TTCP. If the Native American Heritage Commission, the tribe(s) and interested parties agree upon mitigation measures necessary for the proposed project, the mitigation measures would be included in the project EIR. If the City and tribe agree adequate mitigation or preservation measures cannot be implemented, neither party is obligated to take action.

SB 18 also amended California Civil Code Section 815.3 to add California Native American tribes to the list of entities that can acquire and hold conservation easements to protect their cultural places.

The Project-associated discretionary application is for a Plot Plan only and therefore is not subject to consultation requirements of California Senate Bill 18.

California Assembly Bill 52

California Governor Brown signed Assembly Bill Number 52 on September 25, 2014. California Assembly Bill 52 became effective on July 1, 2015. The legislation imposes new requirements for consultation regarding projects that may affect a tribal cultural resource, includes a broad definition of what may be considered to be a tribal cultural resource, and includes a list of recommended mitigation measures.

Assembly Bill 52 added tribal cultural resources to categories of cultural resources in CEQA. “Tribal resources” are defined as either (1) sites, features, places cultural landscapes, sacred places and objects with cultural value to a California Native American tribe” that are included in the State register of historical resources or a local register of historical resources, or that are determined to be eligible for inclusion in the State register; or, (2) resources determined by the lead agency, in its discretion, to be significant based on the criteria for listing in the State register. Under this legislation, a project that may cause a substantial adverse change in the significance of a tribal cultural resource is defined as a project that may have a significant effect on the environment. Where a project may have a significant impact on a tribal cultural resource, the lead agency’s environmental document must discuss the impact and whether feasible alternatives or mitigation measures could avoid or substantially lessen the impact.

Assembly Bill 52 further requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if they have requested notice of projects proposed within that area. If a tribe requests consultation within 30 days upon receipt of the notice, the lead agency must consult with the tribe. Consultation may include discussing type of environmental review necessary, significance of tribal cultural resources, significance of project impacts on tribal cultural resources, and alternatives and mitigation measures recommended by the tribe. The parties must consult in good faith, and consultation is considered concluded when either the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource (if such a significant effect exists) or when a party concludes mutual agreement cannot be attained.

The legislation also identifies mitigation measures that may be considered to avoid significant impacts if there is no agreement on appropriate mitigation. Recommended measures include the following.

- Preservation in place
- Protecting the cultural character and integrity of the resource
- Protecting the traditional use of the resource
- Protecting the confidentiality of the resource
- Permanent conservation easements with culturally appropriate management criteria

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County of Riverside General Plan

The Riverside County General Plan Cultural and Paleontological Resources Element indicates the cultural history of Riverside County is divided into two general chronological units separated by the advent of written documentation of events: Prehistory (10,000-12,000 years ago through initial Euro-American settlement in the late 18th century) and the historic (1774-late 20th century) time periods that include ethnohistoric information. A large number of cultural resources from the Historic Era are known or expected to occur within Riverside County, many of which have been documented and preserved when identified and many more are expected to occur that have not been identified.

The County of Riverside General Plan describes County Ordinances, Regulations and Programs that pertain to Cultural Resources including County Ordinance No. 578 – Establishment of Historic Preservation Districts, County Historic Preservation Commission, County Planning Department Procedures, General Conditions of Approval for Discretionary Actions, and various policies.

General Plan Policies

The following General Plan policies are relevant to Cultural Resources and to Project development.

Policy OS 19.2: The County of Riverside shall establish a cultural resources program in consultation with Tribes and the professional cultural resources consulting community. Such a program shall, at a minimum, address each of the following: application processing requirements; information database(s); confidentiality of site locations; content and review of technical studies; professional consultant qualifications and requirements; site monitoring; examples of preservation and mitigation techniques and methods; and the descendant community consultation requirements of local, state and federal law.

Policy OS 19.3: Review proposed development for the possibility of cultural resources and for compliance with the cultural resources program.

Policy OS 19.4: To the extent feasible, designate as open space and allocate resources and/or tax credits to prioritize the protection of cultural resources preserved in place or left in an undisturbed state.

Policy OS 19.5: Exercise sensitivity and respect for human remains from both prehistoric and historic time periods and comply with all applicable laws concerning such remains.

Planning Department Procedures

Riverside County Planning Department Procedures are most relevant to the Project. The Riverside County Archaeologist reviews all proposed land use projects subject to CEQA and not otherwise deemed categorically exempt and reviews all Phase I cultural resources studies. Vacant parcels within areas known to have prehistoric or historic resources, any parcels with environmental, geomorphological or vegetative features known to increase the likelihood of cultural resources being present compel a Phase I Cultural Resources study. The Phase I study serves to advise the Riverside County Archaeologist about matters relating to any identified prehistoric or historic resources, provide requisite information to complete the project-related CEQA analysis and guide the Riverside County Archaeologist in determining which land use conditions of approval and/or mitigation measures apply to a proposed project.

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4.5.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Some grading will be necessary to prepare the property for accommodating the proposed warehouse building and parking. No cultural resources (historical; archaeological; paleontological) or human remains are known to exist on the Project site. There may be a possibility of discovery of paleontological resources or human remains associated with Native American settlement beneath the surface that were not discovered during previous grading activity onsite. Project development and operational impacts to historical and archaeological resources would remain less than significant.

4.5.7 MITIGATION MEASURES

Compliance with the following Mitigation Measures, would contribute to ensuring any Project-related impacts to Cultural Resources would be reduced to a less than significant level.

MM-CR-1 (Project Archaeologist): Prior to issuance of grading permits: The applicant/developer shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist (Project Archaeologist) has been contracted to implement a Cultural Resource Monitoring Program (CRMP). 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. A fully executed copy of the contract and a wet-signed copy of the Monitoring Plan shall be provided to the County Archaeologist to ensure compliance with this condition of approval.

Working directly under the Project Archaeologist, an adequate number of qualified Archaeological Monitors shall be present to ensure that all earth moving activities are observed and shall be on-site during all grading activities for areas to be monitored including 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.

MM-CR-2 (Unanticipated Resources):

If during ground disturbance activities, unique cultural resources* are discovered, the following procedures shall be followed:

- i. 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 archaeologist, the tribal representative, and the Planning Director to discuss the significance of the find. ii. At the meeting, the significance of the discoveries shall be discussed and after consultation with the tribal representative(s) and the archaeologist, a decision shall be made, with the concurrence of the Planning Director, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resources.
- iii. Grading or further ground disturbance shall not resume within the area of the discovery until a decision has been made through consultation with all relevant parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will continue if needed.

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iv. Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the appropriate tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Condition.

v. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the project archeologist, in consultation with the Tribe, and shall be submitted to the County for their review and approval prior to implementation of the said plan.

vi. Pursuant to Calif. Pub. Res. Code § 21083.2(b), if the project will cause damage to a unique archaeological resource, the County shall determine if reasonable efforts can be formulated to permit any or all of these resources to be preserved in place or left in an undisturbed state. If the landowner and the Tribe(s) cannot agree on the significance or the mitigation for the archaeological or cultural resources, these issues will be presented to the County Planning Director for decision. The County Planning Director shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the project archeologist and shall take into account the cultural and religious principles and practices of the Tribe(s).

* Unique cultural resources are defined, for this condition only, as being multiple 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 as determined in consultation with the Native American Tribe(s).

MM-CR-3 (Phase IV Monitoring Report): Prior to Grading Permit Final Inspection, 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 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 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 and evidence that any artifacts have been treated in accordance to procedures stipulated in the Cultural Resources Management Plan.

4.5.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Adherence to Mitigation Measures MM-CR-1 through MM-CR-3 as presented above will reduce any potential Project impacts to Cultural Resources to a less than significant level.

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4.6 ENERGY

Information presented within this Section is summarized from *Barker Logistics, Energy Analysis, County of Riverside* (Urban Crossroads, Inc.) March 18, 2019. The Energy Analysis is presented as Appendix G to this EIR.

4.6.1 ENVIRONMENTAL SETTING

The Project site is located on the northeast corner of the Patterson Avenue/Placentia Avenue intersection in unincorporated Riverside County. The Project site currently is vacant, shows evidence of grading and disking, and contains intermittent grasses and some trees. Existing land uses near the Project site include residential homes to portions of the lands to the north, south, east and west. An existing and designated future Business Park use is located east of the Project site. Interstate-215 is approximately 1,600 feet east of the Project site; BNSF Metrolink rail lines are approximately 1,500 feet east of the Project site. March Air Reserve Base/Inland Port Airport is approximately 2.5 miles northeast of the Project site.

Existing Conditions

The most recent data for California's estimated annual energy use is from 2016 and included the following:

- Approximately 7,830 trillion British Thermal Unit (BTU) of energy was consumed;
- Approximately 2,115 billion cubic feet of natural gas; and,
- Approximately 15.8 billion gallons of transportation fuel (for the year 2017).

The most recent data provided by the United States Energy Information Administration (EIA) is from 2016 and illustrates energy use in California by demand sector as follows:

- Approximately 39.8 percent transportation;
- Approximately 23.7 percent industrial;
- Approximately 17.7 percent residential; and,
- Approximately 18.9 percent commercial.

In 2017, total system electric generation for California was 292,039 gigawatt-hours (GWh). California's electricity in-State generation system generated approximately 71% (206,336 GWh) of the electricity it uses; the remainder was imported from the Pacific Northwest (14%) and the U.S. Southwest (16%). Natural gas is the primary source for electricity generation at 50% of the total in-State generation system power. **Table 4.6.1** presents the total electricity system power in California in 2017.

Table 4.6.1 – California Total Electricity System Power (2017)

Fuel Type	California In-State Generation (GWh)	Percent of California In-State Generation	Northwest Imports (GWh)	Southwest Imports (GWh)	California Power Mix (GWh)	Percent California Power Mix
Coal	302	0.15%	409	11,364	12,075	4.13%
Large Hydro	36,920	17.89%	4,531	1,536	42,987	14.72%
Natural Gas	89,564	43.40%	46	8,705	98,315	33.67%
Nuclear	17,925	8.69%	0	8,594	26,519	9.08%
Oil	33	0.02%	0	0	33	0.01%
Other	409	0.20%	0	0	409	0.14%
Renewables	61,183	29.65%	12,502	10,999	84,684	29%
<i>Biomass</i>	5,827	2.82%	1,015	32	6,874	2.35%
<i>Geothermal</i>	11,745	5.69%	23	937	12,705	4.35%
<i>Small Hydro</i>	6,413	3.11%	1,449	5	7,867	2.70%
<i>Solar</i>	24,331	11.79%	0	5,465	29,796	10.20%
<i>Wind</i>	12,867	6.24%	10,015	4,560	27,442	9.40%
Unspecified Sources of Power	N/A	N/A	22,385	4,632	27,017	9.25%
TOTAL	206,336	100%	39,873	45,830	292,039	100%

The “U.S. Energy Information Administration, California State Profile and Energy Estimates, Quick Facts” presents a summary of, and context for, energy consumption and energy demands within the State, as excerpted below.

- California was the fourth largest producer of crude oil among the 50 states in 2017 and, as of January 2018, third in oil refining capacity.
- California is the largest consumer of jet fuel among the 50 states and accounted for one-fifth of the nation’s jet fuel consumption in 2016.
- California’s total energy consumption is second highest in the nation, but in 2016 the State’s per capita energy consumption ranked 48th, due in part to its mild climate and its energy efficiency programs.
- In 2017, California ranked second in the nation in conventional hydroelectric generation and first as a producer of electricity from solar, geothermal, and biomass resources.
- In 2017, solar PV and solar thermal installations provided approximately 16% of California’s net electricity generation.

The Energy Analysis prepared for the Project focused on the three energy sources most relevant to the Project – electricity; natural gas; and, transportation fuel for vehicle trips associated with industrial uses planned for the industrial nature of the Project.

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Electricity

Southern California Edison (SCE) provides electricity to the Project vicinity. SCE provides electric power to more than 14 million persons in 15 counties and in 180 incorporated cities within a service area encompassing approximately 50,000 square miles. SCE derives electricity from varied energy resources including the following: fossil fuels; hydroelectric generators; nuclear power plants; geothermal power plants; solar power generation; and, wind farms. SCE also purchases from independent power producers and utilities that include out-of-state suppliers.

California’s electricity industry is an organization of traditional utilities, private generating companies, and State agencies, each with a variety of roles and responsibilities to ensure electrical power is provided to consumers. The California Independent Service Operator (ISO) is a nonprofit public benefit corporation and is the impartial operator of the State’s wholesale power grid. The ISO is charged with maintaining grid reliability and directing uninterrupted electrical energy supplies to California homes and communities. Part of the ISO’s charge is to plan and coordinate grid enhancements to ensure that electrical power is provided to California consumers. To accomplish this, transmission owners file annual transmission expansion/modification plans to accommodate California’s growing electrical needs. The ISO reviews and either approves or denies proposed additions. Also, the ISO works with other areas in the western United States electrical grid to ensure adequate power supplies are available to the State to ensure continuing reliable and affordable electrical power is assured to existing and new consumers throughout California.

The following **Table 4.6.2** identifies SCE specific proportional shares of electricity sources in 2017. The 2017 SCE Power Mix has renewable energy at 32% of the overall energy resources. Geothermal resources are at 8%, wind power is at 10%, large hydroelectric sources are at 8%, solar energy is at 13%, and coal is at 0%. Biomass and waste sources have decreased to 0% from 1% in 2016. Natural gas is at 20%.

Table 4.6.2 – SCE 2017 POWER CONTENT MIX

ENERGY RESOURCES	2016 SCE POWER MIX
Eligible Renewable	32%
Biomass and Waste	0%
Geothermal	8%
Small Hydroelectric	1%
Solar	13%
Wind	10%
Coal	0%
Large Hydroelectric	8%
Natural Gas	20%
Nuclear	6%
Other	0%
Unspecified Sources of Power	34%
TOTAL	100%

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Natural Gas

Natural gas would be provided to the Project by Southern California Gas (SoCal Gas). The California Public Utilities Commission (PUC) regulates natural gas utility service for approximately 10.8 million customers who receive natural gas from Pacific Gas and Electric, Southern California Gas, San Diego Gas & Electric, Southwest Gas, and several smaller natural gas utilities. The vast majority of California's natural gas customers are residential and small commercial customers. Large consumers, like electric generators and industrial customers, referred to as "noncore" customers, accounted for approximately 68% of the natural gas delivered by California utilities in 2012. The PUC oversees utility purchases and transmission of natural gas to ensure reliable and affordable natural gas deliveries to existing and new consumers throughout California.

The Greenhouse Gas Analysis for the Project calculated natural gas usage according to the CalEEMod model.

Transportation Energy Resources

The Project would generate additional vehicle trips with resulting consumption of energy resources, predominantly gasoline and diesel fuel. The California Department of Motor Vehicles in March 2018 identified 35 million registered vehicles including more than 27 million passenger vehicles and light trucks and nearly 8 million medium- and heavy-duty vehicles in California, which consume an estimated 19 billion gallons (15.1 billion gallons of gasoline and ethanol and 3.9 billion gallons of diesel/biodiesel/renewable diesel) of fuel each year. In 2016, Californians also used 194 million therms of natural gas as a transportation fuel, or the equivalent of 155 million gallons of gasoline.

4.6.2 THRESHOLDS OF SIGNIFICANCE

The County of Riverside has adopted Thresholds of Significance that vary in some cases topically and in format from the Appendix G Thresholds, as reflected in the Initial Study prepared for the Project. This EIR uses the following County-adopted Thresholds of Significance to comprise the basis of impact analyses. In addition to the County-adopted Thresholds of Significance, Appendix F of the State CEQA Guidelines 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.

Would the project - -

- a) **Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**
- b) **Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

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4.6.3 ENVIRONMENTAL IMPACTS

- a) **Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

Less Than Significant Impact.

Project Operation

Energy consumption in support of or related to Project operation would include transportation energy demands (energy consumed by employee and patron vehicles accessing the Project site) and facilities energy demands (energy consumed by building operations and site maintenance activities).

Transportation Energy Demands

Light-Duty Automobiles

Full Project build-out would generate an estimated 7,677,039 annual vehicle miles traveled (VMT). The aggregated fuel efficiency of Light-Duty Automobiles (model years 1974-2021) are estimated to have a fuel economy of 29.67 miles per gallon. Therefore, it is estimated that 258,748 gallons of fuel will be consumed from Project-generated Light-Duty Automobiles.

Light-Heavy Duty Trucks

Full Project build-out is estimated to generate 1,291,077 annual vehicle miles traveled along area roadways for all Light-Heavy Duty trucks. An aggregated fuel efficiency of Light-Heavy Duty trucks (model years 1974-2021) are estimated to have a fuel economy of 14.32 miles per gallon. Therefore, it is estimated that 90,159 gallons of fuel will be consumed from Project-generated Light-Heavy Duty trucks.

Medium-Heavy Duty Trucks

Full Project build-out is estimated to generate 1,291,077 annual vehicle miles traveled along area roadways for all Medium-Heavy Duty trucks. An aggregated fuel efficiency of Medium-Heavy Duty trucks (model years 1974-2021) are estimated to have a fuel economy of 8.52 miles per gallon. Therefore, it is estimated that 151,535 gallons of fuel will be consumed from Project-generated Medium-Heavy Duty trucks.

Heavy-Heavy Duty Trucks

Full Project build-out is estimated to generate 3,422,855 annual vehicle miles traveled along area roadways for all Heavy-Heavy Duty trucks. An aggregated fuel economy of Heavy-Heavy Duty trucks (model years 1974-2021) is estimated to have a fuel economy of 5.92 miles per gallon. Therefore, it is estimated that 578,185 gallons of fuel will be consumed from Project-generated Heavy-Heavy Duty trucks.

These estimates are presented In **Table 4.6.3**.

Table 4.6.3 – PROJECT-GENERATED ANNUAL FUEL CONSUMPTION

Vehicle Type	Annual Miles Traveled	Estimated Annual Fuel Consumption (gallons)
Light-Duty Automobiles	7,677,039	258,748
Light-Heavy Duty Trucks	1,291,077	90,159
Medium-Heavy Duty Trucks	1,291,077	151,535
Heavy-Heavy Duty Trucks	3,422,855	578,185
Total (All Vehicles)	13,682,048	1,078,627

Facility Energy Demands

Project building operations and Project site maintenance activities would result in consumption of natural gas and electricity, to be supplied to the Project, respectively, by Southern California Gas Company and Southern California Edison. Annual natural gas and electricity demands of the Project are summarized in **Table 4.6.4** (Project Annual Operational Natural Gas and Electricity Demand Summary).

Table 4.6.4 – PROJECT FACILITY ENERGY DEMANDS

Natural Gas Demand	kBTU/year
Other Non-Asphalt Surfaces	0
Parking Lot	0
High-Cube Fulfillment Center Warehouse	1,420,250
<i>Total Project Natural Gas Demand</i>	1,420,250
Electricity Demand	kWh/year
Other Non-Asphalt Surfaces	0
Parking Lot	160,158
High-Cube Fulfillment Center Warehouse	1,651,130
<i>Total Project Electricity Demand</i>	1,811,288

As indicated in **Table 4.6.4**, the Energy Analysis prepared for the Project discusses Project Facility Energy Demands. Estimated Project facility operational energy demands are 1,420,250 kBTU/year of natural gas and 1,811,288 kWh/year of electricity and notes that the Project proposed conventional industrial uses reflect contemporary energy efficient/energy conserving design and operational systems.

The Energy Analysis therefore states “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 industrial projects of similar scale and configuration.”

The resultant level of impact is less than significant in that the following:

- The Project would implement energy-saving features and operational programs, consistent with reduction measures contained in the County of Riverside Climate Action Plan Update;
- The Project would comply with the California Building Standards (CALGreen; CCR, Title 24, Part 11) as implemented by the County of Riverside;
- The Project would provide for and promote energy efficiencies beyond those required under Federal and State of California standards and regulations and in doing so would meet or exceed

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all California Building Standards Code Title 24 standards;

- Energy consumed by Project operation is calculated to be comparable to, or less than, energy consumed by other industrial uses of similar scale and intensity constructed and operating in California; and,
- The Project would not cause or result in the need for additional energy producing facilities or energy delivery systems.

Additionally, the County of Riverside requires that a minimum of 20% of Project electricity usage must be provided by renewable energy sources. The Applicant will install photovoltaic cells on the building roof that will provide at least 20% of the projected Project annual usage of 1,811,288 kWh/year.

Project Construction

Construction equipment used by the Project would result in single-event consumption of approximately 56,780 gallons of diesel fuel. Construction equipment use of fuel would not be atypical for the type of construction proposed because there are not aspects of the Project construction process that are unusual or energy-intensive and Project construction equipment would conform to applicable California Air Resources Board emissions standards and thereby act to promote equipment fuel efficiencies.

California Code of Regulations Title 13, Motor Vehicles, Section 2449(d)(3) limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel to unproductive idling of construction equipment. Best available control measures inform construction equipment operators of this requirement. Enforcement of idling limitations is realized through periodic site inspections conducted by County Building Department officials and/or in response to citizen complaints.

Construction worker trips for full construction of the Project would result in an estimated fuel consumption of 78,409 gallons. Additionally, fuel consumption from construction vendor trips (medium and heavy-duty trucks) would total approximately 342,877 gallons. Diesel fuel would be supplied by County and regional commercial vendors. Indirectly, construction energy efficiencies and energy conservation would be achieved through use of bulk purchases, transport and use of construction materials. Fuel efficiencies are improving within on- and off-road vehicle engines due to more stringent government requirements. Therefore, Project energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary and the result level of impact would be less than significant.

b) Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact.

Project consistency with State and County Energy Efficiency/Energy Conservation Plans and related policies and/or regulations relevant to the Project are summarized at Table 4.6.5. In addition to the plans, policies, and regulations listed below, the State and County have also implemented measures that reduce air pollutant emissions and greenhouse gases. As a corollary effect, these measures in part act to promote energy efficiency and reduce energy consumption. Discussions of these plans, policies, and regulations are presented at EIR Sections 4.3, *Air Quality* and 4.8, *Greenhouse Gas Emissions*. As substantiated at **Table**

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4.6.5, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

**Table 4.6.5 –
STATE AND LOCAL ENERGY EFFICIENCY/ENERGY CONSERVATION PLAN CONSISTENCY**

PLANS, POLICES, REGULATIONS	Remarks
STATE of CALIFORNIA	
<p>California Code of Regulations (CCR) 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. The Project would be required to comply with energy efficiency standards in effect at the time of building permit application(s).</p>	<p>Consistent: <i>The Project would be designed, constructed and operated to meet or exceed incumbent CCR Title 24 Energy Efficiency Standards. On this basis, the Project is determined to be consistent with, and would not interfere with or obstruct implementation of Title 24 Energy Efficiency Standards.</i></p> <p><i>Based on the preceding, the Project is considered consistent with CCR Title 24, Part 6: Energy Efficiency Standards.</i></p>
<p>CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen). CALGreen is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2011. CALGreen is updated on a regular basis, with the most recent update consisting of the 2016 California Green Building Code Standards that became effective January 1, 2017. Under state law, local jurisdictions are permitted to adopt more stringent requirements.</p>	<p>Consistent: <i>The Project would be designed, constructed and operated to meet or exceed incumbent CCR Title 24 CALGreen Standards. On this basis, the Project is determined to be consistent with, and would not interfere with or obstruct implementation of Title 24 CALGreen Standards.</i></p> <p><i>Based on the preceding, the Project is considered consistent with CCR, Title 24, Part 11: CALGreen.</i></p>
COUNTY of RIVERSIDE GENERAL PLAN	
Open Space Element	
<p>Policy OS 11.2: Support and encourage voluntary efforts to provide active and passive solar access opportunities in new developments.</p>	<p>Consistent: <i>The Project would comply with on-site renewable energy production requirements presented in the Riverside County Climate Action Plan (CAP) (CAP p. 4-14, R2-E10, On-Site Renewable Energy Production Requirements for New Land Use Development Projects) More specifically, The Project incorporates a photovoltaic (PV) system. that would provide a portion of the Project electrical energy demands. Current designs indicate that a minimum of 20 percent of the Project electrical demands would be supplied by the proposed PV system. The Project does not propose or require designs or operations that would interfere with or obstruct County actions to support, permit, or encourage use of solar energy. Please refer also to related discussions presented at EIR Section 4.8, Greenhouse Gas Emissions.</i></p> <p><i>Based on the preceding, the Project is considered consistent with General Plan Policies OS 11.2, OS 11.3, OS 11.4.</i></p>
<p>Policy OS 11.3: Permit and encourage the use of passive solar devices and other state-of-the-art energy resources.</p>	
<p>Policy OS 11.4: Encourage site-planning and building design that maximizes solar energy use/potential in future development applications.</p>	
<p>Policy OS 16.1: Continue to implement Title 24 of the State Building Code California Code of Regulations (the “California Building Standards Code”), particularly Part 6 (the California Energy Code) and Part 11 (the California Green Building Standards Code), as amended and adopted pursuant to County ordinance. Establish mechanisms and incentives to encourage architects and builders to exceed the energy efficiency standards of within CCR Title 24.</p>	<p>Consistent: <i>Please refer to remarks above addressing Project consistency with CCR Title 24, Part 6: Energy Efficiency Standards, and CCR, Title 24, Part 11: CALGreen.</i></p>
<p>Policy OS 16.14: Coordinate energy conservation activities with the County Climate Action Plan (CAP) as decreasing energy usage also helps reduce carbon emissions.</p>	<p>Consistent: <i>The Project would conform to and implement applicable provisions of the CAP. Please refer also to related discussions presented at EIR Section 4.8, Greenhouse Gas Emissions.</i></p> <p><i>Based on the preceding, the Project is considered consistent with General Plan Policy OS 16.14</i></p>
<p>Policy OS 16.9: Encourage increased use of passive, solar design and day-lighting in existing and new structures.</p>	<p>Consistent: <i>Please refer to remarks above addressing Project consistency with General Plan Policies OS 11.2, OS 11.3, OS 11.4.</i></p>
Air Quality Element	
<p>Policy AQ 4.1: Require Encourage the use of all feasible building materials/methods which reduce emissions.</p>	<p>Consistent: <i>The Project would conform to or surpass all CCR Title 24, Part 6: Energy Efficiency Standards, and CCR, Title 24, Part 11: CALGreen building design and materials requirements. Conformance with</i></p>

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**Table 4.6.5 –
STATE AND LOCAL ENERGY EFFICIENCY/ENERGY CONSERVATION PLAN CONSISTENCY**

PLANS, POLICES, REGULATIONS	Remarks
	<p><i>these requirements acts to conserve energy and reduce energy-source emissions. Please refer also to related discussions presented at EIR Section 4.4, Air Quality, and Section 4.8, Greenhouse Gas Emissions.</i></p> <p><i>Based on the preceding, the Project is considered consistent with General Plan Policy</i></p>
<p>Policy AQ 4.2: Encourage the use of all feasible efficient heating equipment and other appliances, such as water heaters, swimming pool heaters, cooking equipment, refrigerators, furnaces and boiler units.</p>	<p>Consistent: <i>The Project would employ energy efficient equipment and appliances that conform to or surpass CCR Title 20 Appliance Efficiency Regulations. The Project would not interfere with or obstruct County efforts to encourage use of all feasible efficient heating equipment and other appliances.</i></p> <p><i>Based on the preceding, the Project is consistent with General Plan Policy AQ 4.2.</i></p>
<p>Policy AQ 4.3: Encourage centrally heated facilities to utilize automated time clocks or occupant sensors to control heating where feasible.</p>	<p>Consistent: <i>The Project would implement centrally heated facilities with automated time clocks and/or occupant sensors to control heating where feasible.</i></p> <p><i>Based on the preceding, the Project is consistent with General Plan Policy AQ 4.3.</i></p>
<p>Policy AQ 5.2: Adopt incentives and/or regulations to enact energy conservation requirements for private and public developments.</p>	<p>Consistent: <i>The Project would incorporate energy efficient designs and operations consistent with County and State requirements. The Project would not interfere with or obstruct County efforts to adopt incentives and/or regulations to enact energy conservation requirements for private and public developments.</i></p> <p><i>Based on the preceding, the Project is consistent with General Plan Policy AQ 5.2.</i></p>
<p>Policy AQ 5.4: Encourage the incorporation of energy-efficient design elements, including appropriate site orientation and the use of shade and windbreak trees to reduce fuel consumption for heating and cooling.</p>	<p>Consistent: <i>To the extent practical, the Project would orient buildings, building elements, and site facilities to conserve energy and promote energy efficiencies. The Project would not interfere with or obstruct County efforts to encourage the incorporation of energy-efficient design elements.</i></p> <p><i>Based on the preceding, the Project is consistent with General Plan Policy AQ 5.4.</i></p>
<p>Policy AQ 18.1: Baseline emissions inventory and forecast. Riverside County CAP has included baseline emissions inventory with data on County’s CO2e emissions for specific sectors and specific years. The carbon inventory greatly aids the process of determining the type, scope and number of GHG reduction policies needed. It also facilitates the tracking of policy implementation and effectiveness. The carbon inventory for the County consists of two distinct components; one inventory is for the County as a whole, as defined by its geographical borders and the other inventory is for the emissions resulting from the County’s municipal operations.</p>	<p>Consistent: <i>The Project Greenhouse Gas Analysis (GHGA) provides an inventory of Project-source GHG emissions. The Project GHG emissions inventory supports County efforts to establish a County-wide GHG emissions inventory for specific sectors and specific years. Please refer also to EIR Section 4.8, Greenhouse Gas Emissions. The Project would not interfere with or obstruct County efforts to inventory sources and quantities of GHG emissions.</i></p> <p><i>Based on the preceding, the Project is consistent with General Plan Policy AQ 18.1.</i></p>
<p>Policy AQ 18.2: Adopt GHG emissions reduction targets. Pursuant to the results of the Carbon Inventory and Greenhouse Gas Analysis for Riverside County, future development proposed as a discretionary project pursuant to the General Plan shall achieve a greenhouse gas emissions reduction of 25% compared to Business As Usual (BAU) project in order to be found consistent with the County’s Climate Action Plan (CAP).</p>	<p>Consistent: <i>Project GHG emissions impact have been evaluated in the context of GHG emissions reductions targets and performance standards established under the incumbent County Climate Action Plan (Riverside County Climate Action Plan Update, November 2019 [CAP Update]). The Project GHGA substantiates that the Project would achieve a greenhouse gas emissions reduction consistent with the CAP Update. Please refer also to EIR Section 4.8, Greenhouse Gas Emissions.</i></p> <p><i>Based on the preceding, the Project is consistent with General Plan Policy AQ 18.2.</i></p>
<p>Policy AQ 18.3: Develop a Climate Action Plan for reducing GHG emissions. The Riverside County CAP has been developed to formalize the measures necessary to achieve County GHG emissions reduction targets. The CAP</p>	<p>Consistent: <i>The Project conforms to and implements applicable provisions of the CAP Update.</i></p>

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**Table 4.6.5 –
STATE AND LOCAL ENERGY EFFICIENCY/ENERGY CONSERVATION PLAN CONSISTENCY**

PLANS, POLICES, REGULATIONS	Remarks
<p>includes both the policies necessary to meet stated targets and objectives. These targets, objectives and Implementation Measures may be refined, superseded or supplemented as warranted in the future.</p>	<p><i>The Project would not interfere with or obstruct County efforts to implement the CAP Update, CAP Update policies, or CAP Update emissions reduction targets. Please refer also to EIR Section 4.8, Greenhouse Gas Emissions.</i></p> <p><i>Based on the preceding, the Project is consistent with General Plan Policy AQ 18.3.</i></p>
<p>Policy AQ 18.4: Implement policies and measures to achieve reduction targets. The County shall implement the green-house gas reduction policies and measures established under the County Climate Action Plan for all new discretionary development proposals.</p>	<p>Consistent: <i>The Project would implement applicable greenhouse gas reduction policies and measures established under the CAP Update.</i></p> <p><i>The Project would not interfere with or obstruct County efforts to implement the CAP Update, CAP Update policies, or CAP Update emissions reduction targets. Please refer also to EIR Section 4.8, Greenhouse Gas Emissions.</i></p> <p><i>Based on the preceding, the Project is consistent with General Plan Policy AQ 18.4.</i></p>
<p>Policy AQ 18.5: Monitor and verify results. The County shall monitor and verify the progress and results of the CAP periodically. When necessary, the CAP’s “feedback” provisions shall be used to ensure that any changes needed to stay “on target” with stated goals are accomplished.</p>	<p>Consistent: <i>The Project GHG emissions inventory supports County efforts to monitor and verify GHG reduction targets established under the CAP Update.</i></p> <p><i>The Project would not interfere with or obstruct County efforts to monitor sources and quantities of GHG emissions. Please refer also to EIR Section 4.8, Greenhouse Gas Emissions.</i></p> <p><i>Based on the preceding, the Project is consistent with General Plan Policy AQ 18.5.</i></p>
<p>Policy AQ 19.3: Require new development projects subject to County discretionary approval to achieve the GHG reduction targets established in the CAP either through:</p> <p>a. Garnishing 100 points through the Implementation Measures found in the County’s CAP; or</p> <p>b. Requiring quantification of project-specific GHG emissions and reduction of GHG emissions to, at minimum, the applicable GHG reduction threshold established in the CAP.</p>	<p>Consistent: <i>Please refer to remarks above addressing Project consistency with General Plan Policies AQ 18.2, AQ 18.4, et al.</i></p>
<p>Policy AQ 20.10: Reduce energy consumption of new developments (residential, commercial and industrial) through efficient site design that takes into consideration solar orientation and shading, as well as passive solar design.</p>	<p>Consistent: <i>Please refer to remarks above addressing Project consistency with General Plan Policies AQ 4.1, AQ 4.2, AQ 4.3, AQ 5.4, et al.</i></p>
<p>Policy AQ 20.11: Increase energy efficiency of new developments through efficient use of utilities (water, electricity, natural gas) and infrastructure design. Also, increase energy efficiency through use of energy-efficient mechanical systems and equipment.</p>	<p>Consistent: <i>Please refer to remarks above addressing Project consistency with General Plan Policies AQ 4.1, AQ 4.2, AQ 4.3, AQ 5.4, AQ 20.10, et al.</i></p>
<p>Policy AQ 20.18: Encourage the installation of solar panels and other energy-efficient improvements and facilitate residential and commercial renewable energy facilities (solar array installations, individual wind energy generators, etc.).</p>	<p>Consistent: <i>Please refer to remarks above addressing Project consistency with General Plan Policies OS 11.2, OS 11.3, OS 11.4, OS 16.9, AQ 4.1, et al.</i></p>
<p>Policy AQ 23.2: For discretionary actions, land use-related greenhouse gas reduction objectives shall be achieved through development and implementation of the appropriate Implementation Measures of the Climate Action Plan for individual future projects. County programs shall also be developed and implemented to address land use-related reductions for County operations and voluntary community efforts.</p>	<p>Consistent: <i>Please refer to remarks above addressing Project consistency with General Plan Policies AQ 18.1 – AQ 18.5, AQ 19.3, et al.</i></p> <p><i>The Project would not interfere with or obstruct County efforts to establish programs to address land use-related GHG emissions reductions for County operations and voluntary community efforts.</i></p> <p><i>Based on the preceding, the Project is consistent with General Plan Policy AQ 23.2.</i></p>
<p>Policy AQ 24.1: The County shall implement programs and requirements to achieve the following Objectives related to reducing greenhouse gas emissions</p>	<p>Consistent: <i>Please refer to remarks above addressing Project consistency with General Plan Policies AQ 4.1 – AQ 4.3, AQ 5.2, AQ 5.4, AQ 18.1 –</i></p>

Table 4.6.5 – STATE AND LOCAL ENERGY EFFICIENCY/ENERGY CONSERVATION PLAN CONSISTENCY

PLANS, POLICES, REGULATIONS	Remarks
<p>achieved through improving energy efficiency and increasing energy conservation:</p> <p>a. Require new development (residential, commercial and industrial) to reduce energy consumption through efficient site design that takes into consideration solar orientation and shading, as well as passive solar design. Passive solar design addressed the innate heating and cooling effects achieved through building design, such as selective use of deep eaves for shading, operable windows for cross-ventilation, reflective surfaces for heat reduction and expanses of brick for thermal mass (passive radiant heating).</p> <p>b. Require new development (residential, commercial and industrial) to design energy efficiency into the project through efficient use of utilities (water, electricity, natural gas) and infrastructure design.</p> <p>c. Require new development (residential, commercial and industrial) to reduce energy consumption through use of energy efficient mechanical systems and equipment.</p> <p>d. Establish or support programs to assist in the retrofitting of older affordable housing units.</p> <p>e. Actively seek out existing or develop new programs to achieve energy efficiency for existing structures, particularly residential units built prior to 1978 when CCR Title 24 energy efficiency requirements went into effect.</p> <p>f. Balance additional upfront costs for energy efficiency and affordable housing economic considerations by providing or supporting programs to finance energy-efficient housing.</p>	<p><i>AQ 18.5, AQ 19.3, AQ 23.2, et al.</i></p> <p><i>The Project would not interfere with or obstruct County efforts to establish or support programs to assist in the retrofitting of older affordable housing units; Actively seek out existing or develop new programs to achieve energy efficiency for existing structures; or balance costs for energy efficiency and affordable housing economic considerations by providing or supporting programs to finance energy-efficient housing.</i></p> <p><i>Based on the preceding, the Project is consistent with General Plan Policy AQ 24.1.</i></p>
<p>Policy AQ 24.2: For discretionary actions, energy efficiency and conservation objectives shall be achieved through development and implementation of the appropriate Implementation Measures of the Climate Action Plan for all new development approvals. County programs shall also be developed and implemented to address energy efficiency and conservation efforts for County operations and the community.</p>	<p>Consistent: <i>Please refer to remarks above addressing Project consistency with General Plan Policies AQ 18.1 – AQ 18.5, AQ 19.3, AQ 23.2, et al.</i></p> <p><i>The Project would not interfere with or obstruct County efforts to establish programs to address energy efficiency and conservation efforts for County operations and the community.</i></p> <p><i>Based on the preceding, the Project is consistent with General Plan Policy AQ 24.2.</i></p>
<p>Policy AQ 26.1: The County shall implement programs and requirements to achieve the following Objectives related to reducing greenhouse gas emissions derived from energy generation:</p> <p>a. Encourage the installation of solar panels and other energy-efficient improvements.</p> <p>b. Facilitate residential and commercial renewable energy facilities (solar array installations, individual wind energy generators, etc.).</p> <p>c. Facilitate development of renewable energy facilities and transmission lines in appropriate locations.</p> <p>d. Facilitate renewable energy facilities and transmission line siting.</p> <p>e. Provide incentives for development of local green technology businesses and locally produced green products.</p> <p>f. Provide incentives for investment in residential and commercial energy efficiency improvements.</p> <p>g. Identify lands suitable for wind power generation or geothermal production and encourage development of these alternative energy sources.</p>	<p>Consistent: <i>Please refer to remarks above addressing Project consistency with General Plan Policies OS 11.2 – OS 11.4, et al.</i></p> <p><i>The Project would not interfere with or obstruct with County efforts to achieve County Objectives related to reducing greenhouse gas emissions derived from energy generation.</i></p> <p><i>Based on the preceding, the Project is consistent with General Plan Policy AQ 26.1.</i></p>
<p>Policy AQ 26.2: For discretionary actions, the objectives for greenhouse gas reduction through increased use of alternative energy sources shall be achieved through development and implementation of the applicable Implementation Measures of the Climate Action Plan. County programs shall also be developed and implemented to address use of alternative energy for County operations and within the community.</p>	<p>Consistent: <i>Please refer to remarks above addressing Project consistency with General Plan Policies AQ 4.1 – AQ 4.3, AQ 5.2, AQ 5.4, AQ 18.1 – AQ 18.5, AQ 19.3, AQ 23.2, AQ 24.2, et al.</i></p> <p><i>The Project would not interfere with or obstruct County efforts to address use of alternative energy for County operations and within the community.</i></p> <p><i>Based on the preceding, the Project is consistent with General Plan Policy AQ 26.2.</i></p>

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Additionally, regulatory measures, standards, and policies directed at reducing air pollutant emissions and GHG emissions would also act to promote energy conservation and reduce Project energy consumption. Please refer to related discussions presented at EIR Sections 4.3, *Air Quality* and 4.8, *Greenhouse Gas Emissions*.

4.6.4 CUMULATIVE IMPACTS

Energy Thresholds a) and b) – Project development and operation, together with other development existing and potential in the vicinity of the Project site, is or will be required to comply with State of California and County of Riverside laws and ordinances pertaining to energy conservation. Compliance will result in less than significant cumulatively considerable impacts pertaining to energy.

4.6.5 EXISTING REGULATIONS & STANDARD CONDITIONS

Federal and State agencies regulate energy use and consumption through various means and programs. The United States Department of Transportation, the United States Department of Energy, and the United States Environmental Protection Agency are three federal agencies with substantial influence over energy policies and programs. On the State level, the PUC and the California Energy Commission are two agencies with different aspects of energy. Following are federal and State energy-related laws and plans relevant to the Project, with a consistency assessment presented in *italicized text* provided by Urban Crossroads.

Federal Regulations

Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)

The Intermodal Surface Transportation Efficiency Act of 1991 promoted development of inter-modal transportation systems to maximize mobility and address national and local interests in air quality and energy. ISTEA contained factors that Metropolitan Planning Organizations (MPO) were to address in developing transportation plans and programs, including some energy-related factors. To meet new ISTEA requirements, MPO adopted explicit policies defining social, economic, energy and environmental values guiding transportation systems. 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 the ISTEA because the Southern California Association of Governments is not planning for intermodal facilities on or through the Project site.*

Transportation Equity Act for the 21st Century (TEA-21)

The Transportation Equity Act for the 21st Century was signed into law in 1998. The Act builds upon initiatives established in the ISTEA legislation. 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 (e.g., flexibility in use of funds; emphasis on measures to improve the environment; focus on a strong planning process as the foundation of good transportation decisions) and also provides for investment in research and its application to maximize performance of the transportation system through such measures as deployment of Intelligent Transportation System to help improve operations and management of transportation systems and vehicle safety. *The Project site is located along major transportation corridors with proximate access to the Interstate freeway system. The site selected*

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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 processes emphasized under TEA-21. The Project is therefore consistent with, and would not otherwise interfere with, nor obstruct implementation of TEA-21.

State of California Regulations

Integrated Energy Policy Report

Senate Bill 1389 requires the California Energy Commission (CEC) to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the State's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the State's economy; and protect public health and safety. The Energy Commission prepares these assessments and associated policy recommendations every two years, with updates in alternate years, as part of the Integrated Energy Policy Report. *Electricity would be provided to the Project by Southern California Edison (SCE). SCE's Clean Power and Electrification Pathway (CPEP) white paper builds on existing State programs and policies. As such, the Project is consistent with, nor obstruct implementation the goals presented in the 2016 Integrated Energy Policy Report.*

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 maintenance of a healthy economy. The Plan calls for the State to assist in transformation of the transportation system to improve air quality, reduce congestion, and increase efficient use of fuel supplies with the least environmental and energy costs. The Plan identifies strategies to further this plan, including provision of assistance to public agencies and fleet operators and encouragement of urban designs that reduce vehicle miles traveled and accommodate pedestrian and bicycle access. *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 introduction of industrial uses on a business park-designated site. The Project therefore supports urban design and planning processes identified under the State of California Energy Plan, is consistent with, and will not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan.*

California Code Title 24, Part 6, Energy Efficiency Standards

This Code was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption and has been updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The 2016 version of Title 24 was adopted by the CEC and became effective on January 1, 2017 and is applicable to the Project. The CEC indicates the 2019 Title 24 standards will require solar photovoltaic systems for new homes, establish requirements for newly constructed healthcare facilities, encourage demand responsive technologies for residential buildings, and update indoor and outdoor lighting for nonresidential buildings. Nonresidential buildings will use approximately 30 percent less energy due to lighting upgrades. *The*

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Project will design building shells and building components, such as windows, roof systems, electrical and lighting systems, and heating, ventilating, and air conditioning systems to meet 2019 Title 24 Standards.

Standard Conditions

Compliance with County of Riverside General Plan policies and with County of Riverside Standard Conditions would contribute to ensuring any Project development and operation impacts to Energy would be reduced to a less than significant level. The Project would implement energy-saving features and operational programs, consistent with reduction measures established in the County of Riverside 2019 Climate Action Plan Update (CAP Update).

Riverside County General Plan Policies

The Project would comply with California Green Building Standards Code (CALGreen) requirements as implemented by the County of Riverside.

County of Riverside Climate Action Plan Update, November 2019

The County of CAP Update establishes GHG emission reduction programs and regulations that correlate with and support evolving State GHG emissions reduction goals and strategies. The CAP Update includes reduction targets for year 2030 and year 2050. These reduction targets require the County to reduce emissions by at least 525,511 MT CO₂e below the Adjusted Business As Usual (ABAU)¹ scenario by 2030 and at least 2,982,948 MT CO₂e below the ABAU scenario by 2050 (CAP Update, p.7-1).

To evaluate consistency with the CAP Update, the County has implemented CAP Update Screening Tables (Screening Tables) to aid in measuring the reduction of GHG emissions attributable to certain design and construction measures incorporated in development projects. To this end, the Screening Tables establish categories of GHG Implementation Measures. Under each Implementation Measure category, mitigation or project design features (collectively “features” or “measures”) are assigned point values that correspond to the minimum GHG emissions reduction that would result from each feature. Projects that yield at least 100 points are considered to be consistent with the GHG emissions reduction quantities anticipated in the County’s GHG Technical Report, and support the GHG emissions reduction targets established under the CAP Update. The Project is required to achieve a minimum of 100 Screening Table points pursuant to EIR Mitigation Measure GHG-1.

The CAP Update and Screening Tables can be accessed at:

https://planning.rctlma.org/Portals/14/CAP/2019/2019_CAP_Update_Full.pdf

4.6.6 PROJECT ENERGY-SAVING FEATURES AND OPERATIONAL PROGRAMS

The Project would implement energy-saving features and operational programs, consistent with the reduction measures set forth in the CAP Update; and would comply with the California Green Building Standards Code (CALGreen; CCR, Title 24, Part 11) as implemented by the County of Riverside. The Project also incorporates and expresses the following design features and attributes promoting energy efficiency and sustainability. The specific CAP Update Measures listed at **Table 4.6.6** (following) may be

¹ Adjusted Business As Usual (ABAU) Scenario reflects GHG emissions reductions achieved through anticipated future State actions (CAP Update, p. 2-1).

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substituted for feasibility so long as they achieve an equal level of total reductions/points pursuant to the CAP Update.

Table 4.6.6 – CAP UPDATE MEASURES

Measure	Description	Points
EE10.A.1 Insulation	Enhanced Insulation (rigid wall insulation R-13, roof/attic R-38)	11
EE10.A.2 Windows	Greatly Enhanced Window Insulation (0.28 or less U-factor, 0.22 or less Solar Heat Gain Coefficient [SHGC])	7
EE10.A.3 Cool Roofs	Modest Cool Roof (Cool Roof Rating Council [CRRC] Rated 0.15 aged solar reflectance, 0.75 thermal emittance)	7
EE10.A.4 Air Infiltration	Blower Door Home Energy Rating System (HERS) Verified Envelope Leakage of equivalent	6
EE10.B.1 Heating/Cooling Distribution System	Model Duct Insulation (R-6)	5
EE10.B.2 Space Heating/Cooling Equipment	Improved Efficiency Heating, Ventilation, and Air Conditioning (HVAC) (Energy Efficiency Ratio [EER] 14/78% Annual Fuel Utilization Efficiency [AFUE] or 8 Heating Seasonal Performance Factor [HSPF])	4
EE10B.4 Water Heaters	High Efficiency Water Heater (0.72 Energy Factor)	10
EE10.B.5 Daylighting	All rooms daylighted	1
EE10.B.6 Artificial Lighting	High Efficiency Lights (50% of in-unit fixtures are high efficiency)	7
W2.E.2 Toilets	Water Efficient Toilets/Urinals (1.5 gallons per minute [gpm])	6
	Waterless Urinals (note that commercial buildings having both waterless urinals and high efficiency toilets will have a combined point value of 6 points)	
W2.E.3 Faucets	Water Efficient faucets (1.28 gpm)	2
T4.B.1 Electric Vehicle (EV) Recharging	Install EV charging stations in garages/parking areas	40*
TOTAL PROJECT POINTS		106

Notes: *The Project is anticipated to include 5 electric vehicle charging stations. Per the Screening Tables, each station is 8 points.

4.6.7 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Project development and operation will result in a less than significant impact to energy resources.

4.6.8 MITIGATION MEASURES

No Mitigation Measures are required.

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4.7 GEOLOGY/SOILS

The analysis in this Section is based on information presented in the following documents:

- County of Riverside General Plan;
- Riverside County General Plan EIR No. 521 for GPA No. 960;
- Mead Valley Area Plan; and
- *Geotechnical Investigation and Percolation Test Results, Barker Logistics Warehouse Development Northeast Corner of Patterson and Placentia Avenues, Mead Valley Area, Riverside County, California* (Geocon West, Inc.) January 4, 2019.

Please also refer to Appendix N of this EIR.

4.7.1 ENVIRONMENTAL SETTING

The Project site is located within the Perris block of the northern Peninsular Ranges Geomorphic Province (Province), defined as a relatively stable area between the Elsinore and San Jacinto fault zones. The geomorphology in the vicinity of the Project site is massive granitic bedrock and older alluvial fan deposits. The Peninsular Ranges are bounded by the Transverse Ranges (San Gabriel and San Bernardino Mountains) to the north and the Colorado Desert Geomorphic Province to the east. The Peninsular Ranges Geomorphic Province extends westward into the Pacific Ocean and southward to the tip of Baja California. Overall, the Province is characterized by Cretaceous-age granitic rock and a less amount of Mesozoic-age metamorphic rock overlain by terrestrial and marine sediments. Faulting within the Province typically is northwest trending and includes the San Andreas, San Jacinto, Elsinore and Newport-Inglewood faults.

The Geotechnical Investigation described the following surficial soils and geologic units on the Project site.

- Topsoil – All borings revealed topsoil in the top one-half to two and one-half feet. The topsoil consists of loose, dry, silty sand and is predominately older alluvium that has been tilled.
- Very Old Alluvial Fan Deposits (Qvof) – Very old alluvium was observed underlying the topsoil throughout the Project site. The Older alluvium consists predominately of dry to moist, medium dense to very dense silty sand. Lesser amounts of clayey sand and sandy silt was encountered.
- Val Verde Tonalite (Kvt) – Val Verde Tonalite was encountered underlying older alluvium in one boring. This granitic bedrock is weathered, strong, coarse-grained, grayish brown, and micaceous. Excavated tonalite is gravelly sand.

The San Jacinto and Elsinore fault zones are located approximately 10.2 and 12.4 miles from the Project site to the northeast and southwest, respectively. Geologic units within the Project site consist of very old alluvial fan deposits overlying granitic bedrock of the Val Verde Tonalite.

The numerous faults in southern California include active, potentially active, and inactive faults. Criteria for these major groups are based on criteria developed by the California Geological Survey (CGS) for the Alquist-Priolo Earthquake Fault Zone Program. An active fault is defined as one that has had surface displacement within Holocene time (about the last 11,000 years). A potentially active fault has demonstrated surface displacement during Quaternary time (approximately the last 1.6 million years) but has had no known Holocene movement. Inactive faults are those that have not moved in the last 1.6 million years.

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The Project site is not located within a currently established State of California Alquist-Priolo Earthquake Fault Zone or a Riverside County Fault Hazard Zone for surface fault rupture hazards. No active or potentially active faults with the potential for surface rupture are known to extend directly beneath the Project site.

4.7.2 THRESHOLDS OF SIGNIFICANCE

The County of Riverside has adopted Thresholds of Significance that vary in some cases topically and in format from the Appendix G Thresholds, as reflected in the Initial Study prepared for the Project. This EIR uses the following County-adopted Thresholds of Significance to comprise the basis of impact analyses.

Alquist-Priolo Earthquake Fault Zone or County Fault Hazard Zone –Would the Project - -

- a) Be subject to rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?**

Liquefaction Potential Zone – Would the Project - -

- a) Be subject to seismic-related ground failure, including liquefaction?**

Ground-shaking Zone – Would the Project - -

- a) Be subject to strong ground shaking?**

Landslide Risk – Would the Project - -

- 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 – Would the Project - -

- 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 – Would the Project - -

- a) Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?**

Slopes – Would the Project - -

- a) Change topography or ground surface relief features?**
- b) Create cut or fill slopes greater than 2:1 or higher than 10 feet?**
- c) Result in grading that affects or negates subsurface sewage disposal systems?**

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Soils – Would the Project - -

- a) **Result in substantial soil erosion or the loss of topsoil?**
- b) **Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2019), creating substantial direct or indirect risks to life or property?**
- 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?**

Wind Erosion and Blowsand from project either on or off site – Would the Project - -

- a) **Be impacted by or result in an increase in wind erosion and blowsand, either on- or off-site?**

4.7.3 ENVIRONMENTAL IMPACTS

Alquist-Priolo Earthquake Fault Zone or County Fault Hazard Zone

Would the Project - -

- a) **Be subject to rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?**

Less Than Significant Impact. The Project site is not located within a currently established State of California Alquist-Priolo Earthquake Fault Zone or a Riverside County Fault Hazard Zone for surface fault rupture hazards. No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the site. The Geotechnical Investigation indicates that according to the “Fault Activity Map of California” (2010) there are 25 “known active faults . . . within a search radius of 50 miles from the property.” The nearest known active fault is the Glen Ivy segment of the Elsinore fault, which is approximately 11 miles west of the Project site. This fault segment is the dominant source of any potential ground motion. Furthermore, earthquakes that might occur on these fault zones or other faults within southern California and northern Baja California may potentially generate significant ground motion at the Project site. The Geotechnical Investigation indicates “the potential for ground rupture is considered to be very low due to the absence of active or potentially active faults” at the Project site.

Ground surface rupture occurs when movement along a fault is sufficient to cause a gap or rupture where the upper edge of the fault zone intersects the earth surface. The Geotechnical Investigation indicates “the potential for ground rupture is considered to be very low due to the absence of active or potentially active faults at the subject site.”

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Liquefaction Potential Zone

Would the Project - -

a) **Be subject to seismic-related ground failure, including liquefaction?**

Less Than Significant Impact. Liquefaction occurs primarily in saturated, loose, fine- to medium-grained soils in areas where the groundwater table is within approximately 50 feet of the surface. Shaking causes the soils to lose strength and behave as liquid. Excess water pressure is vented upward through fissures and soil cracks, and a water-soil slurry bubbles onto the ground surface. Liquefaction-related effects include loss of bearing strength, ground oscillations, lateral spreading, and flow failures or slumping. Site-specific geotechnical studies are the only practical and reliable way of determining the specific liquefaction potential of a site; however, a determination of general risk potential can be provided based on soil type and depth of groundwater. Areas identified as susceptible to liquefaction are identified in Figure S-3 [of the Riverside County General Plan]. Seismically-induced landslides and rock falls should be expected throughout the county in a major earthquake. Field investigation enables identification of slide-prone slopes before an earthquake occurs. Landslides and rock falls occur most often on steep or compromised slopes. Factors controlling the stability of slopes include: 1) slope height and steepness; 2) engineering characteristics of the earth materials comprising the slope; and 3) intensity of ground shaking. Figure S-4 [of the Riverside County General Plan] maps areas with varying levels of earthquake induced slope instability.

The Geotechnical Investigation did not encounter groundwater or seepage during site investigation. According to the California Department of Water Resources, several wells in the Project vicinity indicated a depth to groundwater of 75 to 80 feet below the existing ground surface. It is not uncommon for seepage conditions to develop where non previously existed. Groundwater and seepage are dependent on seasonal precipitation, irrigation and land use among other factors, and varies as a result. Proper surface drainage will be important to Project operation.

The Mead Valley Area Plan (Figure 13) indicates the Project site is located in an area of “Low” liquefaction susceptibility. Liquefaction typically occurs when a property is located in a zone with seismic activity, on-site soils are cohesionless or silt/clay with low plasticity, groundwater is encountered within 50 feet of the surface, and soil has a relative density less than approximately 70 percent. If these criteria are met, a seismic event could result in a rapid pore water pressure increase from the earthquake-generated ground accelerations. However, the Geotechnical Investigation states that “due to the lack of a permanent, near-surface groundwater table and the dense to very dense nature of the old alluvial fan deposits, liquefaction potential for the site is negligible and not a design consideration.”

Ground-shaking Zone

Would the Project - -

a) **Be subject to strong ground shaking?**

Less Than Significant Impact. As indicated previously, the nearest known active fault is the Glen Ivy segment of the Elsinore fault, which is approximately 11 miles west of the Project site. This fault

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segment is the dominant source of any potential ground motion. In addition, earthquakes that might occur on the 25 known active faults or other faults within southern California and northern Baja California are potential generators of significant motion at the Project site. The following Table 4.7.1 lists known active faults within 50 miles of the Project site and estimated maximum earthquake magnitude for the most dominant faults in relationship to the Project site location.

Table 4.7.1: Known Active Faults Within 50 Miles of the Project Site

Fault Name	Maximum Earthquake Magnitude (Mw)	Distance from Site (miles)	Direction from Project Site
Elsinore Fault (Glen Ivy)	6.8	11	West
San Jacinto (Casa Loma)	6.9	12	East
Elsinore (Wildomar)	6.8	13	South
San Jacinto (Claremont)	6.7	13	East
San Andreas (San Bernardino)	7.5	16	North
Chino	6.7	20	Northwest
San Geronio Pass	n/a	23	East/Northeast
San Jacinto (Glen Helen)	6.7	24	North
San Jacinto (Clark)	7.2	24	Southeast
Whittier	6.8	25	Northwest
Cucamonga	6.9	28	North/Northwest
Pinto Mountain	7.2	36	Northeast
San Andreas Fault (North Branch)	7.4	37	East/Northeast
San Andreas Fault (South Branch)	7.5	37	East
Morongo Valley	7.2	41	Northeast
North Frontal Thrust	7.2	42	North/Northeast
Newport-Inglewood-Rose Canyon	7.1	43	Southwest
Helendale	7.3	46	North/Northeast
Burnt Mountain	6.5	48	East/Northeast

The following Table presents historic earthquakes in southern California of magnitude 6.0 and greater, their magnitude, distance and direction from the Project site.

Table 4.7.2: Historic Earthquake Events with Respect to Project Site

Earthquake (Oldest to Youngest)	Date of Earthquake	Magnitude	Distance to Epicenter (Miles)	Direction to Epicenter
San Jacinto	12/25/1899	6.7	15	East/Southeast
San Jacinto	4/21/1918	6.8	15	East/Southeast
Loma Linda Area	7/22/1923	6.3	12	North
Long Beach	3/10/1933	6.4	44	West/Southwest
Buck Ridge	3/25/1937	6.0	64	East/Southeast

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Earthquake (Oldest to Youngest)	Date of Earthquake	Magnitude	Distance to Epicenter (Miles)	Direction to Epicenter
Imperial Valley	5/18/1940	6.9	57	East/Southeast
Desert Hot Springs	12/4/1948	6.0	50	East
Arroyo Salada	3/19/1954	6.4	77	East/Southeast
Borrego Mountain	4/8/1968	6.5	83	East/Southeast
San Fernando	2/9/1971	6.6	83	West/Northwest
Joshua Tree	4/22/1992	6.1	59	East
Landers	6/28/1992	7.3	57	East/Northeast
Big Bear	6/28/1992	6.4	37	Northeast
Northridge	1/17/1994	6.7	85	West/Northwest
Hector Mine	10/16/1999	7.1	82	Northeast

The primary seismic hazard is ground shaking due to a large earthquake on any of the major active regional faults identified above. Accordingly, as with most locations within Southern California, there is potential that, within the project lifetime, the project structure would experience strong ground shaking as a result of seismic activity originating from regional faults.

California State Law requires structures to incorporate earthquake-reducing design standards in accordance with the latest California Building Code and appropriate seismic design criteria. Project development and operation compliance with this regulatory requirement would reduce potential impacts related to exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving strong seismic ground shaking to a less than significant level. Overall, the Project site is located in the seismically active Southern California region and could be subject to moderate to strong ground shaking in the event of an earthquake on one of the many faults in Southern California.

Landslide Risk

Would the Project - -

- 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?**

Less Than Significant Impact. There are no landslides mapped on, or near, the Project site. The Geotechnical Investigation states that “due to the relatively level topography of the site, we opine that landslides are not present at the property or at a location that could impact the subject site.” In addition, rock falls are not a design hazard or consideration due to the absence of natural bedrock slopes above and adjacent to the Project site.

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Ground Subsidence

Would the Project - -

- 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?**

Less Than Significant Impact. “Hydrocompression” is the tendency of unsaturated soil structure to collapse upon wetting resulting in the overall settlement of the affected soil and overlying foundations or improvements supported thereon.” Normally, potentially compressible soils underlying a property are removed and recompacted during remedial site grading. If compressible soil is left in place, a potential for settlement due to hydrocompression of the soil exists. The Geotechnical Investigation tested soils on the Project site for hydrocompression and exhibited a collapse potential of 1.1 to 1.7 percent when loaded to expected post-graded pressures. Thereby, the Geotechnical Investigation indicates “the test results indicate that the soils are classified as having a ‘slight’ (0.1 to 2.0 percent) degree of specimen collapse” and the associated impact would be less than significant. The required remedial grading and compaction adherence to the geology report recommendations and existing grading regulations make the impacts less than significant.

Other Geologic Hazards

Would the Project - -

- a) **Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?**

No Impact. Seiches are caused by movement of an inland body of water due to movement from seismic forces. The Project site is located approximately 3.8 miles southwest of Lake Perris. In the unlikely event of a seiche, water is anticipated to be confined to the young alluvial valley channel east of Interstate 215.

A tsunami is a series of long-period waves generated in the ocean by a sudden displacement of large volumes of water. Causes of tsunamis include underwater earthquakes, volcanic eruptions, or offshore slope failures. The Project site is located approximately 36 miles from the Pacific Ocean at an elevation greater than 1,500 feet above Mean Sea Level. Therefore, the risk of tsunamis affecting the Project site is, according to the Geotechnical Investigation “negligible and not a design consideration.”

Slopes

Would the Project - -

- a) **Change topography or ground surface relief features?**

Less Than Significant Impact. Project site ground surface relief features will change somewhat during Project development in that Project development will necessitate grading that will involve cuts of approximately 16 feet and fills of approximately 15 feet to achieve proposed finished grades. The Geotechnical Investigation indicates “in general, permanent, cut slopes and graded fill slopes constructed with on-site soils inclined no steeper than 2:1 (h:v) with vertical heights of 30 feet or less will possess

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Factors of Safety of 1.5 or greater under static loading, 1.1 or greater under pseudo-static loading, and 1.5 or greater for surficial stability.” The Geotechnical Investigation determined that these factor thresholds for Project development meet or exceed the level of safety significance as per County of Riverside standards. As a result, the Project impact would be less than significant.

Would the Project - -

- a) **Create cut or fill slopes greater than 2:1 or higher than 10 feet?**

Less Than Significant Impact. A cut slope with varying heights of approximately 5 to 24 feet and inclined at 2:1 (horizontal: vertical) is planned along Patterson Avenue. Furthermore, permanent cut slope height at 2:1 (or less) inclination generally will possess Factors of Safety of 1.5 or greater under static loading, 1.1 or greater under pseudo-static loading, and 1.5 or greater for surficial stability. Grading of fill slopes should be designed in accordance with requirements of the County of Riverside and the 2016 California Building Code. Fill keys should be constructed in accordance with standard grading specifications in the Geotechnical Investigation. Compliance with the Geotechnical Investigation requirements and standard grading specifications will ensure any Project-development impacts related to cut and fill slope stability will be maintained at a less than significant level.

Would the Project - -

- a) **Result in grading that affects or negates subsurface sewage disposal systems?**

No Impact. No subsurface disposal systems exist on site. Therefore, no grading associated with Project development will affect subsurface sewage disposal systems. Project development and operation will connect to the existing Eastern Municipal Water District sewer system for disposal of waste water.

Soils

Would the Project - -

- a) **Result in substantial soil erosion or the loss of topsoil?**

Less Than Significant Impact. Much of the Project site is covered with grassland. The Project site is blanketed by topsoil and underlain by very old alluvium and granitic bedrock. Although the majority of soils on-site consist of silty and clayey sands, some granular material having little or no cohesion and subject to caving from un-shored excavations could be expected on-site. Project development will remove the grassland and the few trees on the property. This would result in short-term erosion impacts due to increasing the rate of water runoff and concomitant susceptibility to erosion. Standard County of Riverside requirements (e.g., Ordinance No. 745.1) as well as the requirements of the Riverside County National Pollutant Discharge Elimination System Municipal Stormwater Permit will ensure decreasing the degree of Project impact. In addition, Best Management Practices for the Project will minimize soil erosion and loss of topsoil resulting from Project development activities. As a result, the Project impact would be less than significant.

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Would the Project - -

- a) **Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2019), creating substantial direct or indirect risks to life or property?**

Less Than Significant Impact. The older alluvium on the Project site generally consists of silty or clayey sands with lesser amounts of sandy silts and sandy clays. The Geotechnical Investigation indicates “laboratory testing results indicate samples of the near surface soils exhibits a ‘very low’ expansion potential (expansion index [EI] of 20 or less) with test results showing expansion indices of 3 and 15.”

Hydrocompression is the tendency of unsaturated soil structure to collapse upon wetting resulting in overall settlement of the affected soil and overlying foundations or improvements supported thereon. Potentially compressible soils underlying the Project site typically are removed and recompacted during remedial site grading. However, if compressible soil is left in-place, a potential for settlement to hydrocompression of the soil exists. The Geotechnical Investigation indicated soils tested exhibited a collapse potential of 1.2 to 1.7 percent when loaded to the expected post-grading pressures. Thereby, “the test results indicated that the soils are classified as having a ‘slight’ (0.1 to 2.0 percent degree of specimen collapse . . .)” The Geotechnical Investigation concludes that laboratory tests indicate site soils are non-expansive and have a “very low” expansion potential and recommends that “if medium to highly expansive soils are encountered at the site, they should be exported from the site or selectively graded and placed in the deeper fill areas to allow for the placement of low expansion material at the finish pad grade.” In addition, the Geotechnical Investigation concludes that “consolidation testing of samples of the subsurface soils indicates that there is a potential for hydrocompression of the soils beneath the [Project] site. Remedial grading will address the collapse potential of the near-surface foils; however, precautionary measures will be needed to mitigate the potential for hydrocollapse of deeper soils.”

Would the Project - -

- b) **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?**

No Impact. No septic tanks or alternative waste water disposal systems will be used as part of the Project. Project development and operation will connect to the existing Eastern Municipal Water District sewer system for disposal of waste water.

Wind Erosion and Blowsand from project either on or off site.

Would the Project - -

- a) **Be impacted by or result in an increase in wind erosion and blowsand, either on- or off-site?**

Less Than Significant Impact. The Riverside County General Plan indicates that wind and wind-blown sand are an environmentally limiting factor throughout much of Riverside County. Soil movement is initiated as a result of wind forces exerted against the surface of the ground. Dust particles in the air create major health problems. Atmospheric dust causes respiratory discomfort, may carry pathogens that cause eye infections and skin disorders, and reduces highway and air traffic visibility. Dust storms can cause

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additional problems. Buildings, fences, roads, crops, trees and shrubs can all be damaged by abrasive blowing soil. Wind and wind-blown sand are an environmentally-limiting factor throughout much of Riverside County. Approximately 20 percent of the land area of Riverside County is vulnerable to “high” and “very high” wind erosion susceptibility. However, the Project site is located in a “moderate” wind erodibility zone. Project development activities will involve removal of vegetative cover on the Project site, temporarily expose on-site soils, and thereby increase erosion and blowsand emanating from moderate winds, potentially affecting adjacent residential properties. This impact would be a short-term potentially significant impact. However, Project design as well as County of Riverside regulations would reduce this impact to a less than significant level via watering and covering stock piles during construction.

4.7.4 CUMULATIVE IMPACTS

Geology and Soils Thresholds (all) – As noted in this Section, all Project-related impacts to geology and soils would be less than significant and not require mitigation. All potential Project-related impacts related to geology and soils would be precluded through Project mandatory compliance with geotechnical recommendations contained in the Geotechnical Investigation and with compliance with State standards and regulations as part of Project design.

Potential geologic and soils impacts (e.g., erosion, liquefaction, ground failure) are restricted to area of development; that is, to the entire Project site covered by building and paving. Thereby, the impacts would not contribute to cumulative impacts associated with other existing, planned, or proposed development. So, issues including fault rupture, seismic ground shaking, liquefaction, landslides and expansive soils would involve impacts to, rather than from, the Project and remain site specific. In addition, addressing these potential hazards for the Project would include using measures to comply to existing requirements and specific design for the Project. These would not relate to off-site areas or projects. Therefore, no connection would exist to similar potential issues or cumulative impacts to/from other projects and properties.

The Project developer would be required to obtain an NPDES permit and demonstrate compliance with required Storm Water Pollution Prevention Plan and Water Quality Management Plan. This requirement also applies to other projects in the Project vicinity. South Coast Air Quality Management District Rule 403 compliance would prevent wind-related erosion hazards during Project development (grading and construction) and ensure the Project together with other projects in the cumulative projects area (which also would be subject to Rule 403 requirements) cumulative impacts related to wind and water hazards would be less than significant.

4.7.5 EXISTING REGULATIONS AND STANDARD CONDITIONS

Regulatory Background

State of California

The State Alquist-Priolo Earthquake Fault Zoning Act (A-P Act) was passed in 1972 to mitigate the hazard of surface faulting. Surface rupture is the most easily avoided seismic hazard. The main purpose of the A-P Act is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The A-P Act only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards. Alquist Priolo Earthquake Fault Zones have been designated by the California Division of Mines and Geology for the Elsinore, San Jacinto, and San Andreas fault zones in Riverside County.

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Standard Conditions

As a Standard Condition of approval, the Project will be required to comply with the site-specific recommendations contained in the Geotechnical Investigation.

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.

Riverside County General Plan Policies

The following are applicable County of Riverside General Plan Policies that are relevant to the Project.

Safety Element

Seismically-Induced Liquefaction, Landslides, and Rock Falls

Policy S 2.2 – Require geological and geotechnical investigations in areas with potential for earthquake-induced liquefaction, landsliding or settlement, for any building proposed for human occupancy and any structure whose damage would cause harm, except for accessory buildings.

Slope and Soil Instability Hazards

Policy S 3.1 – Require the following in landslide potential hazard management zones, or when deemed necessary by the California Environmental Quality Act.

- a) Preliminary geotechnical and geologic investigations.
- b) Evaluations of site stability, including any possible impact on adjacent properties, before final project design is approved.
- c) Consultant reports, investigations, and design recommendations required for grading permits, building permits, and subdivision applications be prepared by state-licensed professionals.

Policy S 3.3 – Before issuance of building permits, require certification regarding the stability of the site against adverse effects of rain, earthquakes, and subsidence.

Policy S 3.11 – Require studies that address the potential of this hazard on proposed development within “High” and “Very High” wind erosion hazard zones as shown on Figure S-8, Wind Erosion Susceptibility Map.

Policy S3.12 – Include a disclosure about wind erosion susceptibility on property title for those properties located within “High” and “Very High” wind erosion hazard zones as shown on Figure S-8, Wind Erosion Susceptibility Map. (AI 92)

Policy S 3.13 – Require buildings to be designed to resist wind loads.

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4.7.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Project development and operational impacts related to Geology and Soils would be less than significant. Thereby, mitigation is not requisite.

4.7.7 PROJECT DESIGN FEATURES

PDF-GEO-1: Recommendations pertaining to Project site preparation and maintenance and Project development (construction) contained in the Geotechnical Investigation (Section 8 – Conclusions and Recommendations) will be implemented.

4.7.8 MITIGATION MEASURES

No Mitigation Measures are required.

4.7.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Compliance with County of Riverside General Plan policies and with County of Riverside Standard Conditions, in combination with Geotechnical Investigation “Recommendations” implemented in Project design and Project construction (expressed as PDF-GEO-1) would contribute to ensuring any Geology and Soils impacts would remain at a less than significant level.

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4.8 GHG EMISSIONS

Global Climate Change (GCC) is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. GCC is currently one of the most controversial environmental issues in the United States, and much debate exists within the scientific community about whether or not GCC is occurring naturally or as a result of human activity. Some data suggests that GCC has occurred in the past over the course of thousands or millions of years. 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 (1900) is occurring at a quicker rate and magnitude than in the past. Scientific 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.

An individual development proposal, such as the Project considered herein, cannot generate enough greenhouse gas emissions to effect a discernible change in the global climate. However, the Project may contribute to GCC through its increment of greenhouse gases (GHG) in combination with the cumulative increase in GHG from all other sources, which when taken together constitute potential influences on GCC. This Section summarizes the potential for the Project to have a significant effect upon the environment as a result of its potential contribution to GCC. Detailed analysis of the Project's potential GHG/GCC impacts is presented in *Barker Logistics Greenhouse Gas Analysis, County of Riverside* (Urban Crossroads, Inc.) May 1, 2020 (Project GHG Analysis); EIR Appendix E.

4.8.1 ENVIRONMENTAL SETTING/BACKGROUND

The Project site is located on the northeast corner of the Patterson Avenue/Placentia Avenue intersection within unincorporated Riverside County. The 31.55-acre Project site is vacant, shows signs of grading and disking, and contains grass and some trees. The Project site is bordered by existing single-family residential and vacant land uses north of the Project site, single-family residential uses south and west of the Project site, and single-family residential and industrial/manufacturing uses east of the Project site.

Interstate 215 is located approximately 1,600 feet east of the Project site. The BNSF/Metrolink rail lines are located approximately 1,500 feet east of the Project site. The March Air Reserve Base/Inland Port Airport is located approximately 2.5 miles northeast of the Project site.

The Project site slopes approximately 45 feet downward from south to northeast. Grasses cover portions of the property and several trees are located in the southerly and southwesterly areas of the Project site.

4.8.1.1 Global Climate Change

GCC refers to the change in average meteorological conditions with respect to temperature, wind patterns, precipitation and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO₂ (Carbon Dioxide), N₂O (Nitrous Oxide), CH₄ (Methane), hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride. These particular gases are important due to their residence time (duration) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the atmosphere, but prevent heat from escaping, thus warming the atmosphere. GCC can occur naturally, as it has in the past with the previous ice ages.

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4.8.1.2 Greenhouse Gases

Gases that trap heat in the atmosphere are often referred to as GHGs. GHGs are released into the atmosphere by both natural and anthropogenic (human) activity. Without the natural greenhouse gas effect, the average temperature would be approximately 61° Fahrenheit (F) cooler than it is currently. The accumulation of these gases in the atmosphere is considered to be the cause for the observed increase in the Earth's temperature.

GHGs have varying global warming potential (GWP) values; GWP values represent the potential of a gas to trap heat in the atmosphere. Carbon dioxide is used as the reference gas for GWP, and thus has a GWP of 1. GWP and atmospheric lifetimes of typical GHGs are summarized in **Table 4.8.1**.

Table 4.8.1
GHG Global Warming Potentials and Atmospheric Lifetimes

Gas	Atmospheric Lifetime (years)	Global Warming Potential (100-year time horizon)	
		2nd Assessment Report	5th Assessment Report
CO ₂	*	1	1
CH ₄	12.4	21	28
N ₂ O	121	310	265
HFC-23	222	11,700	12,400
HFC-134a	13.4	1,300	1,300
HFC-152a	1.5	140	138
SF ₆	3,200	23,900	23,500

Table 4.8.2 summarizes and describes commonly occurring GHGs, their sources, and general characteristics.

Table 4.8.2
GHG Descriptions, Sources, and Health Effects

GHGs	Description	Sources	Health Effects
Water	Water 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. A climate feedback is an indirect, or secondary, change, either positive or negative, that occurs within the climate system in response to a forcing mechanism. The feedback loop in which water is involved is critically important to projecting future climate change.	The main source of water vapor is evaporation from the oceans (approximately 85%). Other sources include evaporation from other water bodies, sublimation (change from solid to gas) from sea ice and snow, and transpiration from plant leaves.	There are no known direct health effects related to water vapor at this time. It should be noted however that when some pollutants react with water vapor, the reaction forms a transport mechanism for some of these pollutants to enter the human body through water vapor.

Table 4.8.2
GHG Descriptions, Sources, and Health Effects

GHGs	Description	Sources	Health Effects
	<p>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 condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the earth’s surface and heat it up).</p>		
CO ₂	<p>CO₂ is an odorless and colorless GHG. Since the industrial revolution began in the mid-1700s, the sort of human activity that increases GHG emissions has increased dramatically in scale and distribution. Data from the past 50 years suggests a corollary increase in levels and concentrations. 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%. Left unchecked, the concentration of CO₂ in the atmosphere is projected to increase to a minimum of 540 ppm by 2100 as a direct result of anthropogenic sources.</p>	<p>CO₂ is emitted from natural and manmade sources. Natural sources include: the decomposition of dead organic matter; respiration of bacteria, plants, animals and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic 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.</p>	<p>Outdoor levels of CO₂ are not high enough to result in negative health effects.</p> <p>According to the National Institute for Occupational Safety and Health (NIOSH), high concentrations of CO₂ can result in health effects such as: headaches, dizziness, restlessness, difficulty breathing, sweating, increased heart rate, increased cardiac output, increased blood pressure, coma, asphyxia, and/or convulsions. It should be noted that current concentrations of CO₂ in the earth’s atmosphere are estimated to be approximately 370 ppm, the actual reference exposure level (level at which adverse health effects typically occur) is at exposure levels of 5,000</p>

Table 4.8.2
GHG Descriptions, Sources, and Health Effects

GHGs	Description	Sources	Health Effects
			ppm averaged over 10 hours in a 40-hour workweek and short-term reference exposure levels of 30,000 ppm averaged over a 15 minute period.
CH ₄	CH ₄ is an extremely effective absorber of radiation, although its atmospheric concentration is less than CO ₂ and its lifetime in the atmosphere is brief (10-12 years), compared to other GHGs.	CH ₄ 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 CH ₄ . Other anthropogenic sources include fossil-fuel combustion and biomass burning.	CH ₄ is extremely reactive with oxidizers, halogens, and other halogen-containing compounds. Exposure to high levels of CH ₄ can cause asphyxiation, loss of consciousness, headache and dizziness, nausea and vomiting, weakness, loss of coordination, and an increased breathing rate.
N ₂ O	N ₂ O, also known as laughing gas, is a colorless GHG. Concentrations of N ₂ O also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb).	N ₂ O 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. It is used as an aerosol spray propellant, i.e., in whipped cream bottles. It is also used in potato chip bags to keep chips fresh. It is used in rocket engines and in race cars. N ₂ O can be transported into the stratosphere, be deposited on the earth's surface, and be converted to other compounds by chemical reaction.	N ₂ O 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 Olney's Lesions (brain damage).
Chlorofluorocarbons (CFCs)	CFCs are gases formed synthetically by replacing all hydrogen atoms in CH ₄ or ethane (C ₂ H ₆) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble and chemically unreactive in the	CFCs have no natural source but were first synthesized in 1928. They were used for refrigerants, aerosol propellants and cleaning solvents. Due to the discovery that they are able to	In confined indoor locations, working with CFC-113 or other CFCs is thought to result in death by cardiac arrhythmia (heart frequency too high or too low) or asphyxiation.

Table 4.8.2
GHG Descriptions, Sources, and Health Effects

GHGs	Description	Sources	Health Effects
	troposphere (the level of air at the earth's surface).	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, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years.	
HFCs	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 (GWP). The HFCs with the largest measured atmospheric abundances are (in order), fluoroform (CHF ₃), 1,1,1,2-tetrafluoroethane (CH ₂ FCF), and 1,1-difluoroethane (CH ₃ CF ₂). Prior to 1990, the only significant emissions were of CHF ₃ . CH ₂ FCF emissions are increasing due to its use as a refrigerant.	HFCs are manmade for applications such as automobile air conditioners and refrigerants.	No health effects are known to result from exposure to HFCs.
PFCs	PFCs have stable molecular structures and do not break down through chemical processes in the lower atmosphere. High-energy ultraviolet rays, which occur about 60 kilometers above earth's surface, are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF ₄) and hexafluoroethane (C ₂ F ₆). The EPA estimates that concentrations of CF ₄ in the atmosphere are over 70 parts per trillion (ppt).	The two main sources of PFCs are primary aluminum production and semiconductor manufacture.	No health effects are known to result from exposure to PFCs.
SF ₆	SF ₆ is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (23,900) (20). The EPA indicates that concentrations in the 1990s were about 4 ppt.	SF ₆ 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.	In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing.
Nitrogen Trifluoride (NF ₃)	NF ₃ is a colorless gas with a distinctly moldy odor. The World Resources Institute (WRI) indicates that NF ₃ has a 100-year GWP of 17,200.	NF ₃ is used in industrial processes and is produced in the manufacturing of semiconductors, Liquid Crystal Display (LCD) panels, types of solar panels, and chemical lasers.	Long-term or repeated exposure may affect the liver and kidneys and may cause fluorosis.

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4.8.1.3 Existing Greenhouse Gases Emissions Inventories

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). This GHG emission data through 2017 is available for Annex I nations. Global GHG emissions are summarized in Table 4.8.2, and are representative of currently available inventory data.

United States

As identified in **Table 4.8.3**, the United States, as a single country, was the number two producer of GHG emissions in 2017. Carbon dioxide from fossil fuel combustion is the largest source of GHG emissions in the United States.

Table 4.8.3
Global GHG Emissions by Source Countries and the EU (2017)

Sources	GHG Emissions (Gigagram CO ₂ e)
China	11,911,710
United States	6,456,718
European Union (28-member countries)	4,323,163
India	3,079,810
Russian Federation	2,155,470
Japan	1,289,630
Total	29,216,501

State of California

California has significantly slowed the rate of growth of GHG emissions through implementation of energy efficiency programs and adoption and implementation of strict emission controls, California nonetheless is still a substantial contributor to the U.S. emissions inventory total.

The California Air Resource Board (CARB) compiles GHG inventories for the State of California. Per the CARB 2019 GHG inventory data for the 2000-2017 GHG emissions period (the latest period for which data are available), California emitted an average 424.1 million metric tons of CO₂e (MMTCO₂e) per year.

County of Riverside

Riverside County's community-wide 2017 GHG emissions totaled an estimated 4,905,518 metric tons of CO₂e (MTCO₂e).¹

Project Site

The Project site comprises vacant, disturbed property, and is not a source of GHG emissions.

¹ County of Riverside Climate Action Plan Update (County of Riverside, Transportation and Land Management Agency, Planning Department) November 2019, Appendix A, p. 8.

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4.8.1.4 Effects of Climate Change in California

Public Health

Higher temperatures may increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to ozone formation could increase from 25 to 35 percent under the lower warming range to 75 to 85 percent under the medium warming range. In addition, if global background ozone levels increase as predicted in some scenarios, it may become impossible to meet local air quality standards. Air quality could be further compromised by increases in wildfires, which emit fine particulate matter that can travel long distances, depending on wind conditions. The Climate Scenarios Report indicates that large wildfires could become up to 55 percent more frequent if GHG emissions are not significantly reduced.

In addition, under the higher warming range scenario, there could be up to 100 more days per year with temperatures above 90°F in Los Angeles and 95°F in Sacramento by 2100. This is a large increase over historical patterns and approximately twice the increase projected if temperatures remain within or below the lower warming range. Rising temperatures could increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress caused by extreme heat.

Water Resources

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.

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 to 90 percent. Under the lower warming range scenario, snowpack losses could be only half as large as those possible if temperatures were to rise to the higher warming range. How much snowpack could be lost depends in part on future precipitation patterns, the projections for which remain uncertain. However, even under the wetter climate projections, the loss of snowpack could pose challenges to water managers and hamper hydropower generation. It could also adversely affect winter tourism. Under the lower warming range, the ski season at lower elevations could be reduced by as much as a month. If temperatures reach the higher warming range and precipitation declines, there may be years with insufficient snow for skiing and snowboarding.

State water supplies are also at risk from rising sea levels. An influx of saltwater could degrade California's estuaries, wetlands, and groundwater aquifers. Saltwater intrusion caused by rising sea levels is 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.

Agriculture

Increased temperatures could cause widespread changes to the agriculture industry reducing the quantity and quality of agricultural products statewide. First, California farmers could possibly lose as much as 25 percent of its water supply. Although higher CO₂ levels can stimulate plant production and increase plant water-use efficiency, California's farmers could face greater water demand for crops and a less reliable water supply as temperatures rise. Crop growth and development could change, as could the intensity and frequency of pest and disease outbreaks. Rising temperatures could aggravate O₃ pollution, which makes plants more susceptible to disease and pests and interferes with plant growth.

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Plant growth tends to be slow at low temperatures, increasing with rising temperatures up to a threshold. However, faster growth can result in less-than-optimal development for many crops, so rising temperatures could worsen the quantity and quality of yield for a number of California's agricultural products. Products likely to be most affected include wine grapes, fruits, and nuts.

In addition, continued GCC could shift the ranges of existing invasive plants and weeds and alter competition patterns with native plants. Range expansion could occur in many species while range contractions may be less likely in rapidly evolving species with significant populations already established. Should range contractions occur, new or different weed species could fill the emerging gaps. Continued GCC could alter the abundance and types of many pests, lengthen pests' breeding season, and increase pathogen growth rates.

Forests and Landscapes

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, terrain, and vegetation, future risks would likely not be uniform throughout the State. For example, wildfires in northern California could increase by up to 90 percent due to decreased precipitation.

Moreover, continued GCC has the potential to alter natural ecosystems and biological diversity within the State. For example, alpine and subalpine ecosystems could decline by as much as 60 to 80 percent by the end of the century as a result of increasing temperatures. The productivity of the State's forests has the potential to decrease as a result of GCC.

Rising Sea Levels

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. Increased sea level elevations of this magnitude would inundate low-lying coastal areas with saltwater, 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.

4.8.2 GCC REGULATORY SETTING

The current GHG regulatory setting is extensive and constantly evolving. The GHG regulatory setting is discussed in detail within the Project GHG Analysis (Project GHGA Section 2.7). California's GHG regulatory setting of relevance to the Project is summarized below.

4.8.2.1 State of California

The State of California legislature has enacted a series of bills and associated actions, described below, that collectively act to reduce GHG emissions. Certain State legislation, such as Assembly Bill (AB 32) *California Global Warming Solutions Act of 2006*, was specifically enacted to address GHG emissions. Other State legislation, such as Title 24 and Title 20 energy standards, originally adopted for other purposes (energy and water conservation), also facilitate GHG emissions reductions.

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Legislative Actions

AB 32

The California State Legislature enacted AB 32, which requires that GHGs emitted in California be reduced to 1990 levels by the year 2020. “GHGs” as defined under AB 32 include CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆. Since AB 32 was enacted, a seventh chemical, nitrogen trifluoride, has also been added to the list of GHGs. CARB is the state agency charged with monitoring and regulating sources of GHGs. Pursuant to AB 32, CARB adopted regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions.

CARB approved the 1990 GHG emissions level of 427 MMTCO_{2e} on December 6, 2007. Therefore, pursuant to AB 32, emissions generated in California in 2020 are required to be equal to or less than 427 MMTCO_{2e}. Emissions in 2020 in a “business as usual” (BAU) scenario were estimated to be 596 MMTCO_{2e}, which do not account for reductions from AB 32 regulations. At that level, a 28.4% reduction was required to achieve the 427 MMTCO_{2e} 1990 inventory. In October 2010, CARB prepared an updated 2020 forecast to account for the circa 2008 recession and resulting slower growth forecasts. The forecasted inventory without the benefits of adopted regulation is now estimated at 545 MMTCO_{2e}. Therefore, under the updated forecast, a 21.7% reduction from BAU is required to achieve 1990 levels.

The State has made steady progress in implementing AB 32 and achieving targets included in Executive Order S-3-05. The progress is shown in updated emission inventories prepared by CARB for 2000 through 2012. The State has achieved the Executive Order S-3-05 target for 2010 of reducing GHG emissions to 2000 levels.

CARB has also made substantial progress in achieving its goal of achieving 1990 emissions levels by 2020. As described earlier in this Section, CARB revised the 2020 BAU inventory forecast to account for new lower growth projections, which resulted in a new lower reduction from BAU to achieve the 1990 base GHG emissions condition. The previous reduction from 2020 BAU needed to achieve 1990 levels was 28.4% and the latest reduction from 2020 BAU is 21.7%.

SB 375

Passing the Senate on August 30, 2008, Senate Bill (SB) 375 was signed by the Governor on September 30, 2008. According to SB 375, the transportation sector is the largest contributor of GHG emissions, which emits over 40% of the total GHG emissions in California.

SB 375 (1) requires metropolitan planning organizations to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, (2) aligns planning for transportation and housing, and (3) creates specified incentives for the implementation of the strategies.

SB 375 also requires Metropolitan Planning Organizations (MPOs) to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions. Although SB 375 does not prevent CARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.

SB 375, as codified at Public Resources Code Section 21159.28, states that CEQA findings for certain projects are not required to reference, describe, or discuss (1) growth inducing impacts, or (2) any project-

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specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network, if the project:

- Is in an area with an approved sustainable communities strategy or an alternative planning strategy that CARB accepts as achieving the GHG emission reduction targets.
- Is consistent with that strategy (in designation, density, building intensity, and applicable policies).
- Incorporates the mitigation measures required by an applicable prior environmental document.

AB 1493

California AB 1493 (Pavley), enacted on July 22, 2002, required CARB to develop and adopt regulations and standards that reduce GHGs emitted by passenger vehicles and light duty trucks. Implementation of the regulation was delayed by lawsuits filed by automakers and by the EPA's denial of an implementation waiver. The EPA subsequently granted the requested waiver in 2009, which was upheld by the U.S. District Court for the District of Columbia in 2011.

The initial phase of the AB 1493 standards address emissions from 2009 – 2016 model year cars and light trucks. When fully implemented, the near-term (2009–2012) AB 1493 standards will result in about a 22% reduction compared with the 2002 fleet, and the mid-term (2013–2016) AB 1493 standards will result in about a 30% reduction. Several technologies stand out as providing significant reductions in emissions at favorable costs. These include discrete variable valve lift or camless valve actuation to optimize valve operation rather than relying on fixed valve timing and lift as has historically been done; turbocharging to boost power and allow for engine downsizing; improved multi-speed transmissions; and improved air conditioning systems that operate optimally, leak less, and/or use an alternative refrigerant.

The second phase of the implementation for the Pavley bill was incorporated into Amendments to the Low-Emission Vehicle Program (LEV III) or the Advanced Clean Cars program. The Advanced Clean Car program combines the control of smog-causing pollutants and GHG emissions into a single coordinated package of requirements for model years 2017 through 2025. The regulation will reduce GHGs from new cars by 34% from 2016 levels by 2025. The new rules will clean up gasoline and diesel-powered cars, and deliver increasing numbers of zero-emission technologies, such as full battery electric cars, newly emerging plug-in hybrid electric vehicles and hydrogen fuel cell cars. The package will also ensure adequate fueling infrastructure is available for the increasing numbers of hydrogen fuel cell vehicles planned for deployment in California.

SB 350

In October 2015, the legislature approved, and the Governor signed SB 350, (Clean Energy and Pollution Reduction Act of 2015). The Act reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the RPS, higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Provisions for a 50% reduction in the use of petroleum statewide were removed from the Bill because of opposition and concern that it would prevent the Bill's passage. Specifically, SB 350 requires the following to reduce statewide GHG emissions:

- Increase the amount of electricity procured from renewable energy sources from 33% to 50% by 2030, with interim targets of 40% by 2024, and 25% by 2027.
- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the California Energy Commission (CEC), and local publicly owned utilities.

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- Reorganize the Independent System Operator to develop more regional electrify transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

SB 32

On September 8, 2016, Governor Jerry Brown signed the Senate Bill (SB) 32 and its companion 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 under Executive Order B-30-15. The new legislation builds upon the AB 32 goal of reducing GHG emissions to 1990 levels by 2020, and establishes intermediate GHG emissions reduction targets. Specifically, SB 32 establishes a statewide GHG emissions reduction target of 80% below 1990 levels by 2050. AB 197 creates a legislative committee to oversee regulators to ensure that CARB not only responds to the Governor, but also to the Legislature. CARB's Climate Change Scoping Plan (Scoping Plan) contains measures designed to reduce the State's emissions to 1990 levels by the year 2020 to comply with AB 32. The Scoping Plan identifies recommended measures for multiple GHG emission sectors and the associated emission reductions needed to achieve the year 2020 emissions target—each sector has a different emission reduction target. Most of the measures target the transportation and electricity sectors. As stated in the Scoping Plan, the key elements of the strategy for achieving the 2020 GHG target include:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards;
- Achieving a statewide renewables energy mix of 33%;
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system;
- Establishing targets for transportation related GHG emissions for regions throughout California and pursuing policies and incentives to achieve those targets;
- Adopting and implementing measures pursuant to existing State laws and policies, including California's clean car standards, goods movement measures, and the LCFS; and
- Creating targeted fees, including a public goods charge on water use, fees on high GWP gases, and a fee to fund the administrative costs of the State's long-term commitment to AB 32 implementation.

CARB approved the First Scoping Plan Update on May 22, 2014. The First Scoping Plan Update identifies the next steps for California's climate change strategy. The First Scoping Plan Update shows how California continues on its path to meet the near-term 2020 GHG limit, but also sets a path toward long-term, deep GHG emission reductions. The report establishes a broad framework for continued emission reductions beyond 2020, on the path to 80% below 1990 levels by 2050. The First Scoping Plan Update identifies progress made to meet the near-term objectives of AB 32 and defines California's climate change priorities and activities for the next several years. The First Scoping Plan Update does not set new targets for the State but describes a path that would achieve the long term 2050 goal of Executive Order S-3-05 for emissions to decline to 80% below 1990 levels by 2050.

Forecasting the amount of emissions that would occur in 2020 if no actions are taken was necessary to assess the amount of reductions California must achieve to return to the 1990 emissions level by 2020 as required by AB 32. The no-action scenario is known as "business-as-usual" or BAU. CARB originally defined the BAU scenario as emissions in the absence of any GHG emission reduction measures discussed in the Scoping Plan.

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As part of CEQA compliance for the Scoping Plan, CARB prepared a Supplemental Functional Equivalent Document (FED) in 2011. The FED included an updated 2020 BAU emissions inventory projection based on current economic forecasts (i.e., as influenced by the economic downturn) and emission reduction measures already in place, replacing its prior 2020 BAU emissions inventory. CARB staff derived the updated emissions estimates by projecting emissions growth, by sector, from the state's average emissions from 2006–2008. The new BAU estimate includes emission reductions for the million-solar-roofs program, the AB 1493 motor vehicle GHG emission standards, and the LCFS. In addition, CARB factored into the 2020 BAU inventory emissions reductions associated with 33% RPS for electricity generation. The updated BAU estimate of 507 MMTCO_{2e} by 2020 requires a reduction of 80 MMTCO_{2e}, or a 16% reduction below the estimated BAU levels to return to 1990 levels (i.e., 427 MMTCO_{2e}) by 2020.

In order to provide a BAU reduction that is consistent with the original definition in the Scoping Plan and with threshold definitions used in thresholds adopted by lead agencies for CEQA purposes and many CAPs, the updated inventory without regulations was also included in the Supplemental FED. CARB 2020 BAU projection for GHG emissions in California was originally estimated to be 596 MMTCO_{2e}. The updated CARB 2020 BAU projection in the Supplemental FED is 545 MMTCO_{2e}. Considering the updated BAU estimate of 545 MMTCO_{2e} by 2020, CARB estimates a 21.7% reduction below the estimated statewide BAU levels is necessary to return to 1990 emission levels (i.e., 427 MMTCO_{2e}) by 2020, instead of the approximate 28.4% BAU reduction previously reported under the original Climate Change Scoping Plan.

2017 Climate Change Scoping Plan Update

In compliance with AB 32 and the 2008 Scoping Plan, the target year 2020 has been fulfilled and will look onward to the *2017 Scoping Plan* that should be in compliance by 2030. In November 2017, CARB released the *2017 Scoping Plan Update*, which identifies the State's post-2020 reduction strategy. The *2017 Scoping Plan Update* reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Key programs that the proposed Second Update builds upon include the Cap-and-Trade Regulation, the LCFS, and much cleaner cars, trucks and freight movement, utilizing cleaner, renewable energy, and strategies to reduce CH₄ emissions from agricultural and other wastes.

The *2017 Scoping Plan Update* establishes a new emissions limit of 260 MMTCO_{2e} for the year 2030, which corresponds to a 40% decrease in 1990 levels by 2030.

California's climate strategy will require contributions from all sectors of the economy, including the land base, and will include enhanced focus on zero- and near-zero-emission (ZE/NZE) vehicle technologies; continued investment in renewables, including solar roofs, wind, and other distributed generation; greater use of low carbon fuels; integrated land conservation and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants (CH₄, black carbon, and fluorinated gases); and an increased focus on integrated land use planning to support livable, transit-connected communities and conservation of agricultural and other lands. Requirements for direct GHG reductions at refineries will further support air quality co-benefits in neighborhoods, including in disadvantaged communities historically located adjacent to these large stationary sources, as well as efforts with California's local air pollution control and air quality management districts (air districts) to tighten emission limits on a broad spectrum of industrial sources. Major elements of the *2017 Scoping Plan* framework include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing ZEV buses and trucks.
- LCFS, with an increased stringency (18% by 2030).
- Implementing SB 350, which expands the RPS to 50% RPS and doubles energy efficiency savings by 2030.

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- California Sustainable Freight Action Plan, which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of zero-emission vehicles (ZEV) trucks.
- Implementing the proposed Short-Lived Climate Pollutant Strategy (SLPS), which focuses on reducing CH₄ and hydrofluorocarbon emissions by 40% and anthropogenic black carbon emissions by 50% by year 2030.
- Continued implementation of SB 375.
- Post-2020 Cap-and-Trade Program that includes declining caps.
- 20% reduction in GHG emissions from refineries by 2030.
- Development of a Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

Note, however, that the *2017 Scoping Plan* acknowledges that:

“[a]chieving net zero increases in GHG emissions, resulting in no contribution to GHG impacts, may not be feasible or appropriate for every project, however, and the inability of a project to mitigate its GHG emissions to net zero does not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA.”

In addition to the statewide strategies listed above, the *2017 Scoping Plan Update* also identifies local governments as essential partners in achieving the State's long-term GHG reduction goals and identifies local actions to reduce GHG emissions. As part of the recommended actions, CARB recommends that local governments achieve a community-wide goal to achieve emissions of no more than 6 metric tons of CO₂e (MTCO₂e) or less per capita by 2030 and 2 MTCO₂e or less per capita by 2050. For CEQA projects, CARB states that lead agencies may develop evidenced-based bright-line numeric thresholds—consistent with the Scoping Plan and the State's long-term GHG goals—and projects with emissions over that amount may be required to incorporate on-site design features and mitigation measures that avoid or minimize project emissions to the degree feasible; or, a performance-based metric using a CAP or other plan to reduce GHG emissions is appropriate.

According to research conducted by the Lawrence Berkeley National Laboratory (LBNL) and supported by CARB, California, under its existing and proposed GHG reduction policies, is on track to meet the 2020 reduction targets under AB 32 and could achieve the 2030 goals under SB 32. The research utilized a new, validated model known as the California LBNL GHG Analysis of Policies Spreadsheet (CALGAPS), which simulates GHG and criteria pollutant emissions in California from 2010 to 2050 in accordance to existing and future GHG-reducing policies. The CALGAPS model showed that GHG emissions through 2020 could range from 317 to 415 MTCO₂e per year (MTCO₂e/yr), “indicating that existing state policies will likely allow California to meet its target [of 2020 levels under AB 32].” CALGAPS also showed that by 2030, emissions could range from 211 to 428 MTCO₂e/yr, indicating that “even if all modeled policies are not implemented, reductions could be sufficient to reduce emissions 40% below the 1990 level [of SB 32].” CALGAPS analyzed emissions through 2050 even though it did not generally account for policies that might be put in place after 2030. Although the research indicated that the emissions would not meet the State's 80% reduction goal by 2050, various combinations of policies could allow California's cumulative emissions to remain very low through 2050.

Cap-and-Trade Program

The Scoping Plan identifies a Cap-and-Trade Program as one of the key strategies for California to reduce GHG emissions. According to CARB, a cap-and-trade program will help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020 and ultimately achieving an 80%

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reduction from 1990 levels by 2050. Under cap-and-trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap will be able to trade permits to emit GHGs within the overall limit.

CARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. See Title 17 of the CCR §§ 95800 to 96023). The Cap-and-Trade Program is designed to reduce GHG emissions from major sources (deemed “covered entities”) by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32’s emission-reduction mandate of returning to 1990 levels of emissions by 2020. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the program’s duration.

Covered entities that emit more than 25,000 MTCO₂e/yr must comply with the Cap-and-Trade Program. Triggering of the 25,000 MTCO₂e/yr “inclusion threshold” is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of GHG Emissions (Mandatory Reporting Rule or “MRR”).

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits. Each covered entity with a compliance obligation is required to surrender “compliance instruments” (30) for each MTCO₂e of GHG they emit. There also are requirements to surrender compliance instruments covering 30% of the prior year’s compliance obligation by November of each year. For example, in November 2014, a covered entity was required to submit compliance instruments to cover 30% of its 2013 GHG emissions.

The Cap-and-Trade Program provides a firm cap, ensuring that the 2020 statewide emission limit will not be exceeded. An inherent feature of the Cap-and-Trade program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on an accumulative basis. As summarized by CARB in the First Update:

“The Cap-and-Trade Regulation gives companies the flexibility to trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more have to turn in more allowances or other compliance instruments. Companies that can cut their GHG emissions have to turn in fewer allowances. But as the cap declines, aggregate emissions must be reduced. In other words, a covered entity theoretically could increase its GHG emissions every year and still comply with the Cap-and-Trade Program if there is a reduction in GHG emissions from other covered entities. Such a focus on aggregate GHG emissions is considered appropriate because climate change is a global phenomenon, and the effects of GHG emissions are considered cumulative (CARB 2014).”

The Cap-and-Trade Program works with other direct regulatory measures and provides an economic incentive to reduce emissions. If California’s direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California’s direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for incrementally increased emissions reductions. The Cap-and-Trade Program provisions (excerpted in pertinent part below) assure that California will meet its 2020 GHG emissions reduction mandate:

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“The Cap-and-Trade Program establishes an overall limit on GHG emissions from most of the California economy—the “capped sectors.” Within the capped sectors, some of the reductions are being accomplished through direct regulations, such as improved building and appliance efficiency standards, the [Low Carbon Fuel Standard] LCFS, and the 33% [Renewables Portfolio Standard] RPS. Whatever additional reductions are needed to bring emissions within the cap is accomplished through price incentives posed by emissions allowance prices. Together, direct regulation and price incentives assure that emissions are brought down cost-effectively to the level of the overall cap. The Cap-and-Trade Regulation provides assurance that California’s 2020 limit will be met because the regulation sets a firm limit on 85% of California’s GHG emissions. In sum, the Cap-and-Trade Program will achieve aggregate, rather than site specific or project-level, GHG emissions reductions. Also, due to the regulatory architecture adopted by CARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the State’s emissions forecasts and the effectiveness of direct regulatory measures.”

As of January 1, 2015, the Cap-and-Trade Program covered approximately 85% of California’s GHG emissions. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects’ electricity usage are covered by the Cap-and-Trade Program.

The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program’s first compliance period. While the Cap-and-Trade Program technically covered fuel suppliers as early as 2012, they did not have a compliance obligation (i.e., they were not fully regulated) until 2015. The Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported. The point of regulation for transportation fuels is when they are “supplied” (i.e., delivered into commerce). Accordingly, as with stationary source GHG emissions and GHG emissions attributable to electricity use, virtually all, if not all, of GHG emissions from CEQA projects associated with VMT are covered by the Cap-and-Trade Program. In addition, the Scoping Plan differentiates between “capped” and “uncapped” strategies. “Capped” strategies are subject to the proposed cap-and-trade program. The Scoping Plan states that the inclusion of these emissions within the Program will help ensure that the year 2020 emission targets are met despite some degree of uncertainty in the emission reduction estimates for any individual measure. Implementation of the capped strategies is calculated to achieve a sufficient amount of reductions by 2020 to achieve the emission target contained in AB 32. “Uncapped” strategies that will not be subject to the cap-and-trade emissions caps and requirements are provided as a margin of safety by accounting for additional GHG emission reductions.

Executive Orders Related to GHG Emissions

California’s Executive Branch has taken several actions to reduce GHGs through the use of Executive Orders. Although not regulatory, they set the tone for the state and guide the actions of state agencies. Additionally, California’s Executive Branch has taken several actions to reduce GHGs through the use of Executive Orders. Although not regulatory, Executive Orders set the tone for the State and guide the actions of State agencies.

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Executive Order S-3-05

Former California Governor Schwarzenegger announced on June 1, 2005, through Executive Order S-3-05, the following reduction targets for GHG emissions:

- By 2010, reduce GHG emissions to 2000 levels.
- By 2020, reduce GHG emissions to 1990 levels.
- By 2050, reduce GHG emissions to 80% below 1990 levels.

The 2050 reduction goal represents what some scientists believe is necessary to reach levels that will stabilize the climate. The 2020 goal was established to be a mid-term target. Because this is an executive order, the goals are not legally enforceable for local governments or the private sector.

Executive Order S-13-08

Executive Order S-13-08 states that “climate change in California during the next century is expected to shift precipitation patterns, accelerate sea level rise and increase temperatures, thereby posing a serious threat to California’s economy, to the health and welfare of its population and to its natural resources.” Pursuant to the requirements in the Order, the 2009 California Climate Adaptation Strategy (CNRA 2009) was adopted, which is the “. . . first statewide, multi-sector, region-specific, and information-based climate change adaptation strategy in the United States.” Objectives include analyzing risks of climate change in California, identifying and exploring strategies to adapt to climate change, and specifying a direction for future research.

Executive Order B-30-15

On April 29, 2015, Governor Brown issued an executive order to establish a California GHG reduction target of 40% below 1990 levels by 2030. The Governor’s executive order aligns California’s GHG reduction targets with those of leading international governments ahead of the United Nations Climate Change Conference in Paris late 2015. The Order sets a new interim statewide GHG emission reduction target to reduce GHG emissions to 40% below 1990 levels by 2030 in order to ensure California meets its target of reducing GHG emissions to 80% below 1990 levels by 2050 and directs CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of MMTCO_{2e}. The Order also requires the state’s climate adaptation plan to be updated every three years, and for the State to continue its climate change research program, among other provisions. As with Executive Order S-3-05, this Order is not legally enforceable for local governments and the private sector. Legislation that would update AB 32 to make post 2020 targets and requirements a mandate is in process in the State Legislature.

Executive Order S-01-07 (LCFS)

The Governor signed Executive Order S-01-07 on January 18, 2007. The order mandates that a statewide goal shall be established to reduce the carbon intensity of California’s transportation fuels by at least 10% by 2020. In particular, the Executive Order established a LCFS and directed the Secretary for Environmental Protection to coordinate the actions of the CEC, CARB, the University of California, and other agencies to develop and propose protocols for measuring the “life-cycle carbon intensity” of transportation fuels. This analysis supporting development of the protocols was included in the State Implementation Plan for alternative fuels (State Alternative Fuels Plan adopted by CEC on December 24, 2007) and was submitted to CARB for consideration as an “early action” item under AB 32. CARB adopted the LCFS on April 23, 2009. The current LCFS regulation became effective on January 1, 2016.

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Executive Order B-55-18 and SB 100

SB 100 and Executive Order B-55-18 were signed by Governor Brown on September 10, 2018. Under the existing RPS, 25% of retail sales are required to be from renewable sources by December 31, 2016, 33% by December 31, 2020, 40% by December 31, 2024, 45% by December 31, 2027, and 50% by December 31, 2030. SB 100 raises California's RPS requirement to 50% renewable resources target by December 31, 2026, and to achieve a 60% target by December 31, 2030. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours of those products sold to their retail end-use customers achieve 44% of retail sales by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030. In addition to targets under AB 32 and SB 32, Executive Order B-55-18 establishes a carbon neutrality goal for the state of California by 2045; and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency (CNRA), California Environmental Protection Agency (CalEPA), the Department of Food and Agriculture (CDFA), and CARB to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal.

Regulations and Building Codes

California has a long history of adopting regulations to improve energy efficiency in new and remodeled buildings. These regulations have kept California's energy consumption relatively flat even with rapid population growth.

Title 20 CCR

CCR, Title 20: Division 2, Chapter 4, Article 4, Sections 1601-1608: Appliance Efficiency Regulations regulates the sale of appliances in California. The Appliance Efficiency Regulations include standards for both federally regulated appliances and non-federally regulated appliances. 23 categories of appliances are included in the scope of these regulations. The standards within these regulations apply to appliances that are sold or offered for sale in California, except those sold wholesale in California for final retail sale outside the state and those designed and sold exclusively for use in recreational vehicles or other mobile equipment (CEC 2012).

Title 24 CCR

California Code of Regulations (CCR) Title 24 Part 6: The California Energy Code (Code) was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2009, and is administered by the California Building Standards Commission. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2019 California Green Building Code Standards that became effective January 1, 2020.

Local jurisdictions are permitted to adopt more stringent requirements, as state law provides methods for local enhancements. CALGreen recognizes that many jurisdictions have developed existing construction waste and demolition ordinances and defers to them as the ruling guidance provided they establish a minimum 65% diversion requirement.

The Code also provides exemptions for areas not served by construction waste and demolition recycling infrastructure. The State Building Code provides the minimum standard that buildings must meet in order to be certified for occupancy, which is generally enforced by the local building official.

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Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG (GHG) emissions. The 2019 version of Title 24 was adopted by the California Energy Commission (CEC) and became effective on January 1, 2020.

The 2019 Title 24 standards will result in less energy use, thereby reducing air pollutant emissions associated with energy consumption in the SCAB and across the State of California. For example, the 2019 Title 24 standards will require solar photovoltaic systems for new homes, establish requirements for newly constructed healthcare facilities, encourage demand responsive technologies for residential buildings, and update indoor and outdoor lighting requirements for nonresidential buildings.

The CEC anticipates that single-family homes built with the 2019 standards will use approximately 7% less energy compared to the residential homes built under the 2016 standards. Additionally, after implementation of solar photovoltaic systems, homes built under the 2019 standards will use about 53% less energy than homes built under the 2016 standards. Nonresidential buildings (such as the Project) will use approximately 30% less energy due to lighting upgrade requirements.

Because the Project will be constructed after January 1, 2019, the 2019 CALGreen standards are applicable to the Project and require, among other items (CALGreen citations in parentheses):

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- Designated parking for clean air vehicles. In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 (5.106.5.2).
- Electric vehicle charging stations. New construction shall facilitate the future installation of electric vehicle supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106.5.3.3 (5.106.5.3).
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, upright and glare ratings per Table 5.106.8 (5.106.8)
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1, 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- Excavated soil and land clearing debris. 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:

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- Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
- Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
- Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
- Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).
- Outdoor portable water use in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient (MWELo), whichever is more stringent (5.304.1).
- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 sf or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (5.303.1.1 and 5.303.1.2).
- Outdoor water use in rehabilitated landscape projects equal or greater than 2,500 sf. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 sf requiring a building or landscape permit (5.304.3).
- Commissioning. For new buildings 10,000 sf and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

Model Water Efficient Landscape Ordinance

The Model Water Efficient Landscape Ordinance (MWELo, Ordinance) was implemented under AB 1881, the Water Conservation Act. The bill required local agencies to adopt a local landscape ordinance at least as effective in conserving water as the Model Ordinance by January 1, 2010. Reductions in water use of 20% consistent with (SBX-7-7) 2020 mandate are expected upon compliance with the Ordinance. New development projects that include landscape areas of 500 sf or more are subject to the Ordinance, including the following provisions:

- More efficient irrigation systems;
- Incentives for graywater usage;
- Improvements in on-site stormwater capture;
- Limiting the portion of landscapes that can be planted with high water use plants; and
- Reporting requirements for local agencies.

CARB Refrigerant Management Program

CARB adopted a regulation in 2009 to reduce refrigerant GHG emissions from stationary sources through refrigerant leak detection and monitoring, leak repair, system retirement and retrofitting, reporting and recordkeeping, and proper refrigerant cylinder use, sale, and disposal. The regulation is set forth in sections

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95380 to 95398 of Title 17, CCR. The rules implementing the regulation establish a limit on statewide GHG emissions from stationary facilities with refrigeration systems with more than 50 pounds of a high GWP refrigerant. The refrigerant management program is designed to (1) reduce emissions of high-GWP GHG refrigerants from leaky stationary, non-residential refrigeration equipment; (2) reduce emissions from the installation and servicing of refrigeration and air-conditioning appliances using high-GWP refrigerants; and (3) verify GHG emission reductions.

Tractor-Trailer GHG Regulation

Tractors and trailers subject to this regulation must either use EPA SmartWay certified tractors and trailers or retrofit their existing fleet with SmartWay verified technologies. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the HD tractors that pull them on California highways. These owners are responsible for replacing or retrofitting their affected vehicles with compliant aerodynamic technologies and low rolling resistance tires. Sleeper cab tractors model year 2011 and later must be SmartWay certified. All other tractors must use SmartWay verified low rolling resistance tires. There are also requirements for trailers to have low rolling resistance tires and aerodynamic devices.

CARB Phase I and 2 Heavy-Duty Vehicle GHG Standards

CARB has adopted a new regulation for GHG emissions from HDTs and engines sold in California. It establishes GHG emission limits on truck and engine manufacturers and harmonizes with the EPA rule for new trucks and engines nationally. Existing HD vehicle regulations in California include engine criteria emission standards, tractor-trailer GHG requirements to implement SmartWay strategies (i.e., the Heavy-Duty Tractor-Trailer GHG Regulation), and in-use fleet retrofit requirements such as the Truck and Bus Regulation. In September 2011, the EPA adopted their new rule for HDTs and engines. The EPA rule has compliance requirements for new compression and spark ignition engines, as well as trucks from Class 2b through Class 8. Compliance requirements begin with model year 2014 with stringency levels increasing through model year 2018. The rule organizes truck compliance into three groupings, which include a) HD pickups and vans; b) vocational vehicles; and c) combination tractors. The EPA rule does not regulate trailers.

CARB staff has worked jointly with the EPA and the NHTSA on the next phase of federal GHG emission standards for medium-duty trucks (MDT) and HDT vehicles, called federal Phase 2. The federal Phase 2 standards were built on the improvements in engine and vehicle efficiency required by the Phase 1 emission standards and represent a significant opportunity to achieve further GHG reductions for 2018 and later model year HDT vehicles, including trailers. But as discussed above, the EPA and NHTSA have proposed to roll back GHG and fuel economy standards for cars and light-duty trucks, which suggests a similar rollback of Phase 2 standards for MDT and HDT vehicles may be pursued.

In February 2019, the OAL approved the Phase 2 Heavy-Duty Vehicle GHG Standards and became effective April 1, 2019. The Phase 2 GHG standards are needed to offset projected VMT growth and keep heavy-duty truck CO₂ emissions declining. The federal Phase 2 standards establish for the first time, federal emissions requirements for trailers hauled by heavy-duty tractors. The federal Phase 2 standards are more technology-forcing than the federal Phase 1 standards, requiring manufacturers to improve existing technologies or develop new technologies to meet the standards. The federal Phase 2 standards for tractors, vocational vehicles, and heavy-duty pick-up trucks and vans (PUVs) will be phased-in from 2021-2027, additionally for trailers, the standards are phased-in from 2018 (2020 in California) through 2027.

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SB 97 and the CEQA Guidelines Update

Passed in August 2007, SB 97 added Section 21083.05 to the Public Resources Code. The code states “(a) On or before July 1, 2009, the Office of Planning and Research (OPR) shall prepare, develop, and transmit to the Resources Agency guidelines for the mitigation of GHG emissions or the effects of GHG emissions as required by this division, including, but not limited to, effects associated with transportation or energy consumption. (b) On or before January 1, 2010, the Resources Agency shall certify and adopt guidelines prepared and developed by the OPR pursuant to subdivision (a).” Section 21097 was also added to the Public Resources Code. It provided CEQA protection until January 1, 2010 for transportation projects funded by the Highway Safety, Traffic Reduction, Air Quality, and Port Security Bond Act of 2006 or projects funded by the Disaster Preparedness and Flood Prevention Bond Act of 2006, in stating that the failure to analyze adequately the effects of GHGs would not violate CEQA.

On December 28, 2018, the Natural Resources Agency announced the OAL approved the amendments to the CEQA Guidelines for implementing the CEQA. The CEQA Amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of GHG emissions in CEQA documents. The CEQA Amendments fit within the existing CEQA framework by amending existing CEQA *Guidelines* to reference climate change.

CEQA Guidelines Section 1506.4 was amended to state that in determining the significance of a project’s GHG emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project’s emissions to the effects of climate change. A project’s incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions. The agency’s analysis should consider a timeframe that is appropriate for the project. The agency’s analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes. Additionally, a lead agency may use a model or methodology to estimate GHG emissions resulting from a project. The lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account the project’s incremental contribution to climate change. The lead agency must support its selection of a model or methodology with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use .

4.8.2.2 SCAQMD

SCAQMD is the agency responsible for air quality planning and regulation in the SCAB. The SCAQMD addresses the impacts to climate change of projects subject to SCAQMD permit as a lead agency if they are the only agency having discretionary approval for the project and acts as a responsible agency when a land use agency must also approve discretionary permits for the project. The SCAQMD acts as an expert commenting agency for impacts to air quality. This expertise carries over to GHG emissions, so the agency helps local land use agencies through the development of models and emission thresholds that can be used to address GHG emissions.

In 2008, SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the SCAB. The Working Group developed several different options that are contained in the SCAQMD Draft Guidance Document – Interim CEQA GHG Significance Threshold, that could be applied by lead agencies. The working group has not provided additional guidance since release of the interim guidance in 2008. The SCAQMD Board has not approved the thresholds; however, the Guidance Document provides substantial evidence supporting the approaches to significance of GHG emissions that can be considered by the lead agency in adopting its own threshold. The current interim thresholds consist of the following tiered approach:

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- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:
 - Residential and Commercial land use: 3,000 MTCO₂e/yr
 - Industrial land use: 10,000 MTCO₂e/yr
 - Based on land use type: residential: 3,500 MTCO₂e/yr; commercial: 1,400 MTCO₂e/yr; or mixed use: 3,000 MTCO₂e/yr
- Tier 4 has the following options:
 - Option 1: Reduce BAU emissions by a certain percentage; this percentage is currently undefined.
 - Option 2: Early implementation of applicable AB 32 Scoping Plan measures
 - Option 3, 2020 target for service populations (SP), which includes residents and employees: 4.8 MTCO₂e/SP/year for projects and 6.6 MTCO₂e/SP/year for plans;
 - Option 3, 2035 target: 3.0 MTCO₂e/SP/year for projects and 4.1 MTCO₂e/SP/year for plans
- Tier 5 involves mitigation offsets to achieve target significance threshold.

The SCAQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO₂ concentrations at 450 ppm, thus stabilizing global climate. SCAQMD only has authority over GHG emissions from development projects that include air quality permits. At this time, it is unknown if the project would include stationary sources of emissions subject to SCAQMD permits. Notwithstanding, if the Project requires a stationary permit, it would be subject to the applicable SCAQMD regulations.

SCAQMD Regulation XXVII, adopted in 2009 includes the following rules:

- Rule 2700 defines terms and post GWPs.
- Rule 2701, SoCal Climate Solutions Exchange, establishes a voluntary program to encourage, quantify, and certify voluntary, high quality certified GHG emission reductions in the SCAQMD.
- Rule 2702, GHG Reduction Program created a program to produce GHG emission reductions within the SCAQMD. The SCAQMD will fund projects through contracts in response to requests for proposals or purchase reductions from other parties.

4.8.2.3 County of Riverside

Good Neighbor Policy for Logistics and Warehouse/Distribution Centers

The Project would be subject to provisions of the County of Riverside *"Good Neighbor" Policy for Logistics and Warehouse Distribution Centers*, Board of Supervisors Policy F-3 (Policy), <https://www.rivcocob.org/wp-content/uploads/2020/01/Good-Neighbor-Policy-F-3-Final-Adopted.pdf>.

The purpose of this Policy is to provide framework for the development and operations of logistics and warehouse projects larger than 250,000 sf in size in a way that would lessen their impact on the surrounding communities. This Policy provides development and operational criteria that can be implemented to supplement project-level mitigation measures. The Policy acts to minimize air quality, noise, and traffic

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impacts resulting from logistics and warehouse/distribution centers. The Project would be required comply with applicable provisions of the Good Neighbor Policy as implemented through EIR MM GHG-3 and the Project Conditions of Approval. The analysis provided here does not take credit for any GHG emissions reductions that may be achieved under the Good Neighbor Policy, thereby establishing a likely maximum impact scenario.

County of Riverside Climate Action Plan Update, November 2019

The County of Riverside Climate Action Plan Update, November 2019 (CAP Update) establishes GHG emission reduction programs and regulations that correlate with and support evolving State GHG emissions reduction goals and strategies. The CAP Update includes reduction targets for year 2030 and year 2050. These reduction targets require the County to reduce emissions by at least 525,511 MT CO₂e below the Adjusted Business As Usual (ABAU)² scenario by 2030 and at least 2,982,948 MT CO₂e below the ABAU scenario by 2050 (CAP Update, p.7-1).

To evaluate consistency with the CAP Update, the County has implemented CAP Update Screening Tables (Screening Tables) to aid in measuring the reduction of GHG emissions attributable to certain design and construction measures incorporated in development projects. To this end, the Screening Tables establish categories of GHG Implementation Measures. Under each Implementation Measure category, mitigation or project design features (collectively “features”) are assigned point values that correspond to the minimum GHG emissions reduction that would result from each feature. Projects that yield at least 100 points are considered to be consistent with the GHG emissions reduction quantities anticipated in the County’s GHG Technical Report, and support the GHG emissions reduction targets established under the CAP Update.

4.8.3 SOURCES OF PROJECT GHG EMISSIONS

4.8.3.1 Construction-Source GHG Emissions

Project construction activities would generate emissions of CO₂, CH₄ and N₂O. Project construction-source emissions are 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 a 30-year project life, then adding that number to the annual operational GHG emissions. Accordingly, Project construction-source GHG emissions were amortized over a 30-year period and added to the annual operational-source GHG emissions of the Project.

4.8.3.2 Operational-Source GHG Emissions

Project operations would result in emissions of CO₂, CH₄, and N₂O from the primary sources listed below, and subsequently described.

- Area Sources;
- Building Energy Consumption (combustion emissions associated with natural gas and electricity);
- Mobile Sources;
- On-site Equipment (yard trucks) Operations;
- Water Supply, Treatment and Distribution; and
- Solid Waste Management.

² Adjusted Business As Usual (ABAU) Scenario reflects GHG emissions reductions achieved through anticipated future State actions (CAP Update, p. 2-1).

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Area Sources

Area sources would include landscape and site maintenance equipment. Landscape and site 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.

Building Energy Consumption

CO₂ and other GHGs are emitted by building energy consumption. Natural gas or other fuels consumed at/within each Project building site would be direct sources of Project GHGs. GHGs are also emitted by off-site fuel consumption for production of electricity; these are considered to be indirect GHG emissions.

Mobile Sources

Project traffic (mobile sources) would also generate GHGs (CO₂, CH₄, and N₂O). Trip characteristics available from the Project Traffic Impact Analysis were utilized in estimating and modeling mobile source GHG emissions.

On-site Equipment Operations

Industrial warehouse buildings such as proposed by the Project 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 which is designed for moving cargo containers. Yard trucks and similar equipment are potential sources of GHGs.

Solid Waste Management

The Project land uses will result in the generation and disposal of solid waste. A large percentage of solid waste generated by the Project would be diverted and recycled consistent with requirements of AB 39. The remainder of the waste not diverted will be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material.

Water Supply

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.

4.8.4 PROJECT GHG EMISSIONS IMPACTS

4.8.4.1 California Emissions Estimator Model™ Employed to Estimate GHG Emissions

The latest version of the California Emissions Estimator Model (CalEEMod) v2016.3.2 has been used to estimate Project construction-source and operational-source criteria pollutant (VOCs, NO_x, SO_x, CO, PM₁₀, and PM_{2.5}) and GHG emissions. CalEEMod calculates emissions from direct and indirect sources; and quantifies emissions reductions achieved from mitigation measures.

4.8.5 THRESHOLD OF SIGNIFICANCE

The County of Riverside has adopted Thresholds of Significance that vary in some cases topically and in format from the Appendix G Thresholds, as reflected in the Initial Study prepared for the Project. This EIR uses the following County-adopted Thresholds of Significance to comprise the basis of impact analyses.

Would the Project - -

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

4.8.6 ENVIRONMENTAL IMPACTS

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant. An individual project cannot generate GHG emissions sufficient to influence global climate change. A project participates in potential global climate change impacts through its incremental contribution, combined with the cumulative increase of all other sources of GHGs. Taken together, these effects may have a potentially significant impact on global climate change. Project GHG emissions from construction and operations are summarized at **Table 4.8.4**.

**Table 4.8.4
Annual Project GHG 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	65.60	0.01	0.00	65.78
Area Sources	0.04	1.00E-04	0.00	0.04
Building Energy Consumption	537.48	0.02	5.33E-03	539.58
Mobile Sources (Passenger Cars)	1,789.70	0.05	0.00	1,790.93
Mobile Sources (Trucks)	4,139.31	0.05	0.00	4,320.65
On-site Equipment	152.52	0.05	0.00	153.75
Solid Waste Management	133.50	7.89	0.00	330.73
Water Supply	722.56	5.30	0.13	893.85
Total CO₂E (All Sources)	8,095.32			

As indicated at Table 4.8.4, the Project would generate approximately 8,095.32 MTCO₂e per year. Of this total, approximately 1,983.74 MTCO₂e per year would be generated by construction activities, area sources, building energy consumption, on-site equipment, solid waste management and water supply. An additional, 6,111.58 MTCO₂e per year would be generated by Project mobile sources.

The CAP Update provides guidance addressing analysis of GHG emissions and CEQA significance determination of GHG emissions impacts. To address State requirements to reduce GHG emissions, the CAP Update establishes a County-wide GHG emissions reduction targets that would support and comply with near-term (2030) and long-term (2050) State GHG emissions targets. More specifically, the CAP

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Update establishes the goal of reducing GHG emissions within the County by 49% below “existing” 2008 levels by the year 2030. The County’s GHG emissions reduction 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. The County’s target is also consistent with the SB 32 target that expands on AB 32 to reduce GHG emissions to 40% below the 1990 levels by 2030. Because the County’s CAP Update addresses GHG emissions reductions and is consistent with the requirements of AB 32, SB 32, and international efforts to reduce GHG emissions, compliance with the CAP Update fulfills the description of mitigation found in the *CEQA Guidelines*.

The CAP Update identifies a two-step approach in evaluating GHG emissions. First, a screening threshold of 3,000 MTCO₂e per year is used to determine if additional analysis is required. To demonstrate consistency with the CAP Update, and therefore support a determination of less-than-significant GHG emissions impacts, projects that exceed the 3,000 MTCO₂e per year projects must demonstrate attainment of at least 100 points through the implementation of CAP Update Screening Table features.

As indicated at Table 4.8.4, the Project will result in approximately 8,095.32 MTCO₂e per year. The Project would therefore exceed the County’s screening threshold of 3,000 MTCO₂e per year. Absent Project demonstrated attainment of at least 100 points through the implementation of CAP Update Screening Table features, the Project could generate direct or indirect GHG emissions that would result in a significant impact on the environment.

Mitigation Measures:

MM-GHG-1: The Project shall implement Screening Table Measures providing for a minimum 100 points per the County Screening Tables. The County shall verify incorporation of the identified Screening Table Measures within the Project building plans and site designs prior to the issuance of building permit(s) and/or site plans (as applicable). The County shall verify implementation of the identified Screening Table Measures prior to the issuance of Certificate(s) of Occupancy.

MM-GHG-2: The Project shall comply with CAP Update Measure R2-CE1. CAP Update Measure R2-CE1 requires that the Project provide onsite renewable energy production generation comprising at least 20 percent of the Project energy demand. The County shall verify implementation of CAP Update Measure R2-CE1 within the Project building plans and site designs prior to the issuance of building permit(s) and/or site plans (as applicable). The County shall verify implementation of CAP Update Measure R2-CE1 prior to the issuance of Certificate(s) of Occupancy.

MM-GHG-3: The Project shall comply with applicable provisions of the County of Riverside Good Neighbor Policy for Logistics and Warehouse/Distribution Centers as implemented through the Project Conditions of Approval.

Level of Significance After Mitigation: Less-Than-Significant. The implemented Screening Table Measures and compliance with CAP Update Measure R2-CE1 would achieve a minimum of 100 Screening Table Points, and would thereby ensure that the Project would achieve GHG emissions levels and GHG emissions reductions targets consistent with those identified in the County CAP Update. Project GHG emissions that are consistent with and would not exceed GHG emissions levels and GHG emissions reductions targets identified in the CAP Update would not comprise a significant impact on the environment. Additional GHG emissions reductions would be achieved through implementation of the County of Riverside *Good Neighbor Policy for Logistics and Warehouse/Distribution Centers*. On this basis, with application of mitigation, the potential for the Project to generate direct or indirect greenhouse

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gas emission that would result in a significant impact on the environment is considered less-than-significant. For informational purposes, a representative example of how the Project could achieve a minimum of 100 Screening Table Points through implementation of CAP Update Screening Table Measures is provided at **Table 4.8.5**. Implementation of CAP Update Measure R2-CE1 is reflected in the Project GHG emissions modeling.

Table 4.8.5
Representative Implementation of CAP Update Screening Table Measures

Feature	Description	Points
EE10.A.1 Insulation	Enhanced Insulation (rigid wall insulation R-13, roof/attic R-38)	11
EE10.A.2 Windows	Greatly Enhanced Window Insulation (0.28 or less U-factor, 0.22 or less SHGC)	7
EE10-A.3 Cool Roofs	Modest Cool Roof (CRRC Rated 0.15 aged solar reflectance, 0.75 thermal emittance)	7
EE10.A.4 Air Infiltration	Blower Door HERS Verified Envelope Leakage of equivalent	6
EE10.B.1 Heating/Cooling Distribution System	Model Duct Insulation (R-6)	5
EE10.B.2 Space Heating/Cooling Equipment	Improved Efficiency HVAC (EER 14/78% AFUE or 8 HSPF)	4
EE10B.4 Water Heaters	High Efficiency Water Heater (0.72 Energy Factor)	10
EE10.B.5 Daylighting	All rooms daylighted	1
EE10.B.6 Artificial Lighting	High Efficiency Lights (50% of in-unit fixtures are high efficiency)	7
W2.E.2 Toilets	Water Efficient Toilets/Urinals (1.5 gpm)	6
	Waterless Urinals (note that commercial buildings having both waterless urinals and high efficiency toilets will have a combined point value of 6 points)	
W2.E.3 Faucets	Water Efficient faucets (1.28 gpm)	2
T4.B.1 Electric Vehicle Recharging	Install electric vehicle charging stations in garages/parking areas	40 ³
TOTAL		106

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially Significant. GHG emissions reduction plans, policies and regulations applicable to the Project include: AB 32, SB 32, (including related 2008/2017 ARB Scoping Plan Elements), and the CAP Update. Project consistency with AB 32, SB 32, (including related 2008/2017 ARB Scoping Plan Elements), and the CAP Update is evaluated in the following discussions.

³ The Project is anticipated to include 5 electric vehicle charging stations. Per the Screening Tables, each station is 8 points.

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2008 Scoping Plan Consistency

The CARB Scoping Plan identifies strategies to reduce California’s greenhouse gas emissions in support of AB 32. Many of the strategies identified in the Scoping Plan are not applicable at the project level, such as long-term technological improvements to reduce emissions from vehicles. Certain measures are applicable to and supported by the Project, such as energy conservation and energy efficiency measures. Other measures, while not directly applicable, would not be obstructed by impeded by Project implementation. **Table 4.8.6** summarizes the Project’s consistency with the State Scoping Plan measures. As indicated, the Project would not conflict with any of the provisions of the Scoping Plan and supports the Scoping Plan through energy efficiency, water conservation, recycling, and landscaping.

Table 4.8.6
2008 Scoping Plan Consistency

Action Category	Supporting Measures	Remarks
Cap-and-Trade Program	--	Consistent. These programs involve capping emissions from electricity generation and similar operations. The Project would not interfere with or obstruct cap-and-trade program measures or initiatives.
Light-Duty Vehicle Standards	T-1	Consistent. This is a statewide measure and is not within the purview of the Project. Vehicles accessing the Project would be required to comply with these standards as implemented. Electric Vehicle (EV) charging stations would be installed on site per 2019 Title 24 standards.
Energy Efficiency	E-1	Consistent. The Project would achieve building, water, and solid waste management efficiencies consistent with the incumbent CALGreen requirements.
	E-2	
	CR-1	
	CR-2	
Renewables Portfolio Standard (RPS)	E-3	Consistent. Establishes the minimum statewide renewable energy mix. The Project would not interfere with or obstruct RPS program measures or initiatives.
Low Carbon Fuel Standard	T-2	Consistent. Establishes reduced carbon intensity (CI) of transportation fuels. The Project would not interfere with or obstruct transportation fuel CI program measures or initiatives.
Regional Transportation-Related GHG Targets	T-3	Consistent. This is a statewide measure and is not within the purview of the Project. The Project would not interfere with or obstruct transportation-related GHG target measures or initiatives.
Vehicle Efficiency Measures	T-4	Consistent. This is a statewide measure and is not within the purview of the Project. Vehicles accessing the Project would be required to comply with these measures as implemented. The Project would not interfere with or obstruct vehicle efficiency measures or initiatives.
Goods Movement	T-5	Consistent. This is a statewide measure and is not within the purview of the Project. Goods movement associated with the Project would be required to comply with these measures as implemented. The Project would not interfere with or obstruct goods movement measures or initiatives.
	T-6	
Million Solar Roofs (MSR) Program	E-4	Consistent. The MSR program sets a goal for use of solar systems throughout the state as a whole. The building designs incorporate PV solar panels.
Medium- & Heavy-Duty Vehicles	T-7	Consistent. This is a statewide measure and is not within the purview of the Project. Medium- & heavy-duty vehicles accessing the Project would be required to comply with these measures as implemented. The Project would not interfere with or obstruct medium- & heavy-duty vehicle measures or initiatives.
	T-8	
Industrial Emissions	I-1	Consistent. These measures are applicable to large industrial facilities (> 500,000 MTCO ₂ e/yr) and other intensive uses such as refineries. The Project
	I-2	

Table 4.8.6
2008 Scoping Plan Consistency

Action Category	Supporting Measures	Remarks
	I-3	would not interfere with or obstruct industrial emissions measures or initiatives.
	I-4	
	I-5	
High Speed Rail	T-9	Consistent. Supports increased mobility choice via provision of high speed rail. The Project would not interfere with or obstruct high speed rail measures or initiatives.
Green Building Strategy	GB-1	Consistent. The Project would implement building, water, and solid waste management efficiencies consistent with incumbent CALGreen requirements.
High Global Warming Potential (GWP) Gases	H-1	Consistent. The Project is not a substantial source of high GWP emissions. The Project would not interfere with or obstruct high GWP emissions measures or initiatives.
	H-2	
	H-3	
	H-4	
	H-5	
	H-6	
	H-7	
Recycling and Waste	RW-1	Consistent. The Project would comply with mandated State and County recycling and waste management measures. Currently a minimum of 65% of construction-source waste and waste from warehouse operations is required to be recycled.
	RW-2	
	RW-3	
Sustainable Forests	F-1	Consistent. The Project would promote carbon sequestration through provision of per the Project on-site landscaping.
Water	W-1	Consistent. The Project would provide low-flow fixtures and water-efficient landscaping per County and State requirements.
	W-2	
	W-3	
	W-4	
	W-5	
	W-6	
Agriculture	A-1	Consistent. The Project is not an agricultural use. The Project would not interfere with or obstruct Scoping Plan agricultural measures or initiatives.

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SB 32/2017 Scoping Plan Consistency

The 2017 Scoping Plan Update reflects the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. As summarized, at **Table 4.8.7**, the Project would support and would not conflict with SB 32/2017 Scoping Plan provisions.

Table 4.8.7
2017 Scoping Plan Consistency

Action	Responsibility	Remarks
Implement SB 350 by 2030		
Increase the Renewables Portfolio Standard to 50 percent of retail sales by 2030 and ensure grid reliability.	CPUC, CEC, CARB	Consistent. The Project would use energy from Southern California Edison (SCE). SCE has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. The Project would not interfere with or obstruct SCE energy source diversification efforts.
Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.		Consistent. The Project would be designed and constructed to implement the energy efficiency measures for new commercial developments and would include several measures designed to reduce energy consumption. The Project would not interfere with or obstruct policies or strategies to establish annual targets for statewide energy efficiency savings and demand reduction.
Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly- owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.		Consistent. The Project would be designed and constructed to implement energy efficiency measures acting to reduce electricity consumption. The Project includes energy efficient lighting and fixtures that meet the current Title 24 Standards. Further, the Project proposes contemporary industrial facilities that would incorporate energy efficient boilers, heaters, and air conditioning systems.
Implement Mobile Source Strategy (Cleaner Technology and Fuels)		
At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, OPR, Local Agencies	Consistent. This is a CARB Mobile Source Strategy. Vehicles that access the Project that are required to comply with the standards will comply with the Strategy. EV charging stations are required to be installed on the site per Title 24. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty electric vehicle 2025 targets.
At least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030.		Consistent. This is a CARB Mobile Source Strategy. Vehicles that access the Project that are required to comply with the standards will comply with the Strategy. EV charging stations are required to be installed on the site per Title 24. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty electric vehicle 2030 targets.
Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.
Medium- and Heavy-Duty GHG Phase 2.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB

Table 4.8.7
2017 Scoping Plan Consistency

Action	Responsibility	Remarks
		efforts to implement Medium- and Heavy-Duty GHG Phase 2 standards.
Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO _x standard.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to improve transit-source emissions.
Last Mile Delivery: New regulation that would result in the use of low NO _x or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5 percent of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10 percent in 2025 and remaining flat through 2030.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to improve last mile delivery emissions.
Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document “Potential VMT Reduction Strategies for Discussion.”		Consistent. This is a CARB VMT Reduction Strategy. The Project would not obstruct or interfere with CARB efforts to implement VMT reduction strategies articulated under SB 374 and the Sustainable Communities Strategies.
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).
By 2019, adjust performance measures used to select and design transportation facilities		
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g., via guideline documents, funding programs, project selection, etc.).	CalSTA, SGC, OPR, CARB, Governor’s Office of Business and Economic Development (GO-Biz), California Infrastructure and Economic Development Bank (IBank), Department of Finance (DOF),	Consistent. The Project would not obstruct or interfere with agency efforts to harmonize transportation facility project performance with emissions reductions and increase competitiveness of transit and active transportation modes.

Table 4.8.7
2017 Scoping Plan Consistency

Action	Responsibility	Remarks
	California Transportation Commission (CTC), Caltrans	
By 2019, develop pricing policies to support low-GHG transportation (e.g., low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR, SGC, CARB	Consistent. The Project would not obstruct or interfere with agency efforts to develop pricing policies to support low-GHG transportation.
Implement California Sustainable Freight Action Plan		
Improve freight system efficiency.	CalSTA, CalEPA, CNRA, CARB, Caltrans, CEC, GO-Biz	Consistent. This measure would apply to all trucks accessing the Project site, this may include existing trucks or new trucks that are part of the statewide goods movement sector. The Project would not obstruct or interfere with agency efforts to improve freight system efficiency.
Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.	CalSTA, CalEPA, CNRA, CARB, Caltrans, CEC, GO-Biz	Consistent. The Project would not obstruct or interfere with agency efforts to deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18 percent.	CARB	Consistent. When adopted, this measure would apply to all fuel purchased and used by the Project in the state. The Project would not obstruct or interfere with agency efforts to adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18 percent.
Implement the Short-Lived Climate Pollutant Strategy (SLPS) by 2030		
40 percent reduction in methane and hydrofluorocarbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, SWRCB, Local Air Districts	Consistent. The Project would be required to comply with this measure and reduce any Project-source SLPS emissions accordingly. The Project would not obstruct or interfere agency efforts to reduce SLPS emissions.
50 percent reduction in black carbon emissions below 2013 levels.		
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLPS and SB 1383.	CARB, CalRecycle, CDFA, SWRCB, Local Air Districts	Consistent. The Project would implement waste reduction and recycling measures consistent with State and County requirements. The Project would not obstruct or interfere agency efforts to support organic waste landfill reduction goals in the SLPS and SB 1383.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	Consistent. The Project would be required to comply with any applicable Cap-and-Trade Program provisions. The Project would not obstruct or interfere agency efforts to implement the post-2020 Cap-and-Trade Program.
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California’s land base as a net carbon sink		
Protect land from conversion through conservation easements and other incentives.	CNRA, Departments Within CDFA, CalEPA,	Consistent. The Project site is designated for industrial uses. The Project does not propose land conversion. The Project would not obstruct or interfere agency efforts to protect land from conversion through conservation easements and other incentives.

Table 4.8.7
2017 Scoping Plan Consistency

Action	Responsibility	Remarks
Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.	CARB	Consistent. The Project site is vacant disturbed property and does not comprise an area that would effectively provide for carbon sequestration. The Project would not obstruct or interfere agency efforts to increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments.		Consistent. Where appropriate, Project designs will incorporate wood or wood products. The Project would not obstruct or interfere agency efforts to encourage use of wood and agricultural products to increase the amount of carbon stored in the natural and built environments.
Establish scenario projections to serve as the foundation for the Implementation Plan.		Consistent. The Project would not obstruct or interfere agency efforts to establish scenario projections to serve as the foundation for the Implementation Plan.
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018.	CARB	Consistent. The Project would not obstruct or interfere agency efforts to establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018.
Implement Forest Carbon Plan	CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA and Departments	Consistent. The Project would not obstruct or interfere agency efforts to implement the Forest Carbon Plan.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	Consistent. The Project would not obstruct or interfere agency efforts to identify and expand funding and financing mechanisms to support GHG reductions across all sectors.

County of Riverside Climate Action Plan Update Consistency

The CAP Update establishes Screening Tables to aid in measuring the reduction of GHG emissions from development projects, and provide a basis for determining project consistency with the CAP Update. Projects that yield at least 100 points 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 Update. Absent implementation of Screening Table Measures yielding 100 points, the Project could be considered inconsistent with the County CAP Update. This is a potentially significant impact.

Good Neighbor Policy for Logistics and Warehouse/Distribution Centers Consistency

The Good Neighbor Policy does not specifically address GHG emissions. However, air quality impact reduction provisions of the Policy would generally reduce GHG emissions. MM-GHG-3 ensures compliance with the Policy.

Mitigation Measures: Please refer to MM-GHG-1, MM-GHG-2, MM-GHG-3.

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Level of Significance After Mitigation: Less-Than-Significant. Projects that yield at least 100 points through application of the Screening Table Measures, and that comply with applicable provisions of CAP Update Measure R2-CE1 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 Update. Pursuant to MM-GHG-1, the Project would implement Screening Table Measures that would provide a minimum of 100 Screening Table Points. Pursuant to MM-GHG-2, the Project would be required to comply with CAP Update Measure R2-CE1. With incorporation of Mitigation Measures MM-GHG-1 and MM-GHG-2, the Project would be consistent with the CAP Update.

The County’s CAP Update currently evaluates and quantifies reductions out to Year 2030. The CAP Update states that . . . “[t]hrough 2050, Riverside County would continue implementation of the Screening Tables. During this time, the reduction measures implemented through the Screening Tables would continue to reduce GHG emissions from new development. Additionally, it is assumed that the State measures would keep being updated and reinforced to further reduce emissions. With these assumptions, Riverside County’s emissions would decrease to a level below the reduction target by 2050” (2019 CAP Update, p. 6-2). In this manner, the County CAP Update and Project compliance with the County CAP Update provide for ongoing compliance with applicable plans, policies and regulations (AB 32, SB 32, including related 2008/2017 ARB Scoping Plan Elements) adopted for the purpose of reducing the emissions of greenhouse gases.

Additionally, MM-GHG-3 ensures compliance with the County Good Neighbor Policy.

Based on the preceding, with incorporation of mitigation, the potential for the Project to conflict with applicable plans, policies and regulations adopted for the purpose of reducing the emissions of greenhouse gases would be less-than-significant.

4.8.7 CUMULATIVE IMPACTS

CEQA emphasizes that the effects of greenhouse gas emissions are cumulative and should be analyzed in the context of CEQA’s requirements for cumulative impacts analysis. (*CEQA Guidelines* Section 15130(f)). The Project Greenhouse Gas (GHG) Analysis (EIR Appendix E) is by nature a cumulative analysis. Because GHG emissions and climate change are a global issue, any approved project regardless of its location has the potential to contribute to a cumulative global accumulation of GHG emissions. The geographic context of the cumulative contributions to GHGs and climate change is worldwide. Practically however, lead agencies and responsible agencies are only able to regulate GHG emissions within their respective jurisdictions. Accordingly, for the purposes of this analysis, the cumulative impact area for GHG/Global Climate Change considerations is the County and the encompassing SCAQMD jurisdictional area.

Consistent with *CEQA Guidelines* direction, the Project GHG Analysis and this EIR evaluate Project GHG emissions under the following topical headings:

- Potential for the Project to generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and
- Potential for the Project to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

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The County has further determined that each of the above thresholds establish a separate and independent basis upon which to substantiate the significance of the Project’s potential GHG emissions impact. Project impacts within the context of the above threshold considerations are evaluated in the following discussions.

As substantiated in this Section, with incorporation of mitigation, the Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. With incorporation of mitigation, the Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The Project’s potential GHG emissions impacts are therefore determined to be less-than-significant as mitigated and would not be cumulatively considerable.

Other related projects within the cumulative impact area would be required to minimize GHG emissions and demonstrate compliance with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

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4.9 HAZARDS/HAZARDOUS MATERIALS

The following narrative is based on information presented in the following documents:

- County of Riverside General Plan;
- Mead Valley Area Plan;
- *Phase I Environmental Site Assessment, Southeast Corner of Patterson Avenue and Walnut Street, Perris, Riverside County, California* (Stantec Consulting Services Inc.) November 21, 2018;
- Phase II Environmental Site Assessment, Southeast Corner of Patterson Avenue and Walnut Street
- Perris, Riverside County, California (Stantec Consulting Services Inc.) October 17, 2019;
- *Barker Logistics, Mobile Source Health Risk Assessment, County of Riverside* (Urban Crossroads, Inc.) December 17, 2018; and
- *Airport Land Use Commission (ALUC) Development Review* (Riverside County Airport Land Use Commission) February 20, 2020.

Please also refer to Appendices J, O, and T of this EIR.

4.9.1 ENVIRONMENTAL SETTING

Although the 31.55-acre Project site is vacant, there is evidence of past agricultural use in the form of crop sow lines. The Phase I Environmental Site Assessment conducted for the Project site indicates that aerial photographs demonstrate that the light agricultural use (row crops) occurred on the property from circa 1953 to 1961.

The Project site is located within C2 Compatibility Zone of the March Air Reserve Base/Inland Port Airport. Highly noise-sensitive outdoor residential uses and hazards to flight are prohibited within Zone C2. Also, children's schools are discouraged, airspace review is required for objects greater than 70 feet tall, and March Air Reserve Base must be notified of any land use having an electromagnetic radiation component. Zone C2 is identified as a flight zone corridor, which means that the site lies within a designated path of overhead aircraft. Within this compatibility zone, the maximum number of persons per acre should not exceed an average of 200, or a maximum of 500 persons on any given acre. Certain review, notification, and disclosure requirements for new land uses are required within Zone C2.

4.9.2 THRESHOLDS OF SIGNIFICANCE

The County of Riverside has adopted Thresholds of Significance that vary in some cases topically and in format from the Appendix G Thresholds, as reflected in the Initial Study prepared for the Project. This EIR uses the following County-adopted Thresholds of Significance to comprise the basis of impact analyses.

Hazards and Hazardous Materials

Would the Project - -

- 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**

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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 (1/4) 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

Would the Project - -

- 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 (2) 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?

4.9.3 ENVIRONMENTAL IMPACTS

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?

Potentially Significant. The Phase I Environmental Site Assessment (Phase I ESA) determined that light agricultural use (i.e., row crops) occurred on the Project site from approximately 1953 to 1961. Based on this historic use, there is a potential for residual pesticides and metals associated with herbicide use in the shallow soils on the site. The Phase I ESA concluded that soil sampling should be conducted to determine the extent, if any, of contamination.

To this end, a Phase II Environmental Site Assessment (Phase II ESA) was conducted. As part of the Phase II ESA, 20 soil samples were collected and analyzed. Based on the laboratory results, all pesticide and metal concentrations were detected at levels below their respective screening levels. The Phase II ESA concluded that no further investigation was necessary in this regard. Please also refer to Draft EIR Appendix J.

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A hazardous material is any material that because of its quality, concentration or physical or chemical characteristics, poses a significant potential hazard to human health or safety or to the environment. Hazardous materials are used in the Planning Area for a variety of purposes. The most common large users include manufacturers, medical clinics, and activities associated with airport operations. Due to the fact that most of the Planning Area is designated for Industrial, Business Park, and aviation-related activities, the possibility exists that the use and transport of hazardous materials may occur. Large users and transporters of hazardous materials are monitored and regulated by the Federal Environmental Protection Agency (EPA) and other Federal, State and County regulatory agencies, such as the State Department of Toxic Substance Control, the Riverside County Department of Health and Hazardous Materials and the Riverside County Fire Department.

Small amounts of hazardous materials may be used during Project development. Construction may involve transport, storage and use of chemical agents, solvents, paints and other hazardous materials typically associated with construction activities. All construction-related materials, including any hazardous materials, will be required to be used, handled, and transported in compliance with federal, State and County requirements.

The future building tenant/business is not yet identified. The type of building occupant anticipated includes general warehousing, assembly, or similar logistics types of uses in the Project building. The potential does exist that hazardous materials could be used during daily operations of the future building tenant. California and federal Community-Right-to-Know laws allow the public access to information about amounts and types of chemicals that may be used by the business within the Project building. County of Riverside also has regulations that require businesses to plan and prepare for possible chemical emergencies. Any business that occupies the Project building and that handles/stores substantial quantities of hazardous materials (as defined in Section 25500 of the California Health and Safety Code, Division 20, Chapter 6.95) will require a permit from the County of Riverside, Health Services Agency, Department of Health Hazardous Materials Division to register the business as a hazardous materials handler. Such businesses also are required to comply with the California Hazardous Materials Release Response Plans and Inventory Law, which requires immediate reporting to the County of Riverside Fire Department and the State Office of Emergency Services regarding any release or threatened release of a hazardous material, regardless of the amount handled by the business. These businesses also are to prepare a Hazardous Materials Business Emergency Plan (HMBEP), which is a written set of procedures and information created to help minimize effects and extent of a release or threatened release of a hazardous material.

If a business that uses or stores hazardous materials occupies the Project building, the business owner and operator would be required to comply with all applicable federal, State, and local regulations to ensure proper use, storage, emission, and disposal of hazardous substances. Thereby, due to mandatory regulatory compliance, Project operation would not result in a significant hazard to the public or the environment through routine transport, use, storage, emission, 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?**

Potentially Significant. In that the Project site was historically farmed for many years, the Phase I ESA determined that there is a potential that irrigation lines on the property may be wrapped with or

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contain asbestos. Mitigation Measure MM-HA-1 requires proper analysis and handling of such materials, and will reduce the potential impact to a less than significant level.

If a business that uses or stores hazardous materials occupies the Project building, the business owner and operator would be required to comply with all applicable federal, State, and local regulations to ensure proper use, storage, emission, and disposal of hazardous substances. Thereby, due to mandatory regulatory compliance, Project operation would not result in a significant hazard to the public or the environment through routine transport, use, storage, emission, or disposal of hazardous materials. Also, Project operation would not increase the potential for accident conditions that could result in release of hazardous materials into the environment. Mitigation Measure MM-HA-1, in combination with mandatory regulatory compliance, would reduce potential hazardous materials impacts associated with the Project to less than significant levels.

c) Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?

No Impact. Project development and operation would not impair or physically interfere with any County-adopted emergency management plan or evacuation plan. Designated evacuation routes and emergency ingress and egress would not be obstructed by Project development or operation. Project development will include construction of the following off-site improvements.

- Widening of the northerly right-of-way of Placentia Avenue to its ultimate width as a Secondary Highway, per Riverside County Standard No. 94, Ordinance 461.
- Placing the existing overhead utilities currently on power poles along the Project site southerly and westerly boundaries along Placentia Avenue underground; placing any Verizon or CATV communication lines currently overhead underground in a common trench with the Southern California Edison distribution lines.
- Widening the easterly right-of-way of Patterson Avenue to its ultimate easterly limit as a Secondary Highway, per Riverside County Standard No. 94, Ordinance 461.

Construction of these Project Design Features will facilitate emergency response to, and evacuation from, the Project site and the Project vicinity.

d) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter (1/4) mile of an existing or proposed school?

Less Than Significant Impact. The South Coast Air Quality Management District “CEQA Air Quality Handbook” (1993) states that emissions of toxic air contaminants (TAC) are considered significant if a Health Risk Assessment demonstrates an increased risk of greater than 10 in one million. Based on guidance from the South Coast Air Quality Management District in the document entitled Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, the Mobile Source Health Risk Assessment prepared for the Project uses 10 in one million as the cancer risk threshold for the Project.

Express 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. The estimated risk is expressed as a unitless probability. The cancer risk attributed

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to a chemical is calculated by multiplying the chemical intake or dose at the human exchange boundaries (e.g., lungs) by the chemical-specific cancer potency factor (CPF). A risk level of 10 in one million implies a likelihood that up to 10 people out of one million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the levels of toxic air contaminants over a specified duration of time. For purposes of an analysis of non-carcinogenic exposures, the Mobile Source Health Risk Assessment determined a hazard index for the respiratory endpoint totaled less than one for all receptors in the Project vicinity and thus was less than significant. Refer to Section 4.3.3.c of this document and to the Air Quality Impact Analysis prepared for the Project (as contained in the Appendices to this EIR) for further information. No school is located within one-quarter mile of the Project site.

- 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?**

No Impact. According to the Phase I ESA, the Project site is not located on a list of hazardous materials sites. Standard environmental records lists researched include Federal National Priorities List (NPL) site list, Federal Delisted NPL site list, Federal CERCLIS list, Federal CERCLIS NFRAP site list, Federal RCRA non-CORRACTS TSD facilities list, Federal RCRA generators list, Federal institutional controls/engineering controls registries, and Federal ERNS list.

Airports

- a) **Result in an inconsistency with an Airport Master Plan?**

Less Than Significant Impact. The March Joint Air Reserve Base is located along Interstate 215, adjacent to the cities of Riverside, Perris and Moreno Valley - - approximately 4.5 miles northeast of the Project site. The Base was established in 1918 and was in continual use until 1993. In 1996, the land was converted from an Air Force Base to an Active Duty Reserve Base. Subsequently, a Joint Powers Authority (JPA) - - comprised of the County of Riverside and the cities of Moreno Valley, Perris, and Riverside - - was created to address the use, reuse, and joint use of the realigned March Joint Air Reserve Base. The Joint Powers Agreement created the March Joint Powers Commission (JPC), which is the governing body for the Authority.

The March JPA Planning Area comprises approximately 6,650 acres of land including the March ARB (See Figure I-1 Planning Area). The area is bisected by Interstate 215 (I-215), located south of Alessandro and Cactus Avenues to the north, bordered to the east by Heacock Street, to the south by Harley Knox Boulevard and Nandina Avenues, and roughly bordered by Barton Street to the west.

Significant hazards exist related to aircraft operations at the March Air Reserve Base/March Inland Port Airport.

The Project Applicant has submitted the Project plans to the Riverside County Airport Land Use Commission (ALUC) for that agency's independent review. The ALUC determined that the Project is consistent with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan.

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Review and conditional approval of the Project is documented in *Airport Land Use Commission (ALUC) Development Review* (Riverside County Airport Land Use Commission) February 20, 2020 (EIR Appendix T). Conditions, revisions or limitations required by the ALUC would be incorporated in the Project prior to approval by the County.

Based on the preceding, the potential for the Project to result in an inconsistency with an Airport Master Plan is considered less than significant.

b) Require review by the Airport Land Use Commission?

Less Than Significant Impact. The Project application was referred to the Riverside County Airport Land Use Commission for its review and comment. The Commission indicated the Project was consistent with Airport land use regulations and restrictions. Reference the text in Section a) above.

c) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) 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?

Less Than Significant Impact. March Air Reserve Base is located approximately 2.3 miles north of the Project site. The Project site is located within Policy 100 Influence Area and is located within March Air Reserve Base Safety Compatibility Zone C2. The Riverside County Airport Land Use Commission reviewed the Project application and indicated the Project was consistent with Airport land use regulations and restrictions. Reference the text in Sections a) and b) above.

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?

No Impact. The Project site is located approximately 3.9 miles northwest of the privately-owned Perris Valley Airport. The “Compatibility Plan” for this Airport is based upon a simplified airport layout diagram reviewed and accepted by the California Division of Aeronautics for compatibility planning purposes. The Project site is located outside the Airport Influence Area. Therefore, the Project will not result in a safety hazard for people working in the Project area.

4.9.4 CUMULATIVE IMPACTS

Hazards and Hazardous Materials Thresholds a), b), and c) – The future occupant of the warehouse/logistics building is not known at this time. However, if the new business uses or stores hazardous materials, the business owner and operator would be required to comply with all Federal, State and County regulations that would ensure proper use, storage and disposal of hazardous substances. The Riverside County Fire Department and Riverside County Department of Environmental Health would exercise review and permitting requirements for any such use. Also, other developments in the Project vicinity that propose construction of uses with the potential for use, storage or transport of hazardous materials would be required to comply with applicable Federal, State and County/City regulations and would be subject to further review of the County Fire Department and County Department of Environmental Health. As a result, the potential for release of toxic substances or hazardous materials into the environment

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through accidents or due to routine transport, use or disposal of such materials would be reduced to a less than significant level.

The Project site does not contain any emergency facilities and does not serve as an emergency evacuation route. Project development would improve any evacuation of the vicinity by improving adjacent roadways. There is no potential for the Project to contribute to any cumulative impacts pertaining to an adopted emergency response plan or emergency evacuation plan.

Hazards and Hazardous Materials Threshold d) – No school is located within one-quarter mile of the Project site or is planned for development within one-quarter of the Project site. Therefore, the Project would not contribute to a cumulatively significant hazards/hazardous materials impact on any public or private schools located within one-quarter mile of the Project site.

Hazards and Hazardous Materials Threshold e) – The Project site is not located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Agricultural uses occupied the Project site at one time. In the event that hazardous materials are encountered beneath the ground surface during grading or construction activities, the materials would be handled and disposed of in accordance with regulatory requirements. Therefore, Project development would not contribute to a cumulatively significant hazardous materials impact associated with a listed hazardous materials site.

Hazards and Hazardous Materials (Airports) Thresholds a), b) and c) – Project development and operation would not introduce any land use to the 31.55-acre Project site that would conflict with the March ARB/IPA Land Use Compatibility Plan. Therefore, cumulatively considerable impacts pertaining to airport-related hazards would be less than significant.

Hazards and Hazardous Materials (Airports) Threshold d) – The Project site is not located within the vicinity of any private airstrips or helipads. Therefore, Project development does not have the potential to result in cumulatively significant impacts with such facilities.

4.9.5 EXISTING REGULATIONS

Riverside County General Plan Policies

Safety Element

Policy S 6.1: Enforce the land use policies and siting criteria related to hazardous materials and wastes through continued implementation of the programs identified in the County of Riverside Hazardous Waste Management Plan including the following:

- a) Ensure county businesses comply with federal, State and local laws pertaining to the management of hazardous wastes and materials including all Certified Unified Program Agency (CUPA) programs.
- b) Ensure active public participation in hazardous waste and hazardous materials management decisions in Riverside County through the County's land use and planning processes.
- c) Encourage and promote the programs, practices, and recommendations contained in the Riverside County Hazardous Waste Management Plan, giving the highest waste management priority to the reduction of hazardous waste at its source.

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Policy S 7.3: Require commercial businesses, utilities, and industrial facilities that handle hazardous materials to: Install automatic fire and hazardous materials detection, reporting and shut-off devices; and install an alternative communication system in the event power is out or telephone service is saturated following an earthquake.

March Air Reserve Base/Inland Port Airport

The Riverside County ALUC found the Project consistent with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan. Conditions, revisions or limitations required by the ALUC would be incorporated in the Project prior to approval by the County.

Mead Valley Area Plan

The Mead Valley Area Plan focuses its narrative on “Hazards” to flooding, seismic occurrences and wildland fire. These subjects are addressed in this Environmental Impact Report in Sections 4.7, 4.10, and 4.21 of this EIR.

Riverside County Multi-Jurisdictional Local Hazard Mitigation Plan

The purpose of the Riverside County Operational Area Multi-Jurisdictional Local Hazard Mitigation Plan is to identify the County’s hazards, review and assess past disaster occurrences, estimate the probability of future occurrences and set goals to mitigate potential risks to reduce or eliminate long-term risk to people and property from natural and man-made hazards.

4.9.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Due to historical agricultural use of the site, the Phase I ESA determined that there is a potential that irrigation lines on the property may be wrapped with or contain asbestos. This is a potentially significant impact. Please refer to Mitigation Measure MM-HA-1, below.

4.9.7 MITIGATION MEASURES

Compliance with County of Riverside General Plan policies and with County of Riverside Standard Conditions, in combination with the following Mitigation Measures, would ensure any Project-related impacts relating to Hazards and Hazardous Materials would be reduced to a less than significant level.

MM-HA-1: Prior to issuance of a grading permit for site preparation for the proposed warehouse/logistics building, the Applicant shall complete and submit an asbestos and hazardous materials survey of all irrigation pipes and building materials for review and approval of the County of Riverside Environmental Health Department. Should asbestos materials be identified on-site, such materials shall be handled and disposed of by licensed contractors in accordance with all appropriate regulatory agency guidelines.

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4.9.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Development and operation of the proposed warehouse/logistics building will generate construction and business operation waste. Transport and disposal of the waste will be conducted according to State and County requirements. Compliance with these requirements will maintain the existing safety level for residents adjacent to the Project site. Furthermore, safe and efficient emergency access to the Project site will be maintained (as discussed in the Transportation/Traffic Section of this document). In addition, Project development and operation would not interfere with an airport master plan.

Mitigation Measure MM-HA-1 delineated above, together with adherence to State and County of Riverside requirements for transport and disposal of identified hazardous materials, would reduce potential impacts associated with hazards and hazardous materials to a less than significant level.

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4.10 HYDROLOGY/WATER QUALITY

The following narrative and analysis are based on information presented within:

- Riverside County General Plan;
- Riverside County General Plan EIR No. 521 for GPA No. 960;
- Mead Valley Area Plan;
- *Preliminary Drainage Report for Barker Industrial, County of Riverside* (Tory R. Walker Engineering) February 12, 2020; and
- *Project Specific Water Quality Management Plan, Project Title: Barker Industrial, Development No: N/A, Design Review/Case No: PPT190008* (Tory R. Walker Engineering) December 23, 2019.

The Project Drainage Report and Water Quality Management Plan (WQMP) are presented as EIR Appendices I and U, respectively.

4.10.1 ENVIRONMENTAL SETTING

Regional Hydrology

The Project site and surrounding region lie within the Santa Ana Hydrologic Basin Planning Area (Basin Planning Area). The Santa Ana River (River) is the dominant hydrologic feature within the region, draining an approximately 2,650-square-mile area generally defined by the San Gabriel and San Bernardino Mountains to the north and the Santa Margarita River Watershed to the south. Within this drainage area, the River flows southwesterly from the San Bernardino Mountains toward the San Bernardino and Chino valleys, through the Santa Ana Mountains, to the Orange County coastal plain/Huntington Beach and the River's mouth at the Pacific Ocean. Runoff from the Project site and surrounding areas drain generally to Canyon Lake and Lake Elsinore.

Surface Water

Surface water quality within the Basin Planning Area is regulated by the Santa Ana Regional Water Quality Control Board (SARWQCB). The SARWQCB Basin Plan (Basin Plan) establishes water quality standards for all ground and surface waters within the Santa Ana Region (Region). The Region includes the upper and lower Santa Ana River Watersheds, the San Jacinto River Watershed, and several other small drainage areas.

Groundwater

The Project site overlies the Perris North Groundwater Basin Management Zone (Basin Management Zone).¹ During 2017, depth to groundwater within the Basin Management Zone ranged from approximately 11.1 feet to 186.4 feet below ground surface.² Groundwater was not encountered in subsurface explorations conducted as part of the Project Geotechnical Investigation. According to the California Department of Water Resources, several wells in the area indicate a depth to groundwater of between 75 and 80 feet below the existing ground surface.³

¹ Eastern Municipal Water District. (n.d.). *2015 Urban Water Management Plan*. p. 6-11. Retrieved from <https://www.emwd.org/post/urban-water-management-plan>

² Eastern Municipal Water District. (n.d.). West San Jacinto Groundwater Management Area 2017 Annual Report. P. 18. Retrieved from https://board.emwd.org/Citizens/Detail_LegiFile.aspx?Frame=&MeetingID=1595&MediaPosition=&ID=3345&CssClass=

³ *Geotechnical Investigation and Percolation Test Results, Barker Logistics Warehouse Development Northeast Corner of Patterson and Placentia Avenues, Mead Valley Area, Riverside County, California* (Geocon West, Inc.) January 4, 2019.

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Water Courses/Flooding

The Project site is located in the San Jacinto River Watershed. There are no designated U.S. Geological Survey (USGS) blue line streams within the Project site. The Project does not propose or require activities that would affect any off-site blueline streams. The Project site is not located in a designated floodplain area.

Stormwater Management and Flood Control

With respect to stormwater management and flood control, the Project site and surrounding areas are under the jurisdiction of the Riverside County Flood Control and Water Conservation District (RCFCWCD). The RCFCWCD provides the following services and regulates the following conditions:

- Identification of flood hazards and problems;
- Regulation of floodplains and development;
- Regulation of drainage and development;
- County Watercourse and Drainage Planning;
- Education for Flood Prevention & Safety;
- Construction of Flood Control Structures and Facilities;
- Flood Warning and Early Detection; and
- Maintenance and operation of completed structures.

Project Site Hydrology

The Project site receives regional run-on from approximately 185 acres located to the southwest. The site currently drains from the southwest to the northeast via overland flow and shallow concentrated flow. Flows are directed to an existing off-site detention pond located adjacent to the northeast corner of the Project site before being discharged into the existing Perris Valley Master Drainage Plan (MDP) storm drain system serving the area. Please also refer to the *Existing Condition Hydrology Map*, presented at Appendix 1 of the Drainage Report.

4.10.2 PROPOSED CONDITIONS

Under proposed conditions, the overall drainage pattern of the site will be retained. The Project includes three (3) underground infiltration vaults, a surface infiltration basin, and self-treating low impact development (LID) landscaped areas along the northern and eastern boundaries. Implementation of LID measures act to minimize potential stormwater pollutant discharges under post-development conditions. The location of these facilities is illustrated at *Post-Developed Hydrology Exhibit*, presented at Appendix 1 of the Drainage Report.

Additionally, the Project includes off-site street improvements to Placentia and Patterson Avenues, as discussed previously at EIR Section 2.2.1, *Roadway/Access Improvements*. As part of these street improvements, corresponding regional storm drain system improvements will also be completed, including the addition of curb and gutter, and extension of Perris Valley MDP storm drain lines H-10.1 and H-11.

4.10.3 THRESHOLDS OF SIGNIFICANCE

The County of Riverside has adopted Thresholds of Significance that vary in some cases topically and in format from the Appendix G Thresholds, as reflected in the Initial Study prepared for the Project. This EIR uses the following County-adopted Thresholds of Significance to comprise the basis of impact analyses.

Would the Project - -

- a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?
- b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces?
- d) Result in substantial erosion or siltation on-site or off-site?
- e) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?
- f) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?
- g) Impede or redirect flood flows?
- h) In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation?
- i) Hazard area or a dam failure inundation zone, risk the release of pollutants due to project inundation?
- j) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

4.10.4 ENVIRONMENTAL IMPACTS

- a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact.

Project SWPPP and Compliance with Regulatory Requirements Address Construction-Source Water Quality Impacts

During site preparation activities, any existing groundcover would be removed from the site, exposing the Project area to increased wind and water erosion potentials. Further, construction site runoff may carry increased loads of sediment, heavy metals and petroleum hydrocarbons (from machinery) which could degrade water quality. In accordance with National Pollution Discharge Elimination System Permit (NPDES) requirements, the Project Applicant would be required to prepare and implement a construction activities erosion control plan to alleviate potential sedimentation and stormwater discharge contamination impacts of the Project.

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The Applicant would also be responsible for compliance with the General Construction NPDES permit from the SARWQCB by filing a Notice of Intent to Commence Construction Activities. Under the General Construction Permit, discharge of materials other than stormwater is prohibited. The General Construction Permit stipulates further that the Applicant shall prepare, retain at the construction site, and implement a Stormwater Pollution Prevention Plan (SWPPP) which identifies the sources of sediments and other pollutants that affect the quality of stormwater discharge, and implement practices to reduce sediment and other pollutants to stormwater discharge. SWPPP requirements include identification of construction and post-construction Best Management Practices (BMPs) that would act to reduce sediments and other pollutants.

Implementation of the Project SWPPP and compliance with applicable NPDES and SARWQCB requirements would ensure that potential construction-source water quality impacts of the Project are reduced below the level of significance.

Project WQMP and Compliance with Regulatory Requirements Address Post-Construction Water Quality Impacts

Over the life of the Project, contaminants such as oil, fuel and grease that are spilled or left behind by vehicular traffic, collect and concentrate on paved surfaces. During storm events, these contaminants are washed into the storm drain system and may potentially degrade receiving water quality. Stormwater runoff from paved surfaces within the developed Project area could carry a variety of urban wastes, including greases and oils and small amounts of metals which are common by-products of vehicular travel. In addition, storm runoff will likely contain residual amounts of fertilizers and plant additives washed off from landscaped areas.

Recognizing the potential hazards of such urban runoff, the Environmental Protection Agency (EPA) has issued regulations which require municipalities to participate in the NPDES program. As part of this program, the SARWQCB has issued an NPDES permit for urban runoff to the RCFCWCD, and the County has been established as a co-permittee. Compliance with the provisions specified in the NPDES permit ensures proper management and disposal of urban runoff from the Project.

To ensure adequate and appropriate treatment of stormwater discharges, the Project stormwater management system concept and associated WQMP incorporate treatment systems to remove potential pollutants of concern from developed stormwater discharges onsite prior to release to the master plan drainage system. The Project WQMP would be designed, constructed, operated and maintained in conformance with design criteria and performance standards presented in the Santa Ana Regional Water Quality Control Board WQMP Guidance Document. The Project WQMP is presented as Appendix U to this EIR.

The Project would also be required to comply with applicable provisions of the Statewide Industrial General Permit (IGP) which implements applicable federal regulations addressing industrial activities that discharge stormwaters to waters of the United States.

Based on the preceding, the potential for the Project to violate any water quality standards or waste discharge requirements; or otherwise substantially degrade water quality would be less than significant.

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- b) **Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

Less Than Significant Impact. The Project does not propose direct withdrawal of groundwater that would substantially deplete groundwater supplies. Nor does the Project propose facilities or activities affecting designated groundwater recharge areas. Further, construction proposed by the Project will not involve massive substructures at depths that would significantly impair or alter the direction or rate of flow of groundwater.

The Project design incorporates three (3) underground infiltration vaults, an infiltration basin, and LID landscaped areas. Low Impact Development Principles and Low Impact Development Ongoing and Annual Best Management Practices would be implemented to fully address all Drainage Management Areas. Based on the preceding discussion, the Project's potential to substantially deplete groundwater supplies, or to substantially interfere with groundwater recharge capabilities are anticipated to be less than significant.

- c) **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces?**

Less Than Significant Impact. As previously mentioned, the site currently drains from the southwest to the northeast. Under post-development conditions, the site would drain in the same orientation, and utilize three (3) underground vaults, as well as a surface basin, to attenuate post-development peak flows. The Project does not propose or require alteration of any streams or rivers. As such, the potential for the Project to substantially alter the existing drainage pattern of the site or area is considered less than significant.

- d) **Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?**

Less Than Significant Impact. The Project stormwater management system described herein would ensure that additional runoff generated by the Project would not exceed the capacity of the receiving storm drain system or otherwise result in flooding on-site or off-site. Based on the analysis presented with the Drainage Study, proposed drainage facilities have been appropriately sized to accommodate drainage for the 2-year, 5-year, and 10-year storms at the 1-hour, 3-hour, 6-hour, and 24-hour durations. Additionally, the proposed drainage facilities would safely convey the 100-year peak hour flow off-site. As such, the potential for the Project to substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site is considered less than significant.

- e) **Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

Less Than Significant Impact. The Project would utilize a series of underground vaults, as well as a surface basin, to attenuate post-development stormwater discharge volumes and rates. As previously stated, proposed drainage facilities have been appropriately sized to accommodate drainage for the 2-year, 5-year, and 10-year storms at the 1-hour, 3-hour, 6-hour, and 24-hour durations. Additionally, the proposed drainage facilities would safely convey the 100-year peak hour flow off-site.

Based on the preceding, the potential for the Project to 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 is considered less than significant.

f) Impede or redirect flood flows?

Less Than Significant Impact. The Project site is not located in a flood zone. Per FEMA Flood Insurance Map 06065C1410G (revised August 28, 2008), the Project site is located in Zone X, which indicates the site is an area determined to be outside the 1% annual chance floodplain. As previously stated, under post-development conditions, the site's existing general drainage pattern will be retained. Based on information presented within the Drainage Report, the Project stormwater management system has been sized to properly convey all drainage. The potential for the Project to impede or redirect flood flows is considered less than significant.

g) In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation?

No Impact. The Project site is not located within a flood hazard, tsunami or seiche zone (reference Riverside County General Plan Figure S-9, *Special Flood Hazards Areas*, and Figure S-10, *Dam Failure Inundation Zones*). Seiches are caused by movement of an inland body of water due to the movement from seismic forces. The Project site is 3.8 miles southwest of Lake Perris. Therefore, a seiche event is very unlikely. In the event of a seiche, water is anticipated to be confined to the young alluvial valley channel east of Interstate 215. In addition, there is no risk of the Project site being affected by a tsunami because the Project side is approximately 36 miles from the Pacific Ocean and is at an elevation exceeding 1,500 feet above Mean Sea Level. The Project will have no impact in this regard.

h) Hazard area or a dam failure inundation zone, risk the release of pollutants due to project inundation?

No Impact. The Project site is not located within a hazard area or dam failure inundation zone (reference Riverside County General Plan Figure S-10, *Dam Failure Inundation Zones*) and would have no impact in this regard.

i) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. The California Porter-Cologne Water Quality Control Act and the Federal Water Pollution Control Act Amendment of 1972 (i.e. the Clean Water Act) require that comprehensive water quality control plans be developed for all waters within California. The Project site is located within the jurisdiction of the Santa Ana Regional Water Quality Control Board, which has produced the Santa Ana River Basin Water Quality Control Plan for the Santa Ana River Watershed. The Project will be required to prepare Storm Water Pollution Prevention Plans for Project operational activities and to implement a long-term water quality sampling and monitoring program or receive an exemption. The Project would not conflict with or obstruct implementation of the Santa Ana River Basin Water Quality Control Plan.

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4.10.5 CUMULATIVE IMPACTS

The cumulative impact analysis considers potential hydrology and water quality impacts of Project development and operation in conjunction with other development projects in the Project vicinity. The analysis of potential cumulative impacts is divided into general topics of discussion by combining the Thresholds of Significance into the following like topics – water quality; groundwater supply and recharge; erosion and siltation; flood hazards; stormwater drainage system capacity; and, other hazards.

Hydrology and Water Quality (Water Quality) Thresholds a) and j) – Pursuant to State Water Resources Control Board and SARWQCB requirements, all construction projects that disturb one or more acres of land are required to obtain a NPDES permit and obtain coverage for construction activities. A site-specific SWPPP is required to be developed and implemented for all development projects to obtain coverage. The SWPPP must identify potential pollutants on the site 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. Also, all projects and cumulative developments within the Santa Ana River Basin would be required to comply with the SARWQCB Santa Ana River Basin Water Quality Control Program. By complying with these regulatory requirements, the Project's contribution to water quality impacts during construction would not be cumulatively considerable.

The Project and other projects within the watershed would be required to prepare site-specific WQMPs and incorporate BMPs into Project design as necessary to ensure runoff does not substantially contribute to existing water quality violations. Therefore, in the long-term warehouse/logistics use on the Project site would not contribute to cumulatively considerable water quality impacts.

Hydrology and Water Quality (Groundwater Supply and Recharge) Threshold b) – The Project does not propose direct withdrawal of groundwater that would substantially deplete groundwater supplies. Nor does the Project propose facilities or activities affecting designated groundwater recharge areas. The Project would not result in cumulatively considerable impacts pertaining to depletion of groundwater supplies or substantial interference with groundwater recharge.

Hydrology and Water Quality Threshold (Drainage, Erosion and Siltation) Thresholds c) and d) – Development projects would be required to prepare SWPPPs and WQMPs to ensure substantial soil erosion and/or sedimentation would not occur during temporary construction conditions or in the long-term. In that the Project and other existing and planned developments would be required to comply with Federal, State and County regulations, Project development and operation would not result in a cumulatively considerable impact to erosion or siltation.

The Project storm drain improvements would have sufficient capacity to accommodate and convey Project-generated stormwater runoff. All development within the Project vicinity is required to demonstrate storm drain capacity is available to accommodate anticipated stormwater flows. Therefore, cumulative impacts would be less than significant and the Project contribution of flows would be less than cumulatively considerable.

Hydrology and Water Quality (Flood Hazards) Thresholds e) and f) – The Project stormwater drainage system described previously in this Section would ensure peak flood flows and volumes would be substantially similar to those that occur under existing conditions and thereby not increase the potential for flooding on-site or off-site. The Drainage Report concluded that the system provides adequate capacity and attenuation of drainage.

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As such, the Project would have a less than significant cumulatively considerable impact associated with flooding.

Hydrology and Water Quality (Flood Hazards) Thresholds g) and h) – The Project site is not located within a special flood hazard area or 100-year floodplain. Therefore, Project development would not place structures within a 100-year floodplain or impede or redirect flood flows within a 100-year floodplain. No cumulatively considerable impact would result.

The Project site is not subject to flood hazards associated with levee or dam failure and therefore has no potential to contribute to cumulative impacts associated with such failures.

Hydrology and Water Quality (Other Hazards) Threshold i) – The Project site is not subject to hazards associated with seiches, tsunamis or mudflows. Therefore, Project development will not result in a cumulatively considerable contribution to these types of impacts.

4.10.6 EXISTING REGULATIONS/PROJECT DESIGN FEATURES

Riverside County General Plan

Policy OS 1.4 – Promote the use of recycled water for landscape irrigation. [to address Riverside County’s water supply issues]

Policy OS 2.1 – Implement a water-efficient landscape ordinance and corresponding policies that promote the use of water-efficient plants and irrigation technologies, minimizes the use of turf, and reduces water-waste without sacrificing landscape quality.

Policy OS 2.2 – Encourage the installation of water-conserving systems such as dry wells and graywater systems, where feasible, especially in new developments. The installation of cisterns or infiltrators shall also be encouraged to capture rainwater from roofs for irrigation in the dry season and flood control during heavy storms.

Policy OS 3.2 – Encourage wastewater treatment innovations, sanitary sewer systems, and groundwater management strategies that protect groundwater quality in rural areas.

Policy OS 3.3 – Minimize pollutant discharge into storm drainage systems, natural drainages, and aquifers.

Policy OS 3.6 – Design the necessary stormwater detention basins, recharge basins, water quality basins, or similar water capture facilities to protect water-quality. Such facilities should capture and/or treat water before it enters a watercourse. In general, these facilities should not be placed in watercourses, unless no other feasible options are available.

Policy OS 3.7 – Where feasible, decrease stormwater runoff by reducing pavement in development areas, reducing dry weather urban runoff, and by incorporating “Low Impact Development,” green infrastructure and other Best Management Practice design measures such as permeable parking bays and lots, use of less pavement, bio-filtration, and use of multi-functional open drainage systems, etc.

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Policy OS 4.6 – Retain storm water at or near the site of generation for percolation into the groundwater to conserve it for future uses and to mitigate adjacent flooding. Such retention may occur through “Low Impact Development” or other Best Management Practice measures.

Mead Valley Area Plan

The Mead Valley Area Plan is part of the Santa Ana River watershed, which includes Cajalco Creek and the San Jacinto River. The San Jacinto River drains southwest toward Canyon Lake through the City of Perris. The watercourses provide corridors through developed land and link with open spaces. This allows wildlife to move from one open space to another without crossing developed land. The following Area Plan policy may be considered relevant to the Project.

MVAP 15.1 – Protect the Santa Ana River watershed, its tributaries, and surrounding habitats, and provide flood protection through adherence to the Floodplain and Riparian Area Management, Wetlands, Multiple Species Habitat Conservation Plans, and Environmentally Sensitive Lands sections of the Multipurpose Open Space Element [of the County of Riverside General Plan].

Project Design Features

Project development will include construction of half-width improvements to Paterson Avenue and Placentia Avenue adjacent to the Project site. These improvements will include widening the proposed roadway half-width to ultimate conditions, addition of curb and gutter, and extension of the public storm drain system (lines H-11 and H10.1).

4.10.7 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

As detailed within this Section, the Project would utilize a series of underground vaults, as well as a surface basin, to attenuate post-development stormwater discharge volumes and rates. Based on information presented within the Drainage Study and Project-specific WQMP, on-site drainage facilities have been sized to accommodate drainage for the 2-year, 5-year, and 10-year storms at the 1-hour, 3-hour, 6-hour, and 24-hour durations. Additionally, the proposed drainage facilities would safely convey the 100-year peak hour flow off-site. No significant hydrology impacts have been identified.

4.10.8 MITIGATION MEASURES

No Mitigation Measures are required.

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4.11 LAND USE & PLANNING

4.11.1 ENVIRONMENTAL SETTING

The Project site is located on the northeast corner of the Patterson Avenue/Placentia Avenue intersection within unincorporated Riverside County. The 31.55-acre Project site is vacant, shows signs of grading and disking, and contains grass and some trees. The Project site is bordered by existing single-family residential and vacant land uses north of the Project site, single-family residential uses south and west of the Project site, and single-family residential and industrial/manufacturing uses east of the Project site.

Interstate 215 is located approximately 1,600 feet east of the Project site. The BNSF/Metrolink rail lines are located approximately 1,500 feet east of the Project site. The March Air Reserve Base/Inland Port Airport is located approximately 2.5 miles northeast of the Project site.

The Project site is vacant, slopes approximately 45 feet downward from south to northeast. Grasses cover portions of the property and several trees are located in the southerly and southwesterly areas of the Project site.

4.11.2 THRESHOLDS OF SIGNIFICANCE

The County of Riverside has adopted Thresholds of Significance that vary in some cases topically and in format from the Appendix G Thresholds, as reflected in the Initial Study prepared for the Project. This EIR uses the following County-adopted Thresholds of Significance to comprise the basis of impact analyses.

Land Use

Would the Project - -

- a) **Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**
- b) **Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?**

4.11.3 ENVIRONMENTAL IMPACTS

- a) **Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

No Impact. Project development is consistent with the land use designations assigned to the Project site in the County of Riverside General Plan, Land Use Ordinance, and the Mead Valley Area Plan. The Project site is located on a 31.55-acre property with a Riverside County General Plan land use designation of Business Park and is zoned Industrial Park (I-P) and Manufacturing-Service Commercial (M-SC). The Project site carries a General Plan Land Use Element land use designation(s) and a Zoning Code designation that would allow development of the proposed warehouse/logistics building. That is, the proposed Project is consistent with all pertinent land use designations and is designed in compliance

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with all zoning standards and Mead Valley Area Plan standards. The Project would not conflict with the Western Riverside County Multiple Species Habitat Conservation Plan.

A Riverside County General Plan Consistency Analysis has been prepared and is presented at EIR Appendix K. As presented, no inconsistencies have been identified. In that the Project would not result in any adverse environmental impacts due to an inconsistency with any applicable land use plans, policies or regulations, there is no potential for the Project to contribute to a considerable environmental effect related to this issue.

b) Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?

Less Than Significant Impact. The Project site is located on a 31.55-acre property with a Riverside County General Plan land use designation of Business Park and is zoned Industrial Park (IP) and Manufacturing-Service Commercial (M-SC). The Project site has been contemplated for industrial/business park uses for some time. The property bordering the Project site to the east is zoned M-SC and contains a light industrial use. Surrounding properties to the north, west and south are residentially-zoned, but the majority of the land is vacant with only 12 single-family residences on large lots bordering the Project site to the north, south and west. Project development does not include any barriers (e.g., freeway, storm channel, bridge, or utility transmission line easement). As a result, Project development as proposed would not divide the physical arrangement of the low-density residential community and the impact would be less than significant.

4.11.4 CUMULATIVE IMPACTS

Land Use Threshold a) – The Project site carries a General Plan Land Use Element land use designation(s) and a Zoning Code designation that would allow development of the proposed warehouse/logistics building. That is, the proposed project is consistent with all pertinent land use designations and is designed in compliance with all zoning standards and Mead Valley Area Plan standards. In that the Project would not result in any adverse environmental impacts due to an inconsistency with any applicable land use plans, policies or regulations, there is no potential for the Project to contribute to a cumulatively considerable environmental effect related to this issue.

The Project would not conflict with the Western Riverside County Multiple Species Habitat Conservation Plan. Thereby, there is no potential for the Project to contribute cumulatively significant impacts to a conflict with any applicable habitat conservation plan or natural community conservation plan and impacts would be less than cumulatively considerable.

Land Use Threshold b) – The Project site abuts residential, industrial and vacant land. The site is physically separated from established land uses by roadways. There is no potential for the Project to cause or cumulatively contribute to division of an established community because the existing community connectivity will remain and be enhanced as a result of roadway improvements that will be part of Project development.

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4.11.5 EXISTING REGULATIONS AND STANDARD CONDITIONS

Riverside County General Plan Land Use Element Policies

The following County of Riverside General Plan Land Use Element policies are relevant to the Project.

Project Design

Policy LU 4.1 – Require that new developments be located and designed to visually enhance, not degrade the character of the surrounding area through consideration of the following concepts:

- a. Compliance with the design standards of the appropriate area plan land use category.
- b. Require that structures be constructed in accordance with the requirements of Riverside County’s zoning, building, and other pertinent codes and regulations.
- c. Require that an appropriate landscape plan be submitted and implemented for development projects subject to discretionary review.
- d. Require that new development utilize drought tolerant landscaping and incorporate adequate drought-conscious irrigation systems.
- e. Pursue energy efficiency through street configuration, building orientation, and landscaping to capitalize on shading and facilitate solar energy, as provided for in Title 24 Part 6 and/or Part 11 of the California Code of Regulations.
- f. Incorporate water conservation techniques, such as groundwater recharge basins, use of porous pavement, drought tolerant landscaping, and water recycling, as appropriate.
- g. Encourage innovative and creative design concepts.
- h. Include consistent and well-designed signage that is integrated with the building’s architectural character.
- i. Locate site entries and storage bays to minimize conflicts with adjacent residential neighborhoods.
- j. Mitigate noise, odor, lighting, and other impacts on surrounding properties.
- k. Provide and maintain landscaping in open spaces and parking lots.
- l. Include extensive landscaping.
- m. Require that new development be designed to provide adequate space for pedestrian connectivity and access, recreational trails, vehicular access and parking, supporting functions, open space, and other pertinent elements.
- n. Design parking lots and structures to be functionally and visually integrated and connected.
- o. Establish safe and frequent pedestrian crossings.
- p. Create a human-scale ground floor environment that includes public open areas that separate pedestrian space from auto traffic or where mixed, it does so with special regard to pedestrian safety.

Infrastructure, Public Facilities and Service Provision – Senate Bill 244

Policy LU 5.2 – Monitor the capacities of infrastructure and services in coordination with service providers, utilities, and outside agencies and jurisdictions to ensure that growth does not exceed acceptable levels of service.

Policy LU 5.3 – Review all projects for consistency with individual urban water management plans.

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Land Use Compatibility

Policy LU 7.1 – Require land uses to develop in accordance with the General Plan and area plans to ensure compatibility and minimize impacts.

Policy LU 7.3 – Consider the positive characteristics and unique features of the project site and surrounding community during the design and development process.

Policy LU 7.4 – Retain and enhance the integrity of existing residential, employment, agricultural, and open space areas by protecting them from encroachment of land uses that would result in impacts from noise, noxious fumes, glare, shadowing, and traffic.

Economic Development

Policy LU 8.1 – Accommodate the development of a balance of land uses that maintain and enhance Riverside County’s fiscal viability, economic diversity, and environmental integrity.

Policy LU 8.2 – Promote and market the development of a variety of stable employment and business uses that provide a diversity of employment opportunities.

Policy LU 8.8 – Stimulate industrial/business-type clusters that facilitate competitive advantage in the marketplace, provide attractive and well landscaped work environments, and fit with the character of our varied communities.

Fiscal Impacts

Policy 10.1 – Require that new development contribute their fair share to fund infrastructure and public facilities such as police and fire facilities.

Air Quality

Policy LU 11.1 – Provide sufficient commercial and industrial development opportunities in order to increase local employment levels and thereby minimize long-distance commuting.

Policy LU 11.2 – Ensure adequate separation between pollution producing activities and sensitive emission receptors, such as hospitals, residences, child care centers and schools.

Policy LU 11.4 – Provide options to the automobile in communities, such as transit, bicycle and pedestrian trails, to help improve air quality.

Policy LU 11.5 – Ensure that all new developments reduce Greenhouse Gas emissions as prescribed in the Air Quality Element and Climate Action Plan.

Scenic Corridors

Policy LU 14.1 – Preserve and protect outstanding scenic vistas and visual features for the enjoyment of the traveling public.

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Policy LU 14.8 – Avoid the blocking of public views by solid walls.

Airports

Policy LU 15.2 – Review all proposed projects and require consistency with any applicable airport land use compatibility plan as set forth in Appendix I-1 and as summarized in the Area Plan’s Airport Influence Area section for the airport in question.

Solar Energy Resources

Policy LU 17.1 – Permit and encourage solar energy systems as an accessory use to any residential, commercial, industrial, mining, agricultural or public use.

Water Conservation and Water-Efficient Landscaping

Policy LU 18.1 – Ensure compliance with Riverside County’s water-efficient landscape policies. Ensure that projects seeking discretionary permits and/or approvals develop and implement landscaping plans prepared in accordance with the Water-Efficient Landscape Ordinance (Ordinance No. 859), the County of Riverside Guide to California Friendly Landscaping and Riverside County’s California Friendly Plant List. Ensure that irrigation plans for all new development incorporate weather-based controllers and utilize state-of-the-art water-efficient irrigation components.

Policy LU 18.3 – Design and field check irrigation plans to reduce run-off. Emphasize the use of subsurface irrigation techniques for landscape areas adjoining non-permeable hardscape. Utilize subsurface irrigation or other low volume irrigation technology in association with long, narrow, or irregularly shaped turf areas. Minimize use of irregularly shaped turf areas.

Industrial and Business Park Area Plan Land Use Designations

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

Policy LU 30.3 – Protect industrial lands from encroachment of incompatible or sensitive uses, such as residential or schools that could be impacted by industrial activity.

Policy LU 30.4 – Concentrate industrial and business park uses in proximity to transportation facilities and utilities, and along transit corridors.

Policy LU 30.6 – Control the development of industrial uses that use, store, produce, or transport toxins, generate unacceptable levels of noise or air pollution, or result in other impacts.

Policy LU 30.7 – Require that adequate and available circulation facilities, water resources, and sewer facilities exist to meet the demands of the proposed land use.

Policy LU 30.8 – Require that industrial development be designed to consider their surroundings and visually enhance, not degrade, the character of the surrounding area.

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Mead Valley Area Plan

The Mead Valley Area Plan includes an extensive area westerly of Interstate 215 that is designated Light Industrial, Business Park, or Light Industrial with a Community Center Overlay. The Mead Valley Area Plan states “it is the policy of Riverside County to stimulate economic development in this area of Mead Valley.” The Project site has a land use designation of Business Park. Due to the proximity of residential uses to industrial designated properties, the Mead Valley Area Plan contains the following 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.

MVAP 6.2 – A minimum 50-foot setback shall be required for any new industrial project on properties zoned I-P, if that property abuts a property that is zoned for residential, agricultural, or commercial uses. A minimum of 20 feet of the setback shall be landscaped, unless a tree screen 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.

A Riverside County General Plan Consistency Analysis has been prepared and is presented at EIR Appendix K.

Standard Conditions/Project Design Features

No Standard Conditions that specifically pertain to Land Use are relevant to the Project.

Project design responds to General Plan and Mead Valley Area Plan Goals and Policies and to County of Riverside Zoning Code requirements pertaining to the I-P and M-SC zoning districts.

4.11.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

The Riverside County General Plan and Mead Valley Area Plan land use designation for the Project site is Business Park and the zoning is I-P and M-SC. The proposed logistics/warehouse use is an allowed use within the General Plan and Mead Valley Area Plan land use designations and the zoning. Therefore, the Project is consistent with the General Plan and zoning. In addition, Project development and operation will comply with all County of Riverside development standards and regulations and will include all feasible mitigation of any identified environmental impacts. A Riverside County General Plan Consistency Analysis has been prepared and is presented at EIR Appendix K. As presented, no inconsistencies have been identified.

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The Project site has been zoned for industrial/business park uses for some time. The property bordering the Project site to the east is zoned for industrial uses and contains an industrial business. Surrounding properties to the north, west and south are residentially-zoned, but the majority of the land is vacant with only 12 single-family residences on large lots bordering the Project site to the north, south and west. As a result, Project development as proposed would not divide the physical arrangement of the existing low-density residential community.

Based on the foregoing, the Project impact on Land Use and Planning will be less than significant.

4.11.7 MITIGATION MEASURES

No Mitigation Measures are required.

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4.12 MINERAL RESOURCES

4.12.1 ENVIRONMENTAL SETTING

The Project site is located on the northeast corner of the Patterson Avenue/Placentia Avenue intersection within unincorporated Riverside County. The 31.55-acre Project site is vacant, sloping approximately 45 feet downward from south to northeast. Although the site evidences signs of grading and disking, grasses cover portions of the property and several trees are located in the southerly and southwesterly areas of the Project site. In the past, the Project site was used for agricultural purposes, but no more recently than 1961.

The Project site is bordered by existing single-family residential and vacant land uses north of the Project site, single-family residential uses south and west of the Project site, and single-family residential and industrial/manufacturing uses east of the Project site. Interstate 215 is located approximately 1,600 feet east of the Project site. The BNSF/Metrolink rail lines are located approximately 1,500 feet east of the Project site. The March Air Reserve Base/Inland Port Airport is located approximately 2.5 miles northeast of the Project site.

The Project site does not have any known mineral resource nor is the site zoned for any mineral resource extraction. The closest mineral resource site is the First Industrial Realty Trust Day Street Site, approximately 1 mile west of the Project site, which is designated MRZ-2.

4.12.2 THRESHOLDS OF SIGNIFICANCE

The County of Riverside has adopted Thresholds of Significance that vary in some cases topically and in format from the Appendix G Thresholds, as reflected in the Initial Study prepared for the Project. This EIR uses the following County-adopted Thresholds of Significance to comprise the basis of impact analyses.

Would the Project - -

- a) 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?**
- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**
- c) Potentially expose people or property to hazards from proposed, existing, or abandoned quarries or mines?**

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4.12.3 ENVIRONMENTAL IMPACTS

- a) **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?**

No Impact. The Project site does not have a known mineral resource nor is the site zoned for any mineral resource extraction. The closest mineral resource site is the First Industrial Realty Trust Day Street Site, approximately 1 mile west of the Project site, which is designated MRZ-2. The Project site is on land designated as MRZ-3 (Significance of mineral deposits undetermined). No State of California plans designate the site as a mineral resource site. Therefore, Project development would not result in the loss of availability of a known mineral resource that would be of value to the region or to residents of the State of California and there would be no impact.

- b) **Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

No Impact. The closest mineral resource site is the First Industrial Realty Trust Day Street Site, approximately 1 mile west of the Project site, which is designated MRZ-2. The MRZ-2 Resource Zone signifies an area where adequate information indicates that significant mineral resources are present, or where it is judged that a high likelihood for their presence exists. Land in this Zone is of prime importance because it contains known economic mineral deposits. The Project site does not have any known mineral resources. The Project site is on land designated as MRZ-3 (Significance of mineral deposits undetermined). No State of California plans designate the site as a mineral resource site. Therefore, Project development will not result in the loss of availability of a locally-important mineral resource recovery site delineated on the Riverside County General Plan or the Mead Valley Area Plan and there would be no impact.

- c) **Potentially expose people or property to hazards from proposed, existing, or abandoned quarries or mines?**

No Impact. There are no proposed, existing or abandoned quarries or mines on the Project site. Therefore, Project development has no potential to expose people or property to hazards from proposed, existing or abandoned quarries or mines and there would be no impact.

4.12.4 CUMULATIVE IMPACTS

Mineral Resources Thresholds a), b) and c) – As indicated above, Project development would not result in any impacts to a known mineral resource or expose people or property to hazards from abandoned mines or quarries. Project development will not have an impact on the First Industrial Realty Trust Day Street site (designated MRZ-2 in the County General Plan Land Use Element). Also, the Project site is not designated for mineral resource extraction and does not have any known mineral resources. As such the Project site, as designated (Significance of Mineral Deposits Undetermined), is not considered a locally-important mineral resources site. This designation, together with the Riverside County General Plan land use designation and the fact that Project development would not affect any other mineral resource locations in the Project vicinity, thereby indicates that the Project would not result in a cumulatively considerable impact pertaining to Mineral Resources.

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4.12.5 EXISTING REGULATIONS AND STANDARD CONDITIONS

Riverside County General Plan Multi-Purpose Open Space (OS) Element Policies

No General Plan Mineral Resources Policies are relevant to the Project site or to Project development and operation.

4.12.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Based on the foregoing, Project development and operation will not impact Mineral Resources.

4.12.7 MITIGATION MEASURES

No Mitigation Measures are required.

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4.13 NOISE

Information presented within this Section is summarized from *Barker Logistics, Noise Impact Analysis, County of Riverside* (Urban Crossroads, Inc.) December 7, 2019. The Noise Impact Analysis is presented as Appendix F to this EIR.

4.13.1 ENVIRONMENTAL SETTING

The Project site is located on the northeast corner of the Patterson Avenue/Placentia Avenue intersection within unincorporated Riverside County. The 31.55-acre Project site is vacant, shows signs of grading and disking, and contains grass and some trees. Existing land uses near the Project site include noise-sensitive residential homes north, south, east and west of the Project site. Existing and future Business Park uses are located east of the Project site. Interstate 215 is located approximately 1,600 feet east of the Project site. The BNSF/Metrolink rail lines are located approximately 1,500 feet east of the Project site. The March Air Reserve Base/Inland Port Airport is located approximately 2.5 miles northeast of the Project site.

Predominate noise sources in the Project area include transportation-related noise associated with adjacent roadways and Interstate 215, the BNSF/Metrolink rail lines, and March Air Reserve Base in addition to background industrial land use activities.

Noise Fundamentals

Noise is defined as “unwanted sound.” That is, 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 source by discriminating against very low and very high frequencies of the audible spectrum. They are adjusted to reflect only those frequencies that are audible to the human ear. Since the range of intensity, the human ear can detect is so large, the scale frequently used to measure intensity is a scale based on multiples of 10 (the logarithmic scale). The scale for measuring intensity is the decibel scale. Each interval of 10 decibels indicates a sound energy ten times greater than before, which is perceived by the human ear as being approximately twice as loud. Most common sounds vary between 40 dBA (very quiet) to 100 dBA (very loud). Another important aspect of noise is the duration of the sound and the way it is described and distributed in time.

Environmental noise descriptors generally are based on averages rather than instantaneous noise levels. The most commonly used figure is the equivalent level (L_{eq}). The equivalent sound level 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 “average” noise levels within the environment.

Peak hour or average noise levels are useful but 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 (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. Time of day corrections require addition of 5 decibels to dBA L_{eq} sound levels at night between 10:00 p.m. and 7:00 am. These additions are made to account for the noise sensitive time periods during evening and night hours when sound appears louder. CNEL does not represent the actual sound level heard at any time; rather, it represents total sound exposure. The County of Riverside relies on the 24-hour CNEL level to assess land use compatibility with transportation related noise sources. Geometric spreading refers to noise from a line

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source propagates outward in a cylindrical pattern. Sound levels decrease at a rate of 3dB for each doubling of distance from a line source. Ground absorption, atmospheric effects and shielding also affect noise levels.

Noise control is the process of obtaining an acceptable noise environment for an observation point or receptor by controlling noise sources, transmission path, receptor, or all three. In general, noise control measures can be applied to these three elements. Effective noise barriers can reduce noise levels by 10 to 15 dBA, cutting the loudness of traffic noise by 50 percent. Noise barriers are most effective when placed close to the noise source or receptor but must be tall enough and long enough to block the path of the noise sources to be most effective.

Several factors are related to the level of community annoyance, including the following:

- Fear associated with noise producing activities;
- Socio-economic status and educational level;
- Perception that those affected are being unfairly treated;
- Attitudes regarding the usefulness of the noise-producing activity; and,
- Belief that the noise source can be controlled.

Approximately ten percent of the population has a very low tolerance for noise and will object to any noise not of their making. Another twenty-five percent of the population will not complain even in very severe noise environments. An increase or decrease of 1dBA cannot be perceived except in carefully controlled laboratory experiments; a change of 3 dBA are considered barely perceptible. Changes of 5 dBA are considered readily perceptible.

Ambient Noise Levels

As previously mentioned, background ambient noise levels in the Project area are dominated by transportation-related noise associated with adjacent roadways and Interstate 215, the BNSF/Metrolink rail lines, and March Air Reserve Base in addition to background industrial land use activities.

As part of the Noise Impact Analysis, ambient noise level measurements were collected at the nearest sensitive receiver locations to assess the existing ambient hourly noise levels surrounding the Project site. Measurement locations are illustrated at Noise Impact Analysis Exhibit 5-A. The following **Table 4.13.1** presents the results of the ambient noise level measurements.

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TABLE 4.13.1 – 24-Hour Ambient Noise Level Measurements

Location	Distance To Project Boundary (feet)	Description	Energy Average Noise Level (dBA L _{eq})		CNEL
			Daytime	Nighttime	
L1	0	Located on Patterson Avenue adjacent to existing rural-residential land use near U-Turn for Christ	61.4	58.5	65.7
L2	650	Located on Harvill Avenue northeast of the Project site adjacent to Daytona Business Park and existing industrial land use area	73.3	70.5	77.6
L3	70	Located on Placentia Avenue southeast of the Project site adjacent to existing rural residential land use	56.4	55.3	62.1
L4	0	Located on Placentia Avenue south of the Project site adjacent to Tobacco Road and existing rural residential land use	60.7	58.2	65.3
L5	0	Located on Patterson Avenue west of the Project site adjacent to existing rural residential land use	58.9	55.5	62.8

Vibration

Ground-borne vibration associated with vehicular traffic generally are 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. While vehicular traffic is rarely perceptible, construction has the potential to result in varying degrees of temporary ground vibration, depending on the specific construction activities and equipment used. **Table 4.13.2** summarizes ground vibration levels associated with various types of construction equipment.

TABLE 4.13.2 – 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

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4.13.2 THRESHOLDS OF SIGNIFICANCE

The County of Riverside has adopted Thresholds of Significance that vary in some cases topically and in format from the Appendix G Thresholds, as reflected in the Initial Study prepared for the Project. This EIR uses the following County-adopted Thresholds of Significance to comprise the basis of impact analyses.

Airport Noise

- a) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) 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?**
- b) **For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?**

Noise Effects by the Project

- a) **Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies?**
- b) **Generation of excessive ground-borne vibration or ground-borne noise levels?**

4.13.3 ENVIRONMENTAL IMPACTS

Airport Noise

- a) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) 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?**

Less Than Significant Impact. The Project site is located approximately 2.5 miles southwest of March Air Reserve Base, within the C2 Compatibility Zone of the March Air Reserve Base. Highly noise-sensitive outdoor residential uses and hazards to flight are prohibited within Zone C2. The Project is not considered a noise-sensitive land use, and has been determined to be consistent with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan.

Review and conditional approval of the Project is documented in Airport Land Use Commission (ALUC) Development Review (Riverside County Airport Land Use Commission) February 20, 2020 (EIR Appendix T). Conditions, revisions or limitations required by the ALUC would be incorporated in the Project prior to approval by the County.

Based on the preceding, the potential for the Project to expose people residing or working in the Project area to excessive noise levels is considered less than significant.

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- b) For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The Project site is not located within the vicinity of a private airstrip. The Perris airstrip is located approximately 4 miles south of the Project site. At this distance, the Project would not expose people working in the Project area to excessive noise levels.

Noise Effects by the Project

- a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies?

Potentially Significant.

Traffic Noise

Traffic generated by Project operation will influence traffic noise levels in surrounding off-site areas. The Noise Impact Analysis calculated Project-generated changes in traffic noise levels and developed noise contours on 10 study-area roadway segments based on changes in average daily traffic volumes. The noise contours represent the distance to noise levels of a constant value and are measured from the center of the roadway for the 60, 65 and 70 dBA noise levels. The noise contours do not consider the effect of any existing noise barriers or topography that may attenuate ambient noise levels. In addition, because the noise contours reflect modeling of vehicular noise on area roadways, they appropriately do not reflect noise contributions from the surrounding stationary noise sources within the Project study area. The Noise Impact Analysis analyzed the following scenarios:

- ***Without Placentia Avenue/Interstate 215 Interchange***
 - Existing Without/With Project – refers to the existing present-day noise conditions, without and with the Project
 - Existing plus Ambient Growth (EA) (2021) Without/With Project – refers to background noise conditions at future Year 2021 without and with the Project plus ambient growth
 - EA plus Cumulative (EAC) (2021) Without/With Project – refers to background noise conditions at future year 2021 without and with Project plus ambient growth, and includes all cumulative projects identified in the Traffic Impact Analysis
- ***With Placentia Avenue/Interstate 215 Interchange***
 - Existing plus Ambient Growth (EA) (2021) Without/With Project – refers to background noise conditions at future Year 2021 without and with the Project plus ambient growth
 - EA plus Cumulative (EAC) (2021) Without/With Project – refers to background noise conditions at future Year 2021 without and with the Project plus ambient growth, and includes all cumulative projects identified in the Traffic Impact Analysis

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Without Placentia Avenue/Interstate 215 Interchange Conditions

Tables 4.13.3 through 4.13.8 present the noise contours developed for all scenarios (Existing, EA, and EAC) under Without Placentia Avenue/Interstate 215 Interchange Conditions.

Table 4.13.3 – Existing Without Project Conditions Noise Contours
(Without Placentia Avenue/Interstate 215 Interchange Conditions)

Road	Segment	Adjacent Planned (Existing) Land Use	CNEL at Nearest Adjacent Land Use (dBA)	Distance to Contour		
				70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
Patterson Avenue	n/o Walnut Street	Residential	55.9	RW	RW	RW
Patterson Avenue	n/o Placentia Avenue	Business Park (BP)/Residential	56.5	RW	RW	RW
Harvill Avenue	s/o Cajalco Expressway	Light Industrial (LI)	74.3	114	245	529
Harvill Avenue	s/o Rider Street	BP/LI	73.7	105	225	485
Harvill Avenue	s/o Placentia Avenue	BP/LI	71.7	76	164	353
Harvill Avenue	s/o Orange Avenue	BP/LI	71.5	74	160	345
Harvill Avenue	s/o A Street	BP/Commercial	73.2	97	209	449
Rider Street	e/o Patterson Avenue	BP/LI	63.8	RW	RW	89
Placentia Avenue	e/o Patterson Avenue	BP/Residential	57.1	RW	RW	RW
Placentia Avenue	e/o Dwy. 2	BP/Residential	57.3	RW	RW	RW

Table 4.13.4 – Existing With Project Conditions Noise Contours
(Without Placentia Avenue/Interstate 215 Interchange Conditions)

Road	Segment	Adjacent Planned (Existing) Land Use	CNEL at Nearest Adjacent Land Use (dBA)	Distance to Contour		
				70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
Patterson Avenue	n/o Walnut Street	Residential	59.6	RW	RW	RW
Patterson Avenue	n/o Placentia Avenue	Business Park (BP)/Residential	59.5	RW	RW	RW

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Road	Segment	Adjacent Planned (Existing) Land Use	CNEL at Nearest Adjacent Land Use (dBA)	Distance to Contour		
				70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
Harvill Avenue	s/o Cajalco Expressway	Light Industrial (LI)	74.7	122	262	565
Harvill Avenue	s/o Rider Street	BP/LI	74.1	105	239	515
Harvill Avenue	s/o Placentia Avenue	BP/LI	72	80	172	371
Harvill Avenue	s/o Orange Avenue	BP/LI	71.8	78	169	363
Harvill Avenue	s/o A Street	BP/Commercial	73.2	100	216	465
Rider Street	e/o Patterson Avenue	BP/LI	64.6	RW	RW	102
Placentia Avenue	e/o Patterson Avenue	BP/Residential	59.8	RW	RW	RW
Placentia Avenue	e/o Dwy. 2	BP/Residential	60.7	RW	RW	56

Table 4.13.5 – EA Without Project Conditions Noise Contours
(Without Placentia Avenue/Interstate 215 Interchange Conditions)

Road	Segment	Adjacent Planned (Existing) Land Use	CNEL at Nearest Adjacent Land Use (dBA)	Distance to Contour		
				70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
Patterson Avenue	n/o Walnut Street	Residential	56.1	RW	RW	RW
Patterson Avenue	n/o Placentia Avenue	Business Park (BP)/Residential	56.7	RW	RW	RW
Harvill Avenue	s/o Cajalco Expressway	Light Industrial (LI)	74.5	122	262	565
Harvill Avenue	s/o Rider Street	BP/LI	73.2	111	239	515
Harvill Avenue	s/o Placentia Avenue	BP/LI	71.8	80	172	371
Harvill Avenue	s/o Orange Avenue	BP/LI	71.7	78	169	363
Harvill Avenue	s/o A Street	BP/Commercial	73.5	100	216	465
Rider Street	e/o Patterson Avenue	BP/LI	64.6	RW	RW	102

Environmental Impacts - Noise

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Road	Segment	Adjacent Planned (Existing) Land Use	CNEL at Nearest Adjacent Land Use (dBA)	Distance to Contour		
				70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
Placentia Avenue	e/o Patterson Avenue	BP/Residential	57.3	RW	RW	RW
Placentia Avenue	e/o Dwy. 2	BP/Residential	57.4	RW	RW	56

Table 4.13.6 – EA With Project Conditions Noise Contours
(Without Placentia Avenue/Interstate 215 Interchange Conditions)

Road	Segment	Adjacent Planned (Existing) Land Use	CNEL at Nearest Adjacent Land Use (dBA)	Distance to Contour		
				70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
Patterson Avenue	n/o Walnut Street	Residential	59.7	RW	RW	RW
Patterson Avenue	n/o Placentia Avenue	Business Park (BP)/Residential	59.6	RW	RW	RW
Harvill Avenue	s/o Cajalco Expressway	Light Industrial (LI)	74.9	125	269	579
Harvill Avenue	s/o Rider Street	BP/LI	74.3	114	245	528
Harvill Avenue	s/o Placentia Avenue	BP/LI	72.1	82	177	381
Harvill Avenue	s/o Orange Avenue	BP/LI	72	80	173	372
Harvill Avenue	s/o A Street	BP/Commercial	73.6	103	221	477
Rider Street	e/o Patterson Avenue	BP/LI	64.8	RW	RW	104
Placentia Avenue	e/o Patterson Avenue	BP/Residential	59.9	RW	RW	RW
Placentia Avenue	e/o Dwy. 2	BP/Residential	60.8	RW	RW	57

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Table 4.13.7 – EAC Without Project Conditions Noise Contours
(Without Placentia Avenue/Interstate 215 Interchange Conditions)

Road	Segment	Adjacent Planned (Existing) Land Use	CNEL at Nearest Adjacent Land Use (dBA)	Distance to Contour		
				70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
Patterson Avenue	n/o Walnut Street	Residential	56.1	RW	RW	RW
Patterson Avenue	n/o Placentia Avenue	Business Park (BP)/Residential	56.7	RW	RW	RW
Harvill Avenue	s/o Cajalco Expressway	Light Industrial (LI)	75.3	134	288	620
Harvill Avenue	s/o Rider Street	BP/LI	74.7	122	263	566
Harvill Avenue	s/o Placentia Avenue	BP/LI	73.1	95	204	440
Harvill Avenue	s/o Orange Avenue	BP/LI	73	93	201	433
Harvill Avenue	s/o A Street	BP/Commercial	74.3	114	246	531
Rider Street	e/o Patterson Avenue	BP/LI	64	RW	RW	92
Placentia Avenue	e/o Patterson Avenue	BP/Residential	57.3	RW	RW	RW
Placentia Avenue	e/o Dwy. 2	BP/Residential	57.4	RW	RW	RW

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Table 4.13.8 – EAC With Project Conditions Noise Contours
(Without Placentia Avenue/Interstate 215 Interchange Conditions)

Road	Segment	Adjacent Planned (Existing) Land Use	CNEL at Nearest Adjacent Land Use (dBA)	Distance to Contour		
				70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
Patterson Avenue	n/o Walnut Street	Residential	59.7	RW	RW	RW
Patterson Avenue	n/o Placentia Avenue	Business Park (BP)/Residential	59.6	RW	RW	RW
Harvill Avenue	s/o Cajalco Expressway	Light Industrial (LI)	75.7	141	304	654
Harvill Avenue	s/o Rider Street	BP/LI	75	128	276	594
Harvill Avenue	s/o Placentia Avenue	BP/LI	73.3	98	212	456
Harvill Avenue	s/o Orange Avenue	BP/LI	73.2	97	208	449
Harvill Avenue	s/o A Street	BP/Commercial	74.5	117	253	545
Rider Street	e/o Patterson Avenue	BP/LI	64.8	RW	RW	104
Placentia Avenue	e/o Patterson Avenue	BP/Residential	59.9	RW	RW	RW
Placentia Avenue	e/o Dwy. 2	BP/Residential	60.8	RW	RW	57

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Based on the previously presented noise contours, **Table 4.13.9** presents the off-site traffic noise level increases that could be expected under Existing Conditions with and without the Project. This scenario is shown for informational purposes but would not actually occur since the Project would not be fully constructed and operational until year 2021 cumulative conditions. Regardless, as shown, increases would be expected to range from 0.2 to 3.6 dBA CNEL.

Table 4.13.9 – Unmitigated Existing with Project Traffic Noise Level Increases
(Without Placentia Avenue/Interstate 215 Interchange Conditions)

Road	Segment	CNEL at Adjacent Land Use (dBA)			Noise Sensitive Land Use?
		No Project	With Project	Project Addition	
Patterson Avenue	n/o Walnut Street	55.9	59.6	3.6	Yes
Patterson Avenue	n/o Placentia Avenue	56.5	59.5	3	Yes
Harvill Avenue	s/o Cajalco Expressway	74.3	74.7	0.4	No
Harvill Avenue	s/o Rider Street	73.7	74.1	0.4	No
Harvill Avenue	s/o Placentia Avenue	71.7	72	0.3	No
Harvill Avenue	s/o Orange Avenue	71.5	71.8	0.3	No
Harvill Avenue	s/o A Street	73.2	73.5	0.2	No
Rider Street	e/o Patterson Avenue	63.8	64.6	0.8	No
Placentia Avenue	e/o Patterson Avenue	57.1	59.8	2.7	Yes
Placentia Avenue	e/o Driveway. 2	57.3	60.7	3.4	Yes

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Table 4.13.10 presents the Existing plus Ambient Growth (EA) with and without Project conditions CNEL noise levels.

Table 4.13.10 – Unmitigated EA with Project Traffic Noise Impacts
(Without Placentia Avenue/Interstate 215 Interchange Conditions)

Road	Segment	CNEL at Adjacent Land Use (dBA)			Noise-Sensitive Land Use?	Threshold Exceeded?
		No Project	With Project	Project Addition		
Patterson Avenue	n/o Walnut Street	56.1	59.7	3.5	Yes	No
Patterson Avenue	n/o Placentia Avenue	56.7	59.6	2.9	Yes	No
Harvill Avenue	s/o Cajalco Expressway	74.5	74.9	0.4	No	No
Harvill Avenue	s/o Rider Street	73.9	74.3	0.4	No	No
Harvill Avenue	s/o Placentia Avenue	71.8	72.1	0.3	No	No
Harvill Avenue	s/o Orange Avenue	71.7	72	0.3	No	No
Harvill Avenue	s/o A Street	73.4	73.6	0.2	No	No
Rider Street	e/o Patterson Avenue	64	64.8	0.8	No	No
Placentia Avenue	e/o Patterson Avenue	57.3	59.9	2.7	Yes	No
Placentia Avenue	e/o Project Driveway 2	57.4	60.8	3.4	Yes	No

As shown above, traffic noise level increases can be expected to range from 0.2 to 3.5 dBA CNEL under the EA with Project scenario.

The Noise Impact Analysis prepared for the Project indicates the Federal Interagency Committee on Noise (FICON) developed guidance to be used for assessment of Project-generated increases in noise levels that consider the ambient noise level. FICON recommendations are based on studies that related aircraft noise levels to the percentage of persons highly annoyed by aircraft noise. Although 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 (CNEL) and equivalent continuous noise level (Leq).

The approach used in the Noise Impact Analysis recognizes “*that there is no single noise increase that renders the noise impact significant*,” based on a 2008 California Court of Appeal ruling on *Gray v. County of Madera*.” As an example, if the ambient noise environment is quiet (<60dBA) and the new noise source greatly increases the noise levels, an impact may occur if the noise criteria may be exceeded. Therefore, the Noise Impact Analysis prepared for the Project, “FICON identifies a *readily perceptible* 5dBA 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 60-65 dBA, a 3dBA barely perceptible noise level increase “appears to be appropriate for most people.” When the

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“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 for a given land use is exceeded because the noise increase likely contributes to an existing noise exposure exceedance.

Therefore, as indicated in Table 4.13.10, because the “without” Project noise levels at Patterson Avenue-north of Walnut Street, Patterson Avenue north of Placentia Avenue, Rider Street-east of Patterson Avenue, Placentia Avenue-east of Patterson Avenue, and Placentia Avenue-east of Project Driveway 2 all are less than 65 dBA, the Project addition of noise is not deemed significant in that no noise level of 65 dBA is achieved. Also, for the roadways identified in Table 4.13.10 that experience “without” Project noise levels greater than 65 dBA (Harvill Avenue-south of Cajalco Expressway; Harvill Avenue-south of Rider Street; Harvill Avenue-south of Placentia Avenue; Harvill Avenue-south of Orange Avenue; and, Harvill Avenue-south of A Street), each of the Project-added noise levels is less than 1.5 dBA. Therefore, the related noise impacts do not exceed the appropriate threshold and the resultant level of impact is less than significant.

Table 4.13.11 presents the Existing plus Ambient Growth plus Cumulative (EAC) with and without Project conditions CNEL noise levels.

Table 4.13.11– Unmitigated EAC with Project Traffic Noise Impacts
(Without Placentia Avenue/Interstate 215 Interchange Conditions)

Road	Segment	CNEL at Adjacent Land Use (dBA)			Noise-Sensitive Land Use?	Threshold Exceeded?
		No Project	With Project	Project Addition		
Patterson Avenue	n/o Walnut Street	56.1	59.7	3.5	Yes	No
Patterson Avenue	n/o Placentia Avenue	56.7	59.6	2.9	Yes	No
Harvill Avenue	s/o Cajalco Expressway	75.3	75.7	0.3	No	No
Harvill Avenue	s/o Rider Street	74.7	75	0.3	No	No
Harvill Avenue	s/o Placentia Avenue	73.1	73.3	0.2	No	No
Harvill Avenue	s/o Orange Avenue	73	73.2	0.2	No	No
Harvill Avenue	s/o A Street	74.3	74.5	0.2	No	No
Rider Street	e/o Patterson Avenue	64	64.8	0.8	No	No
Placentia Street	e/o Patterson Avenue	57.3	59.9	2.7	Yes	No
Placentia Street	e/o Dwy. 2	57.4	60.8	3.4	Yes	No

As shown above, the off-site traffic noise level increases can be expected to range from 0.2 to 3.5 dBA CNEL. Based on the FICON significance criteria discussed previously, impacts would be less than significant under the EAC scenario.

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With Placentia Avenue/Interstate 215 Interchange Conditions

Tables 4.13.12 through 4.13.15 present the noise contours developed for all scenarios With Placentia Avenue/Interstate 215 Interchange Conditions.

Table 4.13.12 – EA without Project Conditions Noise Contours
(With Placentia Avenue/Interstate 215 Interchange Conditions)

Road	Segment	Adjacent Planned (Existing) Land Use	CNEL at Nearest Adjacent Land Use (dBA)	Distance to Contour from Centerline (Feet)		
				70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
Patterson Avenue	n/o Walnut Street	Residential	56.1	RW	RW	RW
Patterson Avenue	n/o Placentia Avenue	Business Park (BP)/Residential	56.7	RW	RW	RW
Harvill Avenue	s/o Cajalco Expressway	Light Industrial (LI)	74.5	119	255	550
Harvill Avenue	s/o Rider Street	BP/LI	74.9	124	268	577
Harvill Avenue	s/o Placentia Avenue	BP/LI	73.6	102	221	475
Harvill Avenue	s/o Orange Avenue	BP/LI	72.9	92	198	426
Harvill Avenue	s/o A Street	BP/Commercial	75	126	272	587
Rider Street	e/o Patterson Avenue	BP/LI	64	RW	RW	92
Placentia Street	e/o Patterson Avenue	BP/Residential	57.3	RW	RW	RW
Placentia Street	e/o Dwy. 2	BP/Residential	57.4	RW	RW	RW

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Table 4.13.13 – EA with Project Conditions Noise Contours
(With Placentia Avenue/Interstate 215 Interchange Conditions)

Road	Segment	Adjacent Planned (Existing) Land Use	CNEL at Nearest Adjacent Land Use (dBA)	Distance to Contour from Centerline (Feet)		
				70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
Patterson Avenue	n/o Walnut Street	Residential	56.5	RW	RW	RW
Patterson Avenue	n/o Placentia Avenue	Business Park (BP)/Residential	57.3	RW	RW	RW
Harvill Avenue	s/o Cajalco Expressway	Light Industrial (LI)	74.6	120	258	556
Harvill Avenue	s/o Rider Street	BP/LI	74.9	125	270	582
Harvill Avenue	s/o Placentia Avenue	BP.LI	73.6	103	223	477
Harvill Avenue	s/o Orange Avenue	BP/LI	72.9	92	234	428
Harvill Avenue	s/o A Street	BP/Commercial	75	127	273	588
Rider Street	e/o Patterson Avenue	BP/LI	64	RW	RW	93
Placentia Street	e/o Patterson Avenue	BP/Residential	57.8	RW	RW	RW
Placentia Street	e/o Dwy. 2	BP/Residential	59.1	RW	RW	RW

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Table 4.13.14 – EAC without Project Conditions Noise Contours
(With Placentia Avenue/Interstate 215 Interchange Conditions)

Road	Segment	Adjacent Planned (Existing) Land Use	CNEL at Nearest Adjacent Land Use (dBA)	Distance to Contour from Centerline (Feet)		
				70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
Patterson Avenue	n/o Walnut Street	Residential	56.1	RW	RW	RW
Patterson Avenue	n/o Placentia Avenue	Business Park (BP)/Residential	56.7	RW	RW	RW
Harvill Avenue	s/o Cajalco Expressway	Light Industrial (LI)	75.4	135	290	625
Harvill Avenue	s/o Rider Street	BP/LI	75.5	138	297	639
Harvill Avenue	s/o Placentia Avenue	BP.LI	74.5	117	252	544
Harvill Avenue	s/o Orange Avenue	BP/LI	73.9	107	231	497
Harvill Avenue	s/o A Street	BP/Commercial	75.6	140	301	648
Rider Street	e/o Patterson Avenue	BP/LI	64	RW	RW	92
Placentia Street	e/o Patterson Avenue	BP/Residential	57.3	RW	RW	RW
Placentia Street	e/o Dwy. 2	BP/Residential	57.4	RW	RW	RW

Table 4.13.15 – EAC with Project Conditions Noise Contours
(With Placentia Avenue/Interstate 215 Interchange Conditions)

Road	Segment	Adjacent Planned (Existing) Land Use	CNEL at Nearest Adjacent Land Use (dBA)	Distance to Contour from Centerline (Feet)		
				70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
Patterson Avenue	n/o Walnut Street	Residential	56.5	RW	RW	RW
Patterson Avenue	n/o Placentia Avenue	Business Park (BP)/Residential	57.3	RW	RW	RW
Harvill Avenue	s/o Cajalco Expressway	Light Industrial (LI)	75.4	136	293	631
Harvill Avenue	s/o Rider Street	BP/LI	75.6	139	299	644
Harvill Avenue	s/o Placentia Avenue	BP.LI	74.5	117	253	545
Harvill Avenue	s/o Orange Avenue	BP/LI	73.9	107	231	498

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Road	Segment	Adjacent Planned (Existing) Land Use	CNEL at Nearest Adjacent Land Use (dBA)	Distance to Contour from Centerline (Feet)		
				70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
Avenue	Avenue					
Harvill Avenue	s/o A Street	BP/Commercial	75.6	140	301	649
Rider Street	e/o Patterson Avenue	BP/LI	64	RW	RW	93
Placentia Street	e/o Patterson Avenue	BP/Residential	57.8	RW	RW	RW
Placentia Street	e/o Dwy. 2	BP/Residential	59.1	RW	RW	RW

Table 4.13.16 presents the Existing plus Ambient Growth (EA) with and without Project conditions CNEL noise levels.

Table 4.13.16 – Unmitigated EA with Project Traffic Noise Impacts
(With Placentia Avenue/Interstate 215 Interchange Conditions)

Road	Segment	CNEL at Adjacent Land Use (dBA)			Noise- Sensitive Land Use?	Threshold Exceeded?
		No Project	With Project	Project Addition		
Patterson Avenue	n/o Walnut Street	56.1	56.5	0.4	Yes	No
Patterson Avenue	n/o Placentia Avenue	56.7	57.3	0.6	Yes	No
Harvill Avenue	s/o Cajalco Expressway	74.5	74.6	0.1	No	No
Harvill Avenue	s/o Rider Street	74.9	74.9	0.1	No	No
Harvill Avenue	s/o Placentia Avenue	73.6	73.6	0.0	No	No
Harvill Avenue	s/o Orange Avenue	72.9	72.9	0.0	No	No
Harvill Avenue	s/o A Street	75	75	0.0	No	No
Rider Street	e/o Patterson Avenue	64	64.1	0.1	No	No
Placentia Street	e/o Patterson Avenue	57.3	57.8	0.5	Yes	No
Placentia Street	e/o Dwy. 2	57.4	59.1	1.7	Yes	No

As shown above, Project off-site traffic noise level increases will range from 0.0 to 1.7 dBA CNEL.

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Based on the significance criteria for off-site traffic noise discussed previously, land uses adjacent to the study area roadway segments would experience less than significant noise level impacts due to unmitigated Project-related traffic noise levels under the EA scenario.

Table 4.13.17 presents the Existing plus Ambient Growth plus Cumulative (EAC) with and without Project conditions CNEL noise levels.

Table 4.13.17 – Unmitigated EAC with Project Traffic Noise Impacts
(With Placentia Avenue/Interstate 215 Interchange Conditions)

Road	Segment	CNEL at Adjacent Land Use (dBA)			Noise-Sensitive Land Use?	Threshold Exceeded?
		No Project	With Project	Project Addition		
Patterson Avenue	n/o Walnut Street	56.1	56.5	0.4	Yes	No
Patterson Avenue	n/o Placentia Avenue	56.7	57.3	0.6	Yes	No
Harvill Avenue	s/o Cajalco Expressway	75.4	75.4	0.1	No	No
Harvill Avenue	s/o Rider Street	75.5	75.6	0.0	No	No
Harvill Avenue	s/o Placentia Avenue	74.5	74.5	0.0	No	No
Harvill Avenue	s/o Orange Avenue	73.9	73.9	0.0	No	No
Harvill Avenue	s/o A Street	75.6	75.6	0.0	No	No
Rider Street	e/o Patterson Avenue	64	64	0.1	No	No
Placentia Street	e/o Patterson Avenue	57.3	57.8	0.5	Yes	No
Placentia Street	e/o Dwy. 2	57.4	59.1	1.7	Yes	No

As shown above, under EAC with Project conditions, Project off-site traffic noise level increases will range from 0.0 to 1.7 dBA CNEL. Based on the significance criteria discussed previously, land uses adjacent to the study area roadway segments would experience less than significant noise level impacts due to unmitigated Project-related traffic noise levels under this scenario.

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Sensitive Receiver Locations

Sensitive receivers are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect use of the land. Noise-sensitive land uses generally are considered to include the following: schools; hospitals; single-family dwellings; mobile home parks; churches; libraries; and, recreation areas. Moderately noise-sensitive land uses typically include the following: multi-family dwellings; hotels; motels; dormitories; out-patient clinics; cemeteries; golf courses; country clubs; athletic/tennis clubs; and, equestrian clubs. Land uses considered relatively insensitive to noise include business, commercial, and professional developments. Land uses typically not affected by noise include the following: industrial; manufacturing; utilities; agriculture; natural open space; undeveloped land; parking lots; warehousing; liquid and solid waste facilities; salvage yards; and, transit terminals.

To assess potential for long-term operational and short-term construction noise impacts, the following sensitive receiver (receptor) locations (reference **Exhibit 4.13-1**) were identified as representative locations for analysis.

R1 – Located approximately 66 feet north of the Project site; represents existing residential homes on the east side of Patterson Avenue. A 24-hour noise measurement was taken near this location to describe the existing ambient noise environment.

R2 – Represents existing residential outdoor living areas (backyards) located east of the Project site at roughly 10 feet, on the north side of Placentia Street. A 24-hour noise measurement was taken near this location to describe the existing ambient noise environment.

R3 – Represents existing residential outdoor living areas (backyards) located east of the Project site at roughly 10 feet, on the north side of Placentia Street. A 24-hour noise measurement near this location is used to describe the existing ambient noise environment.

R4 – Represents the existing residential home located roughly 112 feet south of the Project site, south of Placentia Street. A 24-hour noise measurement near this location is used to describe the existing ambient noise environment.

R5 – Located approximately 102 feet west of the Project site, represents existing residential homes on the west side of Patterson Avenue. A 24-hour noise measurement was taken near this location to describe the existing ambient noise environment.

Sensitive receiver locations in the Project study area include residential uses, as described above. Other sensitive land uses in the Project study area that are located at greater distances than those identified in this noise study will experience lower noise levels than those presented in this report due to the additional attenuation from distance and the shielding of intervening structures.

Operational Noise Levels

The Noise Impact Analysis prepared for the Project collected data and/or made assumptions pertaining to the following noise sources to assist in analyzing potential stationary-source operational noise impacts at the nearby sensitive receiver locations noted above: idling trucks; delivery truck activities; backup alarms; loading/unloading of dry goods; roof-top air conditioning units; and, parking lot vehicle movements. These noise level impacts likely will vary throughout the day. The reference noise level

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measurements used to estimate Project operational noise impacts are shown in **Table 4.13.18**.

Table 4.13.18 – Reference Noise Level Measurements

Noise source	Duration (hh:mm:ss)	Ref. Distance (Feet)	Noise Source Height (Feet)	Reference Noise Level (dBA L_{eq})		Sound Power Level (dBA)
				@ Ref. Dist.	@ 50 Feet	
Truck Unloading/Docking Activity	00:15:00	30	8	67.2	62.8	94.5
Roof-Top Air Conditioning Units	96:00:00	5	5	77.2	57.2	88.9
Parking Lot vehicle Movements	01:00:00	10	5	52.2	41.7	73.4

Based on the reference noise levels presented above, the following **Table 4.13.19** shows individual operational noise levels of each noise source at each of the nearby sensitive receiver locations.

Table 4.13.19 – Unmitigated Project-Only Operational Noise Levels

Receiver Location	Noise Levels by Noise Source (dBA L_{eq})			Combined Operational Noise Levels (dBA L_{eq})
	Truck Unloading and Docking Activity	Roof-Top Air Conditioning Units	Parking Lot vehicle Movements	
R1	36.4	35.8	28.2	39.5
R2	41.8	33.6	18.6	42.4
R3	38.6	35.3	28.9	40.6
R4	22.8	36.4	22.5	36.8
R5	40	36	14.5	41.5

Based on the above noise levels, **Table 4.13.20** shows the operational noise level compliance. As shown, County of Riverside exterior noise level standards at receiver location R2 will be exceeded during nighttime hours. This is a potentially significant impact. All receiver locations will experience less than significant unmitigated noise impacts during daytime hours.

Table 4.13.20 – Unmitigated Operational Noise Level Compliance

Receiver Location	Noise Level at Receiver Locations (dBA L_{eq})	Threshold Exceeded	
		Daytime (65 dBA L_{eq})	Nighttime (45 dBA L_{eq})
R1	39.5	No	No
R2	42.4	No	Yes
R3	40.6	No	No
R4	36.8	No	No
R5	41.5	No	No

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To reduce the impact at location R2, a 17-foot wall is required along the Project’s easterly boundary (in addition to the 14-foot wall proposed along the westerly boundary). The 17-foot wall is required by Mitigation Measure MM-N-1, presented subsequently. Please also refer to Exhibit 2-6, *Proposed Site Plan*, for the location of the required walls. With the implementation of this mitigation, impacts would be reduced to less than significant.

Construction Noise

Noise generated by Project construction equipment (trucks; power tools; concrete mixers; portable generators) can reach high levels. The number and mix of construction equipment are expected to occur in the following stages: site preparation; grading; building construction; architectural coating; and, paving. The Noise Impact Analysis prepared for the Project used reference noise level measurements taken to describe typical construction activity noise levels for each state of Project construction. Noise levels generated by heavy construction equipment can range from approximately 68 dBA to more than 80 dBA when measured at 50 feet, but diminish with distance from the construction site at a rate of 6 dBA per doubling of distance.

Based on the reference noise levels, **Tables 4.13.21 through 4.13.25** present short-term construction noise levels at each of the five sensitive receiver locations for each stage of construction.

Table 4.13.21 – Site Preparation Equipment Noise Levels

Reference Construction Activity	Reference Noise Level @ 50 Feet (dBA L _{eq})
Truck Pass-Bys and Dozer Activity	59.2
Dozer Activity	64.2
Dozer Pass-By	79.6
Highest Reference Noise Level at 50 Feet (dBA L _{eq})	79.6

Receiver Location	Distance to Construction Activity (Feet)	Distance Attenuation (dBA L _{eq})	Estimated Noise Barrier Attenuation (dBA L _{eq})	Construction Noise Level (dBA L _{eq})
R1	86	-4.7	0.0	74.9
R2	50	0.0	0.0	79.6
R3	70	-2.9	0.0	76.6
R4	145	-9.2	0.0	70.3
R5	130	-8.3	0.0	71.3

Table 4.13.22 – Grading Equipment Noise Levels

Reference Construction Activity	Reference Noise Level @ 50 Feet (dBA L _{eq})
Truck Pass-Bys and Dozer Activity	59.2
Dozer Activity	64.2
Rough Grading Activities	73.5
Highest Reference Noise Level at 50 Feet (dBA L _{eq})	73.5

Receiver Location	Distance to Construction Activity (Feet)	Distance Attenuation (dBA L _{eq})	Estimated Noise Barrier Attenuation (dBA L _{eq})	Construction Noise Level (dBA L _{eq})
R1	86	-4.7	0.0	68.8
R2	50	0.0	0.0	73.5
R3	70	-2.9	0.0	70.5
R4	145	-9.2	0.0	64.2
R5	130	-8.3	0.0	65.2

Table 4.13.23 – Building Construction Equipment Noise Levels

Reference Construction Activity	Reference Noise Level @ 50 Feet (dBA L _{eq})
Construction Vehicle Maintenance Activities	67.5
Foundation trenching	68.2
Framing	62.3
Highest Reference Noise Level at 50 Feet (dBA L _{eq})	62.3

Receiver Location	Distance to Construction Activity (Feet)	Distance Attenuation (dBA L _{eq})	Estimated Noise Barrier Attenuation (dBA L _{eq})	Construction Noise Level (dBA L _{eq})
R1	86	-4.7	0.0	63.5
R2	50	0.0	0.0	68.2
R3	70	-2.9	0.0	65.2
R4	145	-9.2	0.0	58.9
R5	130	-8.3	0.0	59.9

Table 4.13.24 – Architectural Coating Equipment Noise Levels

Reference Construction Activity	Reference Noise Level @ 50 Feet (dBA L _{eq})
Construction Vehicle Maintenance Activities	67.5
Framing	62.3
Highest Reference Noise Level at 50 Feet (dBA L _{eq})	67.5

Receiver Location	Distance to Construction Activity (Feet)	Distance Attenuation (dBA L _{eq})	Estimated Noise Barrier Attenuation (dBA L _{eq})	Construction Noise Level (dBA L _{eq})
R1	86	-4.7	0.0	62.8
R2	50	0.0	0.0	67.5
R3	70	-2.9	0.0	64.5
R4	145	-9.2	0.0	58.2
R5	130	-8.3	0.0	59.2

Table 4.13.25 – Paving Equipment Noise Levels

Reference Construction Activity	Reference Noise Level @ 50 Feet (dBA L _{eq})
Concrete Mixer Truck Movements	71.2
Concrete Paver Activities	65.6
Concrete Mixer Pour and Paving Activities	65.9
Concrete Mixer Backup Alarms and Air Brakes	71.6
Concrete Mixer Pour Activities	67.7
Highest Reference Noise Level at 50 Feet (dBA L _{eq})	71.6

Receiver Location	Distance to Construction Activity (Feet)	Distance Attenuation (dBA L _{eq})	Estimated Noise Barrier Attenuation (dBA L _{eq})	Construction Noise Level (dBA L _{eq})
R1	86	-4.7	0.0	66.9
R2	50	0.0	0.0	71.6
R3	70	-2.9	0.0	68.7
R4	145	-9.2	0.0	62.4
R5	130	-8.3	0.0	68.3

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Based on the noise levels presented in preceding Tables 4.13.21 through 4.13.25, **Table 4.13.26** presents the peak noise levels that can be expected at the receiver locations during construction. As shown, noise levels are expected to range from 58.2 to 79.6 dBA L_{eq} .

TABLE 4.13.26 – Unmitigated Construction Noise Levels

Receiver Location	Construction Noise Level (dBA L_{eq})					
	Site Preparation	Grading	Building Construction	Architectural Coating	Paving	Highest Activity Noise Levels
R1	74.9	68.8	63.5	62.8	66.9	74.9
R2	79.6	73.5	68.2	67.5	71.6	79.6
R3	76.6	70.5	65.2	64.5	68.7	76.6
R4	70.3	64.2	58.9	58.2	62.4	70.3
R5	71.3	65.2	59.9	59.2	63.3	71.3

The County of Riverside does not have a specific standard for construction activities. As such, a significance threshold of 85 dBA L_{eq} from the National Institute for Safety and Health (NIOSH) has been employed for analysis. **Table 4.13.27** provides a summary of noise level compliance with the applicable threshold, as received at each of the receiver locations.

Table 4.13.27 –Construction Equivalent Noise Levels Compliance

Receiver Location	Construction Noise Levels (dBA L_{eq})		
	Highest Construction Noise Levels	Threshold	Threshold Exceeded?
R1	74.9	85	No
R2	79.6	85	No
R3	76.6	85	No
R4	70.3	85	No
R5	71.3	85	No

As shown above, noise levels associated with Project construction would not exceed the NIOSH significance threshold at any location. As such, construction noise impacts of the Project are considered less than significant.

Summary

Based on the preceding discussions, impacts resulting from Project-related traffic and construction noise would be less than significant. Operational noise has been mitigated to a less than significant level, with the implementation of Mitigation Measure MM-N-1. As such, the potential for the Project to generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies is considered less than significant, as mitigated.

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b) Generation of excessive ground-borne vibration or ground-borne noise levels?

Potentially Significant.

Operational Vibration

Project operation will include heavy trucks moving on-site to and from loading docks. Truck vibration levels are dependent on vehicle characteristics, load, speed, and pavement conditions. Trucks transitioning on-site will be traveling at very low speeds. Therefore, it is expected that delivery truck vibration at nearby residences will not exceed the 0.01 in/sec root-mean-square velocity (RMS) vibration threshold set forth by the County of Riverside. As such, operational vibration impacts of the Project are considered less than significant.

Construction Vibration

Construction activity can result in varying degrees of ground vibration, depending on equipment and methods used, distance to the affected structures, and soil type. It is expected that ground-borne vibration from Project construction activities would cause only intermittent, localized intrusion. Project construction activities most likely to cause vibration impacts are the following:

- Heavy Construction Equipment – Although all heavy mobile construction equipment has the potential of causing at least some perceptible vibration while operating close to buildings, the vibration is usually short-term and is not of sufficient magnitude to cause building damage.
- Trucks – Trucks hauling building materials to construction sites can be sources of vibration intrusion if the haul routes pass through residential neighborhoods on streets with bumps or potholes; repairing bumps and potholes generally eliminates the problem.

The Noise Impact Analysis prepared for the Project estimated ground-borne vibration levels resulting from construction activities occurring within the Project site using data published by the Federal Transit Administration. The following **Table 4.13.28** presents expected Project related vibration levels at the nearby receiver locations.

Table 4.13.28 – Unmitigated Project Construction Vibration Levels

Receiver	Dist. To Const. Activity (Feet)	Receiver PPV Levels (in/des)					RMS Velocity Levels (in/sec)	Threshold	Threshold Exceeded?
		Small Bulldozer	Jack-hammer	Loaded Trucks	Large Bulldozer	Peak Vibration			
R1	86	0.0005	0.0055	0.0119	0.0139	0.0139	0.0099	0.01	No
R2	50	0.0011	0.0124	0.0269	0.0315	0.0315	0.0223	0.01	Yes
R3	70	0.0006	0.0075	0.0162	0.0190	0.0190	0.0135	0.01	Yes
R4	145	0.0002	0.0025	0.0054	0.0064	0.0064	0.0045	0.01	No
R5	130	0.0003	0.0030	0.0064	0.0075	0.0075	0.0053	0.01	No

As shown above, at distances ranging from 50 to 145 feet from primary construction activities, construction vibration velocity levels are expected to approach 0.022 in/sec RMS. This will exceed the County of Riverside RMS vibration threshold of 0.01in/sec at selected receiver locations east of the Project site. Therefore, Project-related vibration impacts will be potentially significant during Project development (construction).

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To this end, Mitigation Measure MM-N-2 would restrict use of large loaded trucks and dozers (greater than 80,000 pounds) within 90 feet of occupied sensitive receptors east of the Project site. **Table 4.13.29** presents the vibration levels that can be expected with the implementation of Mitigation Measure MM-N-2.

Table 4.13.29 – Mitigated Project Construction Vibration Levels

Receiver	Dist. To Const. Activity (Feet)	Mitigated Receiver PPV Levels (in/sec)					RMS Velocity Levels (in/sec)	Threshold	Threshold Exceeded?
		Small Bulldozer	Jack-Hammer	Loaded Trucks	Large Bulldozer	Peak Vibration			
R2	90	--	--	0.0111	0.0130	0.0130	0.0093	0.01	No
R3	90	--	--	0.0111	0.0130	0.0130	0.0093	0.01	No

As shown above, mitigated vibration levels within the 90-foot buffer zone will be reduced to 0.0093 in/sec RMS and would not exceed the County of Riverside perceptible vibration threshold of 0.01 in/sec RMS.

Project construction-related vibration levels do not represent vibration levels capable of causing building damage to nearby residences. Construction vibration levels capable of building damage range from 0.12 to 0.5 in/sec PPV. The peak Project-construction vibration levels approaching 0.031 in/sec PPV will remain below levels capable of causing building damage at the nearest residences. Furthermore, vibration levels at the closest sensitive receptors are unlikely to be sustained during the entire construction period; rather the levels will occur only during times that heavy construction equipment is operating adjacent to the Project site perimeter.

4.13.4 CUMULATIVE IMPACTS

Noise Thresholds (Airport Noise) a) and b) – The Project site is not located within two miles of a public airport or public use airport or within the vicinity of a private airstrip. Therefore, Project development and operation would not result in a cumulatively considerable impact.

Noise Thresholds (Project Noise) a) and b) –. Based on the preceding analysis, noise levels associated with Project construction would not exceed applicable thresholds. There are no known active or pending development projects in the immediate vicinity of the Project site that would overlap with the Project’s construction schedule. As such, the Project’s contribution to the cumulative exposure of sensitive receptors to substantial temporary increases in ambient noise levels due to construction is considered less than significant.

As mitigated, operational noise levels will not contribute a long-term noise level impact to the existing ambient noise environment at any sensitive receptor locations. Therefore, permanent stationary noise impacts would not cumulatively considerable.

In addition, with implementation of specified mitigation, identified Project construction vibration impacts to adjacent residences will be reduced to a less than significant level.

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Project traffic (operational) noise impacts or vibration impacts would not be cumulative considerable under short-term or long-term cumulative conditions.

4.13.5 EXISTING REGULATIONS AND STANDARD CONDITIONS

To limit population exposure to physically and/or psychologically damaging as well as intrusive noise levels, the Federal government, the State of California, various county governments, and most municipalities in the State have established standards and ordinances to control noise. In most areas, automobile and truck traffic is the major source of environmental noise. Traffic activity generally produces an average sound level that remains constant with time. Air and rail traffic and commercial and industrial activities also are major sources of noise in some areas. 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.

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 each city and county adopt a General Plan that includes a Noise Element.

The 2016 State of California Green Building Standards Code contains mandatory measures for non-residential building construction. These noise standards are applied to new construction in California for controlling interior noise levels resulting from exterior noise sources. The regulations specify acoustical studies must be prepared when non-residential structures are developed in areas where 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.

County of Riverside General Plan Policies

The County of Riverside has adopted a Noise Element of its General Plan to control and abate environmental noise and to protect the citizens of County of Riverside from excessive exposure to noise. The Noise Element specifies maximum allowable exterior noise levels for new developments impacted by transportation noise sources such as arterial roads, freeways, airports and railroads. The Noise Element also identifies several policies to minimize impacts of excessive noise levels throughout the community and establishes noise level requirements for all land uses. The Noise Element contains the following policies related to the Project.

Policy N 1.1 – Protect noise sensitive land uses from high levels of noise by restricting noise-producing land uses from these areas. If the noise-producing land use cannot be relocated, then noise buffers such as setbacks, landscaping, or block walls should be used.

Policy N 1.3 – Consider the following uses noise-sensitive and discourage these uses in areas in excess of 65 CNEL:

- Schools
- Hospitals
- Rest Homes
- Long Term Care Facilities
- Mental Care Facilities

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- Residential Uses
- Libraries
- Passive Recreation Uses
- Places of Worship

Policy N 1.5 – Prevent and mitigate the adverse impacts of excessive noise exposure on the residents, employees, visitors, and noise-sensitive uses of Riverside County.

Policy N 4.1 – Prohibit facility-related noise, received by any sensitive use, from exceeding the following worst-case noise levels:

- a) 45 dBA 10-minute L_{eq} between 10:00 p.m. and 7:00 a.m.
- b) 65 dBA 10-minute L_{eq} between 7:00 a.m. and 10:00 p.m.

Policy 13.1 – Minimize the impacts of construction noise on adjacent uses within acceptable standards.

Policy 13.2 – Ensure that construction activities are regulated to establish hours of operation in order to prevent and/or mitigate the generation of excessive or adverse impacts on surrounding areas.

Policy 13.3 – Condition subdivision approval adjacent to developed/occupied noise-sensitive land uses (see policy N 1.3) by requiring the developer to submit a construction-related noise mitigation plan to the [County] for review and approval prior to issuance of a grading permit. The plan must depict the location of construction equipment and how the noise from this equipment will be mitigated during construction of the project, through the use of such methods as:

- i. Temporary noise attenuation fences;
- ii. Preferential location and equipment; and
- iii. Use of current noise suppression technology and equipment.

Policy N 16.3 – Prohibit exposure of residential dwellings to perceptible ground vibration from passing trains as perceived at the ground or second floor. Perceptible motion shall be presumed to be a motion velocity of 0.01 inches/second over a range of 1 to 100 Hz.

As indicated above in Policy N 4.1, the County-established exterior noise limit not to be exceeded for a cumulative period of more than 10 minutes limits noise from idling trucks, delivery truck activities, backup alarms, loading and unloading of dry goods, roof-top air conditioning units and parking lot vehicle movements - - all of which are associated with Project operation. The County considers noise generated using motor vehicles to be a stationary noise source when operated on private property such as at a loading dock. 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 10 minutes standard in Policy N 4.1.

Standard Conditions

Neither the County 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 a substantial temporary or periodic noise increase. However, to control noise impacts associated with Project development, the County of Riverside has established limits to hours of operation. Riverside County Ordinance No. 847 (May 14, 2006), as Amended through No. 847.1 (July 19,

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2007) establishes limits on construction noise, although this ordinance states it “is not intended to establish thresholds of significance for the purpose of any analysis required by the California Environmental Quality Act and no such thresholds are hereby established.” Maximum noise levels for uses established within the Business Park zone are 65 decibels between 10:00 a.m. and 7:00 p.m. and 45 decibels between 7:00 p.m. and 10:00 a.m. Maximum noise levels for uses established within the Light Industrial zone are 75 decibels between 10:00 a.m. and 7:00 p.m. and 55 decibels between 7:00 p.m. and 10:00 a.m. The Noise Ordinance provides as follows - - “No person shall create any sound, or allow the creation of any sound, on any property that causes the exterior sound level on any other occupied property to exceed the sound level standards....”

4.13.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

As determined within the preceding analysis, the Project would have potentially significant operational noise and construction vibration impacts. All other impacts would be less than significant.

4.13.7 MITIGATION MEASURES

Compliance with County of Riverside General Plan policies and with County of Riverside Standard Conditions would contribute to ensuring any Project-related impacts to Noise would be reduced to a less than significant level. In addition, the Noise Impact Analysis prepared for the Project recommends the following Mitigation Measures be required of Project development and operation. Please note the transmission loss requirement of 20 dBA (noted in MM-N-1) is intended to describe the type of material used for the recommended sound barrier. This transmission loss is NOT the sound attenuation or performance rating of the actual barrier. If the barrier does not have adequate sound transmission properties, the noise will simply go through the barrier. For example, a wood or vinyl fence will not provide the minimum transmission loss rating needed to provide the necessary sound attenuation for the barrier.

MM-N-1 – The following noise barrier is required to reduce the operational noise level impacts to owned and/or occupied noise-sensitive uses at the time of Project operation.

- A minimum 17-foot tall noise barrier at the eastern truck court boundary is required. The barrier shall provide a weight of at least four (4) pounds per square foot of face area with no decorative cutouts or line-of-sight openings between shielded areas and the roadways, or a minimum transmission loss of 20dBA. The barriers shall consist of a solid face from top to bottom. Unnecessary openings or decorative cutouts shall not be made. All gaps (except for weep holes) should be filled with grout or caulking. The noise barriers shall be constructed using the following materials:
 - Masonry block;
 - Earthen berm;
 - Or any combination of construction materials capable of the minimum weight of 4 pounds per square foot or a minimum transmission loss of 20 dBA.

MM-N-2 – For Project-related construction activities, large loaded trucks and dozers (greater than 80,000 pounds) shall not be used within 90 feet of owned and occupied noise-sensitive residential homes east of the Project site as identified in the Noise Impact Analysis prepared for the Project during construction activities. Instead, small rubber-tired or alternative equipment shall be used within this area during Project construction to reduce vibration effects.

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4.13.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Table 4.13.30 indicates a summary of findings of significance for each potential noise and/or vibration impact before and after any required Mitigation Measures.

Table 4.13.30 – Summary of Significance Findings

Analysis	Significance Findings	
	Unmitigated	Mitigated
Off-Site Traffic Noise	Less than Significant	--
Operational Noise	Potentially Significant	Less than Significant
Operational Vibration	Less than Significant	--
Construction Noise	Less than Significant	--
Construction Vibration	Potentially Significant	Less than Significant

As shown, with the incorporation of Mitigation Measures MM-N-1 and MM-N-2, all noise impacts are considered less than significant.

Exh 4.13-1
Sensitive Receiver
Locations



LEGEND:

- Receiver Locations
- Distance from receiver to Project site boundary (in feet)

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4.14 PALEONTOLOGICAL RESOURCES

Information within this Section is based on *Paleontological Resource Assessment and Impact Mitigation Program, for the Barker Logistics (APN 317-240-001-8) Project in Perris, Riverside County, California* (Environmental Planning Group, LLC) March 28, 2019.

The Paleontological Resource Assessment and Impact Mitigation Program (PRIMP) is presented as Appendix Q to this EIR.

4.14.1 ENVIRONMENTAL SETTING

The 31.55-acre Project site is vacant, largely covered by weeds, and has some vegetation including trees in its southerly portion, and shows evidence of previous grading. The Project site is located within the Perris Block, between the Santa Ana Mountains to the southwest and the San Jacinto Mountains to the northeast. The Perris Block is a highland bounded by the Elsinore-Chino fault zones to the southwest and the San Jacinto Fault Zone to the northeast.

The nearest fossil locality to the Project site comes from the Clarendonian Land Mammal Age near Lake Matthews, approximately 8.5 miles west of the Project site. This fossil assemblage originates from the Lake Matthews Formation - a geologic unit that is not present on the Project site or in the Project vicinity. Several localities have been reported from Pleistocene and Pliocene deposits farther to the southeast, but within the Elsinore Fault Zone. Although fossils from Pleistocene deposits are rare, the deposits can occur in southern California.

The State Geological Map of California indicates the Project site overlies Quaternary alluvium and marine deposits described as alluvium, lake, playa, and terrace deposits that are of late to middle Pleistocene in age. This unit is described as mostly well-dissected, well-indurated, reddish-brown alluvial fan deposits.

The parcel report from Riverside County classifies the geological unit underlying the Project site as having a High (B) sensitivity for paleontological resources indicating that fossils could occur at or below a depth of four feet (the report also states that after a comprehensive review of the literature, a record search, and a field survey, it may be determined that the geological unit for this area has a LOW (L) potential for paleontological resources.)

4.14.2 THRESHOLDS OF SIGNIFICANCE

The County of Riverside has adopted Thresholds of Significance that vary in some cases topically and in format from the Appendix G Thresholds, as reflected in the Initial Study prepared for the Project. This EIR uses the following County-adopted Thresholds of Significance to comprise the basis of impact analyses.

- a) **Would the Project directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature?**

4.14.3 ENVIRONMENTAL IMPACTS

- a) **Would the Project directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature?**

Potentially Significant. Preparation of the PRIMP included literature review, a record search, and a field survey. No unique geologic features or paleontological resources have been identified on or near the Project site. Specifically, the literature review and record search revealed no reported/recorded fossil localities within one mile of the Project site.

Regardless, due to the presence of other Quaternary fossil localities in southern California and the sediments present beneath the Project site, the Western Science Center recommended that a Mitigation Program be in place for the Project. To this end, the PRIMP contains a detailed Paleontological Monitoring Plan for the Project. The Plan requires monitoring of grading, sets forth procedures to be employed should paleontological resources be encountered, and details proper documentation of Plan implementation. Adherence to the Paleontological Monitoring Plan, as required by **Mitigation Measure MM-PR-1**, would ensure impacts to paleontological resources would be less than significant.

4.14.4 CUMULATIVE IMPACTS

Paleontological Resources Threshold a) – No paleontological resources have been identified on or near the Project site. There is the possibility that Project development (grading and construction) may reveal fossils, as is the case with other potential projects in the vicinity of the Project site. Cumulative development thereby has the potential to unearth paleontological resources. This is a potentially cumulatively considerable impact that requires mitigation. Adherence to the Paleontological Monitoring Plan, as required by **Mitigation Measure MM-PR-1**, would ensure the Project's contribution to cumulative Paleontological Resources impacts would be less than significant.

4.14.5 EXISTING REGULATIONS AND STANDARD CONDITIONS

Riverside County General Plan

The Riverside County General Plan Cultural and Paleontological Resources Element indicates Riverside County Planning Department procedures include the Riverside County Geologist conducting an initial review of the County's database and mapped information for the Project site to ensure review and protection of paleontological resources. If the existing information would indicate a project has high paleontological sensitivity, a paleontological resource impact mitigation program (PRIMP) would be required for the project. The PRIMP is required to specify steps to be taken to mitigate impacts to paleontological resources. If the project site were to warrant protection, an "Environmental Constraint" will be placed on the approved map.

When existing information indicates a site proposed for development has low paleontological sensitivity, no direct mitigation is required unless a fossil is encountered during a project site's development. Should a fossil be encountered, the Riverside County Geologist must be notified and a paleontologist must be retained by the project proponent. The paleontologist then would document the extent and potential

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significance of the paleontological resource(s) on the site and establish appropriate mitigation measures for future site development.

When existing information indicates a site proposed for development has undetermined paleontological sensitivity, a report is filed with the Riverside County Geologist that documents the extent and potential significance of the paleontological resources on site and that identifies mitigation measures for the fossil and for impacts to significant paleontological resources.

Standard Conditions

Following is a relevant General Condition for “Projects Located Completely within the Low Potential Zone” contained in the Riverside County General Plan. The Low Potential Zone encompasses lands for which previous field surveys and documentation demonstrated a low potential for containing significant paleontological resources subject to adverse impacts. As such, the project would not be anticipated to require any direct mitigation for paleontological resources. However, should fossil remains be encountered during site development the following conditions must be met - -

- All site earthmoving shall be ceased in the area of where the fossil remains are encountered. Earthmoving activities may be diverted to other areas of the site.
- The owner of the property shall be immediately notified of the fossil discovery and shall in turn immediately notify the Riverside County Geologist of the discovery.
- The applicant shall retain a qualified paleontologist approved by the County of Riverside.
- The paleontologist shall determine the significance of the encountered fossil remains.
- Paleontological monitoring of earthmoving activities will continue thereafter on an as-needed basis by the paleontologist during all earthmoving activities that may expose sensitive strata. Earthmoving activities in areas of the project area where previously undisturbed strata will be buried, but not otherwise disturbed, need not be monitored. The supervising paleontologist will have the authority to reduce monitoring once he/she determines the probability of encountering any additional fossils has dropped below an acceptable level.
- If fossil remains are encountered by earthmoving activities when the paleontologist is not on site, these activities will be diverted around the fossil site and the paleontologist called to the site immediately to recover the remains.
- Any recovered fossil remains will be prepared to the point of identification and identified to the lowest taxonomic level possible by knowledgeable paleontologists. The remains then will be curated (assigned and labeled with museum [or] repository fossil specimen numbers and corresponding fossil site numbers, as appropriate; placed in specimen trays or vials [along] with completed specimen data cards) and catalogued. Associated specimen data and corresponding geologic and geographic site data will be archived (specimen and site numbers, and corresponding data, entered into appropriate museum repository catalogs and computerized databases) at the museum [or] repository fossil collection, where they will be permanently stored, maintained and, along with associated specimen and site data, made available for future study by qualified scientific investigators. The County of Riverside must be consulted on the repository [or] museum to receive the fossil material prior to [its] being curated.

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Riverside County General Plan Policies

Multi-Purpose Open Space (OS) Element Policies

Policy OS 19.2: The County of Riverside shall establish a cultural resources program in consultation with Tribes and the professional cultural resources consulting community. Such a program shall, at a minimum, address each of the following: application processing requirements; information database(s); confidentiality of site locations; content and review of technical studies; professional consultant qualifications and requirements; site monitoring; examples of preservation and mitigation techniques and methods; and the descendant community consultation requirements of local, state and federal law.

Policy OS 19.3: Review proposed development for the possibility of cultural resources and for compliance with the cultural resources program.

Policy OS 19.4: To the extent feasible, designate as open space and allocate resources and/or tax credits to prioritize the protection of cultural resources preserved in place or left in an undisturbed state.

Policy OS 19.5: Exercise sensitivity and respect for human remains from both prehistoric and historic time periods and comply with all applicable laws concerning such remains.

Policy OS 19.6: Whenever existing information indicates that a site proposed for development has high paleontological sensitivity as shown on Figure OS-8, a paleontological resource impact mitigation program (PRIMP) shall be filed with the County Geologist prior to site grading. The PRIMP shall specify the steps to be taken to mitigate impacts to paleontological resources.

Policy OS 19.7: Whenever existing information indicates that a site proposed for development has low paleontological sensitivity as shown on Figure OS-8, no direct mitigation is required unless a fossil is encountered during site development. Should a fossil be encountered, the County Geologist shall be notified and a paleontologist shall be retained by the project proponent. The paleontologist shall document the extent and potential significance of the paleontological resources on the site and establish appropriate mitigation measures for further site development.

4.14.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Geological units underlying the Project site are older Pleistocene deposits, and there is the presence of previously recorded fossils from similar deposits in southern California. The possibility of currently unknown paleontological resources onsite is considered a potentially significant impact of the Project.

4.14.7 MITIGATION MEASURES

MM-PR-1: Project development shall adhere to all guidelines and recommendations of the Paleontological Monitoring Plan as presented within *Paleontological Resource Assessment and Impact Mitigation Program, for the Barker Logistics (APN 317-240-001-8) Project in Perris, Riverside County, California* (Environmental Planning Group, LLC) March 28, 2019.

4.14.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of the Paleontological Monitoring Plan, as required by **Mitigation Measure MM-PR-1**, will ensure any direct or indirect impacts to a unique paleontological resource, site or unique geologic feature found on the Project site will be reduced to a less than significant level.

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4.15 POPULATION & HOUSING

4.15.1 ENVIRONMENTAL SETTING

The Project is comprised of a Plot Plan that would allow development of a 699,630 square foot warehouse building and associated necessary improvements on a 31.55-gross acre property. The warehouse building will include office space and will extend to a height of 42 to 49.5 feet. The Project site is vacant, slopes approximately 45 feet downward from south to northeast. Grasses cover portions of the property and several trees are located in the southerly and southwesterly areas of the Project site.

The Project site is located on the northeast corner of the Patterson Avenue/Placentia Avenue intersection within unincorporated Riverside County. The Project site shows signs of grading and disking, and contains grass and some trees. The Project site is bordered by existing single-family residential and vacant land uses north of the Project site, single-family residential uses south and west of the Project site, and single-family residential and industrial/manufacturing uses east of the Project site.

The current adopted Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (April 2016) growth forecasts for the County of Riverside identifies projected growth in population from 359,500 in 2012 to 499,200 in 2040, which represents a 39.1 percent increase over the 28-year period. The change in population equates to approximately a 1.18 percent growth rate, compounded annually. Also, growth over the same 28-year period in households is projected to increase by 45.1 percent, or 1.33 percent annual growth rate.

Growth in employment between 2012 and 2040 is projected to increase by 122.1 percent, or a 2.89 percent annual growth rate. Total non-farm employment in Riverside County in December, 2018 was estimated to be 1,528,800. Of this number, approximately 99,900 jobs (an increase of 1.6% over the previous 12 months) were in the Manufacturing sector and 131,300 (an increase of 4.8% over the previous 12 months) were in the Transportation and Warehousing sector. The combined Manufacturing and Transportation/Warehousing sectors thereby accounted for 15.2% of the total jobs in Riverside County in December, 2018.

4.15.2 THRESHOLDS OF SIGNIFICANCE

The County of Riverside has adopted Thresholds of Significance that vary in some cases topically and in format from the Appendix G Thresholds, as reflected in the Initial Study prepared for the Project. This EIR uses the following County-adopted Thresholds of Significance to comprise the basis of impact analyses.

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Would the Project - -

- a) **Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**
- b) **Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County’s median income?**
- c) **Induce substantial unplanned 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)?**

4.15.3 ENVIRONMENTAL IMPACTS

- a) **Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

No Impact. The Project site is vacant. Therefore, Project development and operation would not result in displacing any people or housing.

- b) **Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County’s median income?**

Less Than Significant Impact. Project development will provide temporary construction employment for workers. Project operation will provide employment opportunities for approximately 700 persons within and aligned to the logistics/warehouse business. Additional adjunct jobs for truck drivers, mechanics and maintenance personnel will be created as well. According to United States Bureau of the Census data for 2017, the median household income in Riverside County was \$60,807. It is not possible to estimate Project development or operation employees at this time in that union/non-union and job descriptions are unavailable. It can be anticipated that a portion of the new jobs will be filled by residents of nearby unincorporated areas and cities. As a result, the impact on housing demand in the area will not be substantial such that additional affordable or market rate housing would be required.

- c) **Induce substantial unplanned 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)?**

Less Than Significant Impact. The Project involves development and operation of a new logistics/warehouse business on what currently is vacant land. The land use proposed is consistent with the Industrial Park and Manufacturing – Service Commercial designation assigned the Project site in the Riverside County General Plan and thereby has been assumed in Riverside County’s population/employment projections. Therefore, the resultant level of impact will be less than significant.

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4.15.4 CUMULATIVE IMPACTS

The Project will not displace people or housing in that the Project site is vacant. The industrial/business nature of the Project will generate employment that is anticipated by the County of Riverside General Plan. The cumulative projects are similarly industrial warehouse in nature with the exception of one small residential project. Any generation of demand for additional housing (including affordable housing) will be cumulatively less than significant.

4.15.5 EXISTING REGULATIONS AND STANDARD CONDITIONS

County of Riverside General Plan

The Riverside County General Plan Land Use Element does not contain Population and Housing policies that relate to Project development and operation.

Mead Valley Area Plan

The Mead Valley Area Plan includes an extensive area westerly of Interstate 215 that is designated Light Industrial, Business Park, or Light Industrial with a Community Center Overlay. The Mead Valley Area Plan states “it is the policy of Riverside County to stimulate economic development in this area of Mead Valley.” The central and northeasterly portions of the Project site have a designation of Manufacturing-Service Commercial (M-SC) and a designation of Industrial Park (I-P) around the remaining perimeter of the property. Due to the proximity of residential uses to industrial designated properties, the Mead Valley Area Plan contains the following 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.

MVAP 6.2 – A minimum 50-foot setback shall be required for any new industrial project on properties zoned I-P, if that property abuts a property that is zoned for residential, agricultural, or commercial uses. A minimum of 20 feet of the setback shall be landscaped, unless a tree screen 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.

Standard Conditions/Project Design Features

No Standard Conditions or Project Design Features related to Population and Housing are necessary or proposed because the Project involves industrial-related uses.

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4.15.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Project development and operation will result in a less than significant impact related to Population and Housing.

4.15.7 MITIGATION MEASURES

No Mitigation Measures are required.

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4.16 PUBLIC SERVICES & UTILITIES

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.

Information contained in this Section is derived from the following:

- Riverside County General Plan; and
- Riverside County General Plan EIR No. 521 for GPG No. 960.

4.16.1 ENVIRONMENTAL SETTING

Fire Protection/Emergency Service

The Riverside County Fire Department provides fire protection services to the Project site and vicinity. The Riverside County Fire Department 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. In addition, the Riverside County Fire Department provides weed abatement service, swift water rescue, and Level 1 hazardous material team response. CalFire (a State agency) has primary responsibility for managing fires on lands designated "State Responsibility Areas" (SRA). The CalFire Riverside Unit 2012 Strategic Fire Plan indicates State resources include 14 type-3 engines, one type-2 helicopter, two type-3 air tankers and three bulldozers. Riverside County resources include 81 type-1 engines, five type-2 engines, one bulldozer, water tenders, eight medic ambulances, and two breathing supports as well as 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. There are 94 fire stations (17 battalions; 230 pieces of equipment) throughout Riverside County that dispatch service calls.

Primary fire protection and emergency service to the Project site will be provided by Riverside County Fire Department Station 59 (21510 Pinewood Street, Perris), approximately 2 miles to the northwest of 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). Station 59 response time to the Project site is 6 minutes for a first-in unit to reach the Project site. 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). Secondary fire protection and emergency service to the Project site will be provided by Riverside County Fire Department Station 90 (333 Placentia Avenue Perris), approximately 1.7 miles east of the Project site. Station 90 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). Other stations in the Project vicinity that may be able to respond to calls on the Project site are Station 1 and Station 101.

The Riverside County Fire Department has a mutual aid agreement with the City of Riverside Fire Department and the Federal Fire Department located at March Air Reserve Base.

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The Riverside County Emergency Services Division maintains two underground Emergency Operation Centers with communications for government use during major events.

As noted in Riverside County General Plan EIR No. 521, an acceptable response time generally is defined as within five minutes for urban areas, ten minutes for suburban and rural community areas, and 20 minutes for rural outlying areas.

Law Enforcement Service

As noted in Riverside County General Plan EIR No. 521, Police protection services in the Project site’s vicinity are provided by the Riverside County Sheriff’s Department, which 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 (approximately 3 miles southeast of the Project site). There are 34 sworn peace officers available for the service area that includes the Project site. The Sheriff’s Department also operates five adult correction or detention centers (that contain a total of 3,906 beds) located throughout Riverside County. The Riverside County Probation Department operates five juvenile detention facilities. The Riverside County Sheriff’s Department has established the following criteria for its staffing requirements in unincorporated areas of Riverside County:

- One sworn officer per 1,000 population;
- One supervisor and one support staff employee per seven officers;
- One patrol vehicle per three sworn officers; and,
- One school resource officer per school.

Riverside County Sheriff’s Department calls for service are categorized/prioritized as Priority 1 through Priority 4. Priority 1 calls are emergency calls and Priority 2-4 calls are non-emergency calls. The following **Table 4.16.1** provides average response time data for Calendar Year 2019 in the northern portion of the Perris Station service area, which encompasses the territory west of Interstate 215, north of Cajalco Road, east of Wood Road, and south of Oleander Avenue.

Table 4.16.1– Riverside County Sheriff’s Department Perris Station
Average Response Times (2019)

Priority	Average Response Time (Minutes)
1	6.19
2	52.75
3	107.07
4	154.82

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

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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).

Schools

The Project site lies within the Val Verde Unified School District. The nearest schools to the Project site are Oak Grove at the Ranch private school (located approximately 0.65-mile northwest of the Project site at 1251 N. A Street, Perris), and Val Verde Elementary School (located approximately 0.9 mile southeast of the Project site at 2656 Indian Avenue, Perris). 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.

Libraries

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 Riverside County Library System does not maintain a specific numerical factor to analyze the needs for physical library space created by new development. Under existing conditions, the Project site places no demand on the public library system because the Project site is undeveloped and vacant.

Health Services

The closest public health service facility to the Project site is the Riverside County Regional Medical Center (Medical Center) located in Moreno Valley at 26520 Cactus Avenue. The Medical Center 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, as noted in the County of Riverside General Plan EIR. The Medical Center 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 Medical Center 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. Under existing conditions, the Project site is vacant and undeveloped and places little to no demand on County health facilities.

4.16.2 THRESHOLDS OF SIGNIFICANCE

The County of Riverside has adopted Thresholds of Significance that vary in some cases topically and in format from the *CEQA Guidelines* Appendix G Thresholds. The County-adopted Thresholds were reflected in the Initial Study prepared for the Project. This EIR uses the following County-adopted Thresholds of Significance to comprise the basis of impact analyses.

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- a) Would the project 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:

- Fire Services
- Sheriff Services
- Schools
- Libraries
- Health Services

4.16.3 ENVIRONMENTAL IMPACTS

- a) Would the project 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:

- Fire Services
- Sheriff Services
- Schools
- Libraries
- Health Services

Less Than Significant Impact. Project development and operation would generate additional calls for fire protection and law enforcement services in that the Project site currently is vacant and will contain a 699,630 square foot warehouse/logistics building with a small area for adjunct offices, loading docks and surface parking. However, the proposed use is consistent with the County of Riverside General Plan land use designations and General Plan EIR No. 521 assumes build out of the allowed uses and indicates such build out impacts to fire protection/emergency services and law enforcement services would be less than significant due to required project compliance with associated development impact fees that would offset increased service demands. The Project is industrial in nature and thereby would not result in impacts to schools, libraries or health services such that the physical impacts would require provision of altered or new government facilities. The overall Project impact level to Public Services will be less than significant.

The increased demand on fire and emergency services and for law enforcement services will impact Riverside County Fire Department and Sheriff facilities and potentially lengthen response times. However, the Project would be served by existing Fire Department (Stations 59 and 90) and Sheriff (Perris) stations. The Fire Department does not, at this time, plan to construct a new fire station or expand the fire stations (Stations 59 and 90) nearest the Project site. The Applicant will be required to comply with fee payment (County of Riverside Development Impact Fee) established by Riverside County Ordinance No. 659, which requires developers to pay fees for funding public facilities.

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Project development and operation will not generate a demand for public school services in that only a warehouse/logistics building will be constructed and operated on the Project site. 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. The Project Applicant would 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).

The nature of the Project (warehouse/logistics building and associated on-site and off-site improvements) would not directly result in a need to construct new library buildings or modify existing library buildings because demand for library facilities is the result of new residential development.

Project development and operation would not result in an increase in the County’s population and would therefore not directly result in an increased demand for library facilities. Therefore, Project-related impacts to library facilities would be less than significant.

The Project would result in an incremental increase in demand for public health services associated with persons that would be employed at 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.

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.

4.16.4 CUMULATIVE IMPACTS

The need for public services and associated facilities is determined by service area population or number of residents and workers within a jurisdiction’s service area. Service population and type and density of development determine the need for new or expanded fire protection, police, and other public services. Local planning policies utilize statistical information and interaction with other agencies enable fire and police service providers to delineate past patterns, emerging trends, and future issues of concern related to provision of services. Once determined, service providers can redeploy resources to meet future service needs.

Project development, together with development of existing, planned and potential projects within the vicinity of the Project site, may result in an overall increase in demand for fire protection and police services that would involve additional personnel, equipment and/or facilities. These agencies routinely assess demand as part of the annual monitoring and budgeting process. New development would be required to adhere to conditions established by fire and police service providers and to pay applicable Development Impact Funds to ensure adequate staffing and equipment levels. Therefore, there would be

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no cumulative impact on fire and police protection services. Cumulative impacts to the environment that may result from new or expanded fire protection and police facilities would be evaluated as those facilities are cleared according to CEQA.

The Project site and vicinity are located within the Val Verde Unified School District. Each school district requires payment of development fees to provide for new school services and/or facilities. Every new development is required to provide applicable fees to the School District and therefore there would be no cumulative impact on school services. Cumulative impacts to the environment that may result from new or expanded school facilities would be evaluated as those facilities are cleared under CEQA.

4.16.5 EXISTING REGULATIONS AND STANDARD CONDITIONS

California State Regulations/Plans

2012 CalFire Riverside Unit Strategic Fire Plan

The Riverside Unit Strategic Fire Plan is used by the CalFire Riverside Unit to direct and guide its fire management activities for its service area. The Plan emphasizes “pre-fire” management - - the process to assess alternatives to protect assets from unacceptable risk of wildland fire damage and focus on those actions that can be taken in advance of a wildland fire to potentially reduce severity of the fire and ensure safety. The overall goal of this Plan is to reduce total government costs and citizen losses from wildland fire in the Riverside County Unit by protecting assets at risk through focused pre-fire management prescriptions and increasing initial attack success.

Public Resources Code Sections 4290-4299

These Public Resources Code Sections require minimum Statewide fire safety standards pertaining to the following: road standards for fire equipment access; standards for signs identifying streets, roads and buildings; minimum private water supply reserves for emergency fire use; and, fuel breaks and greenbelts. With some exceptions, all new construction in potential wildland fire areas is required to meet Statewide standards. However, State requirements do not supersede more restrictive local regulations.

California Code of Regulations Title 24, Parts 2 and 9 – Fire Codes

Part 2 of Title 24 refers to the California Building Code that contains complete regulations and general construction building standards of State adopting agencies, including administrative, fire and life safety and field inspection provisions. Part 9 of Title 24 refers to the California Fire Code, which contains other fire safety-related building standards.

California Code of Regulations Title 14 – Natural Resources

These regulations constitute the basic wildland fire protection standards of the California Board of Forestry. The regulations were prepared and adopted to establish minimum wildfire protection standards in conjunction with building, construction and development within State Responsibility Areas. This Title requires design and construction of structures, subdivisions and developments in a State Responsibility Area to provide for basic emergency access and perimeter wildfire protection measures.

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California Government Code Sections 51178-51179 – Very High Fire Hazard Severity Zones

The former Section specifies that the Director of CalFire, in cooperation with local fire authorities, must identify areas that are Very High Fire Hazard Severity Zones in Local Responsibility Areas, based on consistent Statewide criteria and the expected severity of fire hazard. It specifies that Very High Fire Hazard Severity Zones “shall be based on fuel loading, slope, fire weather and other relevant factors,” including areas subject to Santa Ana winds that are a “major cause of wildfire spread.” The latter Section states that a local agency must also designate and map the Very High Fire Hazard Severity Zones in its jurisdiction by ordinance. Other portions of the Government Code outline when a local agency may use its discretion to exclude areas from Very High Fire Hazard Severity Zone requirements or add areas not designated by the State of California to its Very High Fire Severity Zone areas.

California Government Code Section 51182 – Defensible Space

This Code Section outlines standards for maintaining a “defensible space” around properties in areas designated as a Very High Fire Hazard Severity Zone.

Public Resources Code Section 4213 – Fire Prevention Fees

The State of California assesses annually a “Fire Prevention Fee” for all habitable structures within the State Responsibility Areas to pay for fire prevention services. The State Responsibility Area is the portion of the State where the State of California is financially responsible for prevention and suppression of wildfires. Land within incorporated city boundaries, Tribal lands, and federally owned land are excluded from State Responsibility Area lands.

Riverside County Regulations/Plans

Riverside County Fire Department Fire Protection and EMS Strategic Master Plan

The County of Riverside has developed a strategic fire plan that details the County Fire Department goals and strategies for proactively coordinating fire facility, service needs, and equipment needs for the period of 2009 -2029. The Strategic Master Plan incorporates CalFire’s management plan for several sub-zones within Riverside County. The Plan is focused on ensuring existing and future development maintains adequate service levels throughout Riverside County.

Ordinance No. 659 – Establishing a Development Impact Fee Program

Ordinance No. 659 requires new development to pay Development Impact Fees to ensure certain facility obligations are met to reasonably serve the subject development. The obligations include construction of new facilities. The Ordinance ensures there is a reasonable relationship between use of the fees and type of development projects on which the fees are imposed.

Ordinance No. 695 – Requiring the Abatement of Hazardous Vegetation

Each spring, CalFire and the Riverside County Fire Department distribute hazard abatement notices. The notices require property owners to reduce fuels around their properties. Requirements for hazard reduction around improved parcels (those with structures) are contained in Riverside County Ordinance No. 787 (and Public Resources Code Section 4291). A minimum 30-foot clearance is required around all

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structures and can be extended to 100-feet in areas where severe fire hazards exist. On unimproved properties, as indicated in Riverside County Ordinance No. 695, the property owner is required to disc or mow 100 feet along the perimeter of the property. The County of Riverside also requires a development within a high fire hazard area to design and implement and fuel modification programs for the interface between developed and natural areas within and adjacent to the proposed project area.

Ordinance No. 787 – Fire Code Standards

Ordinance No. 787 adopts a variety of State codes, such as the Uniform Fire Code, established by the International Fire Code Institute, for implementation and enforcement at the county level. The Ordinance also addresses implementation of the California Building Code, based on the International Conference of Building Officials. Both major Codes prescribe performance characteristics and materials to be used to achieve acceptable levels of fire protection.

Assembly Bill 16

Assembly Bill 16 created the Critically Overcrowded School Facilities program, which supplements new construction provisions within the School Facilities Program. This Program 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, to apply for new construction projects in advance of meeting all School Facilities Program new construction program requirements. Districts with School Facilities Program new construction eligibility and school sites included on a California Department of Education list of source schools may apply.

Leroy F. Greene School Facilities Act of 1998 (Senate Bill 50)

The State Legislature enacted this legislation in 1998, which thereby amended existing state law governing school fees. In particular, SB 50 amended prior California Government Code 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....” The legislation also amended Government Code 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 General Plan Policies

Safety Element

Policy S 5.1 – Develop and enforce construction and design standards that ensure that proposed development incorporates fire prevention features through the following:

- a. All proposed development and construction within Fire Hazard Severity Zones shall be reviewed by the Riverside County Fire and Building and Safety departments.

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- b. All proposed development and construction shall meet minimum standards for fire safety as defined in the Riverside County Building or County Fire Codes, or by County zoning, or as dictated by the Building Official or the Transportation Land Management Agency based on building type, design, occupancy, and use.
- c. In addition to the standards and guidelines of the California Building Code and California Fire Code fire safety provisions, continue to implement additional standards for high-risk, high occupancy, dependent, and essential facilities where appropriate under the Riverside County Fire Code (Ordinance No. 787) Protection Ordinance. These shall include assurance that structural and nonstructural architectural elements of the building will not impede emergency egress for fire safety staffing/personnel, equipment, and apparatus; nor hinder evacuation from fire, including potential blockage of stairways or fire doors.
- d. Proposed development and construction in Fire Hazard Severity Zones shall provide secondary public access, in accordance with Riverside County Ordinances.
- e. Proposed development and construction in Fire Hazard Severity Zones shall use single loaded roads to enhance fuel modification areas, unless otherwise determined by the Riverside County Fire Chief.
- f. Proposed development and construction in Fire Hazard Severity Zones shall provide a defensible space or fuel modification zones to be located, designed, and constructed that provide adequate defensibility from wildfires.

Policy S 5.3 – Monitor fire-prevention (such as fuel reduction) through a site specific fire-prevention plan to reduce long-term fire risks in the Very High Fire Hazard Severity Zones.

Policy S 5.5 – Encourage proposed development in Fire Hazard Severity Zones to develop where fire and emergency services are available or planned.

Policy S 5.6 – Demonstrate that the proposed development can provide fire services that meet the minimum travel times identified in Riverside County Fire Department Fire Protection and EMS Strategic Master Plan.

Policy S 5.7 – Minimize pockets of flammable vegetation that increase likelihood of fire spread through conceptual landscaping plans to be reviewed by Planning and Fire Departments in the Fire Hazard Severity Zones. The conceptual landscaping plan of the proposed development shall at a minimum include:

- a. Plant palette suitable for high fire hazard areas to reduce the risk of fire hazards.
- b. Retention of existing natural vegetation to the maximum extent feasible.
- c. Removal of onsite combustible plants.

Policy S 5.9 – Reduce fire threat and strengthen fire-fighting capability so that the County could successfully respond to multiple fees.

Policy S 5.10 – Require automatic natural gas shutoff earthquake sensors in high-occupancy industrial and commercial facilities, and encourage them for all residences.

Policy S 7.3 – Require commercial businesses, utilities, and industrial facilities that handle hazardous materials to: install automatic fire and hazardous materials detection, reporting and shut-off devices, and install an alternative communication system in the event power is out or telephone service is saturated following an earthquake.

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Policy S 7.4 – Use incentives and disincentives to persuade private businesses, consortiums, and neighborhoods to be self-sufficient in an emergency by maintaining a fire control plan, including an onsite firefighting capability and volunteer fire response teams to respond to and extinguish small fires, and identifying medical personnel or local residents who are capable and certified in first aid and CPR.

Land Use Element

Policy LU 5.1 – Ensure that development does not exceed the ability to adequately provide supporting infrastructure and services, such as libraries, recreational facilities, education and day care centers transportation systems, and fire/police/medical services.

Policy LU 5.2 – Monitor the capacities of infrastructure and services in coordination with service providers, utilities, and outside agencies and jurisdictions to ensure that growth does not exceed acceptable levels of service.

Policy LU 10.1 – Require that new development contribute their fair share to fund infrastructure and public facilities such as police and fire facilities.

4.16.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Based on the preceding discussions, no significant impacts related to Public Services Systems have been identified.

Project development and operation would result in an incremental increase in fire protection and emergency service provision. 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. The County of Riverside requires new developments pay fire protection mitigation fees pursuant to County Ordinance No. 659 to ensure accomplishment of State of California Codes noted above, the Riverside County Fire Department Fire Protection and EMS Strategic Master Plan, and County Ordinance No. 787 (Fire Code Standards). The Riverside County Fire Department uses the fees to construct new fire protection facilities or to provide facilities in lieu of the fee as approved by the Riverside County Fire Department. Also, the County of Riverside requires all new structures constructed in unincorporated areas comply with construction requirements of Riverside County Ordinance No. 787 and shall be provided with fire-retardant roofing material as described in the Uniform Building Code. Furthermore, County of Riverside General Policies relevant to the Project that are noted above also serve to reduce Project-related impacts to fire protection and emergency service provision. In particular, General Plan Safety Element Policies would mitigate wildland fire risks through the following: compliance with construction design standards and requirements; long-range fire safety planning; improved infrastructure, fire response agreements and adequate water supply and flow; compliance with the Riverside County Fire Protection Strategic Master Plan; brush management; and, fire mitigation through landscaping. As a result, these Policies would assist protection of structures and nearby residents from fire impacts.

The increased demand could also affect the Riverside County Fire Department's ability to meet its response time goals from Station 59 (21510 Pinewood Street, Perris) and Station No. 90 (333 Placentia Avenue, Perris). Although demand would be increased and the Fire Department's response time goal of four minutes would not be met to the Project site, the existing fire stations have adequate physical capacity to service the Project. Fire hydrants are proposed on the Project site and an Early Suppression,

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Fast Response (ESFR) fire sprinkler system is proposed to be installed in the 699,630 square foot building. The Riverside County Fire Department 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; thereby, impacts are less than significant.

The Project would introduce structures, traffic, and workers to the Project site, which would increase the demand for services provided by the Riverside County Sheriff's Department. Service to the Project site is provided by the Perris Station, and the Sheriff's Department 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.

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.

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. Thereby, less-than-significant impacts to library facilities would occur.

The Project would result in an incremental increase in demand for public health services associated with persons that would be employed at 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.

Although Project development will not result in significant impacts to Public Services, the Project Applicant/Developer will be required to comply with the County 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, and with provisions of California Government Code Sections 65995.5-65998, which will require the Project Applicant/Developer to pay required school impact fees to the Val Verde Unified School District in accordance with the District Level 1 Fee Schedule. In addition, compliance with the County of Riverside General Plan Policies would further prevent or reduce any impacts to Public Services associated with the Project.

4.16.7 MITIGATION MEASURES

No Mitigation Measures are required.

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4.17 RECREATION

4.17.1 ENVIRONMENTAL SETTING

The Project site is located on the northeast corner of the Patterson Avenue/Placentia Avenue intersection within unincorporated Riverside County. The 31.55-acre Project site is vacant, shows signs of grading and disking, and contains grass and some trees. The Project site is bordered by existing single-family residential and vacant land uses north of the Project site, single-family residential uses south and west of the Project site, and single-family residential and industrial/manufacturing uses east of the Project site.

Interstate 215 is located approximately 1,600 feet east of the Project site. The BNSF/Metrolink rail lines are located approximately 1,500 feet east of the Project site. The March Air Reserve Base/Inland Port Airport is located approximately 2.5 miles northeast of the Project site.

The Project site slopes approximately 45 feet downward from south to northeast. Grasses cover portions of the property and several trees are located in the southerly and southwesterly areas of the Project site.

4.17.2 THRESHOLDS OF SIGNIFICANCE

The County of Riverside has adopted Thresholds of Significance that vary in some cases topically and in format from the Appendix G Thresholds, as reflected in the Initial Study prepared for the Project. This EIR uses the following County-adopted Thresholds of Significance to comprise the basis of impact analyses.

Parks and Recreation

Would the Project - -

- a) **Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**
- b) **Increase 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)?**

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4.17.3 ENVIRONMENTAL IMPACTS

- a) **Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

No Impact. The Project involves development of a 699,630 square foot, 42 to 49.5 foot tall logistics/warehouse building, surface parking lot and perimeter and project site landscaping on a vacant 31.55-acre property. Project development will not include recreational facilities. Therefore, Project development and operation will not result in a significant increase in population and thereby will not require construction or expansion of recreational facilities which might have an adverse physical effect on the environment. No impact will result.

- b) **Increase 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?**

No Impact. The Project involves development of a 699,630 square foot, 42 to 49.5 foot tall logistics/warehouse building, surface parking lot and perimeter and project site landscaping on a vacant 31.55-acre property. Project development will not include recreational facilities. No residential uses are part of the proposed project. Therefore, project development and operation will not result in an increase in population and thereby will not result in an increase in use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. No impact will result.

- c) **Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?**

Less Than Significant Impact. The Project site is not located within a Community Service Area. The Community Service Area closest to the Project site is CSA 117 (Mead Valley), which is west of the Project site. The Quimby Act (Government Code Section 66477) allows local jurisdictions, through an ordinance, to require developers to dedicate land, pay fees or a combination of both for park and recreational purposes as a condition of approval of tract and parcel maps. The land, fees, or combination thereof would be used for the development of new, or rehabilitation of existing, park and recreation facilities to serve the associated population. Implementation of Quimby Act standards would provide for additional park and recreational resources throughout the County, which in turn would lessen impacts related to overuse and overcrowding at existing facilities in the affected region. The County of Riverside currently does not have a requirement for industrial projects to pay Quimby Act fees. The Project will have a Condition of Approval requiring any such future fees be paid according to County of Riverside requirements. The resultant impact level will be less than significant.

4.17.4 CUMULATIVE IMPACTS

Project development will not increase use of neighborhood or regional parks because the entire Project involves development and operation of a warehouse/logistics facility. All but one project in the vicinity of the Project site is industrial in nature and thereby would not impact parks or contain recreational facilities. All projects would be required to pay the County-required fees for recreational facilities. Thereby, Project development and operation would not result in a cumulatively considerable impact related to Recreation.

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4.17.5 EXISTING REGULATIONS & STANDARD CONDITIONS

Riverside County Ordinance No. 460

Riverside County Ordinance No. 460 – Regulating the Division of Land (Section 10.35) details methods by which Quimby Act compliance is achieved (i.e., land dedication, in-lieu fee payment or combination of both) for residential projects.

Riverside County Ordinance No. 659

Riverside County Ordinance No. 659, as amended, provides that industrial developments within the Mead Valley area pay Development Impact Fees of \$6,743 per acre. Although these fees are focused to public improvements or public facilities, no industrial development in the Mead Valley Plan Development Impact Fees is assigned to Regional Parks or Regional Trails.

Standard Conditions/Project Design Features

The County of Riverside will place a Standard Condition on the Project discretionary permit (Plot Plan) that requires the Project developer to pay Development Impact Fees enumerated in Riverside County Ordinance No. 659 (as amended, March 14, 2015).

4.17.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Project development and operational impacts related to Recreation will be less than significant.

4.17.7 MITIGATION MEASURES

No Mitigation Measures are required.

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4.18 TRANSPORTATION

Detailed analysis of the Project's potential transportation impacts is presented in *Barker Logistics Traffic Impact Analysis* (Urban Crossroads, Inc.) May 14, 2019 (TIA, EIR Appendix H). The TIA Scope of Work and Methodology were developed in consultation with County Staff. The TIA was prepared in accordance with the *County Traffic Impact Analysis Preparation Guide*, April 2008 (County TIA Guide); and the California Department of Transportation (Caltrans) *Guide for the Preparation of Traffic Impact Studies*, December 2002.

Additionally, in response to concerns expressed regarding truck access to the Project site via Patterson Avenue, refinement and focused evaluation of the potential effects of restricted truck access to the Project site is presented in *Barker Logistics Supplemental Traffic Assessment* (Urban Crossroads, Inc.) July 22, 2019 (Supplemental Assessment, EIR Appendix H). The Supplemental Analysis substantiates that restricting access to the Project site via Patterson Avenue, and resulting redistribution of truck traffic would not materially affect the TIA findings and conclusions.

Discussions were held with the County and the Applicant to identify TIA Study Area (Study Area) facilities requiring analysis. Discussions with the County also defined Project trip generation, trip distribution, and LOS deficiency criteria. Related projects to be considered in the TIA were also identified.

The TIA assumes Project completion and occupancy by 2021, the Project Opening Year. The TIA evaluates potential transportation impacts under the following scenarios:

- Existing Conditions (2019);
- Existing Plus Project (E+P) Conditions;
- Existing Plus Ambient Growth Plus Project (EAP) (2021) (without and with I-215/Placentia Avenue Interchange); and
- Existing Plus Ambient Growth Plus Project Plus Cumulative Projects (EAPC) (2021) (without and with I-215/Placentia Avenue Interchange)

As substantiated herein and discussed in detail in the Project TIA and Supplemental Analysis, all potential transportation impacts resulting from the Project would be less-than-significant or less-than-significant as mitigated.

4.18.1 ENVIRONMENTAL SETTING

4.18.1.1 Study Area Intersections

The TIA Study Area includes those facilities where the Project could contribute 50 or more trips during the morning peak hour condition (7:00 AM to 9:00 AM) or the evening peak hour condition (4:00 PM to 6:00 PM). The "50 peak hour trip" criteria generally represents a minimum number of trips at which a typical intersection would have the potential to be substantively impacted by a given development proposal. Although each intersection may have unique operating characteristics, this traffic engineering rule of thumb is a widely utilized tool for estimating a potential area of impact (TIA, p. 4).

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Evaluated Study Area intersections are listed at **Table 4.18.1**; Study Area Congestion Management Program (CMP) intersections are identified. Study Area intersections are mapped at **Exhibit 4.18-1**.

Table 4.18.1
Study Area Intersections

ID	Intersection	Jurisdiction	CMP Intersection
1	Patterson Avenue & Rider Street	County of Riverside	No
2	Patterson Av. & Walnut St./Driveway 1	County of Riverside	No
3	Patterson Av. & Placentia St.	County of Riverside	No
4	Driveway 2/Tobacco Rd. & Placentia St.	County of Riverside	No
5	Driveway 3 & Placentia St. – Future Intersection	County of Riverside	No
6	Harvill Av. & Cajalco Expressway	County of Riverside	No
7	Harvill Av. & Rider St.	County of Riverside	No
8	Harvill Av. & Placentia St.	County of Riverside	No
9	Harvill Av. & Orange St.	County of Riverside	No
10	Harvill Av. & A St.	County of Riverside	No
11	I-215 SB Ramps & Ramona Expressway	County of Riverside, Caltrans	No
12	I-215 SB Ramps & Placentia Av. – Future Intersection	City of Perris, Caltrans	No
13	I-215 SB Ramps & Nuevo Rd.	City of Perris, Caltrans	No
14	I-215 NB Ramps & Ramona Expressway	City of Perris, Caltrans	No
15	I-215 NB Ramps & Placentia Av. – Future Intersection	City of Perris, Caltrans	No
16	I-215 NB Ramps & Nuevo Rd.	City of Perris, Caltrans	No

4.18.1.2 Study Area Freeway Facilities

Study Area freeway facilities include I-215 mainline segments and merge/diverge ramp junctions. I-215 traverses the Study Area in a generally northwest – southeast orientation. Within the Study Area, Caltrans retains jurisdiction over all freeway mainline facilities. Consistent with recent Caltrans guidance, and because impacts to freeway segments tend to dissipate with distance from the point of State Highway System (SHS) entry, quantitative study of freeway segments beyond those immediately adjacent to the point of entry typically is not required (TIA, p. 7). Also consistent with Caltrans guidance, the Study Area freeway merge/diverge ramp junction analysis includes those locations where the Project is anticipated to contribute 50 or more one-way peak hour trips (TIA, p. 7). Freeway segments and merge/diverge ramp junction locations evaluated in the TIA are identified at **Table 4.18.2**.

Table 4.18.2
Study Area Freeway Mainline Segments Merge/Diverge Ramp Junction Locations

ID	
1	I-215 Freeway Southbound, North of Ramona Expressway
2	I-215 Freeway Southbound, Off-Ramp at Ramona Expressway
3	I-215 Freeway Southbound, On-Ramp at Ramona Expressway
4	I-215 Freeway Southbound, Ramona Expressway to Placentia Avenue
5	I-215 Freeway Southbound, Off-Ramp at Placentia Avenue – Future Ramp Location
6	I-215 Freeway Southbound, On-Ramp at Placentia Avenue – Future Ramp Location
7	I-215 Freeway Southbound, Placentia Avenue to Nuevo Road – Future Freeway Segment
8	I-215 Freeway Southbound, Off-Ramp at Nuevo Road
9	I-215 Freeway Southbound, On-Ramp at Nuevo Road
10	I-215 Freeway Southbound, South of Nuevo Road
11	I-215 Freeway Northbound, North of Ramona Expressway
12	I-215 Freeway Northbound, On-Ramp at Ramona Expressway
13	I-215 Freeway Northbound, Off-Ramp at Ramona Expressway
14	I-215 Freeway Northbound, Ramona Expressway to Placentia Avenue
15	I-215 Freeway Northbound, On-Ramp at Placentia Avenue – Future Ramp Location
16	I-215 Freeway Northbound, Off-Ramp at Placentia Avenue – Future Ramp Location
17	I-215 Freeway Northbound, Placentia Avenue to Nuevo Road – Future Freeway Segment
18	I-215 Freeway Northbound, On-Ramp at Nuevo Road
19	I-215 Freeway Northbound, Off-Ramp at Nuevo Road
20	I-215 Freeway Northbound, South of Nuevo Road

4.18.2 LEVELS OF SERVICE CRITERIA AND ANALYSIS METHODOLOGY

Level of Service (LOS) denotes traffic operations “quality of flow.” LOS classifications of “A” through “F” correlate to traffic operational conditions from best to worst, respectively. In general, Level A represents free-flow conditions with no congestion. Conversely, Level F represents severe congestion with stop-and-go conditions and is considered to be unsatisfactory.

4.18.2.1 Intersection Analysis Methodology

LOS criteria identified in *Highway Capacity Manual 6th Edition* (National Academy of Sciences) 2016 (HCM) was employed in evaluation of the Study Area intersections. For signalized intersections, average stopped vehicle delay is used to determine LOS. For unsignalized intersections, average delay for the controlled intersection approach is used to determine LOS. **Table 4.18.3** presents HCM LOS criteria for signalized intersections. HCM LOS criteria for unsignalized intersections is presented at **Table 4.18.4**.

Table 4.18.3
Signalized Intersection LOS Criteria

LOS	Description	Average Delay (seconds)
A	Operations with very low delay occurring with favorable progression and/or short cycle length.	0 to 10.00
B	Operations with low delay occurring with good progression and/or short cycle lengths.	10.01 to 20.00
C	Operations with average delays resulting from fair progression and/or longer cycle lengths. Individual cycle failures begin to appear.	20.01 to 35.00
D	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
E	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
F	Operation with delays unacceptable to most drivers occurring due to over saturation, poor progression, or very long cycle lengths.	80.01 and up

Table 4.18.4
Unsignalized Intersection LOS Criteria

LOS	Description	Average Delay (seconds)
A	Little or no delays.	0 to 10.00
B	Short traffic delays.	10.01 to 15.00
C	Average traffic delays.	15.01 to 25.00
D	Long traffic delays.	25.01 to 35.00
E	Very long traffic delays.	35.01 to 50.00
F	Extreme traffic delays with intersection capacity exceeded.	> 50.00

4.18.2.2 Freeway Ramp Queuing Analysis Methodology

Per Caltrans requirements, the progression of vehicles has been assessed to determine potential queuing impacts at Study Area freeway ramps. A vehicle is considered queued if traveling at less than 10 feet/second and is either at the stop bar or behind another queued vehicle. The average (50th percentile) queue considered in this analysis represents the typical queue length for peak hour traffic conditions. Queues exceeding the 95th percentile are considered to represent deficient conditions. Please refer to the Project TIA (EIR Appendix H) for details regarding freeway off-ramp queuing analysis methodology and protocols.

4.18.2.3 Freeway Mainline Segment Analysis Methodology

Freeway mainline segment operations were evaluated employing vehicle density performance standards. HCM freeway mainline segment LOS criteria (Table 4.18.5) reflect the quality of traffic flow, quantified in terms of vehicle density (passenger cars per mile per lane [pc/mi/ln]).

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The Project TIA Freeway mainline volumes were obtained from the Caltrans Performance Measurement System (PeMS) for the Study Area I-215 freeway segments (see: <https://dot.ca.gov/programs/traffic-operations/mpr/pems-source>). Maximum mainline traffic volumes observed over a 3-day period were utilized for the weekday AM and PM peak hours. For the purposes of the freeway segment analysis, the Project TIA considers truck traffic as a percentage of total actual vehicles (as opposed to as a percentage of Passenger Car Equivalents [PCEs]). The number of freeway lanes for Existing Conditions was obtained through February 2019 field observations.

Table 4.18.5
Freeway Mainline Segment LOS Criteria

Level of Service	Description	Density Range (pc/mi/ln)
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 to 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 to 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 to 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 to 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 to 45.0
F	Breakdown in vehicle flow.	>45.0

4.18.2.4 Freeway Merge/Diverge Ramp Junction Analysis Methodology

The freeway system in the Study Area is apportioned into segments defined by freeway-to-arterial interchange locations. The HCM indicates the influence area for a freeway merge/diverge junction is approximately 1,500 feet. The TIA conservatively evaluates all Study Area ramp locations with respect to the nearest on or off-ramp at each interchange, and irrespective of ramp separation distances. The analysis considers actual vehicle volumes (as opposed to PCEs), and utilizes Caltrans PeMS peak hour volumes. HCM freeway merge/diverge ramp junction LOS criteria (see **Table 4.18.6**) is quantified in terms of vehicle density, expressed as passenger cars per mile per lane (pc/mi/ln).

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Table 4.18.6
Freeway Merge/Diverge Ramp Junction LOS Criteria

Level of Service	Density Range (pc/mi/ln) ¹
A	≤10.0
B	10.1 to 20.0
C	20.1 to 28.0
D	28.1 to 35.0
E	>35.0
F	Demand Exceeds Capacity

4.18.3 DEFICIENCY CRITERIA

4.18.3.1 Intersections

Per the County of Riverside traffic study protocols, intersection LOS deficiencies at County intersections would occur under the following conditions.

- When the “Without Project” condition is acceptable (LOS D or better), and Project traffic (50 or more peak hour trips) causes deterioration below LOS D, a deficiency would occur.
- When the “Without Project” condition is already unacceptable (LOS D or worse) and Project traffic (50 or more trips) would contribute to the pre-existing unacceptable conditions, a deficiency would occur.

The above deficiency criteria are also applicable to City of Perris intersections within the Study Area.

4.18.3.2 Freeway Ramps Queues

The average (50th percentile) queue represents the typical queue length for peak hour traffic conditions. Queues exceeding the 95th percentile are considered to represent deficient conditions.

4.18.3.3 Freeway Mainline Facilities (Segments/Merge Diverge Areas)

Freeway facility LOS deficiencies would occur under the following conditions:

- When the “Without Project” LOS condition is acceptable (LOS D or better) and Project traffic would degrade operations below LOS D, a deficiency would occur.
- When the “Without Project” condition is already unacceptable (below LOS D, or operating at or near capacity) and Project traffic (50 or more peak hour trips) would contribute to pre-existing unacceptable conditions, a deficiency would occur.

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4.18.4 ACCEPTABLE/TARGET LOS CONDITIONS

Acceptable or target roadway system LOS conditions are summarized below.

4.18.4.1 County of Riverside

The Project site is located within the Mead Valley Area Plan (MVAP). County General Plan Policy C 2.1, excerpted in pertinent part below, establishes LOS D as the acceptable operating condition for the MVAP roadway system.

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 . . . LOS D shall apply to all development proposals located within any of the following Area Plans: Eastvale, Jurupa, Highgrove, Reche Canyon/Badlands, Lakeview/Nuevo, Sun City/Menifee Valley, Harvest Valley/Winchester, Southwest Area, The Pass, San Jacinto Valley, Western Coachella Valley and those Community Development Areas of the Elsinore, Lake Mathews/Woodcrest, **Mead Valley** [emphasis added] and Temescal Canyon Area Plans (County of Riverside General Plan Circulation Element, pp. C-6, C-7).

4.18.4.2 City of Perris

City of Perris target LOS conditions identified in the City of Perris General Plan Circulation Element are as follows:

- LOS D should be maintained along all City maintained roads (including intersections) and LOS D along I-215 and SR-74 (including intersections with local streets and roads). An exception to the local road standard is LOS E, at intersections of any Arterials and Expressways with SR-74, the Ramona-Cajalco Expressway, or at I-215 Freeway ramps (City of Perris General Plan Circulation Element, p. 83).
- LOS E may be allowed within the boundaries of the Downtown Specific Plan Area to the extent that it would support transit-oriented development and walkable communities. Increased congestion in this area will facilitate an increase in transit ridership and encourage development of a complementary mix of land uses within a comfortable walking distance from light rail stations (City of Perris General Plan Circulation Element, p. 83).

4.18.4.3 Caltrans

Study Area freeway facilities are part of the State Highway System (SHS). SHS facilities are owned and maintained by Caltrans. Caltrans District 8 Guidelines were employed in the analysis of SHS facilities. The Caltrans region-wide target minimum acceptable operational standard for SHS facilities is LOS D.

Caltrans nonetheless acknowledges that attainment of LOS D may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS (*Caltrans Guide for the Preparation of Traffic Impact Studies*, p. 1). Within these analyses, LOS D is employed generally as the target operational condition for Caltrans-maintained facilities. If, however, the evaluated SHS facility is

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operating at less than the LOS D target, Caltrans guidance provides that the existing LOS condition should be maintained.

4.18.4.4 Riverside County Transportation Commission (RCTC) Congestion Management Program (CMP)

The RCTC monitors the CMP roadway network system to minimize LOS deficiencies. Within the Study Area, none of the evaluated intersections are CMP facilities. However, the I-215 Freeway is CMP roadway system facility. The RCTC has adopted LOS E as the minimum standard for CMP system roadways.

4.18.5 EXISTING CONDITIONS

The following discussions describe the existing Study Area roadway system and summarize other transportation modes that exist within, or are available to, the Study Area.

4.18.5.1 Roadway System

Regional Access

Regional access to the Study Area is provided by I-215. I-215 exists in a generally northwest-to-southeast orientation approximately 0.5 miles easterly of the Project site. Within the Study Area, I-215 is a six-lane freeway traversing western Riverside County. Regional access to the Project site is generally available from the I-215 Freeway via Cajalco Expressway/Ramona Expressway, Harvill Avenue/Nuevo Road, and the future interchange at Placentia Avenue. Direct access between the Project site and I-215 would be provided by Placentia Avenue providing connection to the existing Placentia Avenue/I-215 interchange.

I-215 connects with Interstate 15 (I-15) approximately 24 miles northwesterly of the Project site, providing access to the High Desert communities located in San Bernardino County. I-215 connects with I-15 approximately 21 miles to the south, providing access to Orange County and San Diego County communities.

Project Site Access

Access to the Project site would be via Patterson Avenue and Placentia Avenue. Please refer also to the discussion of Project site access improvements presented subsequently.

Truck Routes

There are no designated County truck routes. Nonetheless, I-215 within the Study Area facilitates truck movement within the region. Placentia Avenue east of I-215 is a designated City of Perris truck route (City of Perris General Plan Circulation Element, p. 30, Exhibit CE-9, *Existing Designated Truck Routes*).

4.18.5.2 Alternative Transportation Modes

Bus Service

Riverside Transit Authority (RTA) is the public transit agency serving the Study Area and unincorporated Riverside County generally. RTA transit route maps and schedules are available at: <http://www.riversidetransit.com/index.php/riding-the-bus/maps-schedules>. There is currently no bus service proximate to (within 0.25 miles of) the Project site.

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Trails and Bikeway System

The Project is located within the MVAP. The MVAP Trails and Bikeway System Plan is presented at **Exhibit 4.18-2**. Within the Study Area, there is a proposed Class II bike path along Cajalco Expressway, Regional Trail along Placentia Avenue, and Community Trail along Tobacco Road.

Pedestrian Access

Existing pedestrian facilities in the Project site vicinity are illustrated at **Exhibit 4.18-3**. At present, there are no improved sidewalks or crosswalks adjacent to the Project site.

4.18.5.3 Traffic Volumes

Existing peak hour traffic volumes within the Study Area were determined by field traffic counts conducted in February 2019, while schools were in session. There were no observations made in the field that would indicate atypical traffic conditions on the count dates, such as construction activity or detour routes.

Weekday morning (AM) peak traffic conditions are represented by traffic counts conducted for the two-hour period between 7:00 and 9:00 a.m. Weekday evening (PM) peak hour traffic conditions are represented by traffic counts conducted for the two-hour period from 4:00 to 6:00 p.m. Detailed traffic count data for Existing Conditions is provided at TIA Appendix 3.1.

4.18.5.4 Intersection Operations

Under Existing Conditions, with the exception of Harvill Avenue/North A Street (see **Table 4.18.7**), all Study Area intersections operate at acceptable LOS. Please refer also to TIA Table 3-1.

Table 4.18.7
Intersection Deficiencies, Existing Conditions

ID No.	Intersection	Traffic Control	Delay		LOS	
			AM	PM	AM	PM
10	Harvill Avenue/North A Street	<u>AWS</u>	>100.0	16.7	F	C

4.18.5.5 Freeway Ramp Queuing Operations

Under Existing Conditions, all Study Area freeway ramp queues perform acceptably. Please refer also to TIA Table 3-2.

4.18.5.6 Mainline Freeway Segment Operations

Under Existing Conditions, with the exception of: I-215 NB - North of Ramona Expressway; and I-215 NB - Ramona Expressway to Nuevo Road (see **Table 4.18.8**), all Study Area freeway segments perform acceptably. Please refer also to TIA Table 3-3.

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Table 4.18.8
Freeway Segment Deficiencies, Existing Conditions

Freeway Segment	Lanes	Density		LOS	
		AM	PM	AM	PM
I-215 NB - North of Ramona Expressway	3	42.1	21.9	E	C
I-215 NB - Ramona Expressway to Nuevo Road	3	39.4	21.4	E	C

Freeway Merge/Diverge Area Operations

Under Existing Conditions, all Study Area merge/diverge areas perform acceptably (TIA, p. 43).

4.18.6 FUTURE CONDITIONS

The following discussions address future traffic conditions within the Study Area including descriptions of traffic that would be generated by the Project, and traffic conditions attributable to ambient growth and related development projects.

4.18.6.1 Project Trip Generation

Trip generation reflects traffic attracted to and produced by a given development. Trip generation rates employed in this analysis establish likely maximum trip generation that would be generated by the Project. The Project peak hour trip generation rates are based on information presented in *Draft TUMF* [Transportation Uniform Mitigation Fee] *High-Cube Warehouse Trip Generation Study* (WSP) November 6, 2018 (WSP Study). The WSP Study was commissioned by the Western Riverside Council of Governments (WRCOG) in support of the current TUMF update. The WSP Study, while providing relevant peak hour trip generation rates, does not provide vehicle split information. Vehicle splits employed in this analysis were obtained from *High-Cube Warehouse Vehicle Trip Generation Analysis* (Institute of Transportation Engineers) October 2016.

PCE factors were applied to the Project truck (large 2-axles, 3-axles, 4+-axles) volumes. PCEs allow truck traffic to be represented as a standardized unit (i.e., passenger cars) to be used for the purposes of roadway system capacity and level of service analyses. For example, a 4-axle truck is equivalent to 3.0 PCE in terms of its effects on roadway system capacities and LOS.

These PCE factors are consistent with the values recommended for use in the San Bernardino County CMP, 2016 Update and exceed factors recommended for use in the County of Riverside traffic study guidelines. In this regard, the TIA PCE factors likely overstate, rather than understate Project trip generation, and thereby establish likely maximum LOS impacts.

Project trip generation rates (PCEs and actual vehicles) are presented at **Table 4.18.9**. Project Trip generation (PCEs and actual vehicles) is presented at **Table 4.18.10**. Please refer also to the Project TIA, Section 4.1 *Project Trip Generation* for further details regarding Project trip generation characteristics.

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Environmental Impacts - Transportation

Table 4.18.9
Project Trip Generation Rates

Land Use	Units	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Actual Vehicle Trip Generation Rates								
High-Cube Fulfillment Center Warehouse	TSF	0.098	0.029	0.127	0.048	0.123	0.171	2.209
Passenger Cars		0.082	0.025	0.107	0.042	0.107	0.149	1.816
2-4 Axle Trucks		0.006	0.002	0.008	0.003	0.008	0.011	0.168
5+ Axle Trucks		0.009	0.003	0.012	0.003	0.008	0.011	0.225
Passenger Car Equivalent (PCE) Trip Generation Rates³								
High-Cube Fulfillment Center Warehouse	TSF	0.098	0.029	0.127	0.048	0.123	0.171	2.209
Passenger Cars		0.082	0.025	0.107	0.042	0.107	0.149	1.816
2-4 Axle Trucks (PCE = 2.0)		0.012	0.004	0.016	0.006	0.016	0.022	0.336
5+ Axle Trucks (PCE = 3.0)		0.028	0.008	0.036	0.009	0.024	0.033	0.675

Table 4.18.10
Project Trip Generation Summary

Land Use	Quantity	Units	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Actual Vehicles									
High-Cube Fulfillment Center Warehouse	699.630	TSF							
Passenger Cars:			58	17	75	29	75	104	1,272
Truck Trips:									
2-4 axle:			4	1	5	2	6	8	118
5+ axle:			6	2	8	2	6	8	158
– Net Truck Trips			10	3	13	4	12	16	276
FULFILLMENT CENTER TOTAL NET TRIPS <i>(Actual Vehicles)</i>			68	20	88	33	87	120	1,548
Passenger Car Equivalent (PCE)									
High-Cube Fulfillment Center Warehouse	699.630	TSF							
Passenger Cars:			58	17	75	29	75	104	1,272
Truck Trips:									

Table 4.18.10
Project Trip Generation Summary

Land Use	Quantity	Units	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
2-4 axle:			9	3	12	4	11	15	236
5+ axle:			19	6	25	6	17	23	472
- Net Truck Trips			28	9	37	10	28	38	708
<i>FULFILLMENT CENTER TOTAL NET TRIPS (PCE)²</i>			86	26	112	39	103	142	1,980

Available or planned alternative travel modes may diminish the Project's forecasted traffic volumes. However, the traffic-reducing potentials of alternative travel modes were not considered in the Project trip generation estimates. Project traffic volumes considered in this analysis therefore represent the likely maximum Project traffic generation and traffic impact condition.

4.18.6.2 Project Trip Distribution and Assignment

The trip distribution process establishes the directional orientation of traffic approaching and departing the Project site. Trip distribution is influenced by the location of the Project site in relation to residential, employment and recreational opportunities, and proximity to the regional freeway system. Based on the trip distribution patterns, peak hour trips were assigned at Study Area intersections. Please refer to the Project TIA Section 4.2, *Project Trip Distribution*, and Section 4.4, *Project Trip Assignment* for additional details regarding the trip distribution and trip assignment processes.

4.18.6.3 Ambient Traffic Growth

Per Riverside County traffic study requirements, a background (ambient) traffic growth factor is reflected in the Project TIA. The ambient growth approximates generalized regional traffic growth. For the Project considered here, a 2% annual growth factor (or 4.04% compounded over two years 2019 – 2021) has been applied to reflect ambient increased traffic in the Study Area.

4.18.6.4 Related Projects Traffic Contributions

Traffic generated by cumulative or "related" projects was then added to the calculated ambient traffic growth. Related projects comprise approved or anticipated development proposals that would generate traffic that would interact with traffic generated by the Project. Related projects are identified at **Table 4.18.11** and are mapped at **Exhibit 4.18-4**.

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Environmental Impacts - Transportation

**Table 4.18.11
Related Projects**

No.	Project Name / Case Number	Land Use	Quantity	Units	Location
Riverside County					
RC1	McCanna Hills / TTM 33978	SFDR	63	DU	SWC of Sherman Ave. & Walnut Ave.
RC2	PP26293	High-Cube Warehouse	612.481	TSF	SWC of Patterson Ave. & Rider St.
RC3	PPT180023: Rider Commerce Center	Warehousing	204.330	TSF	NEC of Patterson Ave. & Rider St.
RC4	PPT180025: Seaton Commerce Center	High-Cube Warehouse	210.800	TSF	SEC of Seaton Av. & Perry St.
RC5	Farmer Boys/Retail Shop	Retail	16.306	TSF	NEC of Harvill Ave. & Cajalco Rd.
		Fast-Food with Drive Thru	3.252	TSF	
RC6	PP26173	High-Cube Warehouse	423.665	TSF	SWC of Harvill Ave. & Rider St.
RC7	Val Verde Logistics Center	High-Cube Warehouse	280.308	TSF	NWC of Harvill Ave. & Old Cajalco Rd.
RC8	Majestic Freeway Business Center - Building 5	Warehousing	40.000	TSF	NEC of Harvill Ave. & Messenia Ln.
RC9	Majestic Freeway Business Center - Building 6	Warehousing	72.000	TSF	North of Messenia Ln., East of Harvill Ave.
RC10	Majestic Freeway Business Center - Building 7	Warehousing	80.000	TSF	North of Cajalco Exwy., East of Harvill Ave.
RC11	Majestic Freeway Business Center - Building 8	Warehousing	110.000	TSF	North of Cajalco Exwy., East of Harvill Ave.
RC12	Majestic Freeway Business Center - Building 9	Warehousing	45.000	TSF	East of Messenia Ln., North of Harvill Ave.
RC13	Majestic Freeway Business Center - Building 10	High-Cube Warehouse	600.000	TSF	SEC of Harvill Ave. & Perry St.
RC14	Majestic Freeway Business Center - Buildings 1, 3 & 4	Warehousing	48.930	TSF	NWC of Harvill Ave. & Cajalco Rd.
		High-Cube Warehouse	1195.740	TSF	
RC15	Majestic Freeway Business Center - Building 11	High-Cube Warehouse	391.045	TSF	NEC of Harvill Ave. & Perry St.
RC16	Majestic Freeway Business Center - Building 15	Warehousing	90.279	TSF	NWC of Harvill Ave. & Commerce Center Dr.
RC17	Majestic Freeway Business Center - Building 19	Warehousing	364.560	TSF	SWC of Harvill Ave. & Old Oleander Ave.
RC18	Majestic Freeway Business Center - Building 20	Warehousing	425.830	TSF	SWC of Harvill Ave. & Old Oleander Ave.
RC19	Majestic Freeway Business Center - Building 21,22	Warehousing	241.059	TSF	NEC of Decker Rd. & Old Oleander Ave.
RC20	Knox Logistics Center	High-Cube Warehouse	1259.410	TSF	NWC of Decker Rd. & Old Oleander Ave.
RC21	Oleander Business Park	High-Cube Warehouse	680.000	TSF	NWC of Decker Rd. & Harley Knox Blvd.
RC22	Majestic Freeway Business Center - Building 12	Warehousing	154.751	TSF	NEC of Harvill Ave. & Commerce Center Dr.
RC23	Harvill Distribution Center	High-Cube Warehouse	345.103	TSF	East of Harvill Ave., South of Orange St.
RC24	PP26241	Warehousing	23.600	TSF	SEC of Harvill Ave. & Placentia St.
RC25	PP26220	Warehousing	66.000	TSF	East of Harvill Ave., North of Placentia St.
City of Perris					
P1	Bargemann / DPR 07-09-0018	Warehousing	173.000	TSF	NEC of Webster & Nance

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Environmental Impacts - Transportation

**Table 4.18.11
Related Projects**

No.	Project Name / Case Number	Land Use	Quantity	Units	Location
P2	Duke 2 / DPR 16-00008	High-Cube Warehouse	669.000	TSF	NEC of Indian & Markham
P3	First Perry / DPR 16-00013	High-Cube Warehouse	240.000	TSF	SWC of Redlands Ave. & Perry St.
P4	Gateway / DPR 16-00003	High-Cube Warehouse	400.000	TSF	South of Harley Knox Blvd., East of Hwy. 215
P6	OLC 1 / DPR 12-10-0005	High-Cube Warehouse	1,455.000	TSF	West of Webster Ave., North of Ramona Exwy.
P5	Duke Realty - Perris & Markham	High-Cube Warehouse	1,189.860	TSF	SEC of Perris Bl. & Markham St.
P7	OLC2 / DPR 14-01-0015	High-Cube Warehouse	1,037.000	TSF	West of Webster Ave., North of Markham St.
P8	Canyon Steel	Manufacturing	28.124	TSF	NWC of Patterson Ave. & California Ave.
P9	Markham Industrial / DPR 16-00015	Warehousing	170.000	TSF	NEC of Indian Ave. & Markham St.
P10	Rados / DPR 07-0119	High-Cube Warehouse	1,200.000	TSF	NWC of Indian Ave. & Rider St.
P11	Rider 1 / DPR 16-0365	High-Cube Warehouse	350.000	TSF	SWC of Redlands Ave. & Rider St.
P12	Indian/Ramona Warehouse	High-Cube Warehouse	428.730	TSF	North of Ramona Exwy., West of Indian Ave.
P13	Rider 3 / DPR 06-0432	High-Cube Warehouse	640.000	TSF	North of Rider St., West of Redlands
P14	Westcoast Textile / DPR 16-00001	Warehousing	180.000	TSF	SWC of Indian St. & Nance St.
P15	Duke at Patterson / DPR 17-00001	High-Cube Warehouse	811.000	TSF	SEC of Patterson Ave. & Markham St.
P16	Harley Knox Commerce Park / DPR 16-004	High-Cube Warehouse	386.278	TSF	NWC of Harley Knox Blvd. & Redlands Ave.
P17	Perris Marketplace / DPR 05-0341	Commercial Retail	520.000	TSF	West of Perris Blvd. At Avocado Ave.
P18	Stratford Ranch Residential / TTM 36648	SFDR	270	DU	West of Evans Rd. At Markham St.
P19	Pulte Residential / TTM 30850	SFDR	496	DU	West of Evans Rd. At Citrus Ave.
P20	Perris Circle 3	Warehousing	210.900	TSF	NWC of Redlands Ave. & Nance Ave.
City of Moreno Valley					
MV1	PEN18-0042	SFDR	2	DU	SEC of Indian St. & Krameria Ave.
MV2	Tract 33024	SFDR	8	DU	SEC of Indian St. & Krameria Ave.
MV3	Tract 32716	SFDR	57	DU	NEC of Indian St. & Mariposa Ave.
MV4	Prologis 1	High-Cube Warehouse	1000.000	TSF	NEC of Indian Ave. & Mariposa Ave.
MV5	Moreno Valley Industrial Park	High-Cube Warehouse	207.684	TSF	NEC of Heacock St. & Iris Ave.
MV6	Moreno Valley Walmart	Retail	193.000	TSF	SWC of Perris Blvd. & Gentian Ave.
MV7	Moreno Valley Utility Substation	High-Cube Warehouse	PUBLIC	TSF	NWC of Edwin Rd. & Kitching St.
MV8	Phelan Development	High-Cube Warehouse	98.210	TSF	SEC of Indian St. & Nandina Ave.
MV9	Nandina Industrial Center	High-Cube Warehouse	335.966	TSF	South of Nandina Ave., West of Perris Blvd.
MV10	Tract 31442	SFDR	63	DU	NWC of Perris Blvd. & Mariposa Ave.

Table 4.18.11
Related Projects

No.	Project Name / Case Number	Land Use	Quantity	Units	Location
MV11	Tract 22180	SFDR	140	DU	North of Gentian Ave., East of Indian St.
MV12	Tract 36760	SFDR	221	DU	SEC of Indian St. & Gentian Ave.

4.18.7 LOS DEFICIENCIES AND RECOMMENDED IMPROVEMENTS

4.18.7.1 Introduction

The following discussions identify Study Area LOS conditions without and with the Project. Potential LOS deficiencies are identified under the following scenarios:

- Existing Plus Project (E+P) (the E+P analysis does not evaluate the proposed I-215/Placentia Avenue Interchange);
- Existing Plus Ambient Growth Plus Project (EAP) (2021) (without and with I-215/Placentia Avenue Interchange); and
- Existing Plus Ambient Growth Plus Project Plus Cumulative Projects (EAPC) (2021) (without and with I-215/Placentia Avenue Interchange).

Sub-topics evaluated under each of these scenarios include:

- Intersection LOS Analysis;
- Freeway Ramp Queueing Analysis; and
- Freeway Mainline Facilities Analysis (Freeway Segments and Freeway Merge/Diverge Areas).

Potential LOS deficiencies that would result from or would be exacerbated by Project traffic contributions are identified, and improvements are recommended to resolve potential deficiencies. The Applicant would either construct recommended traffic improvements or pay requisite fees that would be assigned to construction of recommended traffic improvements.

4.18.7.2 Project Improvements

Improvements to be constructed by the Project are listed below and are illustrated at **Exhibit 4.18-5**. Roadways adjacent to the Project, site access points and site-adjacent intersections will be constructed consistent with the identified roadway classifications and respective cross-sections in the County of Riverside General Plan Circulation Element or as otherwise specified by the County. Additional or alternative improvements may be specified by the County through the Project Conditions of Approval.¹

On-site traffic signing and striping should be implemented in conjunction with detailed construction plans for the Project site. Sight distance at each Project access point should be reviewed with respect to standard Caltrans and County of Riverside sight distance standards at the time of preparation of final grading, landscape and street improvement plans.

¹ This EIR evaluates potential impacts that would result from the maximum scope of recommended improvements as detailed in the Project TIA. The ultimate scope of required Project traffic improvements may be less than that evaluated here, and would be determined in consultation with the Lead Agency prior to the issuance of development permits.

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Roadways

Patterson Avenue (N – S)

Construct Patterson Avenue at its ultimate half-section width as a Secondary Highway (100-foot right-of-way) between the Project’s northern boundary and Placentia Street, in compliance with applicable County of Riverside and Caltrans standards.

Placentia Street (E – W)

Construct Placentia Street at its ultimate half-section width as a Secondary Highway (100-foot right-of-way) between the Project’s Patterson Avenue and the Project’s eastern boundary, in compliance with applicable County of Riverside and Caltrans standards.

Intersections

*Patterson Avenue & Driveway 1*²

Install a stop control on the westbound approach and construct the intersection with the following geometrics:

- Northbound Approach: One shared left-through-right turn lane.
- Southbound Approach: One shared left-through-right turn lane.
- Eastbound Approach: One shared left-through-right turn lane.
- Westbound Approach: One shared left-through-right turn lane.

Patterson Avenue & Placentia Street

Maintain the existing traffic control and construct the intersection with the following geometrics:

- Northbound Approach: Not Applicable (N/A)
- Southbound Approach: One shared left- right turn lane.
- Eastbound Approach: One shared left-through lane.
- Westbound Approach: One through lane and one right turn lane.

Driveway 2/Tobacco Road & Placentia Street

Install a stop control on the southbound approach and construct the intersection with the following geometrics:

- Northbound Approach: One shared left-through-right turn lane.
- Southbound Approach: One shared left-through-right turn lane.
- Eastbound Approach: One shared left-through-right turn lane.
- Westbound Approach: One shared left-through-right lane.

Placentia Street & Driveway 3

Install a stop control on the southbound approach and construct the intersection with the following geometrics:

² The Applicant is endeavoring to acquire right-of-way that would allow for alignment of Driveway 1 on Patterson Avenue with Walnut Street to the west. If the right-of-way cannot be acquired, the Project Applicant will work with County staff to develop an alternative design for Driveway 1.

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- Northbound Approach: N/A
- Southbound Approach: One shared left-right turn lane.
- Eastbound Approach: One shared left-through lane.
- Westbound Approach: One shared through-right turn lane.

Project Site Access

Vehicular and truck traffic access to the Project site would be provided via the following driveways:

- Patterson Avenue and Walnut Street via Driveway 1 – full access for passenger cars and trucks;
- Placentia Street via Driveway 2 – full access for passenger cars only; and
- Placentia Street via Driveway 3 – full access for passenger cars and trucks.

4.18.7.3 Other Study Area Improvements, Fee Assessments, and Funding Mechanisms

Overview

In instances where recommended improvements would not be constructed as part of the Project, the Applicant would pay all requisite fees directed to the completion of recommended Study Area improvements. Recommended Study Area improvements are identified for each of the analysis timeframes.

Improvements under each of the analytic scenarios tier off of the preceding scenario(s). That is, Opening Year (2021) improvements reflect improvements required under Existing Conditions (2019), plus any additional improvements required to address increased traffic demands under (2021) conditions. This tiered structure provides the Lead Agency with incremental as well as aggregated estimates of recommended improvements and establishes approximate timeframes for their implementation. The final configuration and timing for implementation of improvements identified herein is, however, subject to priorities of the County and other affected jurisdictions.

Traffic impact fee assessment mechanisms and fee programs applicable to the Project and under which fees would be paid directly to the County include the Riverside County Development Impact Fee (DIF) Program. The Applicant would also remit applicable Transportation Uniform Mitigation Fee (TUMF) Program payments to the County. The County would then transmit Project TUMF Program payments to the Executive Director of WRCOG. In instances where recommended improvements are not covered under DIF or TUMF Programs, the Applicant would pay fair share fees representing the Project's proportional contributions to cumulative traffic impacts at the affected location(s).

Compliance with the County DIF Program, WRCOG TUMF Program, and any required fair share fee payments would fulfill the Applicant responsibilities for improvements recommended to address potential LOS deficiencies, and would reduce impacts to levels that would be less-than-significant.

Local and Regional Traffic Impact Fee Programs

Transportation improvements within the Study Area would be funded via a combination of DIF Program and TUMF Program fee assessments. Fee Programs are described below.

County DIF Program

The County DIF Program covers all portions of unincorporated Riverside County and provides funding for a variety of public facilities that are both transportation and non-transportation related, including various roads, bridges and traffic signals. The transportation facilities component of the County DIF Program

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provides funding for improvements necessary to accommodate traffic growth as reflected in the County General Plan Circulation Element.

The County DIF Program establishes separate rates for each County Area Plan, including the MVAP. The County DIF Program is administered by the Riverside County Executive Office and was adopted under County Ordinance No. 659. (See also: <https://www.rivcocob.org/wp-content/uploads/2009/10/659.13.pdf>).

In compliance with the Mitigation Fee Act, after the County collects impact fees, the fees are deposited into a separate capital facilities account to avoid any co-mingling of the fees with other County revenues and funds. The fees, and any interest thereon, must be expended solely for the purpose for which the fees were collected. The County's DIF Program thus creates a mechanism for charging fees for new development for purposes of defraying the cost of public roadway facilities related to such development. The County's DIF Program is a result of a comprehensive analysis of the need for future roadway infrastructure improvements and it allows the County to deal logically and reasonably with the cumulative impacts of development.

The timing of the improvements is established through the County's Transportation Improvement Program ("TIP"). This program is overseen by the County Transportation Department and is amended on a periodic basis to add projects that the County identifies as required to maintain adequate levels of service on County roadway facilities or to remove projects which have been fully funded, constructed and completed. The roadway improvements identified in the TIP consist of improvements that improve County roadway facilities consistent with the County General Plan Circulation Element. Periodically (e.g., each year), the County conducts traffic counts, reviews traffic accident reports and reviews traffic trends throughout the County. The County uses this data to determine necessary roadway improvements and to ensure that construction of needed improvements occurs prior to, or concurrent with, the time they are necessary to achieve performance levels established by the County. In this way, improvements are typically constructed before the levels of service degrade beyond one of the County's performance standards.

The Applicant would pay MVAP DIF consistent with the DIF rates in effect at the time of building permit issuance. Payment of requisite DIF would satisfy the Applicant's mitigation responsibilities for potentially significant impacts. These fees would be assigned under the County TIP to construction of those improvements necessary to ensure adequate LOS conditions are maintained in the Study Area.

Western Riverside Council of Governments TUMF Program

The Western Riverside Council of Governments (WRCOG) TUMF Program provides funding for major transportation facilities within the Study Area. Riverside County adopted the Western Riverside County TUMF through Ordinance 824. (See also: <http://www.rivcocob.org/ords/800/824.pdf>).

The County of Riverside collects TUMF for new development. Fees submitted to the County are passed on to the WRCOG, the TUMF program administrator. Pursuant to Ordinance 824, TUMF Program fees shall be paid at the time a certificate of occupancy is issued for the Project or upon final inspection, whichever comes first (the "Payment Due Date"). Alternatively, TUMF may be paid at the issuance of a building permit, and the fee payment shall be calculated based on the fee in effect at that time, provided the developer tenders the full amount of the TUMF obligation. If the developer makes only a partial payment prior to the Payment Due Date, the total TUMF amount due shall be based on the TUMF fee schedule in place on the Payment Due Date.

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Fair Share Fees

In the event that a pre-existing fee program does not fully cover costs of required improvements, the Lead Agency may require a fair share fee calculation. The Applicant would pay any required fair share fees. Payment of fair share fees would satisfy the Applicant’s mitigation responsibilities for potentially significant impacts. These fees would be assigned to construction of those improvements necessary to ensure adequate LOS conditions are maintained in the Study Area.

4.18.8 L.O.S. DEFICIENCY/IMPACT SIGNIFICANCE CRITERIA

4.18.8.1 Intersections

Study Area intersection LOS deficiency criteria are summarized below. Project traffic that would result in or contribute to intersection LOS deficiencies would be considered potentially significant cumulative impacts.

- When the “Without Project” condition is acceptable (LOS D or better), and Project traffic (50 or more peak hour trips) causes deterioration below LOS D, a deficiency would occur.
- When the “Without Project” condition is already unacceptable (LOS D or worse) and Project traffic (50 or more trips) would contribute to the pre-existing unacceptable conditions, a deficiency would occur.

For ease of reference, Project peak hour trip contributions to Study Area intersections are summarized at **Table 4.18.12**.

Table 4.18.12
Summary of Project Peak Hour Trip Contributions-Study Area Intersections

ID	Intersection Location	Without I-215/Placentia Ave. Interchange Improvements		With I-215/Placentia Ave. Interchange Improvements	
		AM Peak Hr.	PM Peak Hr.	AM Peak Hr.	PM Peak Hr.
1	Patterson Avenue & Rider Street	21	26	8	11
2	Patterson Av. & Walnut St./Driveway 1	30	37	30	38
3	Patterson Av. & Placentia St.	9	11	22	27
4	Driveway 2/Tobacco Rd. & Placentia St.	43	58	56	74
5	Driveway 3 & Placentia St. – Future Intersection	91	116	104	131
6	Harvill Av. & Cajalco Expressway	70	85	20	24
7	Harvill Av. & Rider St.	69	85	20	25
8	Harvill Av. & Placentia St.	91	116	106	131
9	Harvill Av. & Orange St.	43	57	12	15
10	Harvill Av. & A St.	43	57	12	15
11	I-215 SB Ramps & Ramona Expressway	54	66	4	5

Table 4.18.12
Summary of Project Peak Hour Trip Contributions-Study Area Intersections

ID	Intersection Location	Without I-215/Placentia Ave. Interchange Improvements		With I-215/Placentia Ave. Interchange Improvements	
		AM Peak Hr.	PM Peak Hr.	AM Peak Hr.	PM Peak Hr.
12	I-215 SB Ramps & Placentia Av. – Future Intersection	0	0	82	102
13	I-215 SB Ramps & Nuevo Rd.	43	57	12	15
14	I-215 NB Ramps & Ramona Expressway	16	49	4	5
15	I-215 NB Ramps & Placentia Av. – Future Intersection	0	0	36	55
16	I-215 NB Ramps & Nuevo Rd.	36	26	12	15

4.18.8.2 Freeway Ramps Queuing

The average (50th percentile) queue represents the typical queue length for peak hour traffic conditions. Queues exceeding the 95th percentile are considered to represent deficient conditions. Project traffic that would result in ramp queues exceeding the 95th percentile would be considered a potentially significant cumulative impact.

4.18.8.3 Freeway Facilities (Freeway Mainline Segments/Merge Diverge Areas)

Study Area freeway facility LOS deficiencies would occur under the conditions summarized below. Project traffic that would result in or contribute to freeway facilities LOS deficiencies would be considered potentially significant cumulative impacts.

- When the “Without Project” LOS condition is acceptable (LOS D or better) and Project traffic would degrade operations below LOS D, a deficiency would occur.
- When the “Without Project” condition is already unacceptable (below LOS D, or operating at or near capacity) and Project traffic (50 or more peak hour trips) would contribute to pre-existing unacceptable conditions, a deficiency would occur.

For ease of reference, Project peak hour trip contributions to Study Area freeway mainline facilities are summarized at **Table 4.18.13**.

Table 4.18.13
Summary of Project Peak Hour Trip Contributions-Study Area Freeway Mainline Facilities

ID	Freeway Mainline Segments	Without I-215/Placentia Ave. Interchange Improvements		With I-215/Placentia Ave. Interchange Improvements	
		AM Peak Hr.	PM Peak Hr.	AM Peak Hr.	PM Peak Hr.
1	I-215 SB, North of Ramona Exwy.	27	13	27	13
2	I-215 SB, Off-Ramp at Ramona Exwy.	27	13	0	0

Table 4.18.13
Summary of Project Peak Hour Trip Contributions-Study Area Freeway Mainline Facilities

ID	Freeway Mainline Segments	Without I-215/Placentia Ave. Interchange Improvements		With I-215/Placentia Ave. Interchange Improvements	
		AM Peak Hr.	PM Peak Hr.	AM Peak Hr.	PM Peak Hr.
3	I-215 SB, On-Ramp at Ramona Exwy.	0	0	0	0
4	I-215 SB, Ramona Exwy. to Placentia Av.	0	0	27	13
5	I-215 SB, Off-Ramp at Placentia Av.	0	0	27	13
6	I-215 SB, On-Ramp at Placentia Av.	0	0	6	26
7	I-215 SB, Placentia Av. to Nuevo Rd.	0	0	6	26
8	I-215 SB, Off-Ramp at Nuevo Rd.	0	0	0	0
9	I-215 SB, On-Ramp at Nuevo Rd.	6	26	0	0
10	I-215 SB, South of Nuevo Rd.	6	26	6	26
11	I-215 NB, North of Ramona Exwy.	8	34	8	34
12	I-215 NB, On-Ramp at Ramona Exwy.	8	34	0	0
13	I-215 NB, Off-Ramp at Ramona Exwy.	0	0	0	0
14	I-215 NB, Ramona Exwy. to Placentia Av.	0	0	8	34
15	I-215 NB, On-Ramp at Placentia Av.	0	0	8	34
16	I-215 NB, Off-Ramp at Placentia Av.	0	0	20	10
17	I-215 NB, Placentia Av. to Nuevo Rd.	0	0	20	10
18	I-215 NB, On-Ramp at Nuevo Rd.	0	0	0	0
19	I-215 NB, Off-Ramp at Nuevo Rd.	20	11	0	0
20	I-215 NB, South of Nuevo Rd.	20	11	20	10

4.18.9 THRESHOLDS OF SIGNIFICANCE

The County of Riverside has adopted Thresholds of Significance that vary in some cases topically and in format from the Appendix G Thresholds, as reflected in the Initial Study prepared for the Project. This EIR uses the following County-adopted Thresholds of Significance to comprise the basis of impact analyses.

Transportation

- a) **Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?**

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- 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) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- d) Cause an effect upon, or a need for new or altered maintenance or roads?
- e) Cause an effect upon circulation during the project's construction?
- f) Result in inadequate emergency access or access to nearby uses?

4.18.10 ENVIRONMENTAL IMPACTS

- a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

OVERVIEW

The discussions in this Section address the potential for the Project to conflict with applicable plans, policies and ordinances establishing a measure of effectiveness for the performance of the circulation system. In this case, the measure of performance is the applicable jurisdictional Level of Service (LOS) standard. The LOS discussions take into account “all modes of transportation, including mass transit and nonmotorized 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 following discussions in this Section summarize LOS conditions within the Study Area reflecting implementation of the Project. Analysis scenarios evaluated include:

- Existing Plus Project (E+P);
- Existing Plus Ambient Growth Plus Project (EAP) (2021) (without and with I-215/Placentia Avenue Interchange); and
- Existing Plus Ambient Growth Plus Project Plus Cumulative Projects (EAPC) (2021) (without and with I-215/Placentia Avenue Interchange).

For each of the considered scenarios, potentially significant traffic impacts (deficient conditions) are identified. Less-than-significant impacts are noted, and mitigation measures are proposed for those impacts determined to be potentially significant impacts.

EXISTING PLUS PROJECT (E+P)

The Existing Plus Project (E+P) analysis identifies potential transportation impacts that would occur assuming implementation of the Project under Existing Conditions and provides an indication of the incremental effects of the Project without the addition of assumed future cumulative traffic growth. The E+P analysis also identifies currently deficient LOS conditions to which the Project would contribute additional traffic. Improvements are recommended to resolve identified LOS deficiencies. The E+P

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analysis assumes that driveways and site-adjacent improvements to be constructed by the Project are in place. Under the E+P scenario, the following subtopics are discussed:

- Intersection LOS Analysis;
- Freeway Ramp Queuing Progression Analysis; and
- Freeway Facilities Analysis (Freeway Mainline Segments, Freeway Merge/Diverge Areas).

Intersection Analysis

Intersection impacts under Existing (2019)/E+P Conditions are summarized at **Table 4.18.14**.

Table 4.18.14
Intersection Impacts
Existing Conditions (2019)/E+P Conditions

ID No.	Intersection	Traffic Control	Existing Conditions (2019)				E+P Conditions			
			Delay (secs.)		LOS		Delay (secs.)		LOS	
			AM	PM	AM	PM	AM	PM	AM	PM
1	Patterson Av. & Rider St.	CSS	9.0	9.8	A	A	8.9	9.9	A	A
2	Patterson Av. & Walnut St./Dwy. 1	CSS	8.4	8.5	A	A	8.7	8.7	A	A
3	Patterson Av. & Placentia St.	CSS	8.7	8.6	A	A	8.7	8.7	A	A
4	Dwy. 2/Tobacco Rd. & Placentia St.	CSS	8.6	8.5	A	A	9.1	9.0	A	A
5	Dwy. 3 & Placentia St.	CSS	Future Intersection				9.1	9.2	A	A
6	Harvill Av. & Cajalco Exwy.	TS	25.6	22.9	C	C	26.1	23.1	C	C
7	Harvill Av. & Rider St.	CSS	13.4	15.4	B	C	14.0	16.5	B	C
8	Harvill Av. & Placentia St.	AWS	16.4	14.0	C	B	17.4	16.2	C	C
9	Harvill Av. & Orange Av.	CSS	15.5	13.4	C	B	13.1	14.4	B	B
10	Harvill Av. & N. A St.	AWS	>100.0	16.7	F	C	>100.0*	18.3	F*	C
11	I-215 SB Ramps & Ramona Exwy.	TS	23.4	28.6	C	C	23.6	30.1	C	C
12	I-215 SB Ramps & Placentia Av.		Does Not Exist				Does Not Exist			
13	I-215 SB Ramps & Nuevo Rd.	TS	17.6	33.5	B	C	17.6	35.0	B	C
14	I-215 NB Ramps & Ramona Exwy.	TS	25.3	14.0	C	B	25.6	16.0	C	B
15	I-215 NB Ramps & Placentia Av.		Does Not Exist				Does Not Exist			
16	I-215 NB Ramps & Nuevo Rd.	TS	18.0	10.1	B	B	18.0	10.3	B	B

Notes: CSS = Cross-street Stop; AWS = All-way Stop; TS = Traffic Signal; **CSS** = Improvement

* Project would contribute fewer than 50 peak hour trips.

As indicated at Table 4.18.14, Project traffic would contribute to deficient LOS conditions at Harvill Av. & N. A St. (Intersection No. 10) under E+P Conditions. However, the Project would contribute fewer than 50 peak hour trips to the deficient conditions. Per the deficiency/impact significance criteria identified at Section 4.18.1.9, Project impacts at Harvill Av. & N. A St. (Intersection No. 10) under E+P Conditions

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would therefore be less-than-significant. For all other intersections and peak hour conditions, the Project would contribute fewer than 50 peak hour trips to deficient LOS conditions and/or Project traffic would not otherwise result in or cause LOS deficiencies. Impacts for these locations and peak hour conditions would also be less-than-significant.

Improvements recommended to achieve acceptable LOS under E+P Conditions are listed below. LOS Conditions without and with the recommended improvements are summarized at **Table 4.18.15**. Although mitigation is not required for Project LOS impacts, MVAP DIF paid by the Applicant would be available for funding of improvements necessary to ensure adequate LOS conditions are maintained in the Study Area.

E+P Conditions-Recommended Improvements

Harvill Avenue & N. A Street (Intersection No. 10)

- Install a Traffic Signal.
- Add a northbound right turn lane with overlap phasing.

Table 4.18.15
Intersection Operations
E+P Conditions w/o Improvements, E+P Conditions w/Improvements

ID No.	Intersection	Traffic Control	Intersection Approach Lanes ¹												Delay (secs.)		LOS	
			Northbound			Southbound			Eastbound			Westbound			AM	PM	AM	PM
			L	T	R	L	T	R	L	T	R	L	T	R				
10	Harvill Av & N. A Street																	
	- Without Improvements	AWS	1	2	0	1	2	0	0	1	0	1	1	0	>100.0	18.3	F	C
	- With Improvements	TS	1	2	1 ≥	1	2	0	0	1	0	1	1	0	20.3	13.9	C	B

Notes: Delay and/ or LOS in Bold Typeface = Deficiency

L = Left; T = Through; R = Right; >> = Free-Right Turn Lane; d= Defacto Right Turn Lane; 1 = Improvement; TS = Traffic Signal
1 = Improvement

Level of Significance: Less Than Significant Impact.

Freeway Ramp Queuing Progression Analysis

Freeway ramp queuing impacts under Existing Conditions (2019)/E+P Conditions are summarized at **Table 4.18.16**.

Table 4.18.16
Ramp Queueing Impacts
Existing Conditions (2019)/E+P Conditions

Intersection	Movement	Available Stacking Distance (Feet)	Existing Conditions (2019)				E+P Conditions			
			95th Percentile Queue (Feet)		Acceptable?		95th Percentile Queue (Feet)		Acceptable?	
			AM Peak	PM Peak	AM	PM	AM Peak	PM Peak	AM	PM
I-215 SB Ramps / Ramona Exwy.	SBL	530	265	286	Yes	Yes	265	289	Yes	Yes
	SBL/T	1,100	267	290	Yes	Yes	267	294	Yes	Yes
	SBR	530	63	36	Yes	Yes	83	50	Yes	Yes
I-215 SB Ramps / Nuevo Rd.	SBL	1,020	116	249	Yes	Yes	116	232	Yes	Yes
	SBL/T	1,020	121	252	Yes	Yes	121	236	Yes	Yes
	SBR	300	19	8	Yes	Yes	19	9	Yes	Yes
I-215 NB Ramps / Ramona Exwy.	NBL	520	93	110	Yes	Yes	93	114	Yes	Yes
	NBL/T	1,120	91	112	Yes	Yes	91	115	Yes	Yes
	NBR	520	265	235	Yes	Yes	265	238	Yes	Yes
I-215 NB Ramps / Nuevo Rd.	NBL/T	1,010	171	64	Yes	Yes	194	73	Yes	Yes
	NBR	300	110	65	Yes	Yes	111	68	Yes	Yes

Notes: 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.

As indicated at Table 4.18.16, all freeway ramps would operate acceptably under Existing Conditions (2019)/E+P Conditions. Impacts would therefore be less-than-significant.

Level of Significance: Less Than Significant Impact.

Freeway Mainline Facilities Analysis

Freeway Segments

Freeway segments impacts under Existing Conditions (2019)/E+P Conditions are summarized at **Table 4.18.17**.

Table 4.18.17
Freeway Mainline Segment Impacts
Existing Conditions (2019)/E+P Conditions

Freeway	Direction	Mainline Segment	Lanes	Existing Conditions (2019)				E+P Conditions			
				Vehicle Density		LOS		Vehicle Density		LOS	
				AM	PM	AM	PM	AM	PM	AM	PM
I-215	SB	North of Ramona Exwy.	3	18.9	27.9	B	D	19.3	27.9	B	D
		SB Off-Ramp at Ramona Exwy.	3	27.1	33.9	C	D	27.5	34.0	C	D
		SB On-Ramp at Ramona Exwy.	3	21.8	29.2	C	D	21.8	29.2	C	D
		Ramona Exwy. to Nuevo Rd.	3	18.1	26.7	B	D	18.1	26.7	C	D
		SB Off-Ramp at Nuevo Rd.	3	25.0	32.4	C	D	25.0	32.4	C	D
		SB On-Ramp at Nuevo Rd.	3	15.5	21.9	B	C	15.5	21.9	B	C
		South of Nuevo Rd.	4	14.0	19.7	B	B	14.1	19.8	B	C
	NB	North of Ramona Exwy.	3	42.1	21.9	E	C	42.2*	22.3	E*	C
		NB On-Ramp at Ramona Exwy.	3	31.7	26.1	D	C	31.8	26.5	D	C
		NB Off-Ramp at Ramona Exwy.	3	31.6	28.6	D	D	31.6	28.6	D	D
		Ramona Exwy. to Nuevo Rd.	3	39.4	21.4	E	C	39.4*	21.4	E*	C
		NB On-Ramp at Nuevo Rd.	3	28.1	24.9	D	C	28.1	24.9	D	C
		NB Off-Ramp at Nuevo Rd.	4	30.7	15.4	D	B	30.8	15.4	D	B
		South of Nuevo Rd.	4	31.6	15.7	D	B	31.7	15.7	D	B

Notes: Delay and/ or LOS in Bold Typeface = Deficiency
 Vehicle Density expressed as passenger cars per mile per lane (pc/mi/ln).
 * Project would contribute fewer than 50 peak hour trips.

As indicated at Table 4.18.17, under E+P Conditions, Project traffic would contribute to AM peak hour deficient LOS conditions at I-215 Northbound, North of Ramona Exwy.; and I-215 Northbound, Ramona Exwy. to Nuevo Rd. However, the Project would contribute fewer than 50 peak hour trips to the deficient conditions. Per the deficiency/impact significance criteria identified at Section 4.18.1.9, Project impacts at I-215 Northbound, North of Ramona Exwy.; and I-215 Northbound, Ramona Exwy. to Nuevo Rd. under E+P Conditions would therefore be less-than-significant.

At this time, Caltrans has no near-term fee programs or other improvement programs in place to address the deficiencies caused by development projects on the SHS freeway facilities. Project TUMF payments would be available for funding and implementing any future recommended interchange improvements (arterial to freeway interchange).

Level of Significance: Less Than Significant Impact.

Freeway Merge/Diverge Area Operations

Under Existing Conditions (2019)/E+P Conditions, all Study Area merge/diverge areas would perform acceptably (TIA, p. 69). Impacts would therefore be less-than-significant.

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Level of Significance: Less Than Significant Impact.

EXISTING PLUS AMBIENT GROWTH PLUS PROJECT (EAP) (2021) CONDITIONS

The EAP (2021) analysis identifies potential transportation impacts that would occur assuming completion of the Project under Opening Year (2021) Conditions. EAP (2021) traffic conditions include existing (2019) traffic volumes, traffic generated by ambient growth, plus traffic generated by the Project.

Effects of the proposed future I-215/Placentia Avenue Interchange on Study Area traffic are also considered under the EAP (2021) analysis. Although the I-215/Placentia Avenue Interchange project is funded and construction is anticipated to commence in 2020, at the County’s request, the EAP (2021) analysis scenario has been evaluated both without and with the proposed interchange. The analysis therefore addresses potential impacts that could occur in the event the Project were to open before the completion of the interchange.

Lane configurations and traffic controls assumed to be in place under EAP (2021) Conditions include:

- Existing (2019) lane configurations and traffic controls;
- Project driveways and those facilities assumed to be constructed by the Project;
- Completion of the I-215/Placentia Avenue Interchange (“With Interchange” analysis only).

Under the EAP (2021) Conditions analysis, the following subtopics are discussed:

- Intersection LOS Analysis;
- Freeway Ramp Queuing Progression Analysis; and
- Freeway Mainline Facilities Analysis (Freeway Mainline Segments, Freeway Merge/Diverge Areas).

Intersection Analysis

Intersection impacts under EAP (2021) Conditions (Without and With I-215/Placentia Interchange improvements) are summarized at **Table 4.18.18**.

Table 4.18.18
Intersection Impacts
EAP (2021) Conditions Without/With I-215/Placentia Interchange

ID No.	Intersection	Traffic Control	Existing (2019)				EAP (2021) Without I-215/Placentia Interchange				EAP (2021) With I-215/Placentia Interchange			
			Delay (secs.)		LOS		Delay (secs.)		LOS		Delay (secs.)		LOS	
			AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM
1	Patterson Av. & Rider St.	CSS	9.0	9.8	A	A	8.9	10.0	A	B	8.9	9.9	A	A
2	Patterson Av. & Walnut St./Dwy. 1	CSS	8.4	8.5	A	A	8.8	8.7	A	A	9.0	8.8	A	A
3	Patterson Av. & Placentia St.	CSS	8.7	8.6	A	A	8.7	8.7	A	A	8.7	8.8	A	A

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Environmental Impacts - Transportation

Table 4.18.18
Intersection Impacts
EAP (2021) Conditions Without/With I-215/Placentia Interchange

ID No.	Intersection	Traffic Control	Existing (2019)				EAP (2021) Without I-215/Placentia Interchange				EAP (2021) With I-215/Placentia Interchange			
			Delay (secs.)		LOS		Delay (secs.)		LOS		Delay (secs.)		LOS	
			AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM
4	Dwy. 2/Tobacco Rd. & Placentia St.	CSS	8.6	8.5	A	A	9.1	9.0	A	A	9.2	9.2	A	A
5	Dwy. 3 & Placentia St.	CSS	Future Intersection				9.1	9.2	A	A	9.2	9.3	A	A
6	Harvill Av. & Cajalco Exwy.	TS	25.6	22.9	C	C	26.5	23.5	C	C	26.0	23.1	C	C
7	Harvill Av. & Rider St.	CSS	13.4	15.4	B	C	14.3	16.6	B	C	15.8	19.5	C	C
8	Harvill Av. & Placentia St.	AWS	16.4	14.0	C	B	18.7	25.6	C	D	>100.0*	100.0**	F**	F**
9	Harvill Av. & Orange Av.	CSS	15.5	13.4	C	B	16.8	14.8	C	B	19.2	17.6	C	C
10	Harvill Av. & N. A St.	AWS	>100.0	16.7	F	C	>100.0*	19.8	F*	C	>100.0*	24.8	F*	C
11	I-215 SB Ramps & Ramona Exwy.	TS	23.4	28.6	C	C	24.8	31.1	C	C	19.5	19.7	B	B
12	I-215 SB Ramps & Placentia Av.	TS	Does Not Exist				Does Not Exist				12.9	13.6	B	B
13	I-215 SB Ramps & Nuevo Rd.	TS	17.6	33.5	B	C	18.0	39.1	B	D	17.6	20.7	B	C
14	I-215 NB Ramps & Ramona Exwy.	TS	25.3	14.0	C	B	32.3	17.9	C	B	11.7	10.2	B	B
15	I-215 NB Ramps & Placentia Av.	TS	Does Not Exist				Does Not Exist				16.0	11.1	B	B
16	I-215 NB Ramps & Nuevo Rd.	TS	18.0	10.1	B	B	17.0	10.2	B	B	19.3	12.5	B	B

Notes: Delay and/ or LOS in Bold Typeface = Deficiency
 Vehicle Density expressed as passenger cars per mile per lane (pc/mi/ln).
 * Project would contribute fewer than 50 peak hour trips.
 ** Project would contribute at least 50 peak hour trips.

As indicated at Table 4.18.18, under the With I-215/Placentia Avenue Interchange scenario, Project traffic would contribute to at least 50 peak hour trips to deficient conditions (AM and PM peak hour) at Harvill Av. & Placentia St. (Intersection No. 8). Project impacts at the affected location(s) and peak hour(s) would be potentially significant.

For all other intersections and peak hour conditions, the Project would contribute fewer than 50 peak hour trips to deficient LOS conditions and/or Project traffic would not otherwise result in or cause LOS deficiencies. Impacts for these locations and peak hour conditions would therefore be less-than-significant.

Level of Significance: Potentially Significant. With I-215/Placentia Interchange only: Harvill Av. & Placentia St. (Intersection No. 8) AM/PM peak hour.

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Mitigation Measure:

MM-TR-1: MVAP DIF shall be paid pursuant to County Ordinance 659. TUMF shall be paid pursuant to County Ordinance 824. Applicant responsibility for improvements not covered by the MVAP DIF or TUMF Programs, and/or not constructed the Project shall be fulfilled by payment of Fair Share fees.

MVAP DIF, TUMF and/or fair share fees paid pursuant to Mitigation Measure MM-TR-1 would be assigned to construction of improvements recommended to ensure adequate LOS conditions are maintained in the Study Area under EAP (2021) Conditions. Improvements recommended to achieve acceptable LOS under EAP (2021) Conditions, and that would be funded through MVAP DIF, TUMF and/or fair share fee payments are listed below.

LOS Conditions without and with the recommended improvements are summarized at **Table 4.18.19**. Payment of requisite DIF, TUMF, and/or fair share fees would satisfy the Applicant’s mitigation responsibilities for potentially significant impacts; and would reduce impacts to levels that would be less-than-significant.

Recommended Improvements - EAP (2021) Conditions
Without I-215/Placentia Interchange (Same as E+P Conditions)
 Harvill Avenue & N. A Street (Intersection No. 10)

- Install a Traffic Signal.
- Add a northbound right turn lane with overlap phasing.

With I-215/Placentia Interchange
 Harvill Avenue & Placentia Street (Intersection No. 8)

- Install a Traffic Signal.
- Add a westbound left turn lane.
- Add a westbound right turn lane with overlap phasing.

Table 4.18.19
Intersection Operations
EAP (2021) Conditions Without/With I-215/Placentia Interchange
Without and With Improvements

		Traffic Control	Intersection Approach Lanes												Delay (secs.)		LOS				
			Northbound			Southbound			Eastbound			Westbound			AM	PM	AM	PM			
ID No.	Intersection		L	T	R	L	T	R	L	T	R	L	T	R	L	T	R	AM	PM	AM	PM
8	Harvill Av & N. A Street																				
	EAP (2021) Without Interchange																				
	- Without Improvements	AWS	1	2	0	1	2	0	0	1	0	0	1	1	18.7	25.6			C	D	
	- With Improvements	Not Applicable																			
	EAP (2021) With Interchange																				
	- Without Improvements	AWS	1	2	0	1	2	0	0	1	0	0	1	1	>100.0	>100.0			F	F	
	- With Improvements	TS	1	2	0	1	2	0	0	1	0	1	1	1	41.7	49.3			D	D	

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Table 4.18.19
Intersection Operations
EAP (2021) Conditions Without/With I-215/Placentia Interchange
Without and With Improvements

ID No.	Intersection	Traffic Control	Intersection Approach Lanes												Delay (secs.)		LOS	
			Northbound			Southbound			Eastbound			Westbound			AM	PM	AM	PM
			L	T	R	L	T	R	L	T	R	L	T	R				
10	Harvill Av & N. A Street																	
	EAP (2021) Without Interchange																	
	- Without Improvements	AWS	1	2	0	1	2	0	0	1	0	1	1	0	>100.0	19.8	F	C
	- With Improvements	TS	1	2	<u>1</u> >	1	2	0	0	1	0	1	1	0	21.1	14.1	C	B
	EAP (2021) With Interchange																	
	- Without Improvements	AWS	1	2	0	1	2	0	0	1	0	1	1	0	>100.0	24.8	F	C
	- With Improvements	Not Applicable																

Notes: Delay and/ or LOS in Bold Typeface = Deficiency
 L = Left; T = Through; R = Right; >> = Free-Right Turn Lane; d= Defacto Right Turn Lane; 1 = Improvement; TS = Traffic Signal
1 = Improvement

Level of Significance with Mitigation: Less Than Significant Impact.

Freeway Ramp Queuing Progression Analysis

Freeway ramp queuing impacts under EAP (2021) Conditions (Without and With I-215/Placentia Interchange improvements) are summarized at **Table 4.18.20**.

Table 4.18.20
Ramp Queuing Impacts
EAP (2021) Conditions-Without and With I-215/Placentia Interchange Improvements

Intersection	Movement	Available Stacking Distance (Feet)	EAP (2021) Without I-215/Placentia Interchange				EAP (2021) With I-215/Placentia Interchange			
			95th Percentile Queue (Feet)		Acceptable?		95th Percentile Queue (Feet) ²		Acceptable?	
			AM Peak	PM Peak	AM	PM	AM Peak	PM Peak	AM	PM
I-215 SB Ramps / Ramona Exwy.	SBL	530	278	317	Yes	Yes	172	223	Yes	Yes
	SBL/T	1,100	282	323	Yes	Yes	175	228	Yes	Yes
	SBR	530	87	54	Yes	Yes	38	29	Yes	Yes
I-215 SB Ramps / Placentia Av.	SBL	1,030	Does Not Exist				94	118	Yes	Yes
	SBL/T	1,030					94	118	Yes	Yes
	SBR	330					31	13	Yes	Yes

**Table 4.18.20
Ramp Queueing Impacts
EAP (2021) Conditions-Without and With I-215/Placentia Interchange Improvements**

Intersection	Movement	Available Stacking Distance (Feet)	EAP (2021) Without I-215/Placentia Interchange				EAP (2021) With I-215/Placentia Interchange			
			95th Percentile Queue (Feet)		Acceptable?		95th Percentile Queue (Feet) ²		Acceptable?	
			AM Peak	PM Peak	AM	PM	AM Peak	PM Peak	AM	PM
I-215 SB Ramps / Nuevo Rd.	SBL	1,020	130	242	Yes	Yes	94	165	Yes	Yes
	SBL/T	1,020	134	246	Yes	Yes	91	169	Yes	Yes
	SBR	300	21	10	Yes	Yes	9	0	Yes	Yes
I-215 NB Ramps / Ramona Exwy.	NBL	520	95	117	Yes	Yes	75	91	Yes	Yes
	NBL/T	1,120	96	120	Yes	Yes	74	92	Yes	Yes
	NBR	520	280	254	Yes	Yes	175	134	Yes	Yes
I-215 NB Ramps / Placentia Av.	NBL	575	Does Not Exist				66	51	Yes	Yes
	NBL/T	1,360					66	52	Yes	Yes
	NBR	1,360					52	44	Yes	Yes
I-215 NB Ramps / Nuevo Rd.	NBL/T	1,010	217	76	Yes	Yes	132	55	Yes	Yes
	NBR	300	123	73	Yes	Yes	53	27	Yes	Yes

As indicated at Table 4.18.20, all freeway ramps would operate acceptably under EAP (2021) Conditions. Impacts would therefore be less-than-significant.

Level of Significance: Less Than Significant Impact.

Freeway Mainline Facilities Analysis

Freeway Segments

Freeway segment impacts under EAP (2021) Conditions (Without and With I-215/Placentia Interchange improvements) are summarized at **Table 4.18.21**.

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Table 4.18.21
Freeway Mainline Segment Impacts
EAP (2021) Conditions-Without and With I-215/Placentia Interchange Improvements

Freeway	Direction	Segment	Lanes	Existing (2019)				EAP (2021) Without I-215/Placentia Interchange				EAP (2021) With I-215/Placentia Interchange			
				Density		LOS		Density		LOS		Density		LOS	
				AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM
I-215 Freeway	Southbound	North of Ramona Exwy.	3	18.9	27.9	B	D	20.1	29.6	C	D	18.9	27.9	C	D
		SB Off-Ramp at Ramona Exwy.	3	27.1	33.9	C	D	28.3	34.9	D	D	26.5	33.4	C	D
		SB On-Ramp at Ramona Exwy.	3	21.8	29.2	C	D	22.6	30.2	C	D	21.5	28.7	C	D
		Ramona Exwy. to Placentia Av.	3	18.1	26.7	B	D	18.8	28.1	C	D	18.3	26.9	C	C
		SB Off-Ramp at Placentia Av.	3	Does Not Exist				Does Not Exist				22.3	29.4	C	D
		SB On-Ramp at Placentia Av.	3	Does Not Exist				Does Not Exist				20.9	28.5	C	D
		Placentia Av. to Nuevo Rd.	3	Does Not Exist				Does Not Exist				18.1	27.1	C	D
		SB Off-Ramp at Nuevo Rd.	3	25.0	32.4	C	D	25.8	33.3	C	D	24.7	32.4	C	D
		SB On-Ramp at Nuevo Rd.	3	15.5	21.9	B	C	16.1	23.0	B	C	15.8	23.0	B	C
		South of Nuevo Rd.	4	14.0	19.7	B	B	14.6	20.7	B	C	13.9	20.1	B	C
	Northbound	North of Ramona Exwy.	3	42.1	21.9	E	C	43.9*	23.3	E*	C	27.7	21.4	D	C
		NB On-Ramp at Ramona Exwy.	3	31.7	26.1	D	C	33.0	27.4	D	C	30.6	25.4	D	C
		NB Off-Ramp at Ramona Exwy.	3	31.6	28.6	D	D	32.5	29.4	D	D	31.4	28.3	D	D
		Ramona Exwy. to Placentia Av.	3	39.4	21.4	E	C	41.0*	22.4	E*	C	25.2	20.9	C	C
		NB On-Ramp at Placentia Av.	3	Does Not Exist				Does Not Exist				27.5	24.0	C	C
		NB Off-Ramp at Placentia Av.	3	Does Not Exist				Does Not Exist				28.6	24.8	D	C
		Placentia Av. to Nuevo Rd.	3	Does Not Exist				Does Not Exist				25.4	20.5	C	C
		NB On-Ramp at Nuevo Rd.	3	28.1	24.9	D	C	29.1	25.7	D	C	27.9	24.1	C	C
		NB Off-Ramp at Nuevo Rd.	4	30.7	15.4	D	B	32.0	16.0	D	B	19.6	15.0	C	B
		South of Nuevo Rd.	4	31.6	15.7	D	B	33.0	16.3	D	B	19.6	15.0	C	B

As indicated at Table 4.18.21, for all freeway segments and peak hour conditions, the Project would contribute fewer than 50 peak hour trips to deficient LOS conditions and/or Project traffic would not otherwise result in or cause LOS deficiencies. Impacts would therefore be less-than-significant.

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At this time, Caltrans has no near-term fee programs or other improvement programs in place to address the deficiencies caused by development projects on the SHS freeway facilities. Project TUMF payments would be available for funding and implementing any future recommended improvements.

Level of Significance: Less Than Significant Impact.

Freeway Merge/Diverge Area Operations

Under EAPC (2021) Conditions, all Study Area merge/diverge areas would perform acceptably (TIA, p. 84). Impacts would therefore be less-than-significant.

Level of Significance: Less Than Significant Impact.

EXISTING PLUS AMBIENT GROWTH PLUS PROJECT PLUS CUMULATIVE PROJECTS (EAPC) (2021) CONDITIONS

The EAPC (2021) analysis identifies potential transportation impacts that would occur assuming completion of the Project under Opening Year (2021) Conditions. EAPC (2021) traffic conditions include existing (2019) traffic volumes, plus traffic generated by ambient growth, plus traffic generated by the Project, plus traffic generated by related cumulative projects.

Effects of the proposed future I-215/Placentia Avenue Interchange on Study Area traffic are also considered under the EAPC (2021) analysis. Although the I-215/Placentia Avenue Interchange project is funded and construction is anticipated to commence in 2020, at the County's request, the EAPC (2021) analysis scenario has been evaluated both without and with the proposed interchange in the event the Project were to open before the completion of the interchange.

Lane configurations and traffic controls assumed to be in place under EAPC (2021) Conditions include:

- Existing (2019) lane configurations and traffic controls;
- Project driveways and those facilities assumed to be constructed by the Project;
- Driveways and those facilities assumed to be constructed by related cumulative projects;
- Completion of the I-215/Placentia Avenue Interchange ("With Interchange" analysis only).

Under the EAPC (2021) Conditions analysis, the following subtopics are discussed:

- Intersection LOS Analysis;
- Freeway Ramp Queuing Progression Analysis; and
- Freeway Mainline Facilities Analysis (Freeway Mainline Segments, Freeway Merge/Diverge Areas).

Intersection Analysis

Intersection impacts under EAPC (2021) Conditions (Without and With I-215/Placentia Interchange improvements) are summarized at **Table 4.18.22**.

Table 4.18.22
Intersection Impacts
EAPC (2021) Conditions Without/With I-215/Placentia Interchange

#	Intersection	Traffic Control	EAPC (2021) without I-215/Placentia Interchange				EAPC (2021) with I-215/Placentia Interchange			
			Delay (secs.)		LOS		Delay (secs.)		LOS	
			AM	PM	AM	PM	AM	PM	AM	PM
1	Patterson Av. & Rider St.	CSS	8.9	10.0	A	B	8.9	10.0	A	B
2	Patterson Av. & Walnut St./Dwy. 1	CSS	8.8	8.7	A	A	9.3	9.1	A	A
3	Patterson Av. & Placentia St.	CSS	8.7	8.7	A	A	8.8	8.9	A	A
4	Dwy. 2/Tobacco Rd. & Placentia St.	CSS	9.1	9.0	A	A	9.6	9.8	A	A
5	Dwy. 3 & Placentia St.	CSS	9.1	9.2	A	A	9.7	10.2	A	B
6	Harvill Av. & Cajalco Exwy.	TS	33.9	23.5	C	C	30.7	32.1	C	C
7	Harvill Av. & Rider St.	CSS	16.5	17.0	C	C	19.2	24.3	C	C
8	Harvill Av. & Placentia St.	AWS	24.6	17.3	C	C	>100.0**	>100.0**	F**	F**
9	Harvill Av. & Orange Av.	CSS	20.0	14.8	C	B	24.4	26.6	C	D
10	Harvill Av. & N. A St.	AWS	>100.0*	19.8	F*	C	>100.0*	47.4**	F*	E**
11	I-215 SB Ramps & Ramona Exwy.	TS	42.4	35.6	D	D	23.3	30.9	C	C
12	I-215 SB Ramps & Placentia Av.	TS	Does Not Exist				14.8	14.8	B	B
13	I-215 SB Ramps & Nuevo Rd.	TS	18.6	50.9	B	D	16.2	20.2	B	C
14	I-215 NB Ramps & Ramona Exwy.	TS	57.6*	17.9	E*	B	17.5	22.3	B	C
15	I-215 NB Ramps & Placentia Av.	TS	Does Not Exist				18.7	12.9	B	B
16	I-215 NB Ramps & Nuevo Rd.	TS	17.1	10.2	B	B	18.3	11.0	B	B

As indicated at Table 4.18.22, under the With I-215/Placentia Avenue Interchange scenario, Project traffic would contribute at least 50 peak hour trips to deficient LOS conditions (AM and PM peak hour) at Harvill Av. & Placentia St. (Intersection No. 8); and deficient LOS conditions (PM peak hour) at Harvill Av. & N. A St. (Intersection No. 10). Per the deficiency/impact significance criteria identified at Section 4.18.1.9, Project impacts at the affected locations and peak hour conditions would therefore be potentially significant.

For all other intersections and peak hour conditions, the Project would contribute fewer than 50 peak hour trips to deficient LOS conditions and/or Project traffic would not otherwise result in or cause LOS deficiencies. Impacts for these locations and peak hour conditions would therefore be less-than-significant.

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Level of Significance: Potentially Significant. With I-215/Placentia Interchange scenario only: Harvill Av. & Placentia St. (Intersection No. 8) AM/PM peak hour; Harvill Av. & N. A St. (Intersection No. 10) PM peak hour.

Mitigation Measure: Same as MM-TR-1.

MVAP DIF, TUMF, and/or fair share fees paid pursuant to Mitigation Measure MM-TR-1 would be assigned to construction of improvements recommended to ensure adequate LOS conditions are maintained in the Study Area under EAPC (2021) Conditions. Improvements recommended to achieve acceptable LOS under EAPC (2021) Conditions, and that would be funded through MVAP DIF, TUMF and/or fair share fee payments are listed below.

LOS Conditions without and with the recommended improvements are summarized at **Table 4.18.23**. Payment of requisite DIF, TUMF, and/or fair share fees would satisfy the Applicant’s mitigation responsibilities for potentially significant impacts; and would reduce impacts to levels that would be less-than-significant.

Recommended Improvements - EAPC (2021) Conditions

Without I-215/Placentia Avenue Interchange (Same as E+P, EAP [2021] Conditions)

Harvill Avenue & N. A Street (Intersection No. 10)

- Install a Traffic Signal.
- Add a northbound right turn lane with overlap phasing.

With I-215/Placentia Avenue Interchange (Same as EAP [2021] Conditions)

Harvill Avenue & Placentia Street (Intersection No. 8)

- Install a Traffic Signal.
- Add a westbound left turn lane.
- Add a westbound right turn lane with overlap phasing.

Table 4.18.23
Intersection Operations
EAPC (2021) Conditions Without/With I-215/Placentia Interchange
Without and With Improvements

ID No.	Intersection	Traffic Control	Intersection Approach Lanes												Delay (secs.)		LOS	
			Northbound			Southbound			Eastbound			Westbound			AM	PM	AM	PM
			L	T	R	L	T	R	L	T	R	L	T	R				
8	Harvill Av & N. A Street																	
	EAPC (2021) Without Interchange																	
	- Without Improvements	AWS	1	2	0	1	2	0	0	1	0	0	1	1	24.6	17.3	C	D
	- With Improvements	Not Applicable																
	EAPC (2021) With Interchange																	
	- Without Improvements	AWS	1	2	0	1	2	0	0	1	0	0	1	1	>100.0	>100.0	F	F

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Environmental Impacts - Transportation

Table 4.18.23
Intersection Operations
EAPC (2021) Conditions Without/With I-215/Placentia Interchange
Without and With Improvements

ID No.	Intersection	Traffic Control	Intersection Approach Lanes												Delay (secs.)		LOS	
			Northbound			Southbound			Eastbound			Westbound			AM	PM	AM	PM
			L	T	R	L	T	R	L	T	R	L	T	R				
	- With Improvements	TS	1	2	0	<u>2</u>	2	0	0	1	0	<u>1</u>	1	<u>1</u> ≥	39.3	44.9	D	D
10	Harvill Av & N. A Street																	
	EAPC (2021) Without Interchange																	
	- Without Improvements	AWS	1	2	0	1	2	0	0	1	0	1	1	0	> 100.0	19.8	F	C
	- With Improvements	TS	1	2	<u>1</u> ≥	1	2	0	0	1	0	1	1	0	20.9	29.6	C	B
	EAP (2021) With Interchange																	
	- Without Improvements	AWS	1	2	0	1	2	0	0	1	0	1	1	0	> 100.0	47.4	F	E
	- With Improvements	Not Applicable																

Notes: Delay and/ or LOS in Bold Typeface = Deficiency
 L = Left; T = Through; R = Right; >> = Free-Right Turn Lane; d= Defacto Right Turn Lane; 1 = Improvement; TS = Traffic Signal
1 = Improvement

Level of Significance with Mitigation: Less Than Significant Impact.

Freeway Ramp Queuing Progression Analysis

Freeway ramp queuing impacts under EAPC (2021) Conditions (Without and With I-215/Placentia Interchange improvements) are summarized at **Table 4.18.24**.

Table 4.18.24
Ramp Queuing Impacts
EAPC (2021) Conditions-Without and With I-215/Placentia Interchange Improvements

Intersection	Movement	Available Stacking Distance (Feet)	EAPC (2021) Without I-215/Placentia Interchange				EAPC (2021) With I-215/Placentia Interchange			
			95th Percentile Queue (Feet)		Acceptable?		95th Percentile Queue (Feet) ²		Acceptable?	
			AM Peak	PM Peak	AM	PM	AM Peak	PM Peak	AM	PM
I-215 SB Ramps / Ramona Exwy.	SBL	530	384	341	Yes	Yes	278	314	Yes	Yes
	SBL/T	1,100	387	346	Yes	Yes	281	318	Yes	Yes
	SBR	530	261	53	Yes	Yes	121	52	Yes	Yes
I-215 SB Ramps / Placentia Av.	SBL	1,030	Does Not Exist				114	141	Yes	Yes
	SBL/T	1,030					114	141	Yes	Yes
	SBR	330					47	32	Yes	Yes

Table 4.18.24
Ramp Queueing Impacts
EAPC (2021) Conditions-Without and With I-215/Placentia Interchange Improvements

Intersection	Movement	Available Stacking Distance (Feet)	EAPC (2021) Without I-215/Placentia Interchange				EAPC (2021) With I-215/Placentia Interchange			
			95th Percentile Queue (Feet)		Acceptable?		95th Percentile Queue (Feet) ²		Acceptable?	
			AM Peak	PM Peak	AM	PM	AM Peak	PM Peak	AM	PM
I-215 SB Ramps / Nuevo Rd.	SBL	1,020	130	221	Yes	Yes	96	173	Yes	Yes
	SBL/T	1,020	134	225	Yes	Yes	95	177	Yes	Yes
	SBR	300	21	9	Yes	Yes	10	1	Yes	Yes
I-215 NB Ramps / Ramona Exwy.	NBL	520	173	117	Yes	Yes	120	112	Yes	Yes
	NBL/T	1,120	176	120	Yes	Yes	122	112	Yes	Yes
	NBR	520	349	254	Yes	Yes	241	213	Yes	Yes
I-215 NB Ramps / Placentia Av.	NBL	575	Does Not Exist				92	64	Yes	Yes
	NBL/T	1,360					92	64	Yes	Yes
	NBR	1,360					55	47	Yes	Yes
I-215 NB Ramps / Nuevo Rd.	NBL/T	1,010	221	76	Yes	Yes	138	57	Yes	Yes
	NBR	300	142	73	Yes	Yes	86	43	Yes	Yes

Notes: 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.

As indicated at Table 4.18.24, all freeway ramps would operate acceptably under EAPC 2021 Conditions. Impacts would therefore be less-than-significant.

Level of Significance: Less Than Significant Impact.

Freeway Mainline Facilities Analysis

Freeway Segments

Freeway segment impacts under EAPC (2021) Conditions (Without and With I-215/Placentia Interchange improvements) are summarized at **Table 4.18.25**.

Table 4.18.25
Freeway Mainline Segment Impacts
EAPC (2021) Conditions-Without and With I-215/Placentia Interchange Improvements

Freeway	Direction	Segment	Lanes	EAPC (2021) Without I-215/Placentia Interchange				EAPC (2021) With I-215/Placentia Interchange			
				Density		LOS		Density		LOS	
				AM	PM	AM	PM	AM	PM	AM	PM
I-215 Freeway	Southbound	North of Ramona Exwy.	3	24.4	34.8	C	D	22.9	32.7	C	D
		SB Off-Ramp at Ramona Exwy.	3	33.5	38.5*	D	E*	31.2	36.7*	D	E*
		SB On-Ramp at Ramona Exwy.	3	24.8	36.9*	C	E*	24.0	34.4	C	D
		Ramona Exwy. to Placentia Av.	3	20.5	35.6*	C	E*	20.3	33.3	C	D
		SB Off-Ramp at Placentia Av.	3	Does Not Exist				24.6	33.0	C	D
		SB On-Ramp at Placentia Av.	3	Does Not Exist				22.5	33.5	C	D
		Placentia Av. to Nuevo Rd.	3	Does Not Exist				19.6	34.2	C	D
		SB Off-Ramp at Nuevo Rd.	3	27.3	36.8*	C	E*	26.2	35.9*	C	E*
		SB On-Ramp at Nuevo Rd.	3	17.5	28.9	B	D	17.2	29.0	B	D
	South of Nuevo Rd.	4	15.7	24.5	B	C	15.0	23.8	B	C	
	Northbound	North of Ramona Exwy.	3	45.6*	28.7	F*	D	30.5	26.7	D	D
		NB On-Ramp at Ramona Exwy.	3	48.5*	33.6	F*	D	33.0	30.9	D	D
		NB Off-Ramp at Ramona Exwy.	3	35.6*	31.8	E*	D	34.1	31.0	D	D
		Ramona Exwy. to Placentia Av.	3	43.0*	24.5	E*	C	28.5	23.6	D	C
		NB On-Ramp at Placentia Av.	3	Does Not Exist				30.0	26.8	D	C
		NB Off-Ramp at Placentia Av.	3	Does Not Exist				31.0	26.6	D	C
		Placentia Av. to Nuevo Rd.	3	Does Not Exist				29.0	22.6	D	C
		NB On-Ramp at Nuevo Rd.	3	46.4*	27.4	F*	C	30.3	25.8	D	C
		NB Off-Ramp at Nuevo Rd.	4	34.7	17.4	D	B	21.5	16.3	C	B
South of Nuevo Rd.	4	36.0*	17.7	E*	B	21.5	16.3	C	B		

Notes: Delay and/ or LOS in Bold Typeface = Deficiency
 Vehicle Density expressed as passenger cars per mile per lane (pc/mi/ln).
 *Project would contribute fewer than 50 peak hour trips.

As indicated at Table 4.18.25, for all freeway segments and peak hour conditions, the Project would contribute fewer than 50 peak hour trips to deficient LOS conditions and/or Project traffic would not

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otherwise result in or cause LOS deficiencies. Per the deficiency/impact significance criteria identified at Section 4.18.1.9, Project impacts at the affected locations and peak hour conditions would therefore be less-than-significant.

At this time, Caltrans has no near-term fee programs or other improvement programs in place to address the deficiencies caused by development projects on the SHS freeway facilities. Project TUMF payments would be available for funding and implementing any future recommended improvements.

Level of Significance: Less Than Significant Impact.

Freeway Merge/Diverge Area Operations

Under EAPC 2021 Conditions, the following ramp/merge diverge areas are anticipated to operate at LOS E under the Without I-215/Placentia Avenue Interchange scenario:

- I-215 Freeway Southbound, Off-Ramp at Ramona Exwy. – LOS E PM peak hour only
 - I-215 Freeway Southbound, On-Ramp at Ramona Exwy. – LOS E PM peak hour only
 - I-215 Freeway Southbound, Off-Ramp at Nuevo Rd. – LOS E PM peak hour only
 - I-215 Freeway Northbound, On-Ramp at Ramona Exwy. – LOS F AM peak hour only
 - I-215 Freeway Northbound, Off-Ramp at Ramona Exwy. – LOS E AM peak hour only
 - I-215 Freeway Northbound, On-Ramp at Nuevo Rd. – LOS F AM peak hour only
- [TIA, p. 100]

Under EAPC 2021 Conditions, the following ramp/merge diverge areas are anticipated to operate at LOS E under the With I-215/Placentia Avenue Interchange scenario:

- I-215 Freeway Southbound, Off-Ramp at Ramona Exwy. – LOS E PM peak hour only
 - I-215 Freeway Southbound, Off-Ramp at Nuevo Rd. – LOS E PM peak hour only
- [TIA, p. 100]

For all the affected locations and peak hour conditions, the Project would contribute fewer than 50 peak hour trips. Per the deficiency/impact significance criteria identified at Section 4.18.1.9, Project impacts at the affected locations and peak hour conditions would therefore be less-than-significant.

Level of Significance: Less Than Significant Impact.

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?

Less Than Significant Impact. The Riverside County Congestion Management Program (CMP) has established LOS E as the target acceptable LOS for all designated CMP intersections and roadway segments, unless the current LOS is lower (i.e., LOS F) (*2011 Riverside County Congestion Management Program*, p. ES-3 et al.).

CMP Freeways

Within the Study Area, I-215 is a CMP freeway. Under all analysis scenarios, the Project would contribute fewer than 50 peak hour trips at all CMP facilities within the Study Area. Per the deficiency/impact

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significance criteria identified at Section 4.18.1.9, Project impacts at Study Area CMP facilities would therefore be less-than-significant.

c), e), f) Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); Cause an effect upon circulation during the project's construction; Result in inadequate emergency access or access to nearby uses?

Less Than Significant Impact. The final design of the Project site plan and all Project traffic improvements would be subject to review and approval by the County, thereby ensuring conformance of the Project improvements with County design and safety standards. In addition, representatives of the County Sheriff Department and County Fire Department would review the Project's plans to ensure that emergency access is provided consistent with Department(s) requirements. Efficient and safe access within, and access to, the Project is provided by the site plan design concept, site access improvements, and site adjacent roadway improvements included as components of the Project. On-site traffic signing and striping would be implemented in conjunction with detailed construction plans for the Project site. Sight distance at each Project access point would be reviewed to ensure conformance with County sight distance standards at the time of preparation of final grading, landscape and street improvement plans.

Based on the preceding, the implemented Project would not substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); cause an effect upon circulation during the project's construction; or result in inadequate emergency access.

It is also recognized that temporary and short-term traffic detours and traffic disruption could result during Project construction activities. Management and control of construction traffic would be addressed through the preparation of a construction area traffic management plan to be submitted to the County prior to or concurrent with Project building plan review(s). The Project Construction Traffic Management Plan (Plan), summarized within the EIR Project Description, would identify traffic controls for any street closures, detours, or other potential disruptions to traffic circulation during Project construction. The Plan would also be required to identify construction vehicle access routes, and hours of construction traffic.

As supported by the preceding discussions and information presented in the EIR Project Description, the potential for the Project to substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); cause an effect upon circulation during the project's construction; or result in inadequate emergency access is considered less-than-significant.

d) Cause an effect upon, or a need for new or altered maintenance of roads?

Less Than Significant Impact. The Project would implement recommended roadway system improvements identified in this Section and any additional/alternative improvements that may be required pursuant to the Project Conditions of Approval. All proposed improvements would be designed and constructed consistent with County engineering standards and requirements. The County would review and inspect all roads constructed as part of the Project prior to their acceptance for maintenance, thereby minimizing potential roadway maintenance requirements.

Roadways in the Study Area generally would require routine, intermittent maintenance. Periodic maintenance of the Study Area roadway system is a function of the County (and Caltrans for Caltrans

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facilities). Such maintenance activities would not result in any new or substantially different impacts beyond those identified and addressed in this EIR.

Maintenance and repair of Study Area roads is funded by federal, state, and local tax revenues. The Project will also contribute fees and tax revenues to the County that may be directed to the repair and maintenance of Study Area roads.

Based on the preceding, the potential for the Project to cause an effect upon, or a need for new or altered maintenance of roads would be less-than-significant.

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?

Less Than Significant Impact. The Project site is located approximately 2.5 miles south/southwesterly of March Air Reserve Base/Inland Port Airport (MARB/IPA), within the MARB/IPA Airport Influence Area (Airport Influence Area). Within the Airport Influence Area are three designated Compatibility Zones. Properties within these zones are subject to MARB/IPA Airport Land Use Compatibility Plan (ALUCP) policies and regulations governing such issues as land use, development intensity, density, height of structures, and noise. The Project site is located within Compatibility Zone C2.

The Project proposes conventional light industrial/warehouse uses and does not propose or require facilities or operations that would affect or be affected by MARB/IPA air traffic levels or air traffic patterns. The Project does not propose designs or uses that would not encroach on restricted air space(s) nor would the Project structures otherwise adversely affect MARB/IPA airfield operations. The Project would comply with all requirements established under the ALUCP.

Based on the preceding, the potential for the Project to 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 would be less-than-significant.

Alter waterborne, rail, or air traffic?

Less Than Significant Impact. As discussed above, the potential for the Project to alter air traffic patterns would be less-than-significant. There are no existing or proposed waterborne traffic routes or rail traffic routes within the Study Area. The Project would have no impact on waterborne traffic or rail traffic. On this basis, the potential for the Project to alter waterborne, rail, or air traffic would be less-than-significant.

4.18.11 CUMULATIVE IMPACTS

Cumulative Impact Area

The cumulative impact area for transportation impacts is defined generally by the Traffic Impact Analysis Study Area (Study Area) as described in *Barker Logistics Traffic Impact Analysis* (Urban Crossroads, Inc.) May 14, 2019 (Project TIA, TIA). The TIA Study Area is illustrated at Exhibit 4.18-1. The analysis of cumulative transportation impacts evaluates the Project's transportation impacts in the context of other known or probable related development proposals that would discernibly affect area transportation operations or systems.

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Cumulative Traffic Growth

Per Riverside County traffic study requirements, a background (ambient) traffic growth factor is reflected in the Project TIA. The ambient growth approximates generalized regional traffic growth. For the Project considered here, a 2% annual growth factor has been applied to reflect ambient increased traffic in the Study Area.

Ambient background traffic growth has been added to daily and peak hour traffic volumes that would be generated by related projects. Related projects comprise approved or anticipated development proposals that would generate traffic that would interact with traffic generated by the Project. Related projects are listed at Table 4.18.11 and are mapped at Exhibit 4.18-4.

Cumulative Intersection LOS Impacts

Project traffic would contribute to potentially significant cumulative LOS impacts at the following Study Area Intersections: Harvill Av. & Placentia St. (Intersection No. 8) and Harvill Av. & N. A St. (Intersection No. 10).

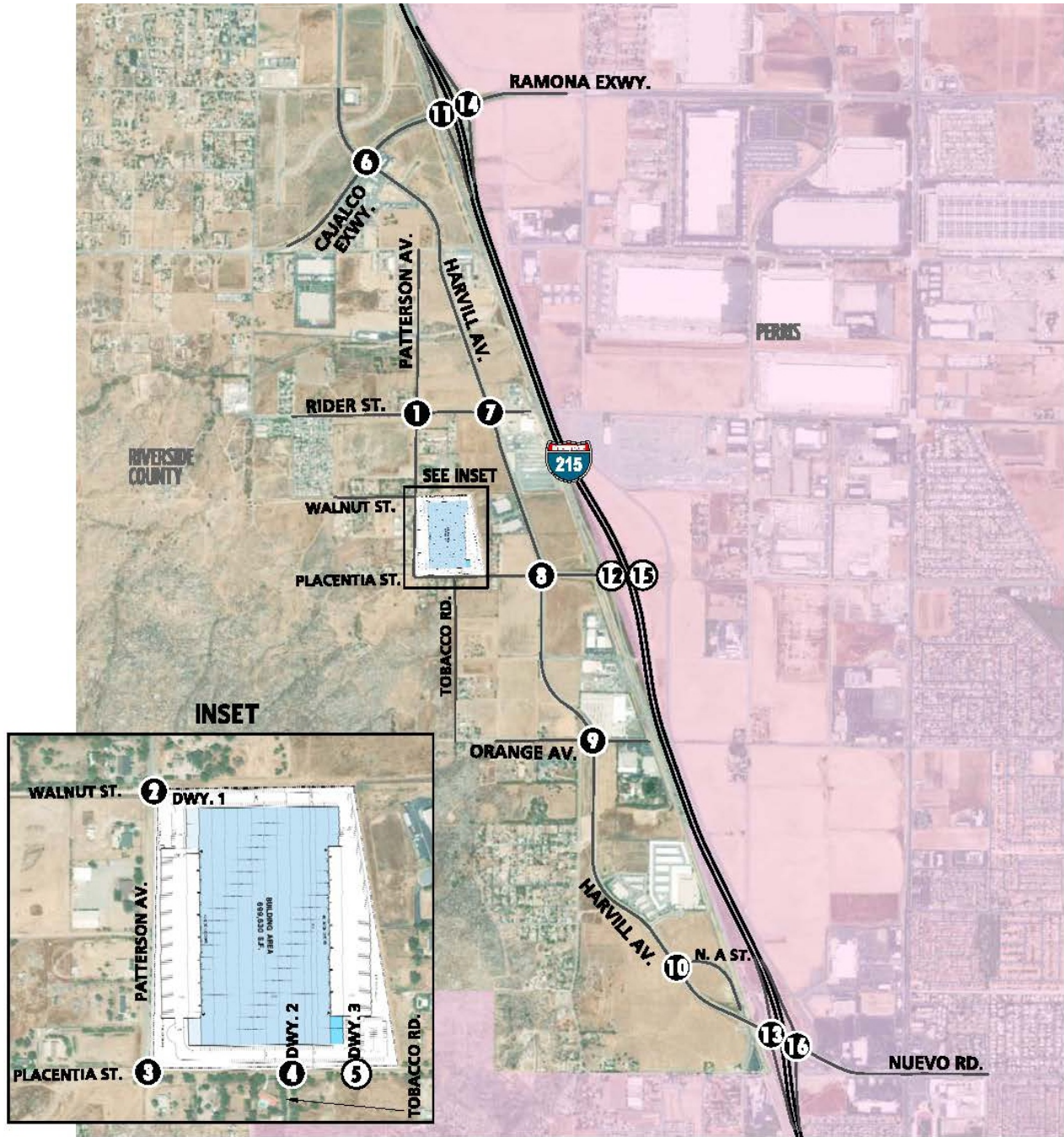
Compliance with the County DIF Program, WRCOG TUMF Program, and payment of any required fair share fees pursuant to MM-TR-1 would fulfill the Applicant responsibilities for improvements recommended to address the potential cumulative intersection LOS deficiencies, and would reduce the Project contributions to cumulative impacts to levels that would be less-than-significant.

Other related projects within the cumulative impact area would be required to minimize LOS impacts and pay required DIF, TUMF, and fair shares fees directed to improvements necessary to minimize or avoid cumulative LOS impacts.

Cumulative Impacts at Other Study Area Transportation Facilities

As substantiated in this Section, the Project would not result in, or considerably contribute to cumulative transportation impacts affecting any other Study Area transportation facilities. Impacts would be less-than-significant.

Exh 4.18-1
 Study Area
 Intersections



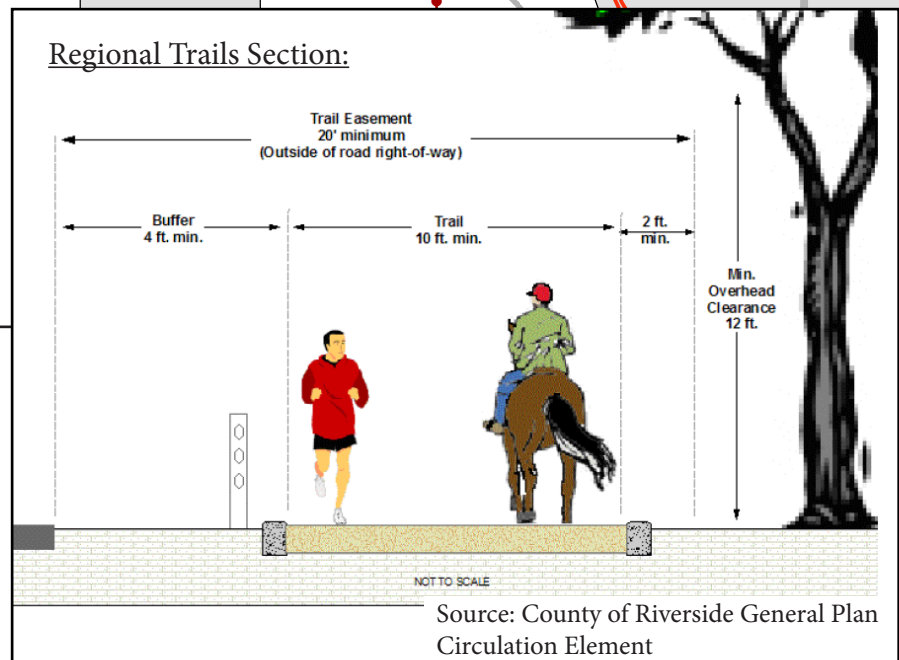
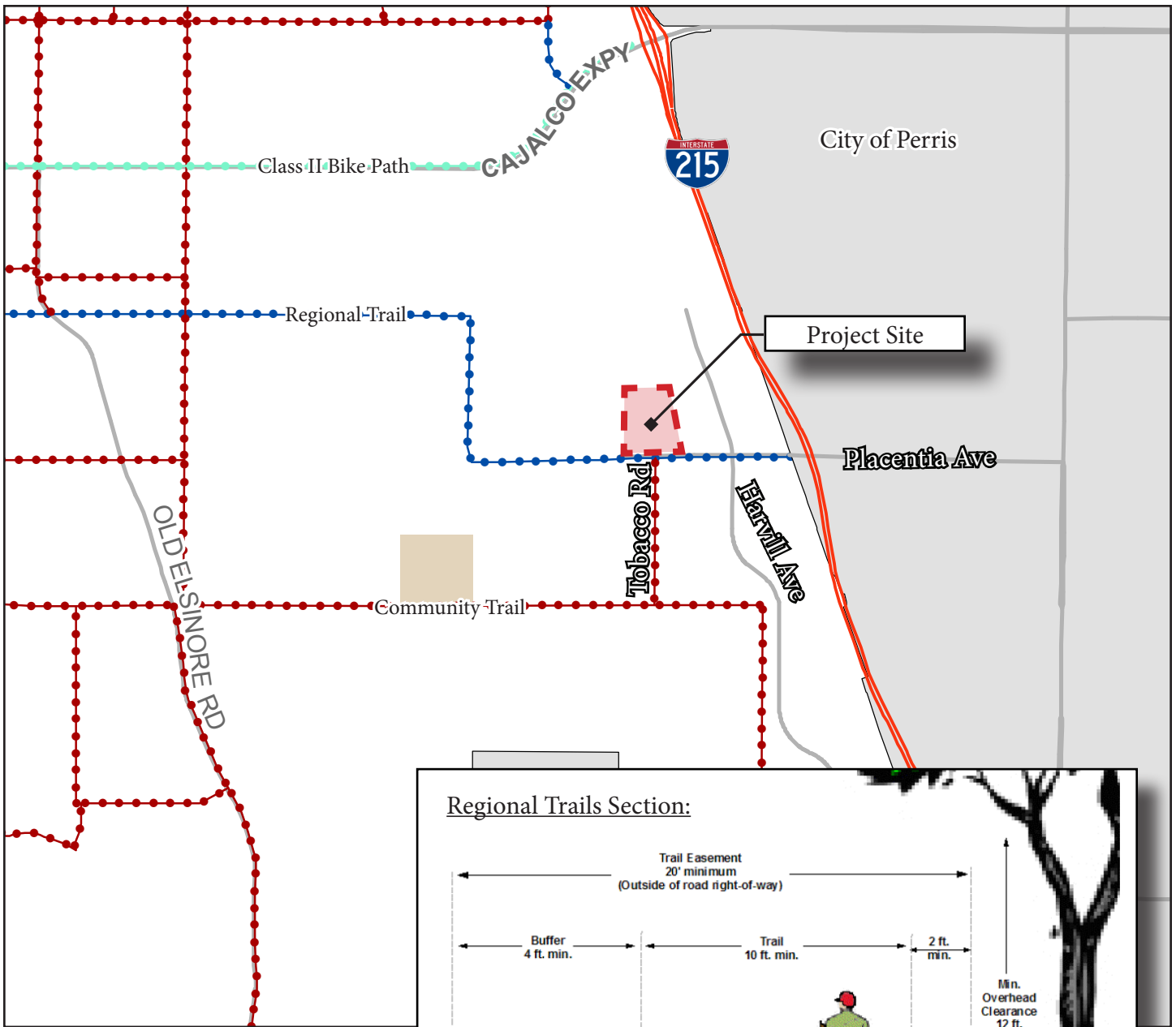
LEGEND:

- 1** = EXISTING INTERSECTION ANALYSIS LOCATION
- 0** = FUTURE INTERSECTION ANALYSIS LOCATION



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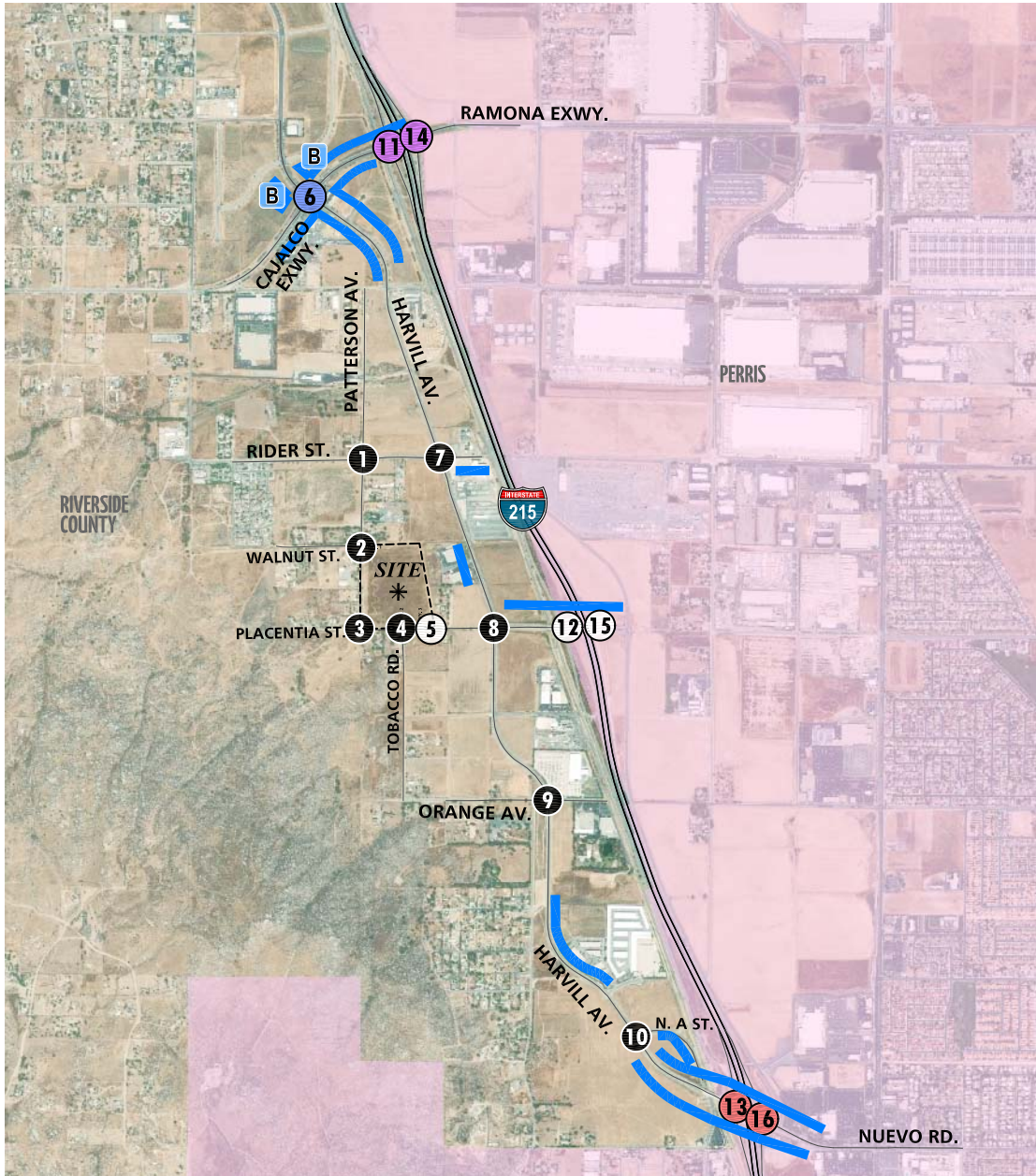




Legend

- Regional Trail: Urban/Suburban
- Community Trail
- Class II Bike Path

Source: County of Riverside Mead Valley Area Plan, 2016



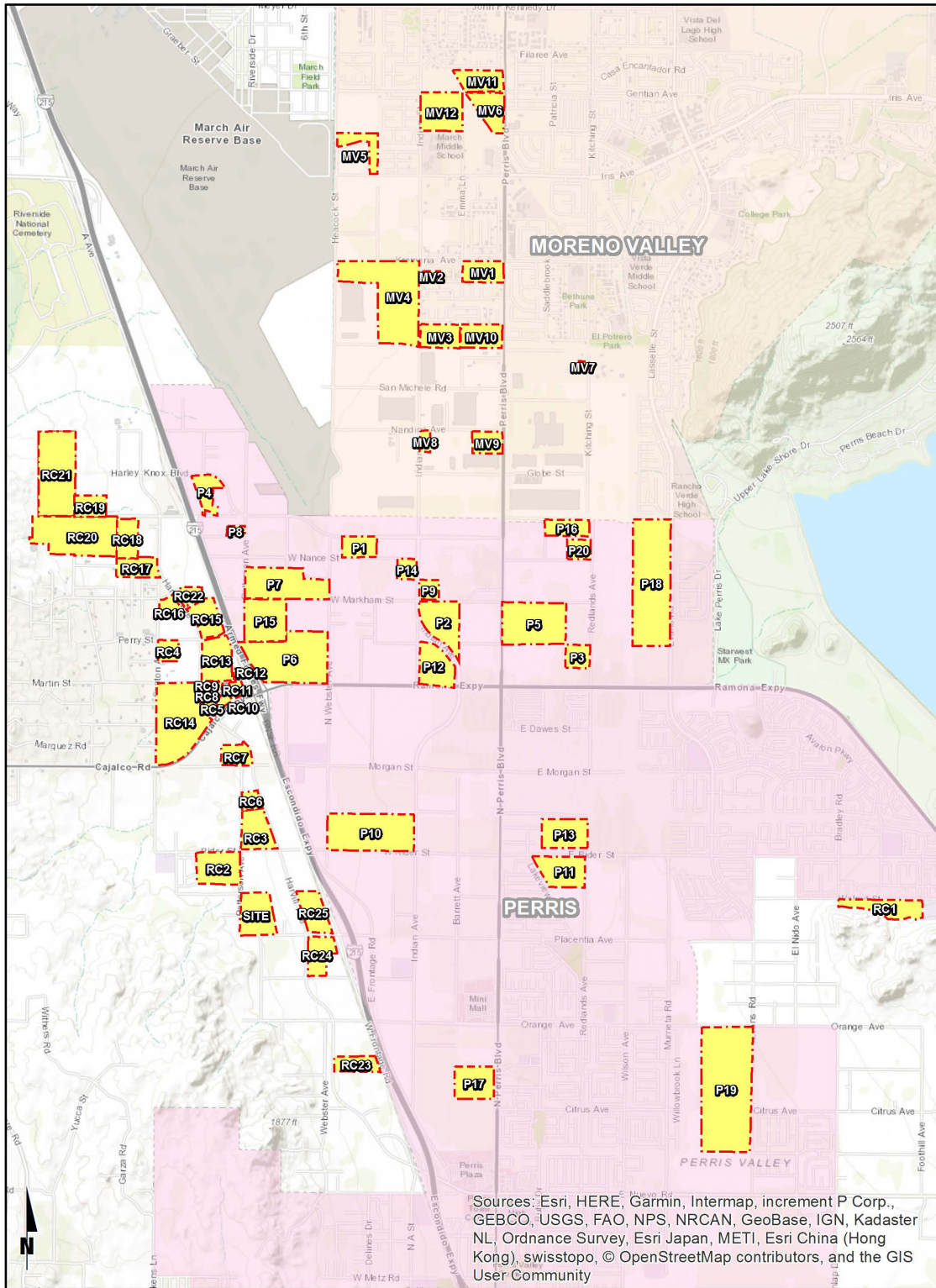
LEGEND:

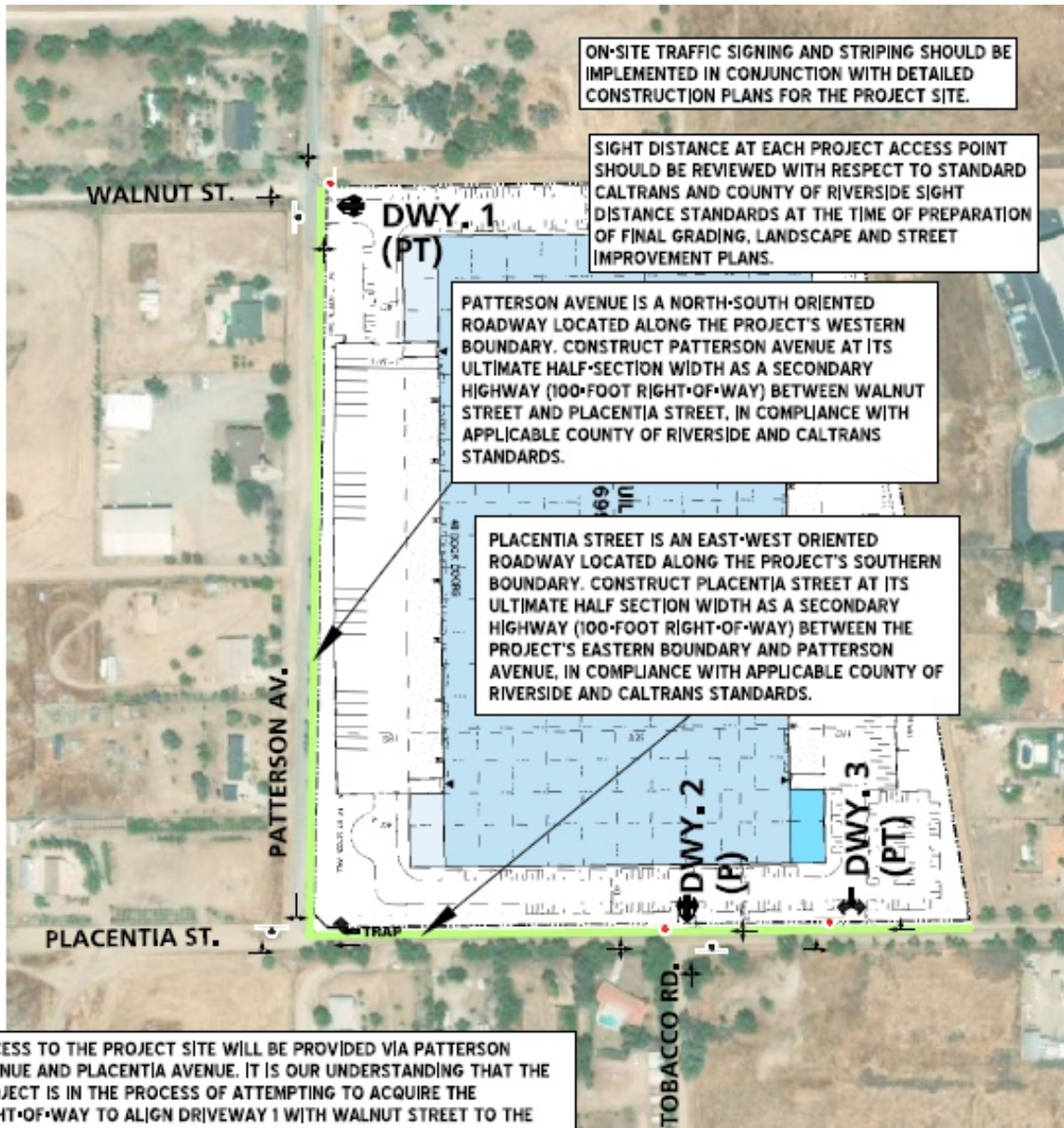
- SIDEWALK
- B - BUS STOP
- 0 - NO CROSSWALK
- 0 - FUTURE INTERSECTION
- 0 - CROSSWALK ON THREE APPROACHES
- 0 - CROSSWALK ON TWO APPROACHES
- 0 - CROSSWALK ON ONE APPROACH



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ON-SITE TRAFFIC SIGNING AND STRIPING SHOULD BE IMPLEMENTED IN CONJUNCTION WITH DETAILED CONSTRUCTION PLANS FOR THE PROJECT SITE.

SIGHT DISTANCE AT EACH PROJECT ACCESS POINT SHOULD BE REVIEWED WITH RESPECT TO STANDARD CALTRANS AND COUNTY OF RIVERSIDE SIGHT DISTANCE STANDARDS AT THE TIME OF PREPARATION OF FINAL GRADING, LANDSCAPE AND STREET IMPROVEMENT PLANS.

PATTERSON AVENUE IS A NORTH-SOUTH ORIENTED ROADWAY LOCATED ALONG THE PROJECT'S WESTERN BOUNDARY. CONSTRUCT PATTERSON AVENUE AT ITS ULTIMATE HALF-SECTION WIDTH AS A SECONDARY HIGHWAY (100-FOOT RIGHT-OF-WAY) BETWEEN WALNUT STREET AND PLACENTIA STREET, IN COMPLIANCE WITH APPLICABLE COUNTY OF RIVERSIDE AND CALTRANS STANDARDS.

PLACENTIA STREET IS AN EAST-WEST ORIENTED ROADWAY LOCATED ALONG THE PROJECT'S SOUTHERN BOUNDARY. CONSTRUCT PLACENTIA STREET AT ITS ULTIMATE HALF SECTION WIDTH AS A SECONDARY HIGHWAY (100-FOOT RIGHT-OF-WAY) BETWEEN THE PROJECT'S EASTERN BOUNDARY AND PATTERSON AVENUE, IN COMPLIANCE WITH APPLICABLE COUNTY OF RIVERSIDE AND CALTRANS STANDARDS.

ACCESS TO THE PROJECT SITE WILL BE PROVIDED VIA PATTERSON AVENUE AND PLACENTIA AVENUE. IT IS OUR UNDERSTANDING THAT THE PROJECT IS IN THE PROCESS OF ATTEMPTING TO ACQUIRE THE RIGHT-OF-WAY TO ALIGN DRIVEWAY 1 WITH WALNUT STREET TO THE WEST ON PATTERSON AVENUE. IF THE RIGHT-OF-WAY CANNOT BE ACQUIRED, THE PROJECT APPLICANT WILL NEED TO WORK WITH COUNTY STAFF IN ORDER TO DEVELOP AN INTERIM DESIGN FOR DRIVEWAY 1.

LEGEND:

- = STOP SIGN
- = STOP SIGN IMPROVEMENT
- = EXISTING LANE
- ↑ = LANE IMPROVEMENT
- TRAP = TRAP LANE
- = SECONDARY HIGHWAY (100-FOOT R.O.W.)

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4.19 TRIBAL CULTURAL RESOURCES

4.19.1 ENVIRONMENTAL SETTING

Cultural resources are comprised of places, objects, structures and settlements that reflect individual or group archaeological, paleontological, architectural or historic activities. The records search BCR Consulting LLC conducted during its research revealed that 33 cultural resource studies have taken place that resulted in recording of 73 archaeological resources within one mile of the Project site. Two previous studies of a portion of the Project site did not identify any cultural resources within the boundary of the Project site. The Project site is vacant, has some vegetation and trees in portions, and shows evidence of periodic grading.

4.19.2 THRESHOLDS OF SIGNIFICANCE

The County of Riverside has adopted Thresholds of Significance that vary in some cases topically and in format from the Appendix G Thresholds, as reflected in the Initial Study prepared for the Project. This EIR uses the following County-adopted Thresholds of Significance to comprise the basis of impact analyses.

- a) **Would the project cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:**

listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

- b) **Would the project cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:**

a resource determined by the lead agency, in the discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (in applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)

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4.19.3 ENVIRONMENTAL IMPACTS

The following is based on information preliminary to receiving tribal consultation comments and recommendations. Information from the tribal consultation(s) will be inserted prior to the end of the public review period of the Draft EIR.

- a) **Would the project cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:**
listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

Potentially Significant Impact. Project development may uncover Native American historical or archaeological resources. County of Riverside Planning Department staff will arrange a tribal consultation with recognized tribal entities to inform them of the Project. The results of the consultation will be incorporated into the Project EIR.

- b) **Would the project cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:**

‘a resource determined by the lead agency, in the discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (in applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024,.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)’

Potentially Significant Impact. California State law provides for limited protection of Native American prehistoric, archaeological, cultural, spiritual and ceremonial places, such as the following: sanctified cemeteries, religious, ceremonial sites, shrines, burial grounds, prehistoric ruins, archaeological sites; and, sacred sites. Riverside County contains tribal lands. Consultation with the Native American community is required, per stipulations in California Assembly Bill 52 (AB 52). The Rincon and Soboba Tribes requested consultation. The consultation with the Rincon Tribe occurred in October, 2019 and led to the Rincon Tribe requesting a Phase I report and requesting that a Luiseno Tribe monitor be on site during Project grading. The consultation with the Soboba Tribe occurred in January, 2020, at which time the Soboba Tribe requested a Phase I report and a standard set of conditions be applied to the Project. The County of Riverside provided a Phase I report and Conditions of Approval to both tribes together with a request for any Tribal Cultural Resources information to be considered in CEQA analyses. The Rincon and Soboba tribes concurred with the Conditions of Approval and agreed to conclude AB 52 consultation. The Cultural Resource Monitoring Program, together with Mitigation Measures listed below, include a Cultural Resource Monitoring be implemented.

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4.19.4 CUMULATIVE IMPACTS

As with all development projects in the vicinity of the Project site, it is possible that Project development (grading and construction) may uncover tribal cultural resources. Specific Mitigation is required that will ensure should any such resources be encountered they will be curated according to State law and appropriate tribal wishes. The potential cumulative effect would be reduced to a less than significant level.

4.19.5 EXISTING REGULATIONS

Riverside County General Plan Policies

Multi-Purpose Open Space (OS) Element Policies

Policy OS 19.2: The County of Riverside shall establish a cultural resources program in consultation with Tribes and the professional cultural resources consulting community. Such a program shall, at a minimum, address each of the following: application processing requirements; information database(s); confidentiality of site locations; content and review of technical studies; professional consultant qualifications and requirements; site monitoring; examples of preservation and mitigation techniques and methods; and the descendant community consultation requirements of local, state and federal law.

Policy OS 19.3: Review proposed development for the possibility of cultural resources and for compliance with the cultural resources program.

Policy OS 19.4: To the extent feasible, designate as open space and allocate resources and/or tax credits to prioritize the protection of cultural resources preserved in place or left in an undisturbed state.

Policy OS 19.5: Exercise sensitivity and respect for human remains from both prehistoric and historic time periods and comply with all applicable laws concerning such remains.

4.19.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

There is a potential for Project development (grading operations) to uncover tribal cultural resources, which would result in a significant impact.

The County of Riverside is actively consulting with Pechanga.

4.19.7 MITIGATION MEASURES

Compliance with County of Riverside General Plan policies and adherence to Mitigation Measures TCR-1 through TCR-4 would contribute to ensuring any Project-related impacts to Tribal Cultural Resources would be reduced to a less than significant level.

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Mitigation Measure TCR-1 (Native American Monitor): Prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement with the consulting tribe(s) for a Native American Monitor.

The Native American Monitor(s) 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(s), the Native American Monitor(s) 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 of approval. Upon verification, the Archaeologist shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure.

Mitigation Measure TCR-2 (Artifact Disposition): Prior to Grading Permit Final Inspection, the landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the Project property during any ground-disturbing activities, including previous investigations and/or Phase III data recovery.

Historic Resources- All historic 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), shall be curated at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines.

Prehistoric Resources- One of the following treatments shall be applied.

a. Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures to protect the reburial area from any future impacts. Reburial shall not occur until all required cataloguing, analysis and studies have been completed on the cultural resources, with an exception that sacred items, burial goods and Native American human remains are excluded. Any reburial processes shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to a Public Records Request.

b. If reburial is not agreed upon by the Consulting Tribes then the resources shall be curated at a culturally appropriate manner at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. 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 of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to the County. There shall be no destructive or invasive testing on sacred items, burial goods and Native American human remains.

Mitigation Measure TCR-3 (Human Remains): If human remains are found on this site, the developer/permit holder or any successor in interest shall comply with State Health and Safety Code Section 7050.5.

If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin.

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Further, pursuant to Public Resources Code Section 50.97.98(b), remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted 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 concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. Evidence of compliance with this condition, if human remains are found, shall be provided to the County of Riverside upon the completion of a treatment plan and final report detailing the significance and treatment of the finding.

Mitigation Measure TCR-4 (Tribal Cultural Sensitivity Training): Prior to ground disturbance, the Project Archaeologist and, if required, 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 and the surrounding area; what resources could potentially be identified during earthmoving activities; the protocols that apply in the event unanticipated 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 copy of the agreement and a copy of the sign-in sheet shall be submitted to the County Archaeologist to ensure compliance with this condition of approval.

4.19.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Compliance with County of Riverside General Plan policies and adherence to Mitigation Measures TCR-1 through TCR-4 would ensure any direct or indirect impacts to Tribal Cultural Resources will be reduced to a less than significant level.

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4.20 UTILITIES & SERVICE SYSTEMS

Information contained in this Section is derived from the following:

- Riverside County General Plan;
- Riverside County General Plan EIR No. 521 for GPG No. 960;
- Mead Valley Area Plan;
- Eastern Municipal Water District Urban Water Management Plan;
- Eastern Municipal Water District Sewer Management Plan;
- *Water Supply Assessment Report, Barker Logistics* (Eastern Municipal Water District) December 12, 2019;
- Riverside County Ordinance No. 657, as amended; and
- Knox Business Park EIR.

4.20.1 ENVIRONMENTAL SETTING

The Eastern Municipal Water District (EMWD) provides potable water, recycled water and wastewater service to the Project site and vicinity. Seventy-five percent of its water resources are imported while 25 percent are local supplies (groundwater, desalinated groundwater from two plants that convert brackish groundwater from the West San Jacinto Basin into potable water, recycled water). EMWD has a service area of 555 square miles. The Project site is vacant, undeveloped and has no existing water service; therefore, under existing conditions no water is consumed by the Project site. Adjacent to the Project site, there is an existing 12-inch (diameter) water line located in Placentia Avenue and a 14-inch water line located in Patterson Avenue.

EMWD is a public water agency formed in 1950 by popular vote. In 1951, it was annexed into the MWD and gained access to a supply of imported water from the Colorado River Aqueduct (CRA). Today, EMWD remains one of the Metropolitan Water District's 26 member agencies and receives water from Northern California through the State Water Project (SWP) in addition to deliveries through the CRA. EMWD's initial mission was to deliver imported water to supplement local groundwater for a small, mostly agricultural, community. Over time, EMWD's list of services has evolved to include groundwater production, desalination, water filtration, wastewater collection and treatment, and regional water recycling. EMWD provides both retail and wholesale water service covering a total population of over 750,000. EMWD's mission is "to provide safe and reliable water and wastewater management services to our community in an economical, efficient, and responsible manner, now and in the future." A five-member Board of Directors governs EMWD. Each Director serves an area of equivalent population size within EMWD's boundaries and is elected to office every four years. As a member agency of MWD, EMWD also has a member appointed to the MWD Board.

The Perris Valley Regional Water Reclamation Facility (PVRWRF) would receive Project-development and Project-operation generated wastewater. The facility has a daily treatment capacity of 22 million gallons per day and treats 13.8 million gallons daily. No wastewater is produced by the Project site under the existing vacant condition.

Stormwater drainage flows are conveyed throughout the Project vicinity by facilities owned and maintained by the Riverside County Flood Control and Water Conservation District. The Project site sewers to an existing manhole at the northwest corner of the site which flows east to Harvill Avenue.

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CR&R Incorporated provides solid waste collection and disposal services to the Project vicinity. Solid waste collected is disposed at the El Sobrante Landfill. Under the existing condition of the vacant Project site, no solid waste is produced.

No electric or natural gas provision, communication systems, street lighting, or other governmental services extend onto the vacant Project site.

4.20.2 THRESHOLDS OF SIGNIFICANCE

The County of Riverside has adopted Thresholds of Significance that vary in some cases topically and in format from the Appendix G Thresholds, as reflected in the Initial Study prepared for the Project. This EIR uses the following County-adopted Thresholds of Significance to comprise the basis of impact analyses.

Water

Would the Project - -

- a) **Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?**
- b) **Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?**

Sewer

Would the Project - -

- a) **Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?**
- b) **Result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

Solid Waste

Would the Project - -

- a) **Generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**
- b) **Comply with federal, State, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?**

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Utilities – Would the project impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?

Electricity?

Natural gas?

Communications systems?

Street lighting?

Maintenance of public facilities, including roads?

Other governmental services?

4.20.3 ENVIRONMENTAL IMPACTS

Water

- a) **Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?**

Less Than Significant Impact. EMWD provides potable water treatment for all customers within the EMWD Service Area (Service Area). Water quality of all potable water deliveries within the Service Area meets or surpasses all regulated drinking water standards and water treatment is not considered a substantive constraint on water supplies. Additionally, as summarized in the 2015 UWMP, “[t]here are no known water quality concerns that will significantly impact water supply reliability. Water supplies will be managed to protect water quality to the greatest extent possible, and treatment will be implemented if necessary” (2015 UWMP, p. 7-8).

The Project proposes conventional light industrial facilities and does not require water treatment beyond that provided by EMWD. No additional or non-standard treatment is required to specifically meet the Project’s water demands.

The Applicant would be required to pay water service connection fees established by EMWD to support the maintenance and planned improvement of water treatment facilities. The EMWD, as a regional water treatment provider, would determine when and in what manner treatment facilities would be constructed and/or upgraded to meet increasing demands of areawide development, including the incremental demands of the Project.

Based on the preceding, the potential for the Project to 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 is considered less-than-significant.

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- b) **Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?**

Less Than Significant Impact. Water service to the Project would be provided by EMWD. The Project would connect to existing EMWD water system lines located in adjacent rights-of-way.

EMWD’s 2015 Urban Water Management Plan (UWMP) was prepared in response to Water Code Sections 10610 through 10656 of the Urban Water Management Planning Act, and includes detailed information about EMWD’s water demand, supply and reliability for the next 25 years.

A Water Supply Assessment (WSA) has been prepared for the proposed Project. Summarizing the findings of the WSA, **Table 4.20.1** compares the water demands associated with the Project to those assumed within the 2015 UWMP.

Table 4.20.1
Anticipated and Projected Water Demand

	Average Daily Demand (gpd)	Annual Demand (million gallons, mg)	Annual Demand (acre-feet, af)
Proposed Barker Logistics Project	17,435	6.4	19.5
2015 UWMP Estimates	69,740	25.5	78.2

The land use considered for the Project area in the 2015 UWMP demand projection was Business Park/Light Industrial. Accordingly, the demand for the proposed Project is anticipated to be within the limits of the projected demand accounted for in the 2015 UWMP. As summarized at Table 4.20.1, the Project’s annual demand of 19.5 af is well below the demand assumed for the site within the 2015 UWMP.

Further, within the 2015 UWMP, EMWD determined that they have the ability to meet all projected demand through 2040, even under a repeat of historic multiple-year drought scenarios.

Based on the preceding analysis, sufficient supplies to meet the anticipated demand for the Project exist. No new or expanded entitlements would be needed to serve the Project. Impacts in this regard are considered less-than-significant.

Sewer

- a) **Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?**

Less Than Significant Impact. Wastewater treatment and conveyance services for the Project would be provided by EMWD. The Project would construct wastewater service lines connecting to existing EMWD sewer mainlines. Existing EMWD sewer mainlines may be realigned or otherwise modified as part of the Project. All proposed connections to sewer lines, and proposed sewer realignments and modifications would conform to purveyor standards and requirements, and would be subject to review and approval by the affected purveyor(s).

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The composition of wastewater produced by the Project would be typical of other light industrial uses currently operating within the EMWD service area, and would not require alteration of EMWD wastewater treatment practices or facilities. No additional or non-standard treatment is required to specifically meet the Project's wastewater treatment demands.

The Applicant would be required to pay sewer connection fees established by EMWD to support the maintenance and planned improvement of wastewater treatment facilities. EMWD, as regional wastewater treatment provider, would determine when and in what manner treatment facilities would be constructed and/or upgraded to meet increasing demands of areawide development, including the incremental demands of the Project.

Based on the preceding, the potential for the Project to require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects is considered less-than-significant.

- b) Result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

Less Than Significant Impact. Wastewater treatment service will be provided to the Project site by EMWD. Wastewater generated by the Project would be collected and conveyed to the PVRWRF. The PVRWRF currently has a capacity to treat 22 million gallons of wastewater per day (mgd) and a planned capacity to expand to 100 mgd. Estimated daily influent flow for this facility is 13.8 mgd.

Based on the current PVRWRF capacity/demand estimates, the PVRWRF has an approximately 8.2 mgd residual treatment capacity. Conservatively assuming the entire Project water demand (17,435 gpd) would translate to wastewater treatment demand, the Project wastewater treatment demand would comprise approximately 0.21 percent of PVRWRF estimated 8.2 mgd residual capacity. It therefore appears that there is available PVRWRF wastewater treatment capacity available to serve the Project without the need for additional or expanded wastewater treatment facilities.

The Applicant would comply with EMWD requirements for wastewater service including, but not limited to, plan check review and approval, facility construction, inspection, jurisdictional annexation, and payment of financial participation charges.

The Applicant would pay applicable sewer connection and service fees, providing funds available for EMWD wastewater system expansion and maintenance, acting to offset the Project's incremental demands for wastewater collection and treatment services.

Based on the preceding discussion, the Project's potential to exceed current or anticipated wastewater treatment capacities or require the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, is considered less-than-significant.

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Solid Waste

- a) **Generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**
- b) **Comply with federal, State, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?**

Less Than Significant Impact. The Riverside County Department of Waste Resources operates several landfills within the County. Additionally, Waste Management, Inc. operates the El Sobrante Landfill, which is open to the public. All Riverside County landfills are Class III disposal sites permitted to receive non-hazardous municipal solid waste such as would be generated by the Project.

The projected capacity of landfills to serve existing and proposed developed is based on buildout of the County, consistent with existing General Plan land use designations. The Project proposes development consistent with the existing land use designations, as envisioned by the Riverside County General Plan. Further the EIR prepared by the General Plan concluded, "...the proposed General Plan would not create demands for waste management services that exceed the capabilities of the County's waste management system and impacts to solid waste facilities associated with future build out of the General Plan are less than significant."

Compliance with State and County waste reduction and recycling mandates would decrease the Project's solid waste disposal requirements by a minimum of 50 percent, further reducing potential impacts at serving landfills.

The Project would be implemented and operated in compliance with applicable County General Plan Goals and Policies, and would comport with County Zoning regulations. Specifically, the Project would comply with local, state and federal initiatives and directives acting to reduce and divert solid waste from landfill waste streams.

In these regards, the California Integrated Waste Management Act under the Public Resources Code requires that local jurisdictions divert at least 50% of all solid waste generated by January 1, 2000. The County remains committed to continuing its existing waste reduction and minimization efforts with the programs that are available through the County. Additionally, beginning July 1, 2012, the State of California required that all businesses that generate four cubic yards or more of refuse per week implement a recycling program. This requirement is set forth in Assembly Bill 341, which was passed by the California legislation in October 2011. The Project would comply with the California Integrated Waste Management Act and AB 341 as implemented by the County.

Based on the preceding discussion, the potential for the Project to generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or conflict with federal, State, and local management and reduction statutes and regulations is considered less than significant.

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Would the project impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?

Electricity?

Natural gas?

Communications systems?

Street lighting?

Maintenance of public facilities, including roads?

Other governmental services?

Less Than Significant Impact. Development of the Project site would require the construction of a variety of utilities on- and/or off-site, including electrical, natural gas, communications systems, storm water drainage facilities, street lighting, and other facilities. All utilities currently exist with the immediate vicinity of the Project site. Additionally, consistent with County requirements, the Project will provide onsite renewable energy production generation comprising at least 20 percent of the Project energy demand. To this end, the Project includes photovoltaic cells on the building roof that will provide a minimum of 20 percent of the Project annual usage.

All connections would be accomplished consistent with County and purveyor requirements. The potential for the Project to impact utilities facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities is considered less than significant.

4.20.4 CUMULATIVE IMPACTS

The January 24, 2020 letter from EMWD indicating District approval of the Project Water Supply Assessment stated “the combined total demand from this Project and other new/planned developments falls below the total amount of new demand anticipated in the 2015 UWMP [Urban Water Management Plan]. . . This land use [Business Park/Light Industrial] is consistent with the Project and the demand for this Project is anticipated to be within the projected demand for this area accounted for in the 2015 UWMP.”

Project development and operation would require water infrastructure, wastewater infrastructure, and solid waste disposal. Public utility infrastructure development involves utility providers and jurisdictions with discretionary review authority. Coordination associated with preparation of infrastructure plans is intended to ensure adequate public utility services and resources are available to serve individual development projects and cumulative growth in the Project vicinity. Each individual development project is subject to review for utility capacity. Coordination with utility providers would allow for provision of utility services to the Project and to other developments in the vicinity of the Project site. The Project and other planned projects are subject to connection and service fees to offset increased demand and assist in facility expansion and service improvements. Due to utility planning and coordination, cumulatively considerable impacts to Utilities and Service Systems would not occur.

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4.20.5 EXISTING REGULATIONS AND STANDARD CONDITIONS

Federal

Clean Water Act

The basis of the Clean Water Act was enacted in 1948 (the Federal Water Pollution Control Act) and was significantly reorganized and expanded in 1972, when the Act became known as the Clean Water Act. The Clean Water Act establishes the basic structure for regulating discharges of pollutants into waters of the United States and regulating quality standards for surface waters. Under the Clean Water Act, the Environmental Protection Agency has implemented pollution control programs such as establishing wastewater standards for industry and has established water quality standards for all contaminants in surface waters. The Clean Water Act made it unlawful to discharge any pollutant from a point source into navigable waters without a permit. The Environmental Protection Agency National Pollutant Discharge Elimination System permit program controls discharges. Point sources are discrete conveyances such as pipes or man-made ditches. Industrial facilities must obtain permits if their discharges proceed directly to surface waters.

Safe Drinking Water Act

The Safe Drinking Water Act was enacted to protect the quality of drinking water in the United States. This law focuses on all waters (above ground or underground) actually or potentially designed for drinking. This Act authorizes the Environmental Protection Agency to establish minimum standards to protect tap water and requires all owners or operators of public water systems to comply with these primary (health-related) standards. The Act was amended in 1996 to require that the Environmental Protection Agency consider a detailed risk and cost assessment and use best available peer-reviewed science when developing these standards. (State governments, which can be approved to implement these rules for the Environmental Protection Agency, also encourage attainment of secondary standards (nuisance-related). Under the Safe Drinking Water Act, the Environmental Protection Agency further establishes minimum standards for state programs to protect underground sources of drinking water from endangerment by underground injection of fluids.

State

Porter-Cologne Water Control Act

The Porter-Cologne Water Control Act is the main law governing water quality regulation in California. The Act establishes a comprehensive program to protect water quality and beneficial uses of water. The Porter-Cologne Water Control Act applies to surface waters, wetlands, ground water, and to both point and non-point sources of pollution. Pursuant to this Act, the policy of the State of California is - -

- That the quality of all the waters of the State shall be protected;
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and,
- That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation.

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The Porter-Cologne Water Control Act established nine Regional Water Quality Control Boards (RWQCB) and the State Water Resources Control Board (SWRCB), which are charged with implementing the Act's provisions and have primary responsibility for protecting water quality in California. The SWRCB provides program guidance and oversight, allocates funds, and reviews RWQCB decisions. Also, the SWRCB allocates rights to the use of surface water. The RWQCB have primary responsibility for individual permitting, inspection and enforcement actions within each of nine hydrologic regions. The SWRCB and RWQCB have numerous non-point source related responsibilities including monitoring and assessment planning, financial assistance, and management.

The RWQCB regulate discharges under the Porter-Cologne Act primarily through issuance of National Pollutant Discharge Elimination Service (NPDES) permits for point source discharges and waste discharge requirements. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The SWRCB and the RWQCB can make their own investigations or may require dischargers to implement water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing waste discharge requirements and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions.

The Porter-Cologne Act also implements many provisions of the Clean Water Act and requires adoption of water quality control plans that contain guiding policies of water pollution management in California. In addition, regional water quality control plans (basin plans) have been adopted by each RWQCB and get updated as necessary and practical. These plans identify existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans further contain implementation, surveillance and monitoring plans. The Project site is located within the Santa Ana River Watershed and thereby is under purview of the Santa Ana RWQCB. The Santa Ana River Basin Water Quality Control Plan is the governing water quality plan for the region.

California Water Code

The California Water Code is the principal State law that regulates water quality in California. Among the water quality provisions in the Code that must be complied with that is relevant to the Project/Project site is the Health and Safety Code for protection of ground and surface waters from hazardous waste and other toxic substances. Surface water quality is the responsibility of the applicable RWQCB, water supply and wastewater treatment agencies, and city and county governments. The primary means of enforcement by the RWQCB is through development, adoption and issuance of water discharge permits. RWQCB basin plans establish water quality objectives that are defined as the limits or levels of water quality constituents or characteristics for reasonable protection of beneficial uses of water.

California Toxics Rule

The California Toxics Rule assists in California's water quality standards that are necessary for protecting human health and aquatic life. The California Toxics Rule supplements and does not change or supersede criteria that the Environmental Protection Agency promulgated for California waters in the National Toxics Rule. The Rule's criteria are similar to those published in the National Recommended Water Quality Criteria. The California Toxics Rule and the National Toxics Rule criteria, together with beneficial use designations in the Basin Plans and the related implementation policies, are the directly applicable water quality standards for toxic priority pollutants in California waters.

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Urban Water Management Planning Act

The Urban Water Management Planning Act requires water agencies to develop Urban Water Management Plans (UWMP) over a 20-year planning horizon and requires UWMP to be updated every five years. UWMP are exempt from CEQA. The Urban Water Management Planning Act was proposed and adopted to ensure water planning is conducted at the local level since the State of California recognized that two water agencies in the same region could have very different impacts from a drought.

UWMPs provide a framework for long-term water planning and inform the public about a supplier's plans for long-term resource planning that ensures adequate water supplies for existing and future water demands. Water suppliers are required to report, describe and evaluate the following: water deliveries and uses; water supply sources; efficient water uses; demand management measures; and, water shortage contingency planning.

The Urban Water Management Planning Act has been modified over time. In 2009, an amendment - - the Water Conservation Act of 2009 - - required agencies to establish water use targets for 2015 and 2020 that would result in Statewide savings of 20 percent by 2020.

California Senate Bill 610

California Senate Bill 610 amends the California Water Code to require an assessment of whether available water supplies are sufficient to serve the demand generated by a proposed project, as well as the reasonably foreseeable cumulative demand in the region over the ensuing 20 years under average normal year, single dry year, and multiple dry year conditions. Water assessments must be furnished to local governments for inclusion in any environmental documentation for certain projects subject to CEQA. Senate Bill 610 defines a "project" as any of the following that relate to the Project:

- A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.
- A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit project.

The Project will require a Water Supply Assessment in that the Project proposes more than 650,000 square feet of floor area.

Water Conservation in Landscaping Act

The Water Conservation in Landscaping Act is designed to ensure adequate water supplies are available for future uses. The Act requires local agencies to adopt a water efficient landscape ordinance. The County of Riverside water efficient landscape ordinance is contained in the Municipal Code.

Executive Order B-37-16

This Executive Order established a new water use efficiency framework for California. The Order strengthened the State drought resilience and preparedness by establishing longer-term water conservation measures that include permanent monthly water use reporting, new urban water use targets, reducing system leaks and eliminating clearly wasteful practices, strengthening urban drought contingency plans, and improving agricultural water management and drought plans.

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Executive Order B-40-17

This Executive Order ended the drought state of emergency in all but four California counties. The Order maintains water reporting requirements and prohibitions on wasteful practices.

California Solid Waste Integrated Waste Management Act (Assembly Bill 939)

The California Solid Waste Integrated Waste Management Act was established in 1989. The Act established an integrated waste management hierarchy to guide the California Integrated Waste Management Board and local agencies in implementation of source reduction, recycling and composting, and environmentally safe transformation and land disposal. The Management Board has been disbanded and CalRecycle has assumed its duties. The Act gave the Management Board the power to mandate reduction of disposed waste and required the following.

- Establishment of a task force to coordinate development of city Source Reduction and Recycling Elements (SRRE) and a county-wide siting element.
- Each city (by July 1, 1991) to prepare, adopt and submit a SRRE to the county which includes the following components: waste characterization, source reduction; recycling; composting; solid waste facility capacity; education and public information; funding; special waste (e.g., asbestos; sewage sludge); and, household hazardous waste.
- Each county (by January 1, 1991) to prepare a SRRE for its unincorporated area, with the components noted above and a countywide siting element that specifies areas for transformation or disposal sites to provide capacity for solid waste generated in the jurisdiction that cannot be reduced or recycled for a 15-year period.
- Each county to prepare, adopt and submit to the Board an Integrated Waste Management Plan that includes all the elements described above.
- Each city or county plan to include an implementation schedule that shows diversion of 25 percent of all solid waste from landfill or transformation facilities by January 1, 1995 through source reduction, recycling and composting activities, and diversion of 50 percent of all solid waste by January 1, 2000 through source reduction, recycling and composting activities.
- The Board to review implementation of each SRRE at least once every two years.
- The Act required the Board, in conjunction with an inspection conducted by a Lead Enforcement Agency to conduct at least one inspection per year of each solid waste facility in the State.

Waste Reuse and Recycling Act (Assembly Bill 1327)

The Waste Reuse and Recycling Act required the California Integrated Waste Management Board to approve a model ordinance for adoption by a local government for transfer, receipt, storage and loading of recyclable materials in development projects by March 1, 1993. The Act also required local agencies to adopt a local ordinance by September 1, 1993 or allow the model ordinance to take effect. The Act requires all development projects that are commercial, industrial or marina in nature and where solid waste is collected and loaded to provide an adequate area for collecting and loading recyclable materials over the lifetime of the project. The area is required to be provided before building permits are issued.

Mandatory Commercial Recycling Program (Assembly Bill 341)

Assembly Bill 341 directed CALRecycle to develop and adopt regulations for mandatory commercial recycling. Final regulation was approved by the Office of Administrative Law on May 7, 2012. This

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Assembly Bill was designed to assist meeting California’s recycling goal of 75% by the year 2020. The Assembly Bill requires all commercial businesses and public entities that generate 4 cubic yards or more of waste per week to have a recycling program in place. All multi-family apartment developments with 5 or more units also are required to form a recycling program.

2016 California Green Building Standards Code (CALGreen, Part 11 of Title 24, California Code of Regulations)

The most recent edition of CALGreen became effective on January 1, 2017. This edition is applicable to planning, design, operation, construction, use and occupancy of every newly constructed building or structure throughout the State of California. CALGreen requires that 100 percent of trees, stumps, rocks and associated vegetation and soils resulting from land clearing shall be reused or recycled. For a phased project, this material may be stockpiled on-site until the storage site is developed.

Sustainable Groundwater Management Act (2014)

The objective is the Sustainable Groundwater Management Act is sustainable groundwater management in a manner that prevents significant and unreasonable impacts to groundwater basins in California. Each high and medium priority basin (as identified by the California Department of Water Resources) - - such as the San Jacinto Groundwater Basin - - is required to have a Groundwater Sustainability Agency (GSA) that will be responsible for groundwater management and development of a Groundwater Sustainability Plan (GSP). The Eastern Municipal Water District Board of Directors is the GSA for the West San Jacinto Groundwater Management Area and is responsible for development and implementation of a GSP.

Although the San Jacinto Groundwater Basin is a “high priority” basin, it is not critically over-drafted. The GSA is required to develop by 2022 and to be implemented by 2042 a Groundwater Sustainability Plan that will document Basin conditions and Basin management based on measurable objectives and minimum thresholds defined to prevent significant and unreasonable impacts to sustainability indicators defined in the GSP.

Local Plans, Policies and Regulations

Eastern Municipal Water District Urban Water Management Plan

The 2015 UWMP acts as the urban water management plan for the Eastern Municipal Water District. This UWMP herein is incorporated by reference and is available for public review 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 presents estimated costs and phasing of recommended improvements. The UWMP includes a Water Shortage Contingency Plan that the Water District is to implement in cases of future water deficiencies caused by limited supplies or the Water District’s delivery system. At time of long-term or short-term drought conditions or other emergencies, the Water District would inform its customers of the need to conserve water and impose penalties for non-compliance with mandatory water use reductions. Compliance with mandatory water use reductions would ensure the Eastern Municipal Water District can meet present and projected demand within its service area during dry years.

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Riverside County Integrated Waste Management Plan

The Countywide Integrated Waste Management Plan was prepared in accordance with the California Integrated Waste Management Act of 1989, Chapter 1095 (Assembly Bill 939). This Waste Management Plan establishes a County-wide plan to reduce volume and toxicity of solid waste that is sent to landfills and incinerated in the County, and to meet minimum diversion goals of Assembly Bill 939 (a 25% diversion of solid waste by 1995 and a 50% diversion of solid waste by 2000).

Water Master Plan, EMWD 2016

This Plan analyzes EMWD facilities needs to meet current and future customer demand.

Recycled Water Strategic and Master Plan, EMWD 2016

This Plan analyzes EMWD recycled water opportunities and contains recycled water projections through year 2045, including descriptions of planned recycled water projects and facilities.

Wastewater Collection Master Plan, EMWD 2016

This Plan analyzes EMWD facilities needs to collect existing and future wastewater.

Regional Water Reclamation Facilities Master Plan

This Plan analyzes EMWD reclamation facility needs for treating existing and future wastewater.

Integrated Resources Plan, MWD 2015

This Plan describes the Metropolitan Water District plan for providing adequate and reliable supplies to member agencies and is used as the basis for the Metropolitan Water District 2015 Urban Water Management Plan.

2015 Urban Water Management Plan, MWD

This Plan describes Metropolitan Water District demand and supply reliability and is used as the basis for the Eastern Municipal Water District imported water supply reliability.

County of Riverside General Plan

Land Use Element

Infrastructure, Public Facilities and Service Provision – Senate Bill 244

Policy LU 5.2 – Monitor the capacities of infrastructure and services in coordination with service providers, utilities, and outside agencies and jurisdictions to ensure that growth does not exceed acceptable levels of service.

Policy LU 5.3 – Review all projects for consistency with individual urban water management plans.

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4.20.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Based on the preceding discussions, no significant impacts related to Utilities & Service Systems have been identified.

4.20.7 MITIGATION MEASURES

No Mitigation Measures are required

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4.21 ENVIRONMENTAL IMPACTS - WILDFIRE

4.21.1 ENVIRONMENTAL SETTING

The Project site is located on the northeast corner of the Patterson Avenue/Placentia Avenue intersection within unincorporated Riverside County. The 31.55-acre Project site is vacant sloping approximately 45 feet downward from south to northeast. Although the site evidences signs of grading and disking, grasses cover portions of the property and several trees are located in the southerly and southwesterly areas of the Project site.

The Project site is bordered by existing single-family residential and vacant land uses north of the Project site, single-family residential uses south and west of the Project site, and single-family residential and industrial/manufacturing uses east of the Project site. Interstate 215 is located approximately 1,600 feet east of the Project site. The BNSF/Metrolink rail lines are located approximately 1,500 feet east of the Project site. The March Air Reserve Base/Inland Port Airport is located approximately 2.5 miles northeast of the Project site.

The Project site is located in a “Very High Fire Hazard” zone, as indicated in the Mead Valley Area Plan (Figure 12) and as depicted on **Exhibit 4.21-1: *Wildfire Susceptibility*** in this Environmental Impact Report.

4.21.2 THRESHOLDS OF SIGNIFICANCE

The County of Riverside has adopted Thresholds of Significance that vary in some cases topically and in format from the Appendix G Thresholds, as reflected in the Initial Study prepared for the Project. This EIR uses the following County-adopted Thresholds of Significance to comprise the basis of impact analyses.

WILDFIRE – If located in or near a State Responsibility Area (“SRA”), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the project

Wildfire Impacts

- a) **Substantially impair an adopted emergency response plan or emergency evacuation plan?**
- b) **Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**
- c) **Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**
- d) **Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**
- e) **Expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?**

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4.21.3 ENVIRONMENTAL IMPACTS

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. Project development will include construction of the following off-site improvements.

- Widening of the northerly right-of-way of Placentia Avenue to its ultimate width as a Secondary Highway, per Riverside County Standard No. 94, Ordinance 461.
- Placing the existing overhead utilities currently on power poles along the Project site's southerly and westerly boundaries along Placentia Avenue underground; placing any Verizon or CATV communication lines currently overhead underground in a common trench with the Southern California Edison distribution lines.
- Widening the easterly right-of-way of Patterson Avenue to its ultimate easterly limit as a Secondary Highway, per Riverside County Standard No. 94, Ordinance 461.

These improvements, together with Project building design/materials and compliance with Riverside County regulations, will ensure Project development and operation will not result in a requirement for installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Furthermore, roadway improvements noted above that are part of Project development will facilitate emergency response to the Project site and Project vicinity.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less Than Significant Impact. The Mead Valley Area Plan indicates the Project site is located within a Very High Fire Hazard Area. Fire potential for Riverside County typically is greatest in August, September and October, when dry vegetation coexists with hot, dry Santa Ana winds, but fires with conflagration can occur at any time of year. Widespread fires that follow an earthquake, coupled with Santa Ana winds, constitute a worst-case fire suppression scenario for areas in Riverside County. According to the County of Riverside General Plan Safety Element, "[b]ecause the fire danger is extreme, there is a statistically significant chance that the worst-case fire suppression scenario could occur." Nonetheless, the post-development danger from wildland fire will be lessened through development of the property. This will be the case because the Project site will replace flammable grassland with a structure built to compliance with State and County Fire Code requirements and a large paved parking lot.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less Than Significant Impact. Project development will include construction of the following off-site improvements.

- Widening of the northerly right-of-way of Placentia Avenue to its ultimate width as a Secondary Highway, per Riverside County Standard No. 94, Ordinance 461.

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- Placing the existing overhead utilities currently on power poles along the Project site southerly and westerly boundaries along Placentia Avenue underground; placing any Verizon or CATV communication lines currently overhead underground in a common trench with the Southern California Edison distribution lines.
- Widening the easterly right-of-way of Patterson Avenue to its ultimate easterly limit as a Secondary Highway, per Riverside County Standard No. 94, Ordinance 461.

These improvements, together with Project building design/materials and compliance with Riverside County regulations, will ensure Project development and operation will not result in a requirement for installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project site is not sufficiently sloped to affect downstream flooding or landslides and would not support post-fire slope stability because Project development (grading) would create a largely flat building site. Drainage is addressed in the “Hydrology/Water Quality” sub-section of this Section and indicates no significant impacts to drainage would occur as a result of Project development or Project operation.

e) Expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Potentially Significant. Although the Project site is located in a “Very High Fire Hazard” zone, the post-development danger from wildland fire will be lessened through development of the property by replacing grassland with a structure built to compliance with State and County Fire Code requirements. Implementation of **MM-WI-1**, which requires compliance with County of Riverside Fire Department Fire Protection and Emergency Medical Services Strategic Master Plan requirements, Riverside County Emergency Operations Plan requirements and County of Riverside Standard Conditions will ensure Project development and operation impact will be reduced to, and maintained at, a less than significant level.

4.21.4 CUMULATIVE IMPACTS

The Project site and vicinity are located within a designated (Mead Valley Area Plan) Very High Fire Hazard Area. The Project site is vacant, as is much of the surrounding Project area. Project development and continuing development throughout the Project vicinity will be accompanied by roadway improvements, utility and services improvements and structural safety measures that will reduce danger to persons and structures from fires. The cumulative impact therefore is substantially positive.

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4.21.5 EXISTING REGULATIONS

Riverside County General Plan Policies

Safety Element

Policy S 5.1 – Develop and enforce construction and design standards that ensure that proposed development incorporates fire prevention features through the following:

- a) All proposed development and construction within Fire Hazard Severity Zones shall be reviewed by the Riverside County Fire and Building and Safety departments.
- b) All proposed development and construction shall meet minimum standards for fire safety as defined in the Riverside County Building or County Fire Codes, or by County zoning, or as dictated by the Building Official or the Transportation Land Management Agency based on building type, design, occupancy and use.
- c) In addition to the standards and guidelines of the California Building Code and the California Fire Code fire safety provisions, continue to implement additional standards for high-risk, high occupancy, dependent, and essential facilities where appropriate under the Riverside County Fire Code (Ordinance No. 787) Protection Ordinance. These shall include assurance that structural and nonstructural architectural elements of the building will not impede emergency egress for fire safety staffing/personnel, equipment, and apparatus; nor hinder evacuation from fire, including potential blockage of stairways or fire doors.
- d) Proposed development and construction in Fire Hazard Severity Zones shall provide secondary public access, in accordance with Riverside County Ordinances.
- e) Proposed development and construction in Fire Hazard Severity Zones shall use single loaded roads to enhance fuel modification areas, unless otherwise determined by the Riverside County Fire Chief.
- f) Proposed development and construction in Fire Hazard Severity Zones shall provide a defensible space or fuel modification zones to be located, designed, and constructed that provide adequate defensibility from wildfires.

Policy S 5.6 – Demonstrate that the proposed development can provide fire services that meet the minimum travel times identified in Riverside County Fire Department Fire Protection and EMS Strategic Master Plan.

Policy S 5.7 – Minimize pockets of flammable vegetation that increase likelihood of fire spread through conceptual landscaping plans to be reviewed by Planning and Fire Departments in the Fire Hazard Severity Zones. The conceptual landscaping plan of the proposed development shall at a minimum include:

- a. Plant palette suitable for high fire hazard areas to reduce the risk of fire hazards.
- b. Retention of existing natural vegetation to the maximum extent feasible.
- c. Removal of onsite combustible plants.

Policy S 5.9 – Reduce fire threat and strengthen fire-fighting capability so that the County could successfully respond to multiple fires.

County of Riverside Emergency Management Department Multi-Jurisdictional Local Hazard Mitigation Plan

The Riverside County Operational Area Multi-Jurisdictional Local Hazard Mitigation Plan identifies hazards, reviews and assesses past disaster occurrences, estimates the probability of future occurrences and

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sets goals to mitigate potential risks to reduce or eliminate long term risk to people and property from natural and man-made hazards. Goals of the Mitigation Plan are as follows.

Goal 1: Significantly reduce life loss and injuries

Goal 2: Minimize damage to structures and property, as well as interruption of essential services and activities

Goal 3: Protect the environment

Goal 4: Promote hazard mitigation and community resilience as both integrated public policy and standard business practice

Riverside County Fire Department Fire Protection and Emergency Medical Services Strategic Master Plan

The Riverside County Fire Department Fire Protection and Emergency Medical Services Strategic Master Plan discusses descriptions of emergency services including available equipment, personnel, appropriate facilities, and capacity to assist and support wildfire suppression emergency service needs.

Riverside County Emergency Operations Plan

The Riverside County Emergency Operations Plan outlines functions, responsibilities and regional risk assessments for emergencies such as wildland fires, hazardous materials incidents, flooding, dam failure, and light airplane crashes, and establishes the planned response for managing those incidents.

Riverside County Ordinance No. 695

Riverside County Ordinance No. 695 commits the County to establish a hazardous vegetation abatement program that protects the lives and property of the citizens of Riverside County while at the same time protecting rare and sensitive plant and animal species and the environment.

The Board of Supervisors found that hazardous vegetation or combustible material poses a danger to the health, safety and welfare of the residents in the vicinity of any real property located throughout the territory of the County of Riverside. Therefore, all hazardous vegetation or combustible material located on real property within the territory of the County of Riverside is deemed a public nuisance and poses a hazard to the safety of the landowners, residents in the vicinity, users of public highways and to the public generally.

Mead Valley Area Plan

MVAP 19.1: Protect life and property from wildfire hazards through adherence to the Fire Hazards section of the General Plan Safety Element.

Southern California Edison Vegetation Management

Southern California Edison promotes vegetation management practices to minimize the impact that trees and vegetation have on providing safe and reliable electric service. Vegetation management includes hazard tree assessments, tree pruning and removal, brush removal, and weed abatement. According to the California Public Utilities Commission 2017 Guidelines, Southern California Edison ensures 12 feet of clearance from a power line to ensure the minimum required clearance is never threatened in high fire risk areas.

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4.21.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Potentially Significant Impact.

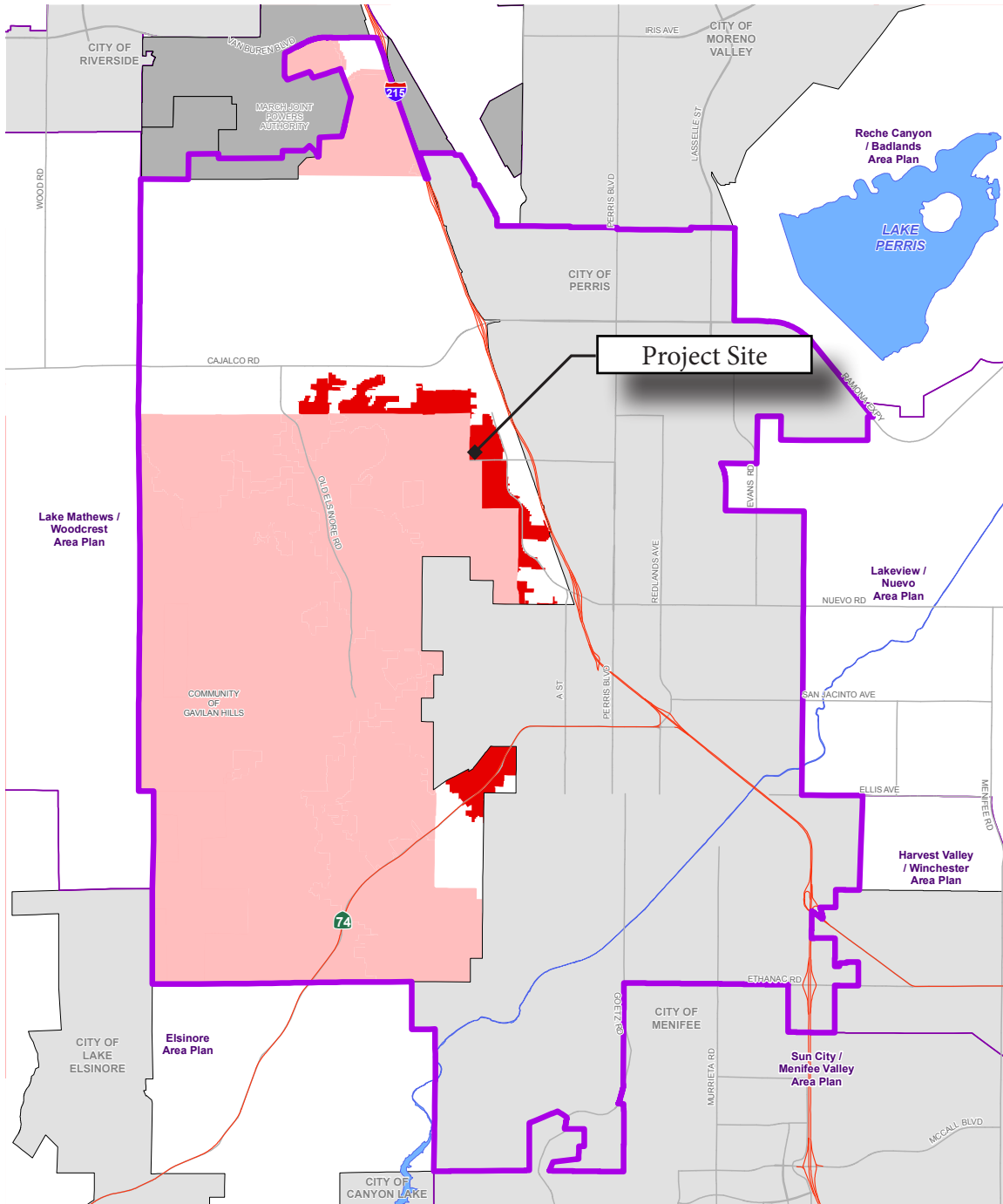
4.21.7 MITIGATION MEASURES

MM-WI-1: The Project Applicant/Developer shall demonstrate compliance with County of Riverside General Plan policies, with the Riverside County Fire Department Fire Protection and Emergency Medical Services Strategic Master Plan requirements, with the Riverside County Emergency Operations Plan requirements, and with County of Riverside Standard Conditions at required stages of Project development as determined by the County of Riverside staff.

4.21.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Although the Project site is located in a “Very High Fire Hazard” zone, the post-development danger from wildland fire will be lessened through development of the property. Project development includes grading, soil movement to provide a level development area, elimination of existing grasses and trees, and creating a largely impervious surface to site the 699,630 square foot warehouse/logistics building, loading docks, parking lot, improvements to adjacent roadways, drainage improvements, and introduced low-fuel landscaping. In addition, Project development and operation must be conducted in compliance with County of Riverside Ordinances and regulations noted above, which will assist in reducing potential impacts from wildland fire. These Project components will reduce the risk of wildfire spread across the Project site, and as a result, would reduce potential wildfire impacts to a less than significant level.

Exh 4.21-1
Wildfire
Susceptibility



Data Source: California Department of Forestry and Fire Protection (CAL FIRE), (2010)

Fire Hazard Severity Zones (FHSZ)

Local Responsibility Area

Very High FHSZ

State Responsibility Area/Federal Responsibility Area

Very High/High/Moderate FHSZ

Highways

Area Plan Boundary

March Joint Powers Authority

City Boundary

Waterbodies

5.0 OTHER CEQA CONSIDERATIONS

Pursuant to *CEQA Guidelines* Section 15126.2, the following is a discussion of short-term and long-term effects of the Project on the environment, significant irreversible environmental changes that would be caused by Project development and operation should it be implemented, and growth-inducing impacts.

5.1 SHORT-TERM AND LONG-TERM IMPLICATIONS OF THE PROJECT/SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

CEQA Guidelines (Section 15126(b)) requires an EIR to disclose significant environmental effects of a project that cannot be avoided if the proposed project is implemented. As described in **Section 4.3** of this EIR, the Project is anticipated to result in impacts to the environment that cannot be reduced to a less than significant level after implementation of relevant Riverside County standard conditions of approval, compliance with applicable State, County and regional regulations, and applicable feasible Mitigation Measures. Significant impacts that cannot be mitigated to a less than significant level are the following:

Air Quality –

Conflict with Air Quality Plan: Project operational-source NO_x emissions would exceed applicable SCAQMD regional thresholds. Project operational-source NO_x emissions exceedances may delay or obstruct goals and strategies articulated in the AQMP for the South Coast Air Basin. Additionally, the Project would allow for development intensities not reflected in the current AQMP. On this basis, the Project would conflict with the governing AQMP. *This is a Project-level and cumulatively significant and unavoidable impact.*

Cumulatively Considerable Increase in Non-Attainment Criteria Pollutant: Project operational-source NO_x emissions exceedances would result in a cumulatively considerable net increase in criteria pollutants (ozone and PM₁₀/PM_{2.5}) for which the Project region is non-attainment. *This is a Project-level and cumulatively significant and unavoidable impact.*

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines sections 15126 (c), 15126.2 (c) & 15127 require that for certain types or categories of projects, an EIR must address significant irreversible environmental changes that would occur should the project be implemented. As presented at *CEQA Guidelines* Section 15127, the topic of Significant Irreversible Environmental Changes need be addressed in EIRs prepared in connection with any of the following activities:

- (a) The adoption, amendment, or enactment of a plan, policy, or ordinance of a public agency;
- (b) The adoption by a local agency formation commission of a resolution making determinations;
- or
- (c) A project which will be subject to the requirements for preparing of an environmental impact statement pursuant to the requirements of the National Environmental Policy Act of 1969, 42 U.S.C. Section 4321- 4347.

The Project would not require or result in actions listed at *CEQA Guidelines* Section 15127. Accordingly, this EIR is not required to address potential significant irreversible environmental changes involved in the proposed action should it be implemented.

5.3 GROWTH-INDUCING IMPACTS

CEQA requires a discussion about ways the Project may be growth-inducing. *CEQA Guidelines* Section 15126.2(d) identifies a project as growth inducing if it would foster economic or population growth or construction of additional housing (directly or indirectly) in the surrounding environment. New employees and new residential populations equate to direct forms of growth, which have a secondary effect of expanding the size of local markets and inducing additional economic activity in the Project area.

Using the County of Riverside General Plan Housing Element employment generation factors, the “Light Industrial” Project would employ one person for every 1,030 square feet of building area. Thereby, the 699,630 square foot warehouse/logistics building can be expected to generate 679 jobs. This does not include short-term grading and construction jobs associated with Project development. It is reasonable to expect that the majority of construction-related employment would originate from the existing labor force in Riverside County.

A project may indirectly induce growth at a local level by increasing demand for additional goods and services associated with employment or population growth. The proposed warehouse/logistics building would result in economic growth in that those employed in construction activities or in Project operational activities likely would purchase goods and services in the Project vicinity or in the region. However, any increase would be marginal and accommodated by existing providers of goods and services. This would mean it is unlikely that new physical impacts to the environment would result because of the plentiful available retail services in the Project vicinity. Employment generated would provide opportunities for residents in vicinity. Therefore, Project generation of jobs would not induce substantial growth in the Project vicinity.

CEQA indicates that growth inducement is not necessarily detrimental, beneficial or of little significance to the environment. Growth-inducing potential of a project would be considered significant if one of two conditions would result from project development and/or operation. Significant growth-inducement would occur if 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 the Southern California Association of Governments. In addition, significant growth-inducement would occur if a project provides infrastructure or service capacity to accommodate growth beyond levels currently permitted by local or regional plans and policies. Furthermore, growth induced by a project may be considered significant if it can be demonstrated the potential growth substantially affects the environment in another way. The Project is consistent with the County of Riverside General Plan land use designation and zoning, along with all applicable development standards. Therefore, a warehouse/logistics use is contemplated in existing County planning documents and codes, and no substantial growth inducement would result from Project development or operation.

6.0 PROJECT ALTERNATIVES

6.1 INTRODUCTION

Under CEQA, identification and analysis of alternatives to a project is a fundamental part of the environmental review process. Public Resources Code Section 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is . . . to identify alternatives to the project."

CEQA Guidelines provides direction about the definition of project alternatives 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."

CEQA Guidelines Section 15126(b) emphasizes that selection of project alternatives be based primarily on the ability to reduce significant effects relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." The *CEQA Guidelines* further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed.

6.2 ALTERNATIVES CONSIDERED AND REJECTED

In selecting project alternatives for analysis, potential alternatives must pass a test of feasibility. Section 15126.6(f)(1) of the *CEQA Guidelines* states that - -

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...

Beyond these factors, *CEQA Guidelines* require the analysis of a "no project" alternative and an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated as such. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives Section 15126.6(e)(2). In addition, *CEQA Guidelines* Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible and discuss reasons for their rejection.

The range of feasible alternatives shall be selected and discussed in a manner that fosters meaningful public participation and informed decision making. The range of potential alternatives to the proposed Project also shall include those that could feasibly accomplish most of the basic objectives of the Project and that could avoid or substantially lessen one or more of the significant effects. Among factors that may be considered when addressing feasibility of alternatives are site suitability, economic viability, availability of infrastructure, General Plan consistency, other plans or regulations, jurisdictional boundaries, and whether

the Project proponent can reasonably acquire, control or otherwise have access to an alternative site (or the alternative site already is owned by the Project proponent). Only locations that would avoid or substantially lessen any of the Project's significant effects need be considered for inclusion. A Project alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative need not be considered. In addition, only those impacts found to be significant and unavoidable are relevant in making the final determination of whether an alternative is environmentally superior or inferior to the proposed Project. The proposed Project would result in significant and unavoidable Air Quality impacts (Conflict with the AQMP; Considerable Contributions to Non-Attainment Conditions). Under all other environmental topics, the Project would have no impact, impacts would be less-than-significant, or would be mitigated to levels that would be less-than-significant.

Throughout the following analysis, the impacts of the Project alternatives are analyzed for each environmental issue area that is examined in Section 4 of this Draft EIR. Thereby, each Project alternative can be compared to the proposed Project on an issue-by-issue basis. **Table 6.1** (Comparison of Project Alternatives) provides an overview of alternatives analyzed and a comparison of each alternative's impact in relation to the proposed Project.

This Section also identifies alternatives the Lead Agency considered but rejected as infeasible during the scoping process.

Among the factors that eliminated alternatives from detailed consideration are the following: failure to meet most of the basic Project Objectives; infeasibility; or, inability to avoid significant environmental impacts. An EIR is required to identify any alternatives considered by the Lead Agency but rejected as infeasible.

The following alternative was considered and rejected as infeasible, as summarized below.

Alternative Sites Alternative

CEQA does not require an analysis of alternative sites always be included in an EIR. However, if the surrounding circumstances make it reasonable to consider an alternative site then this alternative should be considered and analyzed in the EIR. In considering whether 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* Section 15126.6(f)(2)).

Under existing conditions, the entire 31.55-acre Project site is vacant and undeveloped. The entire Project site is disturbed, has been graded intermittently, has no ornamental landscaping, is characterized by non-native grasses, and has several trees in the southwesterly portion of the site. No buildings, man-made structures/facilities, or other discernable man-made features exist on the Project site. Based on review of aerial photography, the County of Riverside General Plan, and the Mead Valley Area Plan, there are no other available properties in the Project vicinity of similar size and accessibility to the regional goods movement system 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 the EIR. In addition, development of the Project in an alternative location would result in similar impacts as would Project development and operation in the preferred location. For these reasons, an alternative sites analysis is not required.

Alternative Analysis

The following narrative compares impacts of each alternative considered by the Lead Agency with impacts of the proposed Project (as disclosed in Section 4 of this EIR). A conclusion is provided for each topic analyzed pertaining to whether the alternative results in one of the following: (1) reduction of elimination of the Project 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. As identified in **Section 2.4: Project Goals and Objectives** of this EIR, the Project's basic Objectives are the following.

- To build a land use in compliance with County of Riverside General Plan and Mead Valley Area Plan.
- To create a sustainable Project.
- To promote regional-oriented warehouse/logistics development near Interstate 215.
- To maintain the integrity of the surrounding single-family residential neighborhood through quality contemporary design, appropriate structural setbacks, architectural treatments and building color palette.
- To concentrate employment opportunities near regional transportation.
- To provide a sustainably designed building that is energy conscious and a healthy work environment.
- To make efficient use of undeveloped property in the Mead Valley area of unincorporated Riverside County by maximizing its buildout potential for employment-generating uses.
- To attract new businesses and jobs to unincorporated Riverside County and thereby provide economic growth.
- To create an employment-generating business in the Project vicinity and thereby reduce the need for members of the local workforce to commute outside the area for employment.
- To develop a vacant or underutilized property with a High-Cube warehouse/logistics building to help meet the substantial unmet regional demand for this type of building and use.
- To develop a warehouse/logistics building that can attract building occupants seeking modern warehouse building space in the Mead Valley area constructed to contemporary design standards.
- To develop a vacant property zoned for the proposed warehouse/logistics building use that has access to available infrastructure, including roads and utilities.
- To develop a vacant property with a warehouse/logistics building that has operational characteristics that complement other existing warehouse buildings in the immediate vicinity and minimize conflicts with other nearby land uses.
- To develop a project that is economically competitive with similarly-sized buildings in the local area and in the inland empire.
- To develop a light industrial use in close proximity to designated truck routes and Interstate 215 to avoid or shorten truck-trip lengths on other roadways.

6.2.1 NO DEVELOPMENT/NO PROJECT ALTERNATIVE

In accordance with *CEQA Guidelines* Section 15126.6(e)(2), “the no project analysis shall discuss the existing conditions . . . as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.” In addition, *CEQA Guidelines* Section 15126.6(e)(3)(B) states that “in certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is

maintained.” The No Development/No Project Alternative includes a discussion and analysis of existing baseline conditions at the time the Notice of Preparation was published (**September 30, 2019**). The No Development/No Project Alternative is described and analyzed to enable decision-makers to compare impacts of approving the proposed Project with impacts of not approving the proposed Project.

Description of Alternative

The No Development/No Project Alternative considers no additional development on the Project site other than that which would occur under existing conditions. The entire 31.55-acre Project site would remain vacant and undeveloped. Under this alternative, no improvements would be made on the Project site. Implementation of the No Development/No Project Alternative would result in no physical environmental impacts beyond those that historically have occurred on the Project site; that is, agriculture. All significant effects of Project development and operation would be avoided or lessened by selection of this Alternative. The No Development/No Project Alternative would not meet all the Project Objectives, although it would maintain the integrity of the surrounding single-family residential neighborhood.

Impact Comparison to the Preferred Project

Aesthetics

The 31.55-acre Project site does not contain any unique aesthetic resources and does not serve as a prominent scenic vista. The Project site is vacant, undeveloped, has been disturbed by previous grading, and has grasses and a few trees/shrubs in its southwesterly portion. Under the No Development/No Project Alternative, the visual character and quality of the site would be maintained in its existing status. No structures or landscaping would be introduced on the site.

Development of the Project site with the proposed warehouse/logistics building and attendant improvements would create a cohesive Project that would occupy the entire property. Project development would include landscaping and perimeter screening walls. The No Development/No Project Alternative would result in a greater long-term impact pertaining to Aesthetics than would the proposed Project. Selection of the No Development/No Project Alternative would result in a greater long-term Aesthetic impact than would the proposed Project because a large vacant lot would be less compatible with the character of surrounding residential and industrial uses that would a logistics warehouse building that would be constructed using high-quality building materials and handsome architecture and landscaping. Also, existing power lines would not be undergrounded. Undergrounding the power lines removes the visual nuisance of poles and lines obstructing views. The landscaping will enhance the neighborhood by providing more ornamental vegetation than what currently exists (grasses across the Project site and several trees in the southerly portion of the property). The landscaping will be professionally maintained to ensure vegetation health, growth, and visual appeal.

Agriculture and Forestry Resources

The No Development/No Project Alternative would result in an equal impact to Agriculture and Forestry Resources as would the proposed Project in that the site would remain vacant and unused for agriculture and forestry purposes.

Air Quality

The No Development/No Project Alternative would result in no short-term construction activities or long-term Project operational activities that have the potential to result in emissions of air pollutants or odors. Under this Alternative, there would be no impacts to Air Quality due to emissions of criteria pollutants, exposure of sensitive receptors to substantial pollutant concentrations, or to creation of objectionable odors. Selection of this Alternative would avoid all the proposed Project's short-term and long-term air quality impacts.

Biological Resources

The No Development/No Project Alternative would result in the Project site remaining in its present state. No grading would occur. Thereby, there would be no impacts to vegetation or wildlife species that may be present or use the Project site. The No Development/No Project Alternative would avoid all the proposed Project's impacts to Biological Resources.

Cultural Resources

The No Development/No Project Alternative would leave the Project site in its existing vacant condition. No grading would occur and there would be no resultant impacts to subsurface archaeological, paleontological, or tribal cultural resources that may be present beneath the ground surface. Therefore, selection of this Alternative would avoid all site disturbance on the Project site and any potential Project resultant impacts to Cultural Resources would not occur.

Energy

The No Development/No Project Alternative would result in less impact to Energy because no energy resources would be needed or used to enable Project development (grading and construction) or Project operation. The Project site would remain vacant and unused and thereby not require any additional Energy resources than are currently used to maintain the Project site in its present condition. There would be no Energy impacts with this alternative.

Geology/Soils

The No Development/No Project Alternative would not result in any grading of the Project site but could see continuing discing of the Project site. Therefore, no impacts to Geology or Soils would occur with this Alternative. There would be no risk to humans or structures related to seismic ground shaking or geologic hazards with this Alternative because no structures would be built on the Project site. This alternative will continue to have the potential to release blowsand because of the periodic maintenance of the site, which the proposed Project would eliminate.

Greenhouse Gas Emissions

The No Development/No Project Alternative would mean no grading, construction or operational impacts would occur on the Project site. Therefore, there would be no sources of near-term or long-term Greenhouse Gas Emissions and related impacts.

Hazards and Hazardous Materials

The No Development/No Project Alternative would not result in any impacts related to Hazards and Hazardous Materials. Routine discing of the Project site would continue to occur to remove dry/dead vegetation that may pose a fire hazard. The Project would underground the power lines, lessening fire hazards due to high winds and downed power lines. Selection of the No Development/No Project Alternative would avoid the proposed Project's impacts related to Hazards and Hazardous Materials.

Hydrology/Water Quality

The No Development/No Project Alternative would not result in changes to existing on-site hydrology or drainage conditions. No stormwater improvement would be constructed. Rainwater would be discharged from the Project site as it occurs under existing conditions. Stormwater leaving the Project site under this Alternative would not be treated to minimize any potential waterborne pollutants to contain any sediment. This Alternative would maintain pervious ground surface. The proposed Project would create more impervious surfaces. Selection of the No Development/No Project Alternative would reduce the proposed Project's impacts to Hydrology and Water Quality with the potential exception of sedimentation.

Land Use/Planning

The No Development/No Project Alternative would result in no grading or other development of the Project site. The County of Riverside land use designations would remain the same. The Project site would remain vacant and undeveloped. Thereby, selection of the No Development/No Project Alternative would result in no impacts related to Land Use and Planning.

Mineral Resources

The No Development/No Project Alternative would result in an equal impact to Mineral Resources as would the proposed Project in that no mineral resources have been known to occur on the site nor is the site zoned for any mineral resource extraction.

Noise

The No Development/No Project Alternative would not result in grading or construction activities on the Project site. Therefore, this Alternative would not generate any noise associated with Project development. Also, this Alternative would not result in generation of any vehicular traffic trips and thereby not contribute to an incremental increase in noise impacts to the Project site vicinity. Selection of the No Development/No Project Alternative would avoid all the proposed Project's associated Noise impacts.

Paleontological Resources

The No Development/No Project Alternative would leave the Project site in its existing vacant condition. No grading would occur and there would be no resultant impacts to subsurface paleontological resources that may be present beneath the ground surface. Therefore, selection of this Alternative would avoid all site disturbance on the Project site and any potential Project resultant impacts to Paleontological Resources would not occur.

Population and Housing

The No Development/No Project Alternative would not generate any housing and thereby not generate any added population. Therefore, the No Development/No Project Alternative level of impact to Population and Housing would be equivalent to the proposed Project.

Public Services

The No Development/No Project Alternative would not generate any construction or operational activities on the Project site. The property would remain in its vacant state. Thereby, no additional need for Public Services would occur with the No Development/No Project Alternative and the level of impact in comparison with the proposed Project would be less.

Recreation

The No Development/No Project Alternative would result in an equal impact to Recreation as would the proposed Project in that neither option would include recreational facilities.

Transportation

The No Development/No Project Alternative would leave the Project site vacant and undeveloped. No vehicular traffic would be generated. Therefore, the No Development/No Project Alternative would avoid all the Project's impacts to area roadways.

Tribal Cultural Resources

The No Development/No Project Alternative would leave the Project site in its existing vacant condition. No grading would occur and there would be no resultant impacts to subsurface tribal cultural resources that may be present beneath the ground surface. Therefore, selection of this Alternative would avoid all site disturbance on the Project site and any potential Project resultant impacts to Tribal Cultural Resources would not occur.

Utilities

The No Development/No Project Alternative would not necessitate any domestic water, sewer, or stormwater drainage facilities. Power lines would not be undergrounded with this Alternative. There would be no demand for domestic water or wastewater treatment services. This Alternative also would not generate a demand for solid waste collection and disposal services. Selection of the No Development/No Project Alternative would avoid all the proposed Project's demand placed on utilities and service systems.

Wildfire

The No Development/No Project Alternative would leave the property vacant, with grassland and some trees and bushes in its southwesterly portion. The Project site is located in a Very High Fire Hazard Zone, as indicated in the Mead Valley Area Plan. The No Development/No Project Alternative would not allow fire protection or suppression techniques to be placed on the Project site and therefore would result in more danger pertaining to wildfire spreading across the 31.55-acre property, which accounts for a greater impact than the proposed Project in relation to Wildfire.

6.2.2 REDUCED PROJECT ALTERNATIVE

Description of Alternative

The Reduced Project Alternative comprises a smaller warehouse/logistics building of approximately 350,000 square feet in area; or approximately one-half the area size of the proposed Project building. The Reduced Project Alternative would not result in a reduction in building height (maximum 49.5 feet). Landscaping is included in the Reduced Project Alternative. Required automobile parking would be reduced by one-half. The number of truck bays would be decreased.

Impact Comparison to the Preferred Project

Aesthetics

Development of the Reduced Project Alternative would result in an approximate 50 percent reduction in building square footage compared to the proposed Project. Views to and across the Project site would be impeded by the Alternative building height of 49.5 feet but would be less impeded due to the shorter length and width of the Reduced Project Alternative building. Under the Reduced Project Alternative, the visual character and quality of the Project site and the amount of artificial light that would be introduced on the Project site would be less than the proposed Project. As indicated in the Aesthetics section, the Project site is not visible from a State-designated or locally-designated scenic highway. Therefore, neither the proposed Project nor the Reduced Project Alternative would negatively impact a scenic highway. In addition, neither the Reduced Project Alternative nor the proposed Project would damage scenic resources on-site because no such resources are present on the Project site. The aesthetic quality and character of the Project site after development of a Reduced Project Alternative would be similar to that of the proposed Project. Although less of the 31.55-acre property would be developed with a smaller building, building height and building materials would be similar to those of the proposed Project. Landscaping for this Alternative would also be similar to the proposed Project's. Neither the proposed Project nor the Reduced Project Alternative would result in significant direct or cumulatively considerable impacts to Aesthetics.

Agriculture and Forestry Resources

The Reduced Project Alternative would result in an equal impact to Agriculture and Forestry Resources as would the proposed Project. The Project site is not used for farmland purposes, is not zoned for agricultural use, and is not zoned for forest use. No Williamson Act land, Prime Farmland, or forest resources would be impacted by Project development. Therefore, there would be no impact to Agriculture and Forestry Resources resulting from implementation of the Reduced Project Alternative.

Air Quality

The Reduced Project Alternative would result in a reduced construction schedule when compared to that of the proposed Project due to the approximate 50 percent reduction in building area. Therefore, the total amount of air pollutant emissions generated during the construction phase would be reduced under the Reduced Project Alternative when compared to the proposed Project. However, the day-to-day intensity of construction activities on the Project site would be similar for both the Reduced Project Alternative and the proposed Project and thereby total daily emissions during the development phase (grading and construction) would be similar to the proposed Project total daily emissions. In addition, the Reduced Project Alternative would require Mitigation Measures to reduce short-term emissions of pollutants to less than significant levels.

The Reduced Project Alternative would generate approximately one-half the estimated daily traffic and thereby would produce fewer operational-associated air pollutants than would the proposed Project. In turn, the Reduced Project Alternative would generate less air pollutant emissions associated with diesel trucks than would the proposed Project.

The Reduced Project Alternative would generate odors during short-term construction activities and long-term operation. Similar to the proposed Project, these odors would occur intermittently, be short-term in duration, and would not be substantial. Long-term odors also would be less than significant with implementation of the Reduced Project Alternative.

Biological Resources

The Reduced Project Alternative would develop the entire 31.55-acre property and would result in similar impacts to Biological Resources as would the proposed Project. Similar mitigation would be required and the impact to Biological Resources of the Reduced Project Alternative would be less than significant.

Cultural Resources

The Reduced Project Alternative would develop the entire 31.55-acre property and would result in similar impacts to Cultural Resources as would the proposed Project. Similar mitigation would be required and the impact to Cultural Resources of the Reduced Project Alternative would be less than significant.

Energy

The Reduced Project Alternative will result in less use of energy resources and of resources (e.g., water) whose provision is driven by electricity than would the proposed Project. Energy resources used during Project development (grading and construction) as well as such resources used during Project operation would be less and the resultant level of impact would be less than significant.

Geology/Soils

Development of the Reduced Project Alternative would disturb the same physical area as would the proposed Project. Soil erosion impacts would be less than significant under both the Reduced Project Alternative and the proposed Project due to required compliance with federal, State and County water quality standards. The Reduced Project Alternative would be required to comply with the same mandatory regulatory requirements as would the proposed Project to preclude substantial hazards associated with ground shaking.

Greenhouse Gas Emissions

The Reduced Project Alternative would reduce the building area by approximately 50 percent and thereby would be expected to require less energy to construct and operate than would the proposed Project. Thereby, there would be a reduction in non-mobile source Greenhouse Gas Emissions when compared to the proposed Project. In addition, because the Reduced Project Alternative would result in fewer vehicle trips than would the proposed Project, there would be an associated reduction in mobile source Greenhouse Gas Emissions.

Hazards and Hazardous Materials

Implementation of the Reduced Project Alternative would not result in a significant impact related to Hazards or Hazardous Materials. The business conducted within a Reduced Project Alternative building would have the same or similar potential to handle or store hazardous materials as would the proposed Project. With mandatory compliance with State and local standards, neither the Reduced Project Alternative nor the proposed Project would pose a significant hazard to the public or the environment pertaining to use, handling, storage, and/or transport of hazardous materials.

Hydrology/Water Quality

The Reduced Project Alternative would develop the entire 31.55-acre property as would the proposed Project. Both the Reduced Project Alternative and the proposed Project would not result in substantial alterations to the drainage pattern of the property or result in substantial erosion. Thereby, the Reduced Project Alternative and the proposed Project would result in less than significant impacts to existing drainage patterns. Long-term impacts pertaining to Hydrology and Water Quality of the Reduced Project Alternative would be similar to those of the proposed Project. Both the Reduced Project Alternative and the proposed Project would be required to implement a long-term Water Quality Management Plan to ensure storm water leaving the property would not contain substantial pollutant concentrations. The Reduced Project Alternative would result in similar, less than significant operational impacts to Hydrology and Water Quality as the proposed Project.

Land Use/Planning

The Reduced Project Alternative would develop the property in accordance with the existing General Plan land use designation and the existing County zoning designation. Therefore, neither the Reduced Project Alternative or the proposed Project would result in any impact to Land Use and Planning.

Mineral Resources

The No Reduced Project Alternative would result in no impact to Mineral Resources as would the proposed Project that no mineral resources have been known to occur on the site nor is the site zoned for any mineral resource extraction.

Noise

Development of the Reduced Project Alternative would result in short-term noise impacts from grading and construction activities and would result in long-term noise impact from operation. Types of daily construction activities associated with the Reduced Project Alternative would be similar to those activities associated with development of the proposed Project although the time associated with construction would be shortened under the Reduced Project Alternative because less building area would be constructed. Therefore, it is anticipated duration of noise impacts during the building construction phase would decrease under the Reduced Project Alternative in comparison to the noise impacts of the proposed Project. The Reduced Project Alternative would require fewer diesel truck and cargo loading/unloading activities on the property. In addition, there would be less noise from automobile traffic due to the smaller building size and fewer vehicles accessing the site.

Paleontological Resources

The Reduced Project Alternative would develop the entire 31.55-acre property and would result in identical impacts to Paleontological Resources as would implementation of the proposed Project. Similar mitigation would be required and the impact to Paleontological Resources of the Reduced Project Alternative would be less than significant.

Population and Housing

The Reduced Project Alternative would not generate any housing and thereby not generate any added population. Therefore, the Reduced Project Alternative level of impact to Population and Housing would be equivalent to the proposed Project.

Public Services

The Reduced Project Alternative, similar to the proposed Project, would generate an increase in demand for law enforcement and fire/emergency service. It is likely that the Reduced Project Alternative level of impact would be less than the level of impact of the proposed Project because there would be fewer employees and customers who would be stationed or visit the smaller building. Therefore, the Reduced Project Alternative level of impact on Public Services would be greater than would the proposed Project level of impact.

Recreation

The Reduced Project Alternative would result in an equal impact to Recreation as would the proposed Project in that the site would be fully developed with a non-residential use.

Transportation

The Reduced Project Alternative would generate fewer daily truck and vehicular trips than would the proposed Project. Selection of the Reduced Project Alternative would decrease the potential for direct and cumulatively considerable and unavoidable impacts to study area intersections during the various studied traffic conditions. The severity of impacts to study area intersections and roadway segments would be decreased under the Reduced Project Alternative when compared to the proposed Project impacts. However, it is likely that implementation would be required with the Reduced Project Alternative due to existing sub-standard levels of service at some nearby intersections/freeway accesses/egresses.

Tribal Cultural Resources

The Reduced Project Alternative would develop the entire the 31.55-acre Project site and would result in identical impacts to Tribal Cultural Resources as the proposed Project. The Reduced Project Alternative would require similar mitigation as the proposed Project and, after mitigation, both the Reduced Project Alternative and the proposed Project would result in less than significant impacts to Tribal Cultural Resources.

Utilities

The Reduced Project Alternative would have a lesser demand for water and sewer service than would the proposed Project. In addition, there would be a lesser demand for solid waste collection and disposal for the Reduced Project Alternative. Both the Reduced Project Alternative and the proposed Project would be required to comply with County regulations regarding waste recycling and water conservation. Therefore, like the proposed Project, the Reduced Project Alternative level of impact on Utilities would be less than significant.

Wildfire

The Reduced Project Alternative and the proposed Project would replace the existing grassland and few tree species on the property with building(s), surface parking, and introduced landscaping. However, because the Project site is located within a Very High Fire Hazard area (per the Mead Valley Area Plan), the impacts of the Reduced Project Alternative and the proposed Project related to Wildfire would be similar in scale.

6.2.3 BUSINESS PARK/OFFICE ALTERNATIVE**Description of Alternative**

The Business Park/Office Alternative would develop the Project site as a business park use in accordance with the site's current General Plan/MVAP Business Park Land Use designation for the site. Under the Business Park/Office Alternative, the Project site would be developed with an approximately 329,823 square foot business park/office building that would support administrative and professional offices. Site improvements would include parking areas, drive aisles and landscaping. As with the proposed Project, the Business Park/Office Alternative would construct necessary supporting infrastructure improvements. The Business Park/Office Alternative would represent a reduction of 369,807 square feet (53 percent) in the Project building area.

Impact Comparison to the Preferred Project*Aesthetics*

Under the Business Park/Office Alternative, the visual character and quality of the Project site and the amount of artificial light that would be introduced on the Project site likely would be very similar to the proposed Project. As indicated in the Aesthetics section, the Project site is not visible from a State-designated or locally-designated scenic highway. Therefore, neither the proposed Project nor the Business Park/Office Alternative would negatively impact a scenic highway. In addition, neither the Business Park/Office Alternative nor the proposed Project would damage scenic resources on-site because such no such resources are present on the Project site. The aesthetic quality and character of the Project site after development of a Business Park/Office Alternative would be similar to that of the proposed Project. Less of the 31.55-acre property would be developed with a building under the Business Park/Office Alternative. However, building height and building materials would be similar to those of the proposed Project. Neither the proposed Project nor the Business Park/Office Alternative would result in significant direct or cumulatively considerable impacts to Aesthetics.

Agriculture and Forestry Resources

Impacts to Agriculture and Forestry Resources of the Business Park/Office Alternative would be equivalent to those of the proposed Project in that the Project site would be fully developed with urban uses.

Air Quality

Air quality impacts associated with development (grading and building construction) and operation of the Business Park/Office Alternative would be substantial due to the anticipated increase in vehicular traffic from office employees. This would result in continuing significant and unavoidable impacts identified with development and operation of the proposed Project.

Biological Resources

The Business Park/Office Alternative would develop the entire 31.55-acre Project site and would result in similar impacts to Biological Resources as the proposed Project. The Business Park/Office Alternative would require similar mitigation as the proposed Project and, after mitigation, both the Business Park/Office Alternative and the proposed Project would result in less than significant impacts to Biological Resources.

Cultural Resources

The Business Park/Office Alternative would develop the entire the 31.55-acre Project site and would result in similar impacts to Cultural Resources as the proposed Project. The Business Park/Office Alternative would require similar mitigation as the proposed Project and, after mitigation, both the Business Park/Office Alternative and the proposed Project would result in less than significant impacts to Cultural Resources.

Energy

The Business Park/Office Alternative would reduce the building area by approximately 50 percent. Although there would be an expected requirement for less energy to construct and operate the building, the Business Park/Office Alternative would require and use energy sources during grading and construction activities, as would the proposed Project. There would be a reduction of non-mobile greenhouse gas emissions when compared to the proposed project. In addition, operation of the Business Park/Office Alternative would require energy for lighting, air conditioning, heating and landscape maintenance, in addition to energy resources being used for the heavier automobile traffic associated with operation of a Business Park. It can be assumed the Business Park/Office Alternative would consume greater long-term energy use than would the proposed Project's warehouse and logistics building.

Geology/Soils

The Business Park/Office Alternative would disturb the same physical area of the 31.55-acre Project site as the proposed Project. The potential for soil erosion during Project development (grading and construction) would be similar for the two types of projects. Geology and Soils impacts (including those that may be associated with seismic ground shaking) from the Business Park/Office Alternative and the proposed Project would be maintained at a less than significant level due to mandatory compliance with federal, State and local water quality regulations and standards.

Greenhouse Gas Emissions

The Business Park/Office Alternative would reduce the building area by approximately 50 percent, which in turn would be expected to require less energy and emit fewer greenhouse gas emissions during grading and construction activities. In addition, the Business Park/Office Alternative would result in additional traffic - - an increase of average daily trips which would yield substantially more greenhouse gas emissions associated with mobile sources than would the proposed Project.

Hazards and Hazardous Materials

Development and operation of the Business Park/Office Alternative and the proposed Project would not result in a significant impact related to Hazards or Hazardous Materials. Land uses that would occur on the 31.55-acre Project site in accordance with the Business Park/Office Alternative would have similar potential to handle, store and dispose of hazardous materials as the proposed Project. Compliance with mandatory federal, State and County regulations would ensure that neither the Business Park/Office Alternative nor the proposed Project would be expected to pose a significant hazard to the public or the environment.

Hydrology/Water Quality

The Business Park/Office Alternative would disturb a similar area on the 31.55-acre Project site as would the proposed Project. Neither the Business Park/Office Alternative nor the proposed Project would result in substantial changes to the drainage patterns of the Project site or would result in substantial erosion impacts. Project development of the Business Park/Office Alternative and the proposed Project would both result in less than significant impacts to existing drainage patterns. Long-term potential impacts to Hydrology and Water Quality would be similar under the Business Park/Office Alternative and the proposed Project. Both the proposed Project and the Business Park/Office Alternative would be required to develop and implement a long-term Water Quality Management Plan to ensure storm water runoff leaving the property would not contain substantial pollutant concentrations. Therefore, the Business Park/Office Alternative would result in similar less than significant operational impacts as would the proposed Project.

Land Use/Planning

The Riverside County General Plan land use designation for the Project site is Business Park; the County Zoning for the Project site is I-P (Industrial Park) and M-SC (Manufacturing-Service Commercial). The Mead Valley Area Plan designates the Project site as Business Park.

The Business Park/Office Alternative would develop the Project site with a use that is consistent with the General Plan and zoning designations for the property. The level of impact to Land Use and Planning resulting from the Business Park/Office Alternative would be similar to that level of impact from the proposed Project.

Mineral Resources

Impacts to Mineral Resources of the Business Park/Office Alternative would be equivalent to those of the proposed Project in that in that no mineral resources have been known to occur on the site nor is the site zoned for any mineral resource extraction.

Noise

Noise associated with the Business Park/Office Alternative would occur during Project development (grading and construction) short-term activities and during long-term Project operation. Types of daily construction activities under the Business Park/Office Alternative would be similar to the proposed Project. However, the schedule of construction activities would be reduced under the Business Park/Office Alternative because less building area would be developed on the Project site. Thereby, it is anticipated that duration of noise impacts during development of the Business Park/Office Alternative would decrease in comparison with the duration of noise impacts under development of the proposed Project. It also is anticipated that long-term noise would be reduced under the Business Park/Office Alternative in comparison to the proposed Project because there would be a reduction of diesel truck traffic and cargo unloading/loading activities on the Project site. Although the increase in traffic accompanying the Business Park/Office Alternative would be a substantial increase in noise in comparison with the proposed Project, vehicular traffic entering and existing the Business Park/Office Alternative would be confined to working hours whereas truck traffic using the proposed Project could extend throughout the entire day.

Paleontological Resources

The Business Park/Office Alternative would develop the entire the 31.55-acre Project site and would result in similar impacts to Paleontological Resources as would the proposed Project. The Business Park/Office Alternative would require similar mitigation as the proposed Project and, after mitigation, both the Business Park/Office Alternative and the proposed Project would result in less than significant impacts to Paleontological Resources.

Population and Housing

The Business Park/Office Alternative would develop the Project site with a use that is consistent with the General Plan and zoning designations for the property. The level of impact to Population and Housing would be negligible and be equivalent to that level of impact from the proposed Project.

Operation of the Business Park/Office Alternative would provide employment opportunities. Additional adjunct jobs for delivery drivers, mechanics and maintenance personnel would be created as well. It can be anticipated that a portion of the new jobs would be filled by residents of nearby unincorporated areas and residents of nearby cities. However, the increase in population generated by development of the Business Park/Office Alternative, like the proposed Project, would not result in a significant impact on housing demand in the area and would not be substantial such that additional affordable or market rate housing would be required.

Public Services

The Business Park/Office Alternative, similar to the proposed Project, would generate an increase in demand for law enforcement and fire/emergency service. It is likely that the Business Park/Office Alternative level of impact would be greater than the level of impact of the proposed Project because there would be more employees and customers who would be stationed at or visit the business park building. Therefore, the Business Park/Office Alternative level of impact on Public Services would be greater than would the proposed Project level of impact.

Recreation

The Business Park/Office Alternative would develop the Project site with a use that is consistent with the General Plan and zoning designations for the property. The level of impact to Recreation would be negligible and be equivalent to that level of impact from the proposed Project.

Transportation

The Business Park/Office Alternative would generate significantly more traffic than would the proposed Project due to additional employees and service vehicles. This would contribute to additional noise and air quality impacts and to sub-standard levels of service at identified nearby intersections and freeway entrances and exits.

Tribal Cultural Resources

The Business Park/Office Alternative would develop the entire the 31.55-acre Project site and would result in similar impacts to Tribal Cultural Resources as would the proposed Project. The Business Park/Office Alternative would require similar mitigation as the proposed Project and, after mitigation, both the Business Park/Office Alternative and the proposed Project would result in less than significant impacts to Tribal Cultural Resources.

Utilities

The Business Park/Office Alternative likely would have a greater demand for water and sewer service than would the proposed Project. In addition, there could be a greater demand for solid waste collection and disposal for the Business Park/Office Alternative. Both the Business Park Alternative and the proposed Project would be required to comply with County regulations regarding waste recycling and water conservation. Therefore, like the proposed Project, the Business Park/Office Alternative level of impact on Utilities would be less than significant.

Wildfire

The Business Park/Office Alternative and the proposed Project would replace the existing grassland and few tree species on the property with building(s), surface parking, and introduced landscaping. However, because the Project site is located within a Very High Fire Hazard area (per the Mead Valley Area Plan), the impacts of the Business Park/Office Alternative and the proposed Project related to Wildfire would be similar in scale.

6.3 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 6.1 below summarizes the comparative analysis (Less Impact; Same Impact; More Impact) presented above for the alternatives in comparison to the proposed Project. The Table demonstrates that the “No Project Alternative” is the superior environmental alternative. However, the “No Project Alternative” would not accomplish the following Project Objectives (as identified in Section 2 – “Project Description” of this EIR).

- To build a land use in compliance with County of Riverside General Plan and Mead Valley Area Plan.
- To create a sustainable Project.
- To promote regional-oriented warehouse/logistics development near Interstate 215.
- To maintain the integrity of the surrounding single-family residential neighborhood through quality contemporary design, appropriate structural setbacks, architectural treatments and building color palette.
- To provide a sustainably designed building that is energy conscious and a healthy work environment.
- To make efficient use of undeveloped property in the Mead Valley area of unincorporated Riverside County by maximizing its buildout potential for employment-generating uses.
- To attract new businesses and jobs to unincorporated Riverside County and thereby provide economic growth.
- To create an employment-generating business in the Project vicinity and thereby reduce the need for members of the local workforce to commute outside the area for employment.
- To develop a vacant or underutilized property with a High-Cube warehouse/logistics building to help meet the substantial unmet regional demand for this type of building and use.
- To develop a warehouse/logistics building that can attract building occupants seeking modern warehouse building space in the Mead Valley area constructed to contemporary design standards.
- To develop a vacant property zoned for the proposed warehouse/logistics building use that has access to available infrastructure, including roads and utilities.
- To develop a vacant property with a warehouse/logistics building that has operational characteristics that complement other existing warehouse buildings in the immediate vicinity and minimize conflicts with other nearby land uses.
- To develop a project that is economically competitive with similarly-sized buildings in the local area and in the inland empire.
- To develop a light industrial use in close proximity to designated truck routes and Interstate-215 to avoid or shorten truck-trip lengths on other roadways.

The only Project Objective that the “No Project Alternative” would satisfy is related to maintaining the integrity of the surrounding residential neighborhood. Therefore, this Alternative has been rejected. *CEQA Guidelines* Section 15126.6(e)(2) (Consideration and Discussion of Alternatives to the Proposed Project) states that “if the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” As Table 6.1 (Comparison of Project Alternatives) indicates, the “Reduced Project Alternative” discussed above would result in similar or less impact than the proposed Project in the following categories: Aesthetics; Air Quality; Energy; Greenhouse Gas Emissions; Public Services; Transportation; and Utilities and Service Systems. Furthermore, the Reduced Project Alternative would accomplish most of the identified Project Objectives, with the exception of developing a project that is economically competitive with similarly-sized buildings in the local area and in the inland empire. The Reduced Project Alternative thereby may be considered an environmentally superior alternative to the Project. However, larger warehouse/logistics buildings have been constructed, are under construction, or are planned in Inland Empire jurisdictions. Thereby, a significantly smaller Project would endanger its ability to be economically competitive with similar uses in the vicinity. “Economic viability” is identified in *CEQA Guidelines* Section 15126(f)(1) (Feasibility) as being one factor “that may be taken into account when addressing the feasibility of alternatives”

Table 6.1 – Comparison of Project Alternatives

Topical Section	No Project Alternative	Reduced Project Alternative	Business Park/Office Alternative
Aesthetics	Less	Less	Same
Agriculture and Forestry Resources	Same	Same	Same
Air Quality	Less	Less	Greater
Biological Resources	Less	Same	Same
Cultural Resources	Less	Same	Same
Energy	Less	Less	More
Geology/Soils	Less	Same	Same
Greenhouse Gas Emissions	Less	Less	Greater
Hazards and Hazardous Materials	Less	Same	Same
Hydrology/Water Quality	Less	Same	Same
Land Use/Planning	Less	Same	Same
Mineral Resources	Same	Same	Same
Noise	Less	Same	Less
Paleontological Resources	Less	Same	Same
Population/Housing	Same	Same	Same
Public Services	Less	Less	Greater
Recreation	Same	Same	Same
Transportation	Less	Less	Greater
Tribal Cultural Resources	Less	Same	Same
Utilities/Service Systems	Less	Less	Greater
Wildfire	More	Same	Similar

7.0 EFFECTS FOUND NOT TO BE SIGNIFICANT AS PART OF THE INITIAL STUDY PROCESS

CEQA Guidelines Section 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 Project and is included as Appendix A to this EIR. Through the Initial Study process, the County of Riverside determined that the Project could potentially cause adverse effects and an Environmental Impact Report is required. The County determined certain issue areas had no potential to be significantly impacted by Project development or operation, as concluded by the Project Initial Study. Therefore, these topical areas are not required to be discussed in the “Environmental Analysis” Section of this EIR. A brief summary of the environmental issue areas found not to be significant is presented below. However, in the interest of ensuring a more thorough document, this EIR contains brief discussions that pertain to the not significant topical areas. The following topical areas were determined to result in “No Impact.”

Aesthetics - - The Project would not - -

- **Have a substantial effect upon a scenic highway corridor within which it is located.** The Project site is not located adjacent to a State-designated scenic highway. The Riverside County General Plan and Mead Valley Area Plan indicate the nearest designated scenic highway is Interstate 215, approximately one-half mile east of the Project site and separated from the Project site by industrial uses and vacant land. In addition, none of the eight eligible Scenic Highways in Riverside County, none were in view of the Project site. The closest eligible Scenic Highway is State Route 74, near Romoland and the City of Perris, which is approximately 6.0 miles from the Project site. The Project will not be visible from any State Routes or from Interstate 215. Therefore, Project development will have no impact upon a scenic corridor.

Agriculture and Forestry Resources - - The Project would not - -

- **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.** The Project site is within an area the Riverside County General Plan designates as “Farmland of Local Importance.” Agricultural activities took place on the Project site in the distant past. However, the Project site is vacant, unused, has grade differentials of approximately 45 feet, has the appearance of weed abatement through periodic grading, and is surrounded by non-agricultural (residential and industrial) land uses. The Project site is not utilized for farmland purposes and is not zoned for agricultural uses or subject to a Williamson Act contract. In addition, the Project site is not located within a Riverside County Agricultural Preserve. Therefore, Project development and operation will not conflict with existing zoning for agricultural uses, a Williamson Act contract, or a Riverside County Agricultural Preserve.

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- **Conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve.** The Project site is within an area the Riverside County General Plan designates as “Farmland of Local Importance.” Agricultural activities took place on the Project site in the distant past. However, the Project site is vacant, unused, has grade differentials of approximately 45 feet, has the appearance of weed abatement through periodic grading, and is surrounded by non-agricultural (residential and industrial) land uses. The Project site is not utilized for farmland purposes and is not zoned for agricultural uses or subject to a Williamson Act contract. In addition, the Project site is not located within a Riverside County Agricultural Preserve. Therefore, Project development and operation will not conflict with existing zoning for agricultural uses, a Williamson Act contract, or a Riverside County Agricultural Preserve.
- **Cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 Right-to-Farm).** Several properties adjacent to the Project site are agriculturally zoned (A-1-1 – Light Agriculture). Those properties are developed with single-family residences, with no agricultural activities occurring. Project development will occur with non-agricultural uses within 300 feet of agriculturally zoned properties, but those properties have contained single-family residences for an extended time.
- **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 for forest land, timberland or timberland production and therefore Project development and operation will not conflict with such zoning/re-zoning. The Project site also does not contain forest land and therefore Project development and operation will not result in loss of such land or conversion of forest land to non-forest use. No agricultural forest uses occur on the Project site and therefore Project development and operation will not conflict with existing zoning for, or cause rezoning of forest land or timberland zoned Timberland Production.
- **Result in the loss of forest land or conversion of forest land to non-forest use.** The Project site does not contain forest land and therefore Project development and operation will not result in loss of such land or conversion of forest land to non-forest use. No forest uses occur on the Project site and therefore Project development and operation will not involve conversion of forest land to non-forest use.
- **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.** The Project site does not contain forest land and therefore Project development and operation will not result in loss of such land or conversion of forest land to non-forest use. No forest uses occur on the Project site and therefore Project development and operation will not involve conversion of forest land to non-forest use.

Cultural Resources - - The Project would not - -

- **Alter or destroy a historic site.** The Project site is vacant and does not contain any known historic site. The Riverside County General Plan does not identify any historical resources on the Project site. Furthermore, the Project Phase I Cultural Resources Assessment indicated Project development would not alter or destroy a historic site. Therefore, Project development and operation would not alter or destroy a historical resource as defined in Section 15064.5.
- **Cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5.** The Project site is vacant and does not contain any known historical resources. The Riverside County General Plan does not identify

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any historical resources on the Project site. Furthermore, the Project Phase I Cultural Resources Assessment indicated Project development would not alter or destroy historical resources. As such, the Project would not result in a substantial adverse change in the significance of a historical resource.

Geology and Soils - - The Project would not - -

- **Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard.** Seiches are caused by movement of an inland body of water due to the movement from seismic forces. The Project site is located 3.8 miles southwest of Lake Perris. Therefore, a seiche event is very unlikely. In the event of a seiche, water is anticipated to be confined to the young alluvial valley channel east of Interstate 215. In addition, there is no risk of the Project site being affected by a tsunami because the Project site is located approximately 36 miles from the Pacific Ocean and is at an elevation exceeding 1,500 feet above Mean Sea Level.
- **Result in grading that affects or negates subsurface sewage disposal systems.** No subsurface sewage disposal systems are located onsite. No grading associated with Project development will affect subsurface sewage disposal systems.
- **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.** No septic tanks or alternative waste water disposal systems will be used as part of the Project. Project development and operation will connect to the existing Eastern Municipal Water District sewer system.

Hazards and Hazardous Materials - - The Project would not - -

- **Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter (1/4) mile of an existing or proposed school.** The Project site is vacant. There is evidence of graded soil on the Project site in that the site in the past was used for agricultural purposes. The nearest schools to the Project site are Oak Grove Ranch private school located approximately 0.65 mile northwest of the Project site at 1251 N. A Street, Perris, CA 92570, and the Val Verde Elementary School, located approximately 0.9 mile southeast of the Project site at 2656 Indian Avenue, Perris, CA 92571. It is not anticipated that truck traffic to/from the Project site will handle acutely hazardous materials, substances or waste will proceed within one-fourth mile of these schools, both of which are east of Interstate 215.
- **Result in an inconsistency with an Airport Master Plan.** March Air Reserve Base is located approximately 3 ½ miles north of the Project site. The Project site is located within Policy 100 Influence Area and is located within March Air Reserve Base Safety Compatibility Zone C2. The Land Use Compatibility Plan for the Air Base indicates the maximum number of persons per acre should not exceed an average of 20 or a maximum of 500 on any given acre. And specifies certain review, notification and disclosure requirements for new land uses within Compatibility Zone C2. The Project will be comprised of a logistics/warehouse building with some small administrative offices. These are not considered noise-sensitive land uses. Thereby, Project development and operation will not be inconsistent with the March Reserve Air Base Master Plan.
- **For a project within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area.** The Project site is not located within the vicinity of a private airstrip or heliport. Therefore, Project development and operation will not result in a safety hazard for people residing or working in the Project area.

Hydrology and Water Quality - - The Project would not - -

- **Impede or redirect flood flows.** The Project site is not located in a flood zone. Per FEMA Flood Insurance Map 06065C1410G (revised August 28, 2008), the Project site is located in Zone X, which indicates the site is an area determined to be outside the 1% annual chance floodplain.
- **In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation.** Seiches are caused by movement of an inland body of water due to the movement from seismic forces. The Project site is 3.8 miles southwest of Lake Perris. Therefore, a seiche event is very unlikely. In the event of a seiche, water is anticipated to be confined to the young alluvial valley channel east of Interstate 215. In addition, there is no risk of the Project site being affected by a tsunami because the Project site is approximately 36 miles from the Pacific Ocean and is at an elevation exceeding 1,500 feet above Mean Sea Level. The Project site is not identified in the Riverside County General Plan as being in a Flood Hazard area or a dam failure inundation zone.

Mineral Resources - - The 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.** The Project site does not contain a known mineral resource, nor is the site zoned for any mineral resource extraction. The closest mineral resource site is the First Industrial Realty Trust Day Street Site, approximately 1 mile west of the Project site, which is designated MRZ-2. Project development will not occur on a mineral resource site and therefore not directly result in loss of availability of a mineral resources site. All developments, such as the Project, require use of various construction materials that may be sourced from local quarries. However, Project development would not result in the loss of availability of a known mineral resource that would be of value to the region or to residents of the State of California.
- **Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.** The closest mineral resource site is the First Industrial Realty Trust Day Street Site, approximately 1 mile west of the Project site, which is designated MRZ-2. The MRZ-2 Resource Zone signifies an area where adequate information indicates that significant mineral resources are present, or where it has been determined that a high likelihood for their presence exists. The Project would not affect the First Industrial Realty Trust Day Street Site. Although all developments such as the Project require use of various construction materials that may be sourced from local quarries, Project development will not result in the loss of availability of a locally-important mineral resource recovery site delineated on the Riverside County General Plan or the Mead Valley Area Plan.
- **Potentially expose people or property to hazards from proposed, existing, or abandoned quarries or mines.** There are no proposed, existing or abandoned quarries or mines on the Project site. Therefore, Project development has no potential to expose people or property to hazards from proposed, existing or abandoned quarries or mines.

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Noise - - The Project would not - -

- **For a project located within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels.** The Project site is not located within the vicinity of a private airstrip. Therefore, Project development and operation would not expose people working in the Project area to excessive noise levels.

Population and Housing - - The Project would not - -

- **Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.** The Project site is vacant. Therefore, Project development and operation would not result in displacing any people or housing.

Public Services - - The Project would not - -

- **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 schools, libraries, and health services.**

Schools – The nearest schools to the Project site are Oak Grove Ranch private school located approximately 0.65 mile northwest of the Project site at 1251 N. A Street, Perris, CA 92570, and the Val Verde Elementary School, located approximately 0.9 mile southeast of the Project site at 2656 Indian Avenue, Perris, CA 92571. Other schools near the Project site are the following: Nan Sanders Elementary School (2 miles southeast of the Project site); Innovative Horizons Charter School at Nan Sanders); Oak Grove at the Ranch (2.1 miles northwest of the Project site); Triple Crown Elementary School (2.16 miles east of the Project site); May Ranch Elementary School (2.8 miles northeast of the Project site); Perris High School (2.34 miles southeast of the Project site); Val Verde Academy (4.5 miles northeast of the Project site); and, Moreno Valley Community College (5.1 miles northeast of the Project site).

No residential development will occur with Project development. Project development and operation will not have a direct impact on schools. However, if employees of the Project reside within the nearest school district (the Val Verde School District), some Project-related student population will be generated. Project development and operation will not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 Val Verde District schools. No impact will result. Notwithstanding the non-impact, the Project may be subject to impact fees established by the Val Verde School District to offset any indirect impacts of the non-residential Project.

Libraries – Project development involves construction and operation of a logistics/warehouse building with a small management office component. No residential use is part of the Project; thereby, no population would be generated as a result of Project development or operation. Therefore, the Project will not directly result in significant impacts causing the need for new or expanded library facilities.

Health Services – Project development involves construction and operation of a logistics/warehouse building with a small management office component and thereby will not generate a direct need for new or expanded public health and human services. Therefore, Project development and operation will not cause a need for new or expanded public health facilities.

Recreation - - The Project would not - -

- **Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.** Project development will not include recreational facilities. Project development and operation will not result in a significant increase in population and thereby will not require construction or expansion of recreational facilities which might have an adverse physical effect on the environment.
- **Increase 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.** Project development will not include recreational facilities. No residential uses are part of the proposed Project. Therefore, Project development and operation will not result in an increase in population and thereby will not result in an increase in use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Transportation - - The Project would not - -

- **Result in inadequate emergency access or access to nearby uses.** The final design of the Project site plan and all Project traffic improvements would be subject to review and approval by the County, thereby ensuring conformance of the Project improvements with County design and safety standards. In addition, representatives of the County Sheriff Department and County Fire Department would review the Project's plans to ensure that emergency access is provided consistent with Department(s) requirements. Efficient and safe access within, and access to, the Project is provided by the site plan design concept, site access improvements, and site adjacent roadway improvements included as components of the Project. On-site traffic signing and striping would be implemented in conjunction with detailed construction plans for the Project site. Sight distance at each Project access point would be reviewed to ensure conformance with County sight distance standards at the time of preparation of final grading, landscape and street improvement plans. As such, the Project would not result in inadequate emergency access or access to nearby uses.

Wildfire - - The Project would not - -

- **Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.** Project development will replace grassland currently on the Project site with a 699,630 square foot structure, a paved surface parking lot around the building perimeter, and landscaping. Therefore, no people or structures will be exposed to significant risks as a result of runoff, post-fire slope instability, or drainage changes.

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